

# McCULLOUGH HILL, PS

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January 7, 2009

Diane Sugimura, DPD Director  
c/o Andy Ishizaki, Sr. Project Manager  
700 Fifth Avenue, Suite 5200  
P.O. Box 94689  
Seattle, WA 98124-4689

Re: NEC Regional Municipal Jail EIS  
Scoping Comments of Shoreline School District

Dear Ms. Sugimura:

This is on behalf of Shoreline School District ("District"), owner of the Aldercrest Annex site. The District appreciates the opportunity to comment on the scope of the NEC Regional Municipal Jail EIS ("NEC Jail EIS").

The District Superintendent and School Board have submitted a letter to you dated January 5, 2009 which addresses their grave concerns regarding the North/East Cities' consideration of the Aldercrest Annex site as a potential jail location ("January 5 Letter"). This letter supplements the January 5 Letter and addresses the District's scoping comments in some greater technical detail.

## **The Aldercrest Annex Site is Not a Reasonable Alternative.**

Only "reasonable alternatives" are to be evaluated in an EIS. WAC 197-11-402. A "reasonable alternative" is defined at WAC 197-11-440: "Reasonable alternatives shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation."

The Aldercrest Annex site does not meet this criterion, for two reasons. First, the site is not "feasible," because it is unavailable to the North/East Cities. As indicated in the January 5 Letter, the District, due to the public safety and other concerns expressed in the Letter, is unwilling to sell the Aldercrest Annex for a jail site. A site that is unavailable to the project proponent is, by definition, not "feasible."

Secondly, selection of the Aldercrest Annex site will result in an unacceptably higher environmental cost and a higher level of environmental degradation than any of the other alternative sites. As explained in the January 5 Letter, this site is directly adjacent to an active school, and immediately surrounded by single family residential homes. It is the only identified site that has these qualities. Placing the jail at this site, then, will create significantly greater public safety costs, adverse impacts on housing and land use, and adverse fiscal impacts on public services as compared with the other proposed sites.

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Because the Aldercrest Annex site is not a “reasonable alternative,” it should be eliminated from the EIS review scope. It is a waste of taxpayer dollars to evaluate a site alternative that is neither available nor feasible.

### **Land Use Compatibility**

The EIS scope should include impacts on land use compatibility. The Aldercrest Annex site is zoned Low-Density Single Family Residential (R-6), and is designated as a “Public Facility” due to its recent educational use, in Shoreline’s Comprehensive Plan. Jails are not an allowed use in the zone and are not authorized by the Comprehensive Plan. Moreover, by definition, jails are incompatible with immediately neighboring elementary schools and immediately abutting single family homes.

### **Housing**

The EIS scope should include impacts on housing. The Aldercrest Annex site is surrounded by single family homes. Placement of a jail in the middle of such an area threatens the viability of the community and of its homes.

### **Public Services**

The EIS scope should include impacts on public services. The mere inclusion of the Aldercrest Annex site as a potential site for evaluation has already financially damaged the School District. The chilling effect of its continued presence on the list of potential sites will harm the District’s ability to market the property and will impose costly maintenance and security obligations upon the District. Long term, placement of the jail directly adjacent to an existing school site and surrounding single family homes will impose burdens on the District’s financial and programmatic abilities to meet the needs of its students.

Thank you for your consideration of these scoping comments. The District urges the North/East Cities to eliminate the Aldercrest Annex site as an alternative. The site is not available. The alternative is unreasonable. Its initial selection was ill-advised. In this light, continuing to study a site that is unavailable and unreasonable is an imprudent use of scarce public resources.

Sincerely,



G. Richard Hill

GRH:lde

cc: Sue Walker  
Shoreline School Board





## NEC Municipal Jail Environmental Impact Statement (EIS)

### SCOPING COMMENT FORM

Public agencies, affected tribes, organizations, and individuals are invited to submit written comments concerning the scope of the proposed EIS. Comments may address alternatives, environmental issues, impacts, appropriate impact mitigation measures, or the types of permits or approvals that may be necessary.

Please either leave your comment form at the sign-in table or mail them no later than **January 30, 2009** to the address indicated on the reverse side of this form.

Comments may also be scanned and sent via e-mail to: [MunicipalJailSEPA@Seattle.gov](mailto:MunicipalJailSEPA@Seattle.gov)

SHORELINE/LAKE FOREST PARK SITE

**Comments:**

1 - I WOULD HOPE 100 REPEATED COMMENTS WOULD CARRY GREATER WEIGHT THAN 1.

2 - POPULATION AND HOUSING: AS A CRITERIA WHY IS THIS NOT CONSIDERED IMPORTANT. YOU ARE INCREASING THE PERMANENT & TRANSIENT POPULATION TO THE MOST POPULATED SITE?

3 - RECREATION: AS A CRITERIA WHY IS THE RECREATIONAL USE OF THE SITE NOT CONSIDERED IMPORTANT? HAS ANYONE TALKED TO THE SOLER ORGANIZATION THAT USES AND DOES MAINTENANCE ON IT?

4 - PUBLIC SERVICE AND UTILITIES: WHY IS THE FIRE CRITERIA NOT CONSIDERED IMPORTANT? THOUGH IN SHORELINE - THE NORTHSIDE STATION WOULD BE CLOSER - HOW CAN THAT NOT EFFECT PROTECTION

By providing your name and address, you will be notified of additional comment opportunities.

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