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From: carrie hollack
To: City Clerk Filing
Cc: Lewis, Andrew; Brown, Kamilah; Dawson, Parker; Thorpe, Jacob; Mosqueda, Teresa; Gonzalez, Lorena; Do, Jessica; Simmons, Monica M
Subject: Attention: Waterfront LID Appeal, CWF-0089
Date: Monday, February 15, 2021 2:04:04 PM

CAUTION: External Email

To Whom It May Concern,

I am appealing the Hearing Examiner's recommendation on CWF-0089, parcel 238200 2330 (Hearing Examiner Final Report, Waterfront LID No. 6751).

As I stated in January and February of 2020 via emails, letters, and in-person testimony, there are many reasons why this LID assessment is inaccurate -- you are welcome to review the details within my case but I'd like to specifically point out the following:

1. The Market Value without LID is incorrect on the Assessment roll -- my parcel is listed at $725 higher than the King County appraised value (note: not a rounding error, just an incorrect value)
2. Lack of transparency in assessment valuation -- despite repeated requests, the detailed methodology and analysis behind our specific parcel was not shared with us although the Final Benefit study states "individual analysis sheets were prepared on each affected parcel in order to form the summarized conclusions, taking into consideration all factors that affect property value and utilizing the best information available"; if each parcel did use a different calculation, this information should have been given to me as the property owner; as it stands, I was left to attempt to reverse engineer the calculation using other similar parcels, appraised values from King County, etc. but was unable to determine the pattern/process due to inconsistencies in the calculation which cannot be explained
3. Using subjective "perception" to come up with an objective dollar amount -- the Final Benefit Study states "Market value conclusions for individual parcels without the LID project, as summarized in the preceding spreadsheets, reflect the market's perception of property values in the subject area as of October 1, 2019 date of valuation" -- however there is insufficient description of the market's perception in the subject area with a degree of precision that aligns to our parcel number, 238200 2330.
    a. Our parcel is grouped into Region C and Zoning DOC2 500/300-550
    b. Our parcel is not indicative of an average parcel within that region / zoning

Additionally:

1. The 2018 assessment value was used as a baseline, not the 2019 assessment value (which is lower than the 2018 value) and therefore the basic math is already incorrect

2. As of the writing of my original objection, the Final Special Benefit Study had not been published or provided in the City's notice, which did not allow sufficient time for property owners to locate, analyze, and respond to the Final Special Benefit Study.
3. There are no "plans and specifications" on file with the Clerk's Office for the LID Improvements, and it is unlawful to move to final assessments without such "plans and specifications." Ordinance 125760, Section 3; *Local and Road Improvement Districts Manual for Washington State 6th Edition*, pp. 3, 19, 31, 44 (2009).
4. There has been no State Environmental Policy Act (SEPA) review of the Waterfront LID formation ordinance, and there are incomplete SEPA reviews of the LID Improvements themselves. It is unlawful to move forward with final assessments until all SEPA reviews are complete for both the Waterfront LID *and* the Waterfront LID Improvements. *LID Manual*, pp. 3, 6, 17, 24, 26; SMC 25.05.800.Q.
5. Without more design details and the date certain for completing construction, it is pure speculation what benefit (general or special), if any, the LID Improvements will create.
6. My property, so far from the waterfront that it is nearly in South Lake Union, is not receiving any special benefits. It is unlawful to include any property that will not receive special benefits, and it is an unconstitutional taking of private property. *Heavens v. King County Rural Library District*, 66 Wash.2d 558, 564, 404 P.2d 453 (1965).
7. The estimated value lift applied by Valbridge is less than 4% which is within the margin of error for any appraisal and thus, by definition, speculation.
8. The LID Improvements are unnecessary, purely aesthetic, and adjacent to a planned 8-lane roadway and mismanaged public spaces of poor quality. There will be no special benefit.
9. The LID is not local or intended to provide special benefits. It is a regional, national, and international destination. There is no special benefit.
10. The LID Improvements do not add anything new to the Central Waterfront, which already has a promenade, viewpoints, as well as connecting streets and bridges.
11. The construction estimates are not based upon substantially complete construction documents, are out of date, and uncertain. Final assessments will bind future City Councils and budgets to complete the LID Improvements regardless of cost. It is unlawful to bind future City Councils and future budgets to spend hundreds of millions of dollars on projects still early in the design process. Washington Attorney General Opinion 2012 No. 4 (May 15, 2012).
12. I incorporate by reference all objections made as part of King County Superior Court Case No. 19-2-05733-5 SEA (Consolidated with No. 19-2-08787-1 SEA).

Thank you,
Carolyn Hollack
CWF-0089
Parcel 238200 2330
1920 4th Ave / Unit 2408