

APPEAL

ENVIRONMENTAL DETERMINATION
ISSUANCE OF A DETERMINATION OF NON-SIGNIFICANCE (DNS)

PROJECT NAME: Highlands Subarea Rezone
PROJECT NUMBER: LUA-06-030
APPLICANT: City of Renton

APPEAL BY: Highlands Community Association
PO Box 2041, Renton, WA 98056
Telephone 425-228-5848

TO: HEARING EXAMINER – City of Renton

CC: As shown on [Attachment A](#)

LOCATION: Text amendments would generally be citywide. Map amendments would be applicable in the Highlands Subarea, defined as an area generally located in northeast Renton, between NE 5th and 23rd Streets, between Camas Avenue NE and Queen Avenue NE

DESCRIPTION:

As stated in LUA-06-030, the City of Renton is rezoning that part of the Highlands Subarea which is currently designated for Center Village (CV) land use in the Comprehensive Plan. Existing Commercial Neighborhood (CN), Residential-10 (R1-10), Center Village (CV), and Residential Multifamily (RMF) zoning in this area is being converted into two new zones—Center Village – Core (CV-C) and Center Village – Residential (CV-R).

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Two new zones are being created with a full complement of zoning and development regulations. The CV-C zone is a new zone that allows commercial and high density residential uses. The CV-R zone is a new zone that allows medium density residential uses, but does allow high density residential uses through a bonus system. Properties that participate in the Center Village Flex Bonus District are subject to master plan development approvals by the Renton City Council.

The change in allowed density in this area is likely to increase the number of housing units by 1,623 units at full build out and to raise maximum densities in certain areas to as much as 80 units per acre.

THE CITY OF RENTON ENVIRONMENTAL REVIEW COMMITTEE (ERC) HAS DETERMINED THAT THE PROPOSED ACTION DOES NOT HAVE A SIGNIFICANT ADVERSE IMPACT ON THE ENVIRONMENT. The ERC's DETERMINATION OF NON-SIGNIFICANCE was made on April 4, 2006.

POINTS of DISAGREEMENT:

The ERC's DETERMINATION OF NON-SIGNIFICANCE allows the City to bypass the typical and customary Environmental Impact Study (EIS) process for a slip-streamed and reduced standard, in order to facilitate faster redevelopment in the area.

The Highlands Community Association (HCA) Board of Directors DOES NOT AGREE with the ERC's DETERMINATION OF NON-SIGNIFICANCE.

The HCA appeals on the basis that the Applicant has not complied with the rule and intent of the law, or with processes that are typical and customary for a proposal of this scope and scale.

Further, that the proposed development is of such significance, scope, and scale as to require a comprehensive Environmental Impact Study.

1. Applicant has not adequately identified and addressed **Environmental Impacts** anticipated to occur in conjunction with the proposed development,
2. With regard to **Environmental Impacts**, the Applicant's **Documentation and Due Diligence** are inadequate to satisfy what is typical and customary for SEPA reviews, and
3. The Applicant's DETERMINATION OF NON-SIGNIFICANCE is being applied to avoid an **Environment Impact Study (EIS)** and the time and cost associated with both an EIS, as well as the resulting remediation that may be required in order (this would cause a schedule delay).
4. Lastly, the Applicant has held no **Public Comment** specific to **Environmental Impacts** and concerns.

1. Environmental Impacts.

There are potentially serious and significant environmental impacts which must be studied; and planning for such an enormous undertaking, involving hundreds of acres of land and thousands of residents is SIGNIFICANT.

Features to be rebuilt include and may not be limited to: streets, alleys, sidewalks, street and road lighting systems, traffic signals, domestic water systems, storm and sanitary sewer systems, parks and recreational facilities.

The area under question also overlays the fragile aquifer supplying water to all Renton's residents.

Of specific concern is the presence of asbestos, lead, and mold in the existing structures (mainly built in 1943 as Boeing housing), and the affect of demolition of these structures on the water, soil, and air quality.

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The affects of redevelopment on the water, soil, and air quality of thousands of people must not be summarily dismissed with a DETERMINATION OF NON-SIGNIFICANCE. And this would also include "bleed over" impacts to areas adjoining the City of Renton, because city water and storm services extend beyond the designation of city limits in some areas.

Due to the vast scope and scale of the proposed redevelopment, the HCA appeals the DETERMINATION OF NON-SIGNIFICANCE and requests that a complete and comprehensive Environmental Impact Study (EIS) be done by an independent and unbiased party with expertise in this field.

This study should include but not be limited to:

- a) Complete mapping of the area and environmental features, including topographical maps, aquifer maps, any underground or daylight streams and wetlands, mapping of mature significant trees, etc., must be conducted.
- b) The level of contaminants actually present in existing buildings must be assessed.
- c) Potential for contamination of the aquifer under laying the site must be assessed.
- d) Potential for contamination of contiguous aquifers and the Cedar River watershed must be assessed.
- e) Ability for the aquifer to recharge as a result of high density development, and the increased pavement in the proposed street and alley network.
- f) Contamination of the air and the number of families that would be exposed to toxic lead and asbestos during the demolition and construction process.
- g) Pollution from petroleum products to the Cedar River and the aquifer, from the increase in cars and traffic through the area.
- h) Additional items that should be considered on maps and in the analysis are the geologic features and factors, including earthquake and slide hazards, and the Olympic Pipeline.

Additionally a complete Mitigation and Remediation Plan should be provided, as well as a Hazardous Materials Removal Plan, which includes the City's proposed budget for remediation.

All findings should be included in a typical and customary Environmental Impact Statement (EIS), and offered for sufficient public review before finalization.

2. Documentation and due diligence.

Rezone boundaries, densities, and other ancillary definitions have not remained stable for any duration sufficient to assess impacts of any kind, or to determine non-significance with certainty; for example, certain areas variously included, or not included, such as areas north of NE 16th Street.

Not including an area on a given plot map does not necessarily mean the area won't be subject to similar and concurrent higher density development, so unstudied environmental impacts are just as important in these areas.

This constant shifting of Rezone requirements should negate any DETERMINATION OF NON-SIGNIFICANCE until such time as the specifications are proposed with certainty and reliability.

Attachment B, dated March 20, 2006 and revised by hand on April 19, 2006, was distributed for the first time at the Planning Commission of April 19, 2006. It was adopted by the Planning Commission at that meeting.

Such an important document as this is not up to the standards customary for a SEPA document. But this document did not exist when the DETERMINATION OF NON-SIGNIFICANCE was made and it is NOT in the SEPA file for LUA-06-030, nor is it the plot map shown on the City's website today, April 24, 2006.

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In addition, the ENVIRONMENTAL CHECKLIST included in LUA-06-030, particularly, Part B, ENVIRONMENTAL ELEMENTS, contains numerous determinations of “N/A non project action.”

Also, the ENVIRONMENTAL & DEVELOPMENT APPLICATION REVIEW SHEETS contain numerous determinations of “N/A” with only the Fire Department providing input which did not relate to environmental impacts. Such determinations are not up to the customary standards for a SEPA document.

The HCA maintains these are “determinations of expediency” and that only a lawfully executed EIS process would ensure that the areas of earth, water, ground water, energy and natural resources, environmental health, housing, recreation, historic and cultural preservation, and utilities are properly assessed and documented. The resulting DRAFT EIS when then be offered for public review prior to finalization.

Please compare the comments on the ENVIRONMENTAL & DEVELOPMENT APPLICATION REVIEW SHEETS contained in LUA-06-030 with comments contained on [Attachment C](#).

Based upon the lack of specific environmental documentation in the ENVIRONMENTAL CHECKLIST and the ENVIRONMENTAL & DEVELOPMENT APPLICATION REVIEW SHEETS, the HCA maintains there is no basis to make the statement that “The analysis of the proposal does not reveal any adverse environmental impacts requiring mitigation above and beyond existing code requirements.” Reference Page 2 of NOTICE OF APPLICATION AND PROPOSED DETERMINATION OF NON-SIGNIFICANCE (DNS).

3. Environmental Impact Study (EIS) .

The DETERMINATION OF NON-SIGNIFICANCE is not applied correctly in this case and is being used to avoid the requirement to prepare an EIS as required by State Law; and this is being done in order to meet an expedited schedule for project implementation. See [Attachment D](#), excerpt from City website, for verification of schedule.

The DETERMINATION OF NON-SIGNIFICANCE is not in accordance with the letter and spirit of the applicable laws, which were conveniently interpreted and/or minimized in order to render this determination.

The HCA asserts that the DETERMINATION OF NON-SIGNIFICANCE by the ERC is procedurally and legally noncompliant because it is based not upon sound environmental data but upon a project schedule which allows no time for analysis of environmental impacts.

The time for adequate and professional environmental analysis is BEFORE any proposed rezoning is adopted by the City Council. Approval of the Rezone proposal without adequate environmental review opens the door to high density redevelopment that may endanger the water that the Public drinks and the air that the Public breathes.

The revitalized vision for the Highlands Subarea must come secondary to SEPA “best practices” so that adequate review of environmental impacts occurs and comprehensive planning for remediation and hazardous waste management also occurs.

4. Public Comment.

PUBLIC HEARINGS CONDUCTED TO DATE: The Renton City Council has held public hearing on the Rezone proposal on April 3rd and April 17th. The published subject of these public comment hearings was rezoning, not environmental concerns.

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But, as the record shows, the mayor went even further by emphatically forbidding any discussion of environmental impacts during the city council meeting of April 17, 2006..

In addition, the scope of the Rezone proposal as delineated on materials presented by the Economic Development, Neighborhoods & Strategic Planning Department (EDNSP) and distributed at each of the meetings has changed from one meeting to the next. The changing scope of the program affects environmental concerns.

PLANNING COMMISSION: The Planning Commission held a public comment period to address the Highlands Rezone proposal during its April 19th meeting, but this comment period did not address environmental impacts, nor was it published as such. The Planning Commission met the first, second, and third Wednesdays during April (normal schedule 1st and 3rd Wednesdays). The extra meeting covered the Rezone proposal, as did the pre and post meetings in April. However, environmental impacts were not reviewed at these meetings; and the Planning Commission voted to adopt the Rezone proposal on April 19th without being adequately briefed regarding environmental impacts.

ENVIRONMENTAL REVIEW COMMITTEE (ERC): The ERC met on April 4th to render its DETERMINATION OF NON-SIGNIFICANCE, but there was inadequate public notice of this meeting, which was announced to a restricted audience just days prior to convening. In addition, there were no minutes taken during this meeting, and the Public was not allowed to attend as silent observers.

Because the Rezone proposal is still so variable, and the plans are yet uncertain and unstable, the ERC met far too early in the process to make any DETERMINATION OF NON-SIGNIFICANCE.

In addition, the scope of the Rezone proposal as delineated on plot map reviewed by the ERC on April 4th is different from plot map shown at the previous Planning Commission meetings and at City Council meetings. Again, the changing scope of the program affects environmental concerns.

AN ADDITIONAL PUBLIC HEARING: A third city council public comment meeting is scheduled for Mon, May 8, 2006, to address the rezoning proposal, but this public comment is not specifically intended to address environmental concerns, although the city council president indicated any subject may be discussed.

PUBLIC COMMENT – OVERALL NON COMPLIANCE: In addition to not following processes appropriate to the scale, scope, and potential impacts of the Rezoning and Redevelopment Proposal:

- The public notification and involvement have been insufficient or non-existent as to environmental impacts.
- There were no public comment meetings specifically addressing environmental impacts prior to the DETERMINATION OF NON-SIGNIFICANCE by the ERC on April 4, 2006, nor were any held after the ERC's determination. In addition, the Planning Commission adopted the Highlands Rezone proposal as of April 19th without ever receiving a specific briefing as to environmental impacts.
- No public meetings are currently scheduled to specifically address environmental impacts. Such meetings should be required and conducted in accordance with an EIS.

MORATORIUM-DRIVEN MEETINGS: The record of public meetings shows that meetings regarding the Highlands Rezone proposal were driven and are still being driven by the Highlands Moratorium which will end on May 14th.

As stated in city council and planning commission meetings, the mayor's vision is to have the City Council formally adopt the Highlands Rezone proposal before the Moratorium ends so she can proceed with Highlands Redevelopment as shown on Attachment D.

An EIS done to professional standards would make the mayor's schedule impossible to maintain.

5. Applicable Statutes:

| | |
|----------------|---|
| RCW 43.21C.030 | Guidelines for local governments |
| RCW 36.70A | Growth management |
| RCW 36.70A.030 | Definitions |
| RCW 36.70A.035 | Public participation |
| RCW 36.70A.040 | Who must plan |
| RCW 36.70A.300 | Final orders |
| RCW 36.70A.330 | Noncompliance |
| RCW 36.70A.390 | Moratoria . . . Public hearing |
| RCW 43.21A | Department of Ecology |
| RCW 43.21.020 | Purpose |
| RCW 43.21C | State environmental policy |
| RCW 43.21C.030 | Guidelines |
| RCW 43.21C.031 | Significant impacts |
| RCW 43.21C.074 | Appeals |
| RCW 43.21C.110 | Content of state environmental policy act rules |
| RCW 43.21C.240 | Project review |
| RCW 90.03 | Water code |
| RCW 90.44 | Regulation of public ground waters |
| RMC 1-6 | Code of Ethics |

DECLARATION of SUBMITTAL:

I, Inez Somerville Petersen, Secretary of the Highlands Community Association (HCA), declare under penalty of perjury pursuant to the laws of the State of Washington that this APPEAL is the official position of the Board of the HCA regarding (1) insufficient processes and proof that there are no environmental impacts as a result of the Rezone proposal covered by LUA-06-030 and (2) that an EIS should be required and performed by an independent and unbiased party before the Highlands Rezone proposal is officially adopted. I certify that I delivered this APPEAL to the City Clerk of the City of Renton prior to the deadline of 5 p.m., on Mon, April 24, 2006.

Signed: Inez Somerville Petersen

Date and time:

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Appeal - Attachment A
CC Distribution List

**AGENCY (DOE) LETTER MAILING
(ERC DETERMINATIONS)**

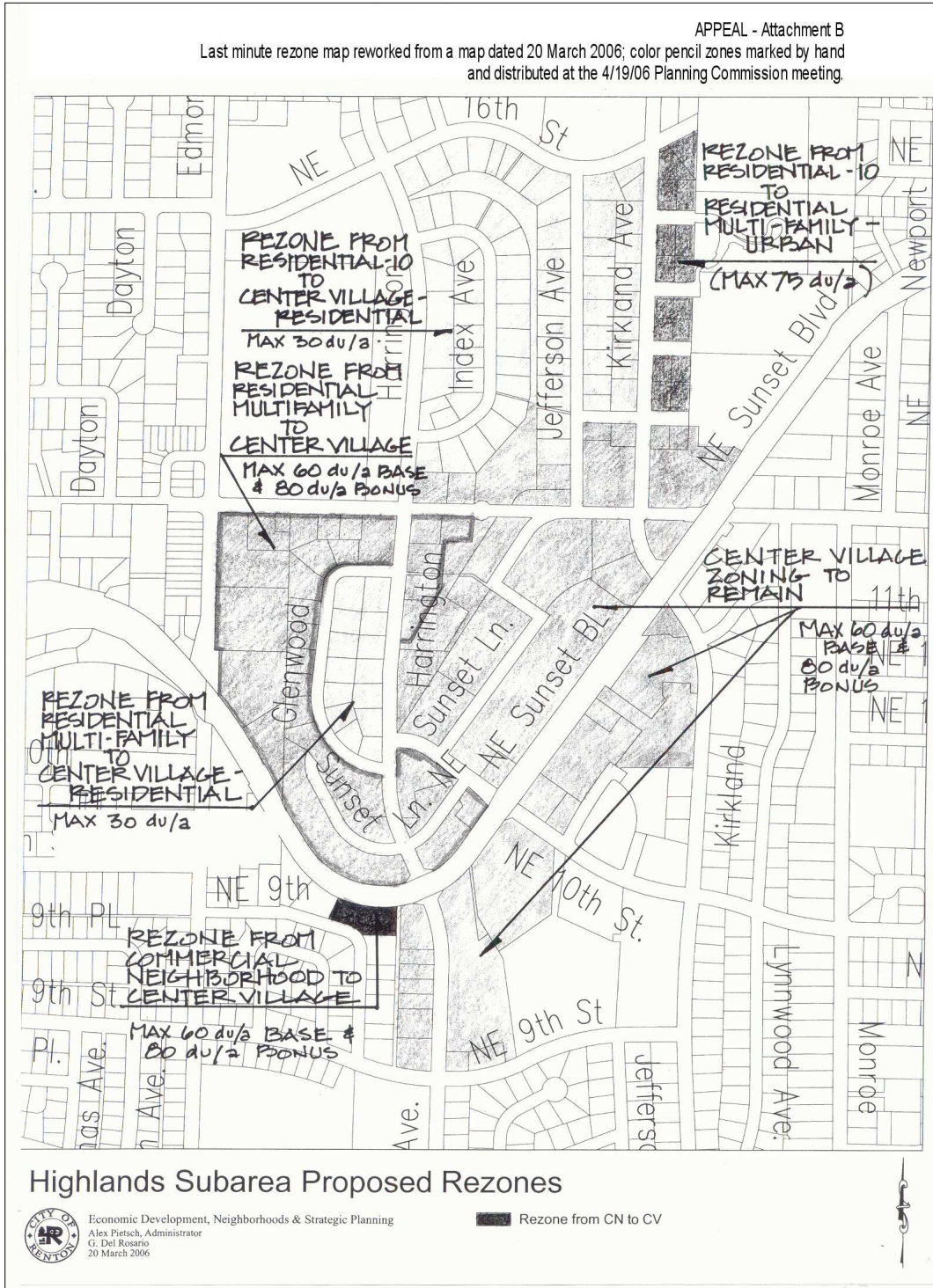
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|--|--|--|
| Dept. of Ecology * Environmental Review Section PO Box 47703 Olympia, WA 98504-7703 | WDFW - Stewart Reinbold * c/o Department of Ecology 3190 160 th Ave SE Bellevue, WA 98008 | Muckleshoot Indian Tribe Fisheries Dept. * Attn: Karen Walter or SEPA Reviewer 39015 – 172 nd Avenue SE Auburn, WA 98092 |
| WSDOT Northwest Region * Attn: Ramin Pazooki King Area Dev. Serv., MS-240 PO Box 330310 Seattle, WA 98133-9710 | Duwamish Tribal Office * 4717 W Marginal Way SW Seattle, WA 98106-1514 | Muckleshoot Cultural Resources Program * Attn: Ms Melissa Calvert 39015 172 nd Avenue SE Auburn, WA 98092-9763 |
| US Army Corp. of Engineers * Seattle District Office Attn: SEPA Reviewer PO Box C-3755 Seattle, WA 98124 | KC Wastewater Treatment Division * Environmental Planning Supervisor Ms. Shirley Marroquin 201 S. Jackson ST, MS KSC-NR-050 Seattle, WA 98104-3855 | Office of Archaeology & Historic Preservation* Attn: Stephanie Kramer PO Box 48343 Olympia, WA 98504-8343 |
| Jamey Taylor * Depart. of Natural Resources PO Box 47015 Olympia, WA 98504-7015 | | |
| KC Dev. & Environmental Serv. Attn: SEPA Section 900 Oakesdale Ave. SW Renton, WA 98055-1219 | City of Newcastle Attn: Mr. Micheal E. Nicholson Director of Community Development 13020 SE 72 nd Place Newcastle, WA 98059 | City of Kent Attn: Mr. Fred Satterstrom, AICP Acting Community Dev. Director 220 Fourth Avenue South Kent, WA 98032-5895 |
| Metro Transit Senior Environmental Planner Gary Kriedt 201 South Jackson Street KSC-TR-0431 Seattle, WA 98104-3856 | Puget Sound Energy Municipal Liason Manager Joe Jainga PO Box 90868, MS: XRD-01W Bellevue, WA 98009-0868 | City of Tukwila Steve Lancaster, Responsible Official 6300 Southcenter Blvd. Tukwila, WA 98188 |
| Seattle Public Utilities Real Estate Services Title Examiner 700 Fifth Avenue, Suite 4900 PO Box 34018 Seattle, WA 98124-4018 | | |

Note: If the Notice of Application states that it is an "Optional DNS", the marked agencies and cities will need to be sent a copy of the checklist, PMT's, and the notice of application. *

Also note, do not mail Jamey Taylor any of the notices she gets hers from the web. Only send her the ERC Determination paperwork.

template - affidavit of service by mailing

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SPECIFIC COMMENTS regarding STAFF REPORT, Paragraph D, *ENVIRONMENTAL IMPACTS*

The following comments are offered regarding the "STAFF REPORT." The HCA does not believe that reviewing parties have complied with State Law with regard to identifying and addressing environmental impacts anticipated to occur in conjunction with the proposed development.

Comments with regard to Paragraph D, *ENVIRONMENTAL IMPACTS* of the Staff Report, are addressed in the same order as subheadings are presented in the Staff Report.

- Earth:
 - (1) There is no proof provided to substantiate the assertion that "The rezone would not result in an increase in the standards for impervious land cover from buildings, driveways, parking lots, or sidewalks . . . "
 - (2) In general, City of Renton streets and parking lots routinely flood with it rains. If city engineers cannot deal with the City's current storm runoff problems, there is no guarantee that the finding on "no impact" is reliable here.
 - (3) And there is no guarantee that the Jefferson Greenway will mitigate the runoff problem.
 - (4) Questioning the "no impact" position by the ERC is further backed up by the statement from the Staff Report which says: "Existing regulations require mitigation in the form of storm water control systems and landscaping of pervious areas and these measures are unchanged." If mitigation is required on something this important, then that indicates that an EIS is required.
 - (4) Mitigation needs to be defined, and it is not here.

- Air:
 - (1) According to the impact statement itself, air quality relates to the amount of traffic, the Rezone will create more traffic, and the resulting change in air quality cannot be quantified until the development is proposed.
 - (2) This impact statement is very plain. The zoning drives the development; therefore, time should be given to prepare an EIS so air impacts can be more adequately reviewed. An EIS is needed before the Rezone is adopted so that adequate study of air quality can be done.

- Water:

In an EIS, we would see solid data and comprehensive analysis of the entire water system, not merely the pipes.

- Plants and Animals:

How can the land be covered with buildings and parking lots and plants and wildlife not be affected? In an EIS, we would see solid data.

- Energy and Natural Resources:

This section indicates that the area is not a location for coal mining activity. But where is the proof of that? In an EIS, proof would be required.

- Environmental Health:

Rodents are mentioned but there is no proof that this population is any worse than in any other equally populated area. Asbestos and lead, Mold and mildew are mentioned and there again is no proof or assessment of amounts, or impacts from demolition.

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ATTACHMENT C

SPECIFIC COMMENTS regarding STAFF REPORT, Paragraph D, *ENVIRONMENTAL IMPACTS*

- Land Use:
This is a good example of minimizing impacts to speed the project along. This section has a lot of words to describe the many changes on the planning board and nothing to substantial to backup the DETERMINATION OF NON-SIGNIFICANCE. This would not be the case in an EIS, proof would be required.
- Housing:
Now we see that there are 607 housing units to which 1623 more will be added. And nothing to substantiate this build out warrants a DETERMINATION OF NON-SIGNIFICANCE. This would not be the case in an EIS, solid analysis would be required.
- Aesthetics:
This relates to the design regulations; and these too have been fluctuating as often as the Rezone maps to determine any impacts.
- Recreation:
With the 607 residences plus another 1623, this section admits that there are not enough parks for the area. But this is NON SIGNIFICANT according to the ERC?
- Transportation:
(1) The ERC agrees there will be increased traffic, but it indicates that these can be addressed with existing services. Over 1600 new residences just might generate 3600 more cars on the road.
(2) We already know from The Landing project, that the intersection at Garden/Park and Lake Wash Blvd North is the weak link in that project, only to made worse by the increased volume from the Highlands rezone.
- Public Services:
The crime statistics must be called into question. There are only two gas stations in this area, and the manager of one of the stations told me had had never been robbed. The HCA has not been able to verify any of the crime statistics used by the City Council, though the attempt has been made to do so using police and fire records.
- Utilities:
(1) This section admits impacts from the increased densities of up to 80 units per acre.
(2) The ERC indicates that needs will be evaluated as development occurs. HCA asserts that is no acceptable for a redevelopment effort of this size and scale.
- Water system/Sanitary system/storm water system:
Some solid analysis is needed here to backup the DETERMINATION OF NON-SIGNIFICANCE. Without it, how can the ERC make a valid determination either way?

An EIS would prevent the kind of subjective comments included throughout the Staff Report. Common sense indicates that many of these items are SIGNIFICANT and that an EIS is called for to evaluate this proposal comprehensively and then offered for public comment prior to finalization.



The logo features the words "Economic Development" in a large, stylized, purple and pink script font. Below this, the words "Neighborhoods & Strategic Planning" are written in a smaller, blue, sans-serif font. The entire text is set against a background of horizontal purple and pink brushstrokes.

HIGHLANDS REDEVELOPMENT INITIATIVE

Description: Comprehensive, strategic approach based on public/private partnerships to make dramatic improvements within a few years.

Outline of Implementation Timing and Steps:

1st Quarter (Jan-Mar) 2006

- \$150,000 set aside in 2006 Budget for planning and public outreach (completed).
- Analyze the real estate market to guide new zoning and density incentives (completed).
- Develop conceptual land use plan identifying land uses, densities and growth assumptions. (nearly complete)
- Collect and analyze data needed to support a declaration of blight under the Community Renewal Act (nearly complete)
- Continue public outreach (four property owner, one developer, and one institutional owner (school and church) focus groups, and one open house completed).
- Mayor outlines the City's Initiative in the State of the City Address.
- At Council Retreat, Mayor and Council determine direction of initiative and request additional \$1 million of unallocated fund balance to Highlands Redevelopment Fund (\$2.5 million total)
- Based on Mayor and City Council's direction, develop expanded public outreach program.

2nd Quarter (April - June) 2006

- City Council committee and Planning Commission hold meetings on proposed implementation legislation including interim zoning, Comprehensive Plan amendments, Sub-area Plan.
- City meets again with expanded focus groups of property owners to discuss plan.
- City meets with residents of the Highlands and adjacent neighborhoods in community open house and other meetings as part of larger communications and outreach strategy.
- Engage Renton Housing Authority (RHA) and other non-profit housing organizations to develop affordable housing replacement plan.

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- By May 14th, expiration of the Highlands Building Moratorium, City Council adopts a package of new, interim zoning to attract new investment to the Highlands residential and commercial areas.
- Complete DRAFT Sub-area Plan, which includes a package of Comprehensive Plan amendments, rezones, development standards, and capital facilities plan.
- By June 30, complete DRAFT Declaration of Blight and North Harrington Community Renewal Plan (NHCRP), which includes plans for redevelopment, infrastructure and facility improvements, and housing relocation and replacement.

3rd Quarter (July-Sept.) 2006

- City encourages redevelopment of area outside of targeted Community Renewal Area by connected willing sellers with developers of smaller scale.
- City continues to work with existing commercial property owner to identify new commercial development with emphasis on leveraging adjacent new mixed income residential development.
- By July 31st, submit Sub-area Plan, Declaration of Blight and NHCRP to City Council for consideration and subsequent adoption.
- City launches media outreach to explain the NHCRP.

- City issues RFP and selects development partner(s) for master planning and redevelopment envisioned in NHCRP.

4th Quarter (Oct.-Dec.) 2006

- RHA identifies new housing locations for existing Section 8 voucher holders displaced by redevelopment.
- RHA partners with non-profit housing developers to identify and build new affordable housing in smaller, scattered developments around the City.
- City and development partner complete Development Agreement.

- Development partner begins to purchase property from willing sellers.

- City offers Community Renewal purchases for willing sellers seeking tax advantages of "friendly condemnation."
- City explores with Development Partner and commercial property owner possible joint redevelopment of both the residential and commercial areas.
- RHA partners with non-profit housing developers and Development Partner to develop mixed-income housing on existing, new, and/or swapped property within the NHCRP area.

2007

- Development Partner initiates first redevelopment project(s).