

FOR THE PUBLIC RECORD

Mayor, Councilmembers, and Commissioners

I want to offer one additional observation that may be useful as you consider changes to housing policies and review procedures.

What the 700 Irwin Street project illustrates is not just the pressure of state housing law, but a **sequencing problem** in how decisions are made. In that case, significant waivers were granted first, while questions about evacuation, emergency access, traffic operations, and system reliability were explicitly acknowledged but deferred to later stages.

From an institutional perspective, that sequencing increases risk. Once waivers are granted, later review is often limited to technical code compliance, and the City's ability to revisit core assumptions is sharply reduced.

As you explore new ministerial processes or changes to Planning Commission roles, I would urge you to consider **where in the process safety-critical questions are answered**. If those questions are pushed downstream, the City may be moving faster — but it may also be locking in decisions before it has the information needed to make them responsibly.

In my view, the lesson from 700 Irwin is that **speed without sequencing clarity can undermine both safety and public confidence**. Designing future processes so that waiver decisions follow — rather than precede — resolution of safety and operational issues would strengthen outcomes under the state laws you're working within.

Thank you for considering that perspective.

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