

# Laurelhurst Community Club

Serving 2800 Households and Businesses in Seattle's Laurelhurst Neighborhood

October 22, 2007

Scott Ringgold, Land Use Planner  
Department of Planning and Development  
P.O. Box 34109  
Seattle, WA 98124-4019

RE: Study of LCC Alternatives in the Children's EIS

Dear Scott,

The Laurelhurst Community Club (LCC) Board of Trustees requests that you reconsider your decision to reject study of the alternatives we submitted during the Children's environmental scoping process. As noted by our Land Use Consultant in the attached memorandum, the analysis in your letter of October 12<sup>th</sup> is fundamentally flawed:

- It incorrectly characterizes the development potential in LCC's alternatives.
- It is based on ambiguous and unsubstantiated conclusory statements.
- It shirks the Department of Planning and Development's authority and responsibility under SEPA to require reasonable design alternatives that would reduce environmental degradation.
- It inappropriately abdicates the design of nearly identical, so-called alternatives to Children's Hospital.

In your letter, you incorrectly state that the LCC alternatives would limit new development to 250,000 square feet. LCC sub-alternatives do not include a square footage limit. Our subsequent analysis in the attached memorandum indicates that square footage increases would range from 636,000 to almost one million square feet under different design parameters. All of LCC's alternatives, even those that do impose square footage limits merit study in the EIS.

You have provided no rationale for determining that the LCC alternatives would not attain or approximate the objectives defined by Children's. Children's development objectives as outlined in its concept plan do not include specifics about square footage, building heights or the number of beds desired. A smaller development program could meet Children's broad objectives. There has also been no determination by the state Department of Health establishing Children's needs regarding beds in the future. You do not address this latter point in your letter despite the information that we provided regarding the last "Certificate of Need" from the state.

Finally, you have rejected LCC's design parameters, which are consistent with SEPA's requirements for EIS alternatives. You do not address elimination of new entrances/access points to the campus, nor limits on roads in landscaped perimeter buffers. Despite city policy strongly discouraging expansion of major institution boundaries, you do not address study of a Hartmann site rezone as an alternative to expanding Children's boundaries. In the scoping report, you, in fact encourage additional expansion of the institution's boundaries if feasible. This will put Laurel Terrace, the 136-unit garden condominium complex at great risk, and we understand that Children's is interested in acquisition of this property. This would mean a loss of affordable housing in our community and is not only unacceptable, but contrary to city policy.

The only thing that you have done is request that Children's develop one or more alternatives with overall lower building heights than proposed. No guidance is provided. Direction from the Department of Planning and Development is needed to ensure development of reasonable design alternatives that address significant impacts.

Again, we ask that you reconsider your decision to reject the LCC alternatives for study in the EIS in light of the additional analysis we have provided in the attached memorandum and the recommendations of the Citizens Advisory Committee.

Sincerely,

*Jeannie Hale*

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cc: Members of the Children's Citizens Advisory Committee, Tom Hansen, Suzanne Petersen, Ruth Benfield, Desiree Leigh, Children's Hospital; Stella Chao and Steve Sheppard, Department of Neighborhoods; Diane Sugimura, Department of Planning and Development