

December 6, 2019

Heather Wright  
Planning Director  
City of Bainbridge Island  
Bainbridge Island, WA 98110

Re: MDNS issued to Winslow Hotel, PLN50880 SPR, PLN50880 CUP  
241 Winslow Way W, 253 Winslow Way W  
Tax parcels: 272502-4-098-2009 and 272502-4-097-2000

Dear Ms. Wright,

I am writing to oppose the Mitigated Determination of Non Significance that was given to the Winslow Hotel on November 25, 2019. Even with the mitigation conditions included in the MDNS, the hotel will have a significant adverse environmental impact on Bainbridge Island and particularly downtown Winslow. I urge you to require that an Environmental Impact Statement be prepared for this project.

Due to its size, scale, and use as an event venue and outdoor event space, the hotel will have a significant adverse impact on traffic, parking, noise, aesthetics, and the “small town feel” of Winslow. The “small town feel” forms the core of the city’s Comprehensive Plan Guiding Principle #1 which states that development must “Preserve the special character of the Island, which includes downtown Winslow’s small town atmosphere and function. . .” Citizen sentiment is strongly against the hotel because the project is blatantly inconsistent with the Comp Plan and development regulations. This has been expressed to the Department of Planning and Community Development in hundreds of letters submitted during public comment periods as well as at public meetings.

The MDNS included 20 mitigation measures. However, these measures are inadequate to substantively reduce or eliminate the hotel’s significant adverse environmental impacts.

In summary, the MDNS is flawed for the following reasons:

- The Winslow Hotel will have significant adverse environmental impacts on its immediate neighborhood and on downtown Winslow as a whole. These impacts include:
  - increased traffic congestion on the city’s already congested main thoroughfare, including tying up traffic at the city’s two major intersections;
  - an increase in parking problems downtown when the hotel operates near or at full capacity, which it hopes to do every weekend;
  - noise from outdoor events and daily commercial service deliveries that will disrupt the immediate residential neighborhood;
  - a structure that is aesthetically incompatible with its surrounding neighborhood, changing the character of the neighborhood and Winslow Way;

- a use that is far more intense than any current use in that part of Winslow, diminishing quality of life for people who live, work, and pass through that area.
- The traffic impact analysis (TIA) submitted by the developer and reviewed by the Planning Director was flawed. Some of its flaws are summarized below.
  - The TIA's findings are based on low-volume winter traffic counts, not on higher volume 3<sup>rd</sup> quarter traffic.
  - The TIA's Level of Service analysis omits pedestrian volumes and their effects on traffic operations.
  - The surges from ferry traffic have not been adequately considered in the TIA for either existing conditions or for future conditions with the project and its event traffic.
- The parking study submitted by the developer and reviewed by the Planning Director was flawed. Some of its flaws are summarized below.
  - The project's compliance with zoning requirements for parking has yet to be demonstrated by the applicant or the city. Additional information on the staffing and number of occupants for the restaurant is needed to determine the zoning requirement. The parking analysis omits restaurant and banquet employee demands and needs to revise some key assumptions. Given the flaws, the city lacked adequate information to assess the traffic impacts. Because the impacts probably will be significant, an EIS should be prepared.
- The developer submitted no noise study to determine the impact of hotel noise on the neighborhood. Therefore, the Director lacked adequate information to determine the hotel's noise impact. Nonetheless, the MDNS requires that the hotel "inform immediately abutting neighbors of events taking place on site," suggesting that the Planning Director is in fact aware that noise generated by hotel events will have a negative environmental impact. The noise impacts of this commercial project in the midst of a residential area will probably be significant, warranting an EIS.
- The project is inconsistent with numerous design guidelines. The recommendation of the Design Review Board was flawed. Because the DRB believed the hotel would meet the requirements of the Living Building Challenge (environmental criteria that were not part of current design guidelines), it approved the hotel despite the fact that the project does not meet numerous design guidelines.
- The mitigation measures required by the MDNS are inadequate to reduce the adverse impacts to less than "significant." Warning neighbors about noisy events, informing guests about alternative modes of transportation, providing bicycles to hotel guests, staggering check-in times to match the ferry schedule, and monitoring hotel use after the fact, among other mitigation requirements, will not effectively alleviate the hotel's adverse impacts.
- The project will have significant land use impacts. The proposed Winslow Hotel violates both the letter and the spirit of the Bainbridge Island Comprehensive Plan and the Winslow Master Plan, which prioritize "Preserv(ing) the special character of the Island,

which includes downtown Winslow's small town atmosphere and function" and state that "Winslow Way is the Centerpiece of Downtown: . . . A simple streetscape retains small-town character and a "sense of place."

- Approval of the hotel would set a precedent for future development in Winslow, effectively eviscerating these provisions of the Comprehensive Plan and Winslow Master Plan.

For all of these reasons and all the reasons previously provided by our group and members, I request that the MDNS for the Winslow Hotel be withdrawn and that the applicant be required to submit a full EIS that evaluates both the impact of the structure on the surrounding neighborhood and the ongoing impact of the hotel on downtown Winslow.

Sincerely,

Robin Simons on behalf of Winslow Neighbors and its members and supporters

Robin Simons  
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