

March 23 2017

Sarah Pyle, Senior Planner
City of Redmond
Dept. of Planning & Community Development
15670 NE 85th Street
Redmond, WA 98052

SUBJECT: SEPA for LAND-2013-00171 for the new construction of a mosque

Dear Ms. Pyle,

Please find below the comments to DNS (SEPA-2017-00172) issued on March 9, 2017.

Based on information available, viz. SEPA checklist as submitted on January 19, 2017 and supporting documents (as obtained via Public Records Request with the City of Redmond), the city has not correctly evaluated the environmental impact of the proposal, specifically the environmental elements “Environmental Health/Noise”, “Aesthetics”, “Transportation” and “Public Services”.

Please find below the comments addressing specific elements of SEPA DNS:

Section 7, “Environmental Health”, “Noise”

The applicant has not described types of noise from the project once complete (potential noise generators – vehicles, special events).

The applicant has not identified any long term noise from the project after construction completion. However according to the applicant’s project documents (see “*Jake Traffic & Parking Letter 2016 Update R1 12-20-2016*”), the site will have parking for up to 65 cars on weekdays and weekends. The study also mentions events lasting till 10 PM and events occurring on weekends with multiple participants.

The applicant has failed to provide any mitigation measures for the noise produced by the traffic associated with 65 parking cars, or any operational hours limits.

Section 10, “Aesthetics”

The applicant identified that the maximum height of the building will be 50’; yet in the project documentation (see “DRB Materials v3”, vertical setbacks diagram), the setbacks associated with declared maximum height are incorrectly calculated.

Per RZC 21.08.280, (D), (c) “Buildings shall maintain a minimum setback of 20 feet from all property lines; building setbacks shall be increased by five feet for every one foot in building height over 30 feet”. The project team incorrectly assumes that the setback applies *only* to building elements higher over 30 feet (minaret and elevator shaft) which is at odds with RZC definitions (see attached “Height Regulations applicable to AEB Mosque proposal” document drawn by the residents’ attorney).

The applicant has identified that no views will be obstructed; however as evidenced in the applicant presentation (see “DRB Materials v3”), the proposed structure will block the views for the neighboring properties (even discounting 50 feet high minaret).

The applicant has not specified any mitigations to address impacts above.

Section 14, “Transportation”

The residents have commissioned professional review of the traffic impact analysis documents presented by the applicant. According to the review the applicant’s traffic impact analysis does not accurately predict the traffic and parking impacts of the project. The review document by William Popp Associates detailing findings and recommendations is attached.

It is important to point out that the applicant’s traffic study (see “AEB Traffic And Parking Letter Update 2016 R1”) relies heavily on 2011 utilization patterns provided by the applicant from the existing site in Kirkland; the site used as source of the data is a) located in industrial area of the City of Kirkland with ample overflow parking, b) is of unspecified square footage but clearly under 22,000 sf and c) is not officially designated as religious assembly use (per the City of Kirkland permitting information available) with undetermined seating capacity.

Section 15, “Public services”

The applicant identified that the project does not increase need for public services; yet Capital Improvement Project directed by the City of Redmond and currently in design stages includes budgeting for left turn lane into the property “*The City’s Public Works department commented and requested that a continuous two-way left-turn lane (TWLTL) be provided instead of exclusive eastbound and westbound left-turn lanes*” (see “NE 51st Street Updated Operational Analysis Memo 2-17-17”).

Moreover, the City of Redmond explicitly names the applicant as the beneficiary for the road improvements (see “*Updated Traffic Study for Anjuman-E-Burhani Mosque and Site Access Restrictions*” email from Dec 28 2016).

Additionally, the bus stop will be moved out of area to improve sight lines for the project driveway (making the stop less accessible to the neighborhood residents).

Based on the comments above, it emerges that the determination of non-significance issued by the lead agency was based on misleading/inaccurate information for the elements mentioned and the agency was unable to perform reasonable consideration of the environmental factors.

Specific unanalyzed issues based on incorrect determination include increased traffic, reduced residential parking, noise, aesthetic issues and increased demand on public services.

The City of Redmond should withdraw the DNS and address the deficiencies, specifically

1. Environmental Health\Noise – the City should request the applicant specify amount of noise for full utilization of the property on weekdays\weekends and implement appropriate mitigation measures. SEPA checklist should be amended accordingly
2. Aesthetics – the City should request the applicant to amend the project to either decrease the height of the structure in accordance with setback or change the building setbacks to be compliant with *RZC 21.08.280, (D), (c)* provisions. SEPA checklist should be amended accordingly
3. Transportation – the City should request the applicant to update traffic impact analysis based on industry standards (ITE etc.) including performing local studies as required. SEPA checklist should be amended accordingly
4. Public Services – the City should not spend public funds on the improvements benefiting specific applicants (or force third parties to fund the development of such improvements). The conflict of interest created best avoided altogether; should the improvements be required for the project based on traffic generated, the City’s should request the improvements as part of the project

Sincerely,
Eugene Zakhareyev

ATTACHMENTS:

1. SEPA-2017-00172 DNS and SEPA checklist documents
2. "WPA Parking and Traffic Analysis Critique of proposed AEB Mosque on NE 51st St in the City of Redmond" document
3. "Height Regulations applicable to AEB Mosque proposal" document
4. "Jake Traffic & Parking Letter 2016 Update R1 12-20-2016" document
5. "DRB Materials v3" document
6. "NE 51st Street Updated Operational Analysis Memo 2-17-2017" document
7. "Updated Traffic Study for Anjuman-E-Burhani Mosque and Site Access Restrictions" email 12-28-2016 document