Seattle 2035

YOUR CITY, YOUR FUTURE

City of Seattle
Office of Planning & Community Development

FINAL ENVIRONMENTAL IMPACT STATEMENT FOR THE SEATTLE COMPREHENSIVE PLAN UPDATE

MAY 5, 2016

FINAL
ENVIRONMENTAL IMPACT STATEMENT

for the

SEATTLE COMPREHENSIVE PLAN

Preparation of this EIS is the responsibility of the City of Seattle. As Lead Agency, the City is responsible for SEPA compliance and based on the scoping process has directed the areas of research and analysis that were undertaken in preparation of this EIS. This Draft EIS is not an authorization for an action, nor does it constitute a decision or a recommendation for an action. In its final form—as a Final EIS—it will accompany the Proposed Action and will be considered in making final decisions concerning proposed options for Comprehensive Plan policy and code amendments.

Date of Final EIS Issuance:
May 5, 2016

Please refer to the City's website (www.2035.seattle.gov) for more information.

City of Seattle
Department of Construction & Inspections

City of Seattle
Edward B. Murray, Mayor

Department of Construction and Inspections
Nathan Torgelson, Director

May 5, 2016

Dear Affected Agencies, Organizations, and Interested Parties:

The City of Seattle is pleased to release the Final Environmental Impact Statement (Final EIS) for the Seattle Comprehensive Plan Update. The proposal considered in this EIS consists of text and map amendments to the Comprehensive Plan that would guide the location of 70,000 new housing units and 115,000 new jobs in Seattle through 2035 and influence the manner in which the City conducts its operations to promote and achieve other goals, such as those related to public health, safety, welfare, service delivery, environmental sustainability and race and social equity.

The City is also considering the use of State Environmental Policy Act (SEPA) mixed use and residential infill exemption provisions, as described in this Final EIS.

The ***Draft EIS*** considered three action alternatives and one no-action alternative (Alternative 1), each representing different approaches to allocating city-wide growth within the framework of the City's adopted urban village strategy. Alternatives included:

1. Continue current growth distribution trends (No Action)
2. Guide growth to urban centers
3. Guide growth to urban villages near light rail
4. Guide growth to urban villages near transit

This ***Final EIS*** considers a Preferred Alternative, which is generally similar to Draft EIS Alternative 4, but differs from Alternative 4 in that it reduces future growth estimates for several of the urban villages where the Growth and Equity Analysis shows a high risk of displacement. In addition, the ***Final EIS*** includes a sensitivity analysis that considers the impacts of increased residential growth.

The Final EIS also responds to comments offered by the public during the Draft EIS comment period and includes revisions and additions to the Draft EIS analyses as appropriate.

The Draft EIS and Final EIS together comprise the full EIS for this proposal. Additional information about the Comprehensive Plan update may be found at the City's project website: http://2035.seattle.gov.

Thank you for your interest in this document.

Sincerely,

Nathan Torgelson
Director

Fact Sheet

Name of Proposal

Seattle Comprehensive Plan Update

Proponent

The proponent is the City of Seattle

Location

The area represented by this EIS is the entire City of Seattle. The City encompasses approximately 83 square miles. The City is bounded on the west by Puget Sound, the east by Lake Washington, the north by the cities of Shoreline and Lake Forest Park and the south by unincorporated King County and the cities of Burien and Tukwila.

Proposed Action

The City is considering text and map amendments to the Seattle Comprehensive Plan that may alter the distribution of projected growth of 70,000 housing units and 115,000 jobs in Seattle through 2035, and that would influence the manner in which the City conducts its operations to promote and achieve other goals such as those related to public health, safety, welfare, efficient service delivery, environmental sustainability and equity.

Proposed Alternatives

The Draft EIS considered four alternatives, including a No Action Alternative. This Final EIS considers a fifth alternative, the Preferred Alternative. All alternatives are based on the same growth assumptions, but vary in the approach to how that growth is distributed. Each alternative is briefly described below.

ALTERNATIVE 1: CONTINUE CURRENT TRENDS (NO ACTION)

Growth will generally follow current market trends. Residential growth will continue in the urban center and urban village neighborhoods that have experienced significant growth in the past 20 years, with a relatively low level of change in other urban villages. New job growth is projected to occur predominantly in Downtown and South Lake Union.

ALTERNATIVE 2: GUIDE GROWTH TO URBAN CENTERS

Urban centers will become magnets that more strongly attract new residents and jobs, faster than over the last 20 years. This change may lead to a significant rise in the number of people walking or biking to work, and a corresponding decline in driving and car ownership. Alternative 2 represents a significantly more concentrated pattern of new growth in the urban centers compared to past trends.

ALTERNATIVE 3: GUIDE GROWTH TO URBAN VILLAGES NEAR LIGHT RAIL

Alternative 3 places an emphasis on growth in urban centers, but also in urban villages near the light rail stations. It also considers boundary adjustments to urban villages with light rail stations to encompass a 10-minute walk to the station. A new urban village could be designated at NE 130th St/Interstate 5, and adjustments in designations and boundaries of other existing urban villages near existing and planned future light rail stations could be made.

ALTERNATIVE 4: GUIDE GROWTH TO URBAN VILLAGES NEAR TRANSIT

Alternative 4 would establish the greatest number of transit-oriented places— served by either bus or rail—that are preferred for growth. In addition to areas covered in Alternative 3, more growth would also be encouraged in other urban villages that currently have very good bus service, including Ballard, West Seattle Junction and Crown Hill. Relatively more urban villages would be subject to increased growth and change.

ALTERNATIVE 5: PREFERRED ALTERNATIVE

Similar to Alternative 4, growth would be guided toward urban villages with light rail transit stations and very good bus service and the greatest number of transit-oriented places are preferred for growth. Compared to Alternative 4, relatively less residential growth would be guided toward urban villages, but some urban village boundaries would be expanded to encompass a ten-minute walk-shed from light rail stations or bus transit nodes.

Lead Agency

City of Seattle Department of Construction and Inspections

SEPA Responsible Official

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Final Action

Adoption of an updated Comprehensive Plan in Spring/Summer 2016.

Required Approvals and/or Permits

The following actions would be required for adoption of Comprehensive Plan amendments:

- Identification of a preferred alternative;
- Finalized maps and policy language.

Authors and Principal Contributors to this EIS

This **Comprehensive Plan Update** EIS has been prepared under the direction of the City of Seattle Office of Planning and Community Development. Research and analysis associated with this EIS were provided by the following consulting firms:

- **3 Square Blocks LLP**—lead EIS consultant; document preparation; environmental analysis
- **BERK**—Land use, population, employment, housing
- **ESA**—Public services, air quality, noise
- **Fehr & Peers**—transportation, circulation, parking; greenhouse gas emissions
- **SvR**—Utilities
- **Weinman Consulting**—Plans and policies

Location of Background Data

CITY OF SEATTLE, DEPARTMENT OF CONSTRUCTION AND INSPECTIONS

Attn: Gordon Clowers Telephone: 206-684-8375
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P.O. Box 34019
Seattle, WA 98124-4019

Date of Issuance of this Final EIS

May 5, 2016

Date of Issuance of the Draft EIS

May 4, 2015

Date Draft EIS Comments Were Due

June 17, 2015

Availability of this Final EIS

Copies of this Final EIS have been distributed to agencies, organizations and individuals as established in SMC 25.05. Notice of Availability of the Final EIS has been provided to organizations and individuals that requested to become parties of record.

The Final EIS can be reviewed at the following public libraries:

- **Seattle Public Library—Central Library** (1000 Fourth Avenue)
- **Ballard Branch** (5614 22nd Avenue NW)
- **Beacon Hill Branch** (2821 Beacon Avenue S)
- **Capitol Hill Branch** (425 Harvard Avenue E)
- **Columbia Branch** (4721 Rainier Avenue S)
- **Douglass-Truth** (2300 E Yesler Way)
- **Greenwood Branch** (8016 Greenwood Avenue N)
- **High Point Branch** (3411 SW Raymond Street)
- **Lake City Branch** (12501 28th Avenue NE)
- **Queen Anne Branch** (400 W Garfield Street)
- **Rainier Beach Branch** (9125 Rainier Avenue S)
- **South Park Branch** (8604 8th Avenue S, at S Cloverdale Street)
- **University Branch** (5009 Roosevelt Way NE)

A limited number of complimentary copies of this Final EIS are available—while the supply lasts—either as a CD or hardcopy from the Seattle Department of Construction and Inspections Public Resource Center, which is located in Suite 2000, 700 Fifth Avenue, in Downtown Seattle. Additional copies may be purchased at the Public Resource Center for the cost of reproduction.

This Final EIS and the appendices are also available online at:
http://2035.seattle.gov/

Contents

Figures

Tables

Acronyms

ACS	American Community Survey
ALS	Advanced Life Support
AMI	Area Median Income
BLS	Basic Life Support
CAP	Climate Action Plan
CIP	Capital Improvement Program
CSO	Combined Sewer Overflow
CPP	King County Countywide Planning Policy
CPTED	Crime Prevention Through Environmental Design
CTR	Commute Trip Reduction
dBA	A-weighted Decibels
DPD	Department of Planning & Development
EIS	Environmental Impact Statement
ECA	Environmentally Critical Area
ESD	Washington Employment Security Department
EMS	Emergency Medical Services
EPA	Environmental Protection Agency
FAR	Floor Area Ratio
FLUM	Future Land Use Map
FTA	Federal Transportation Administration
GHG	Greenhouse Gas
GMA	Growth Management Act
GSI	Green Stormwater Infrastructure
GTEC	Growth & Transportation Efficiency Center
HALA	Housing Affordability & Livability Agenda
HCT	High Capacity Transit
HOV	High Occupancy Vehicle
HUD	U.S. Department of Housing & Urban Development
I-5	Interstate 5
KCM	King County Metro
LEED	Leadership in Energy & Environmental Design
LOS	Level of Service
MFTE	Multi-family Tax Exempt
MIC	Manufacturing/Industrial Center
MPP	Multicounty Planning Policy
MMTCO$_2$e	Million Metric Tons of CO_2 Equivalent
NAAQS	National Ambient Air Quality Standards
NHTSA	National Highway Traffic Safety Administration
OFM	Washington Office of Financial Management
OPCD	Seattle Office of Planning & Community Development
PARC	Parking Revenue Control System
PMP	Pedestrian Master Plan
PSCAA	Puget Sound Clean Air Agency
PSRC	Puget Sound Regional Council
RPZ	Restricted Parking Zone
SCL	Seattle City Light
SDCI	Seattle Department of Construction & Inspections
SDOT	Seattle Department of Transportation
SEPA	State Environmental Policy Act
SMC	Seattle Municipal Code
SMP	Shoreline Master Program
SOV	Single Occupancy Vehicle
SPD	Seattle Police Department
SPS	Seattle Public Schools
SPU	Seattle Public Utilities
SR	State Route
ST	Sound Transit
TAP	Toxic Air Pollutant
TMP	Transit Master Plan
TOD	Transit Oriented Development
TSP	Transportation Strategic Plan
VMT	Vehicles Miles Traveled
WAC	Washington Administrative Code
WSDOT	Washington Department of Transportation
WWTP	Wastewater Treatment Plant
UFSP	Urban Forest Stewardship Plan
U.S. EPA	U.S. Environmental Protection Agency
v/c	Volume-to-Capacity

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1.0 Summary

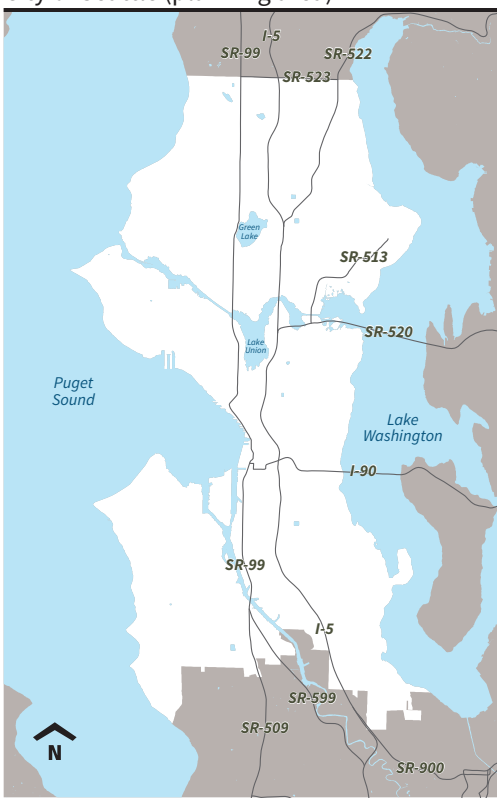
This chapter summarizes the findings of this Environmental Impact Statement (EIS) with respect to environmental impacts, mitigation strategies and significant unavoidable adverse impacts for the ~~four~~ Seattle Comprehensive Plan alternatives. Revisions to this summary section prepared since issuance of the Draft EIS are shown in cross-out (for deleted text) or underline (for new text) format. This summary provides a brief overview of the information considered in this EIS. The reader should consult Chapter 2 for more information on the alternatives and Draft EIS Chapter 3 and Final EIS Chapter 3 for more information on the affected environment, environmental impacts and mitigation strategies for each alternative and element of the environment.

1.1 Proposal

The City is considering text and map amendments to the Seattle Comprehensive Plan that would influence the manner and distribution of projected growth of 70,000 housing units and 115,000 jobs in Seattle through 2035, and that would influence the manner in which the City conducts its operations to promote and achieve other goals such as those related to public health, safety, welfare, service delivery, environmental sustainability and equity. The Growth Management Act requires the City's Comprehensive Plan to plan for the amount of population and employment growth that has been allocated to the City by the Washington State Office of Financial Management. This EIS evaluates the potential environmental impacts of alternative distributions of that growth throughout the City.

~~All~~ Most Comprehensive Plan elements ~~will be~~ have been reviewed and updated as part of the proposal. In many cases, proposed policy amendments reflect changes to state and regional guidance, incorporate language and editorial changes to policies to increase readability, clarify direction and remove redundancies; and add new or updated information since adoption of the current Comprehensive Plan. Other policy changes are intended to reflect evolving city policy.

Figure 1–1
City of Seattle (planning area)



No changes are proposed to the adopted neighborhood plans in the Comprehensive Plan, nor the Container Port and Shoreline Management elements.[1]

Major policy questions addressed in the plan update include consideration of the following:

- Updated preferred distribution of growth within the urban village framework
- Whether to expand boundaries of certain existing urban villages and create new urban villages
- Whether to eliminate or redefine how growth estimates are made for urban villages
- Whether to replace the generalized land use designations with a single designation for each type of urban village
- Whether to revise single family Land Use Element goals and policies addressing rezone criteria
- Incorporation of new housing policies that emerge from the City's Housing Affordability and Livability Agenda (HALA)
- For measurement of the City's transportation network performance, replacement of the current "screenline" system with a mode-share based level of service standard
- Replacement of existing quantitatively-expressed goals for parks/open space with a more general commitment to expand open space to meet the needs of the community, and develop new guidelines in the *Park Development Plan*
- Addition of guidance for prioritizing use of rights-of-way transition spaces

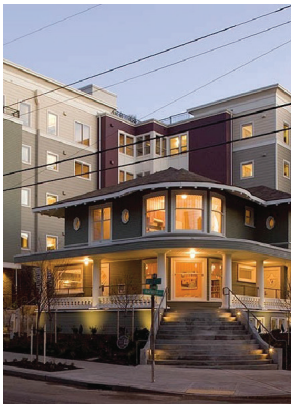
The proposal applies to the entire City of Seattle.

1.2 Objectives of the Proposal

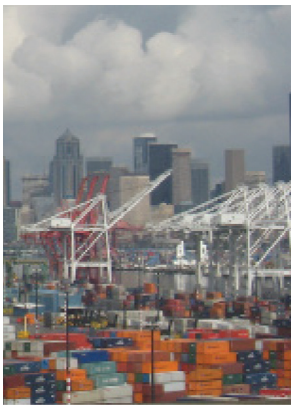
The City's objectives for this proposal include:

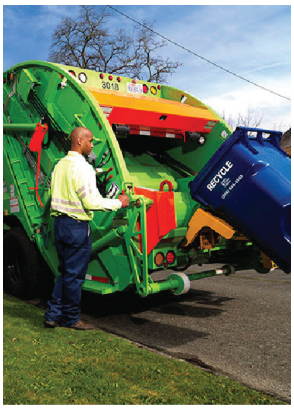
- Retaining the urban village strategy and achieving a development pattern in line with it
- ~~Leverage growth~~ Seek to create a variety of housing choices and to promote healthy, complete communities
- Create jobs and economic opportunity for all City residents
- Build on regional transportation investments and balance transportation investments
- Support strategic public investment that addresses areas of need and maximizes public benefit
- Become a more climate-friendly city
- Distribute the benefits of growth more equitably

1 Although the Shoreline Management Element is a new element in the Comprehensive Plan, it consists entirely of policies that were in the Land Use Element and the policies are not proposed to be changed at all with this Plan update.



BALLARD FARMERS MARKET
STREET
CLOSED



RECYCLE

PUBLIC
MARKET
FARM






1.3 Alternatives

The City has identified ~~four~~ five alternatives for consideration in this EIS. The alternatives assume the same level of total growth, but evaluate differing levels of growth emphases that may occur in various areas of the city, and with differing levels of resulting land use intensities. Each alternative emphasizes different patterns of projected future growth amount and intensity among the urban centers, urban villages and transit-related areas.

- **Alternative 1, Continue Current Trends (No Action)**, would plan for a continuation of current growth policies associated with the Urban Village Strategy along with a continuation of assumed trends that distribute growth among all of the urban centers and urban villages.
- **Alternative 2, Guide Growth to Urban Centers**, prioritizes greater growth concentrations into the six existing urban centers—Downtown, First/Capitol Hill, University District, Northgate, South Lake Union and Uptown.

The emphasis in alternatives 3 and 4 is on providing opportunity for more housing and employment growth in areas closest to existing and planned transit service. Specifically:

- **Alternative 3, Guide Growth to Urban Villages near Light Rail**, prioritizes greater growth concentrations around existing and planned light rail transit stations.
- **Alternative 4, Guide Growth to Urban Villages near Transit**, prioritizes greater growth concentrations around light rail stations and in specific areas along priority bus transit routes.

For this Final EIS, the City has identified a **Preferred Alternative**. Compared to the Draft EIS alternatives, the Preferred Alternative is most similar to Alternative 4 in that it guides growth toward urban villages and centers with light rail stations and places with very good transit service. The Preferred Alternative also seeks to address the equity and displacement issues identified in public comment and the separate Growth and Equity Analysis. In order to reduce the potential for displacement, the Preferred Alternative reduces the amount of estimated future growth that would be guided toward several of the urban villages where the Equity Analysis showed a high risk of displacement and low access to opportunity and distributes this growth to other urban villages and to areas outside of the urban villages.

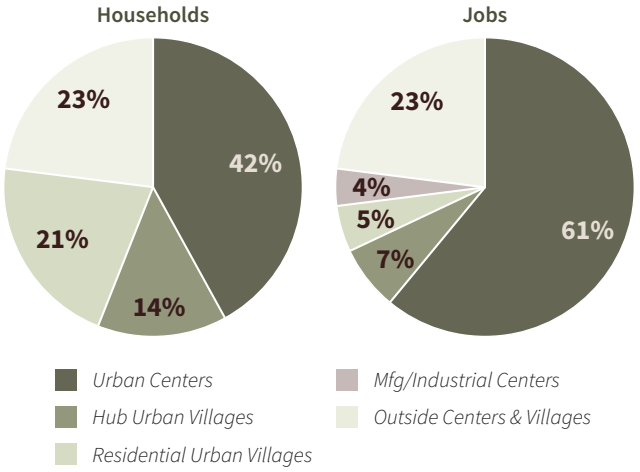
The boundaries of the existing urban villages would remain unchanged under both alternatives 1 and 2. ~~a~~Alternatives 3 and 4 and the Preferred Alternative assume ~~would result in~~ expansions to some urban village boundaries and the designation of one new urban village (at NE 130th Street/Interstate 5) in order to encompass a 10-minute walkshed around existing/planned future light rail stations and priority transit routes.

Additional description of each alternative and supporting maps are provided on the following pages.

Figure 1–2 Summary of alternatives

Alternative 1
Continue Current Trends (No Action)

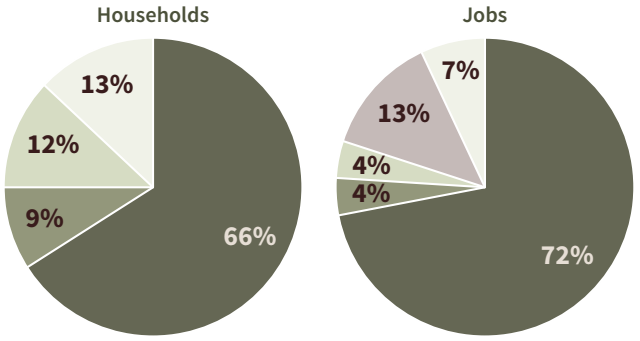
Growth will generally follow current market trends. Residential growth will continue in the urban village neighborhoods that have experienced significant growth in the past 20 years, with a relatively low level of change in other urban villages. New jobs would occur primarily in Downtown and South Lake Union.



- No change in the number, designation or size of urban villages.
- Greater residential growth emphasis in hub urban villages, in selected residential urban villages and more growth outside of urban villages.
  - Hub urban village emphases: Ballard, Bitter Lake, Lake City and West Seattle Junction.
  - Residential urban village emphases: 23rd & Union-Jackson, Aurora-Licton Springs, Columbia City, Madison-Miller and Othello.
  - Nearly 1/4 of residential growth (16,000 units) to occur outside of urban villages.
- Comparatively, urban centers would have a smaller role in accommodating residential growth and a continued focus on job growth.

Alternative 2
Guide Growth to Urban Centers

Urban centers will become magnets that more strongly attract new residents and jobs, faster than over the last 20 years. This change may lead to a significant rise in the number of people walking or biking to work, and a corresponding decline in driving and car ownership. Alternative 2 represents a significantly more concentrated pattern of new growth in the urban centers compared to past trends.



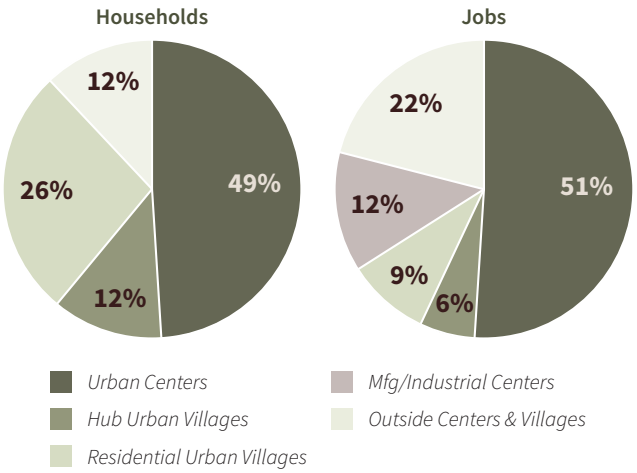
- No change in the number, designation or size of urban villages.
- More growth in urban centers, especially in Downtown, First/ Capitol Hill and Northgate and South Lake Union.
- Less growth outside urban centers, including the least emphasis on hub urban village growth.
- More mid- and high-rise housing is likely to occur than under other alternatives, given the more concentrated growth patterns.
- A higher concentration of jobs in urban centers, especially Downtown, Northgate and South Lake Union.

Figure 1–2 Summary of alternatives (cont.)

Alternative 3

Guide Growth to Urban Villages near Light Rail

An emphasis on growth in urban centers, but also in urban villages near the light rail stations. Would include boundary adjustments to urban villages with light rail stations to encompass a 10-minute walk to the station. A new village could be designated at 130th St/I-5 and ~~possible~~ reconfiguration of the Mount Baker and 23rd & Union-Jackson urban villages near the I-90 East Link Station ~~would~~ may occur.

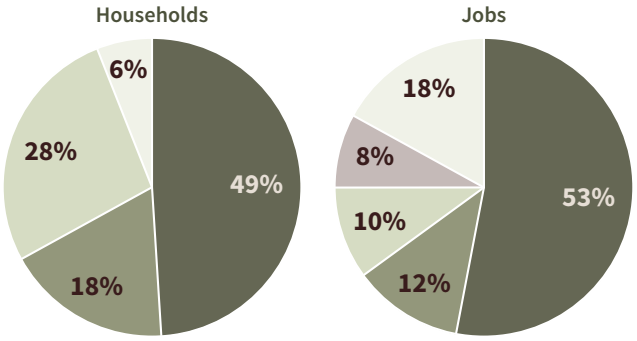


- Larger share of growth and expanded urban village boundaries near light rail stations (Mount Baker, Columbia City, North Beacon Hill, Othello, Rainier Beach, Roosevelt).
- Possible new residential urban village around the North Link 130th Street Station and possible reconfiguration of the Mount Baker and 23rd & Union-Jackson urban villages near the I-90 East Link station.
- An intermediate level of growth in urban centers that is less concentrated than assumed for Alternative 2.
- A relatively smaller share of growth in urban villages without light rail, comparable to Alternative 2.

Alternative 4

Guide Growth to Urban Villages near Transit

The greatest number of transit-oriented places—served by either bus or rail—that are preferred for growth. In addition to areas covered in Alternative 3, more growth would also be concentrated in other urban villages that currently have very good bus service. Relatively more urban villages would be subject to increased growth and possible boundary changes.



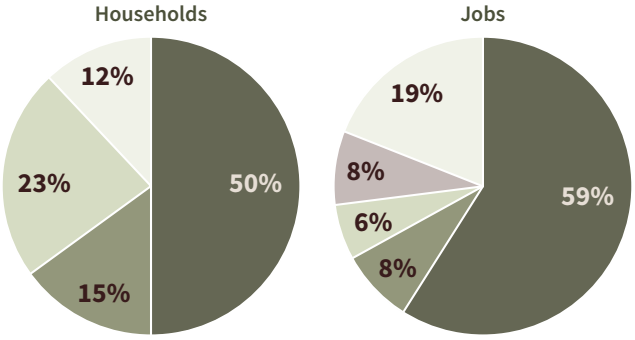
- Includes the higher-growth assumptions and expanded urban village boundaries of Alternative 3 (to capture 10-minute walksheds), and the addition of other selected areas that have very good bus service. These include areas are located in the western half of the city (Ballard, Fremont, West Seattle Junction and Crown Hill).
- Three of the four added areas are hub urban villages, which defines this alternative as having the greatest emphasis on growth in the hub urban villages.
- This assumes a smaller share of residential growth would occur outside centers and villages than all of the other alternatives.

Figure 1–2 Summary of alternatives (cont.)

Alternative 5, Preferred Alternative

Guide Growth to Urban Villages near Transit

Similar to Alternative 4, growth would be guided toward urban villages with light rail transit stations and very good bus service and the greatest number of transit-oriented places are preferred for growth. Compared to Alternative 4, relatively less residential growth would be guided toward urban villages, but some urban village boundaries would be expanded to encompass a ten-minute walk-shed from light rail stations or bus transit nodes.



- Includes the same expanded urban village boundaries of Alternative 4 except omission of the Fremont expansion area.
- Compared to the other alternatives, intermediate amount of residential growth guided within and outside of the urban centers and villages.
- Guides more employment growth to the urban centers than alternatives 3 and 4 and an intermediate amount of growth to the urban villages, relative to the other alternatives.

Figure 1–3 Urban village boundaries under alternatives 1 and 2

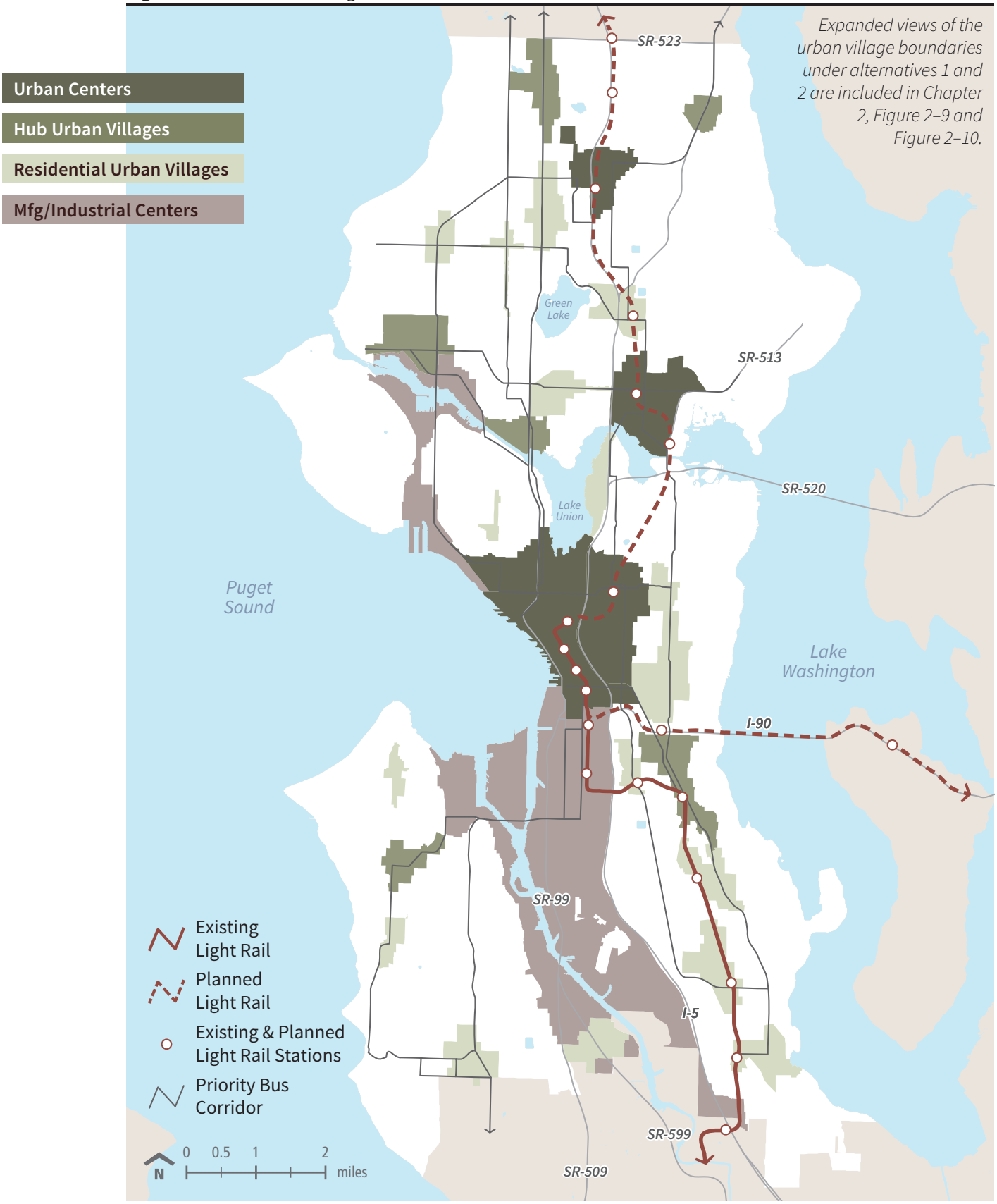


Figure 1–4 Urban village boundaries under Alternative 3

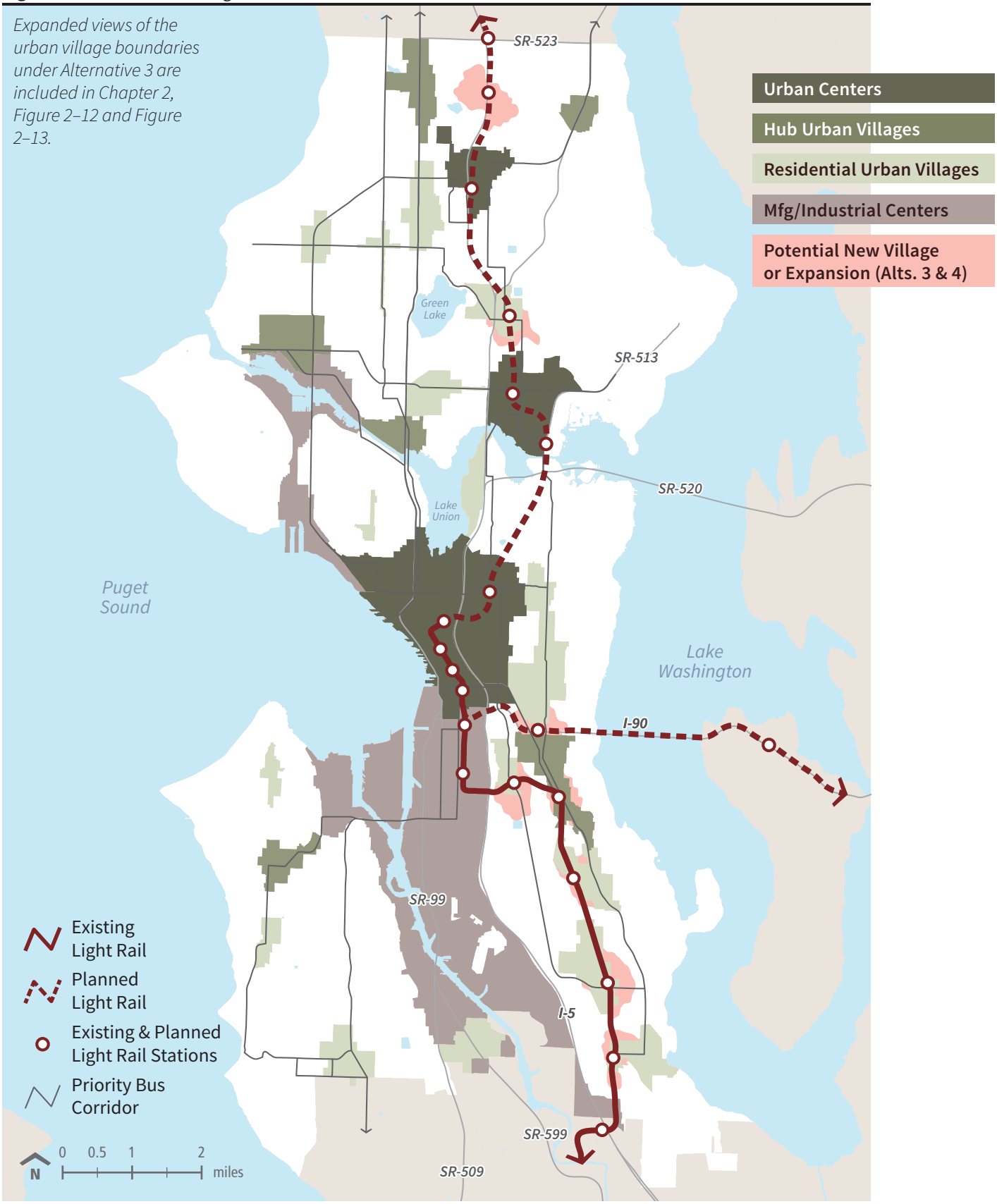
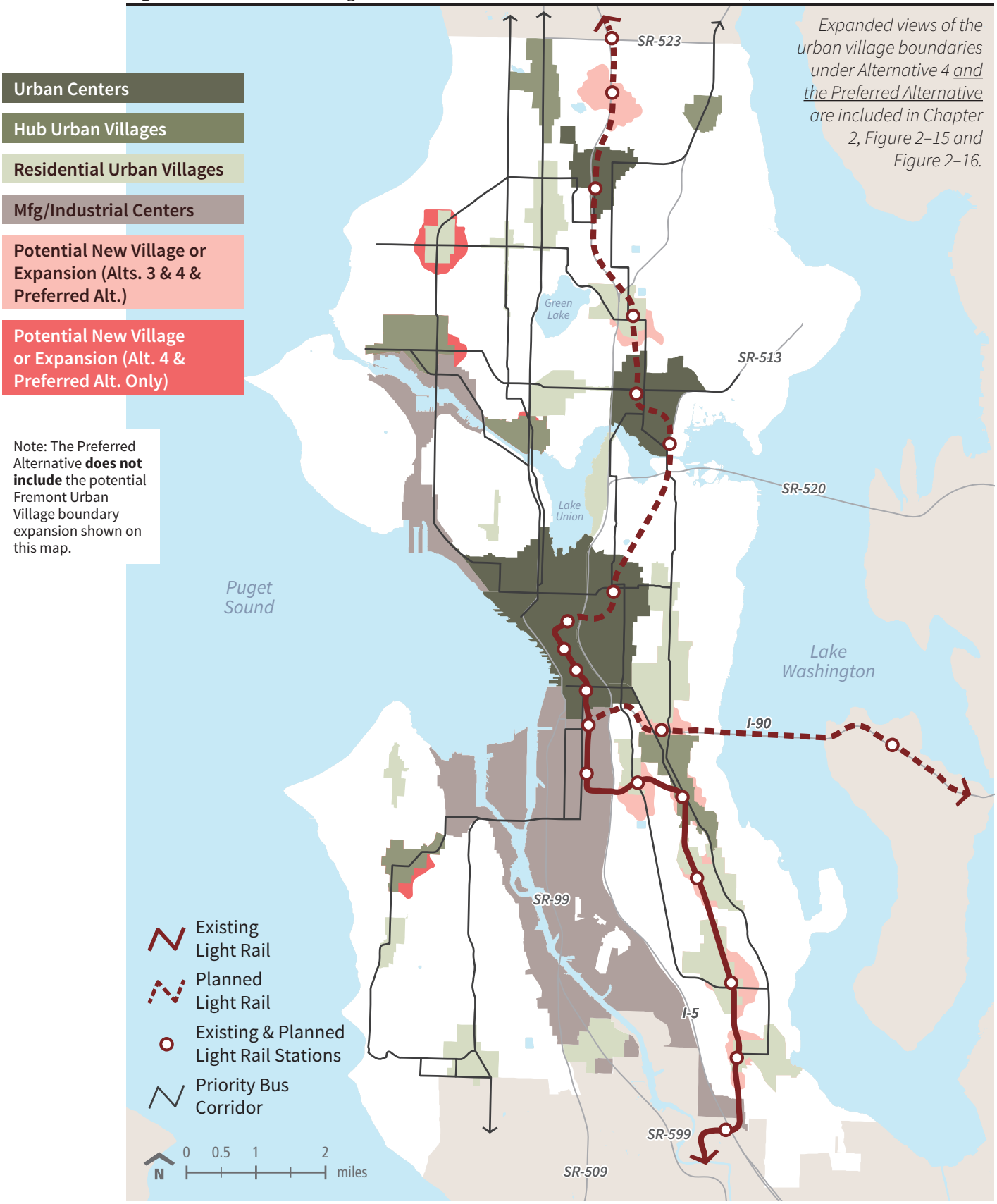


Figure 1–5 Urban village boundaries under Alternative 4 and Alternative 5, Preferred Alternative



1.4 Environmental Review

The adoption of a comprehensive plan or development regulations is classified by SEPA as a non-project (also referred to as a programmatic) action. A non-project action is defined as an action that is broader than a single site-specific project and involves decisions on policies, plans or programs. An EIS for a non-project action does not require site-specific analysis; instead the EIS will discuss alternatives and impacts appropriate to the scope of the non-project proposal and to the level of planning for the proposal (WAC 197-11-442).

According to Washington's state environmental policies (see RCW 43.21c), the City may consider adjustments to categorical exemptions from environmental review, including for infill development as described in RCW 43.21c.229, if it fulfills certain requirements. Among these requirements is SEPA environmental review of a comprehensive plan in an EIS. By preparing this EIS on the City's Comprehensive Plan update, the City fulfills this obligation.

1.5 Significant Areas of Controversy and Uncertainty, and Issues to be Resolved

Key environmental issues and options facing decision-makers include:

- Where forecast growth should be guided, including continuation of current trends, focused within urban centers or guided toward urban villages that are well served by light rail and bus service;
- Effect of alternative growth patterns on housing affordability, displacement of residents and businesses, and demand for public services and transportation infrastructure investment; and
- Review and refinement of draft goals and policies

1.6 Summary of Impacts and Mitigation Strategies

The following pages summarize impacts of the alternatives and mitigation strategies for each element of the environmental analysis.

Please see Chapter 3 in the Draft and Final EIS for a complete discussion of impacts and mitigation strategies for each element of the environment.

This Final EIS includes a **sensitivity analysis in Section 3.1.2** *as an optional illustrative exercise. It considers the sensitivity of impact findings in a scenario with hypothetically increased residential growth levels.*

Earth and Water Quality

IMPACTS COMMON TO ALL ALTERNATIVES

Future construction activities will generate the potential for disturbed soil on construction sites to be conveyed to nearby drainage systems. On construction sites that are close to natural vegetated areas and/or Environmentally Critical Areas (ECAs), there may be increased potential for disturbance to generate adverse impacts, such as when potentially unstable steep slopes or poor quality soils are present. This could occur in places that drain to natural streams, or via drainage utility systems that are designed to outfall to natural receiving waterbodies, if soils and other pollutants are washed off and conveyed far enough away from construction sites.

Increased density and activity levels and the associated use of automobiles and other activities, could contribute to additional increments of adverse water quality impacts in ECAs such as wetlands and streams due to wash-off of pollutants from street surfaces and discharge of pollutants into drains.

ALTERNATIVES 1–4 AND PREFERRED ALTERNATIVE

Each alternative growth strategy described in this EIS may generate different levels or distributions of potential adverse critical area impacts. Potential differences are summarized below.

Alternative 1: Continue Current Trends (No Action)

Steep Slope/Landslide Prone Soils. Most or all of the steep slopes present in South Lake Union are likely to be affected due to their central locations within the neighborhood and within properties that are likely to be developed within the next twenty years.

In the portions of Uptown/Queen Anne where steep slopes are located in the most accessible and developable places, disturbance of steep slopes is relatively likely.

Comparatively high projected levels of growth in Eastlake could increase the total amounts of future disturbance of existing steep slope edges in this neighborhood.

Peat and Settlement Prone Soils. In Mount Baker, Greenwood-Phinney Ridge, Rainier Beach and South Park, peat and settlement prone soils are relatively widespread in the neighborhoods' core areas. For Greenwood-Phinney Ridge, Rainier Beach and South Park, the projected amounts of growth are relatively similar for all alternatives.

For Mount Baker, compared to the other alternatives, the residential and employment growth projected under Alternative 1 is less than the other alternatives, meaning a lesser exposure of the neighborhood's settlement prone soils to potential adverse impacts.

Comparatively, Northgate has a lesser overall presence of these potentially unstable soils than the other neighborhoods, but several of the properties with such soils could be subject to future development under any alternative. The residential and employment growth

projected under Alternative 1 is less than the other alternatives, meaning a lesser exposure of the neighborhood's settlement prone soils to potential adverse impacts.

Presence of Streams or Wetland ECAs. Given the combination of proximity of these natural features to future development, and the amount of projected residential and employment growth, the neighborhoods facing a greater risk of adverse impacts on these ECAs under Alternative 1 are: Northgate, Lake City and Columbia City.

Alternatives 2, 3 and 4: Guide Growth to Urban Centers, Guide Growth to Urban Villages near Light Rail and Guide Growth to Urban Villages near Transit

Compared to Alternative 1, the potential adverse impacts related to alternatives 2, 3 and 4 are (1) a somewhat elevated risk of peat/settlement-prone soil ECA disturbances with future development in Northgate and Rainier Beach, given amounts of projected growth; (2) elevated risks of peat/settlement-prone soil ECA disturbances in Mount Baker and Rainier Beach, and; (3) a somewhat elevated risk of downstream creek or wetland ECA disturbances in Northgate (alternatives 2, 3 and 4), Columbia City (alternatives 3 and 4) and Westwood-Highland Park (alternatives 3 and 4).

Preferred Alternative

The Preferred Alternative would guide growth throughout the City in a pattern similar to alternatives 3 and 4 and would be expected to result in earth and water quality impacts similar to alternatives 3 and 4 in most areas. Compared to Alternative 4, the Preferred Alternative would guide relatively less growth toward several urban villages in south Seattle, which would proportionately reduce the potential for impacts on earth and water resources in those areas. These include the Columbia City, Rainer Beach and Mount Baker/North Rainier urban villages.

MITIGATION STRATEGIES

None of these identified impacts are concluded to be significant adverse impacts. The continued application of the City's existing policies, review practices and regulations, including the operational practices of Seattle Public Utilities, would help to avoid and minimize the potential for significant adverse impacts to critical areas discussed in this section.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to earth and water quality are anticipated.

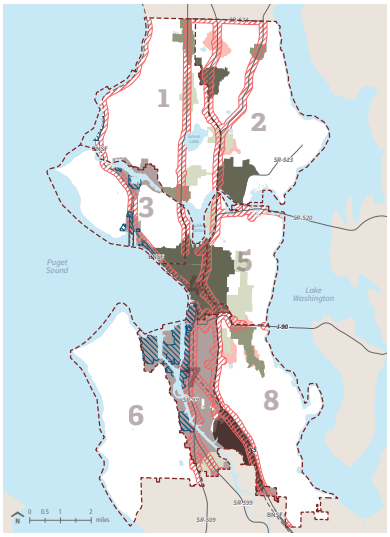
Air Quality and Greenhouse Gas Emissions

CONSTRUCTION-RELATED EMISSIONS

Development of new residential, retail, light industrial, office, and community/art space would generate construction phase air emissions, such as exhaust emissions from heavy duty construction equipment and trucks, as well as fugitive dust emissions associated with earth-disturbing activities. For construction equipment, the primary emissions of concern are NO_x and $PM_{2.5}$. NOx contributes to regional ozone formation and $PM_{2.5}$ is associated with health and respiratory impacts. Construction-related NO_x and $PM_{2.5}$ emissions are not expected to generate significant adverse air quality impacts nor lead to violation of standards under any of the alternatives. Given the transient nature of construction-related emissions, construction related emissions associated with all ~~four~~ alternatives, including the Preferred Alternative, of the Comprehensive Plan are identified as a minor adverse air quality impact.

LAND USE COMPATIBILITY AND PUBLIC HEALTH CONSIDERATION

Comprehensive Plan growth strategies may affect future growth and development patterns in ways that could increase exposure to mobile and stationary sources of air toxics and $PM_{2.5}$. A health risk assessment conducted by the Washington State Department of Health found that on-road mobile sources contribute to the highest cancer and non-cancer risks near major roadways over a large area of south Seattle and that risks and hazards are greatest near major highways. Portions of Seattle located within 200 meters of major highways are exposed to relatively high cancer risk values of up to 800 in one million. A similar phenomenon occurs near rail lines that support diesel locomotive operations as well as stationary sources, such as industrial areas



Thumbnail of Draft EIS Figure 3.2–5, 200 meter buffer around major freeways, rail lines and major port terminals.

Portions of several growth areas are within 200 meters of these pollution sources. Under any alternative, including the Preferred Alternative, increased residential development within this buffer area could potentially expose future sensitive receptors to relatively high increased cancer risks. The percentage of growth areas within the 200 meter buffer is highest (52 percent) under Alternative 2 and lowest (36 percent) under Alternative 1.

CONSTRUCTION-RELATED GREENHOUSE GAS EMISSIONS

GHGs would be emitted during construction activities from demolition and construction equipment, trucks used to haul construction materials to and from sites, and from vehicle emissions generated during worker travel to and from construction sites. An estimated 22 million metric tons of CO_2E over the 20-year period would be expected to result from con-

struction activities. Because of the combination of regulatory improvements and Climate Plan Actions under way, construction related GHG emissions associated with all ~~four~~ alternatives, including the Preferred Alternative, of the Comprehensive Plan would be considered a minor adverse air quality impact.

OPERATION-RELATED GREENHOUSE GAS EMISSIONS

Operational GHG emissions associated with development under all alternatives would change due to a number of factors. Under all alternatives, projected improvements in fuel economy ~~outweigh~~ would be slightly outweighed by the projected increase in vehicle miles traveled. ~~For this reason, a~~All of the alternatives are expected to generate ~~lower~~ slightly higher GHG emissions than current emissions in 2015 and all would generate roughly the same annual increases in GHG emissions, ranging between ~~2,160,000~~ 111,303 to ~~2,169,000~~ 124,518 $MTCO_2e$ annually. ~~As a result, n~~No significant adverse impacts are identified with respect to GHG emissions.

MITIGATION STRATEGIES

To address potential land use compatibility and public health impacts related to air quality, the City could consider separating residences and other sensitive uses (such as schools) from freeways, railways and port facilities by a buffer of 200 meters. Where separation by a buffer is not feasible, consider filtration systems for such uses.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.

No significant unavoidable adverse impacts to air quality and greenhouse gas emissions are anticipated.

Noise

The proposed comprehensive plan alternatives envision future residential and job growth primarily within areas where transit infrastructure either exists or is planned. As such, implementation of ~~the~~ all alternatives, including the Preferred Alternative, would result in a concentration of development within existing infill development areas. Resulting construction activities associated with development of new residences and commercial and retail land uses would have the potential to temporarily affect nearby sensitive receivers such as existing residences, schools and nursing homes.

From a regional perspective, temporary construction noise and vibration within these infill development areas would occur in urban areas where ambient noise and vibration levels are already affected by roadway traffic and other transportation sources and would therefore be less noticeable to receivers than if these activities were to occur on the edges of existing development areas.

CONSTRUCTION NOISE AND VIBRATION IMPACTS

Construction noise standards established in the Seattle Municipal Code limit construction activities to times when construction noise would have the least effect on adjacent land uses, and also restrict the noise generated by various pieces of construction equipment. Development under ~~the four~~ all alternatives, including the Preferred Alternative, would range from high intensity development (high-rise and mid-rise offices and residences) in urban centers to low intensity development (low-rise development) both within and outside of urban villages. Consequently, depending on the extent of construction activities involved and background ambient noise levels, localized construction-related noise effects could range from minor to significant.

Pile driving or similar invasive foundation work are the construction activities with the greatest potential for significant construction-related noise or vibration impacts. Generally speaking these types of construction activities are associated with high-rise development which all alternatives envision to occur within the city's urban centers. Pile driving adjacent (closer than 50 feet) to occupied buildings construction noise impacts are identified as a potential moderate noise impact.

Pile driving can also result in vibration levels that can damage adjacent sensitive structures (within 50 feet), such as historic buildings, and result in interference or annoyance impacts for land uses where people sleep, such as homes, hotels and hospitals. However, time restrictions in the Seattle Municipal Code are sufficient to avoid sleep interference impacts during times that most people sleep.

LAND USE COMPATIBILITY AND NOISE

All alternatives generally seek to locate residential uses in places where transit service is good in order to help reduce single occupant vehicle use. If an active industrial operation would locate adjacent to sensitive land uses, noise compatibility problems could also arise. This would be a moderate noise impact.

For all alternatives, roadside noise levels would increase by less than 0.5 dBA at all locations which is considered a minor impact on environmental noise. While the impacts of additional noise would not be discernible from background noise levels, all of the alternatives would increase noise levels that in some areas are already above levels considered healthy for residential and other sensitive land uses.

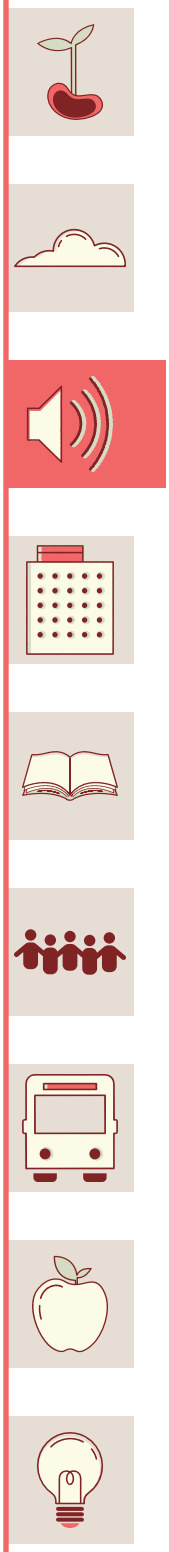
MITIGATION STRATEGIES

If residences or other sensitive receptors are located close to major roadway or noisy industrial operations, additional insulation or window treatments may be warranted to reduce interior noise levels to generally acceptable levels. To address the potential impact for impact pile driving on noise and vibration, best practices for noise control are recommended, including "quiet" pile-driving technology and cushion blocks to dampen impact noise from pile driving.

To address the potential for exposure of residences and other sensitive land uses to incompatible environmental noise, the comprehensive plan could include a policy that recommends that residences and other sensitive land uses (i.e., schools, day care) be separated from freeways or that such development achieve an interior noise performance standard of 45 dBA L_{dn}.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to noise are anticipated.



Land Use: Patterns, Compatibility, Height, Bulk and Scale

IMPACTS COMMON TO ALL ALTERNATIVES

Land Use Patterns. All alternatives would focus the majority of future residential and job growth into urban centers and urban villages, which are characterized by higher densities and a more diverse mix of uses. Areas outside of the urban centers and villages would continue to be comprised of low-density predominantly single-family residential uses.

Land Use Compatibility. Future growth is likely to increase the frequency of different land use types locating close to one another often with differing levels of intensity, particularly in urban centers and villages.

Height, Bulk and Scale. Increased height, bulk and overall development intensity would occur primarily in the designated urban centers and urban villages with specific levels and locations of development varying in distribution by alternative. New development would likely expand low-rise, midrise and high-rise districts currently observed in urban villages and centers.

Alternative 1: Continue Current Trends (No Action)

Alternative 1 is projected to lead to the greatest amount of housing and job growth in areas outside urban centers or villages.

Land use incompatibilities could occur as a result of infill development of vacant lots and redevelopment of existing properties at higher intensities. Some localized incompatibilities could also occur on the edges of urban centers and villages where more intense development could occur near low-intensity uses outside urban centers and villages.

Alternative 2: Guide Growth to Urban Centers

Alternative 2 would result in the most concentrated development pattern of the four alternatives. Growth in urban centers is likely to result in the construction of more mid-rise and high-rise commercial and mixed-use buildings. There would be little effect on land use patterns outside urban centers or villages.

As urban centers within the Downtown core are already-intensely developed, new development would tend to be relatively compatible with existing forms and uses. However, the Northgate and University District urban centers would have increased potential for compatibility issues as these centers still contain areas of relatively low-intensity development. However, on a citywide basis, Alternative 2 is likely to result in fewer potential occurrences of incompatible uses in urban villages compared to other alternatives.

Alternative 3: Guide Growth to Urban Villages near Light Rail

Alternative 3 would include expansions of some urban villages and could also create a new urban village around the possible NE 130th Street transit station. Land use patterns in these areas would convert to higher levels of intensity as future growth occurs. As a

result, Alternative 3 has the potential to result in localized compatibility issues within these villages as existing lower intensity uses transition to higher-intensity development forms.

Alternative 4: Guide Growth to Urban Villages near Transit

Similar to Alternative 3, Alternative 4 would result in new and expanded urban villages, converting existing lower-intensity land uses to higher-intensity development forms as future growth occurs. Impacts to land use patterns and compatibility would be similar to Alternative 3, but would occur in a greater number of locations.

Preferred Alternative

Similar to Alternative 4, the Preferred Alternative guides growth toward urban villages near transit. In contrast to Alternative 4, the Preferred Alternative assumes relatively less growth in several urban villages where the Equity Analysis showed a high risk of displacement and relatively greater growth in areas outside of the urban centers and villages.

MITIGATION STRATEGIES

Impacts identified in the land use analysis are not identified as probable significant adverse impacts, meaning that no mitigation strategies are required. The City would continue to rely upon use of regulations in its municipal code, including Land Use Code (Title 23), SEPA rules and policies (Title 25), the design review program (SMC 23.41 and related guidelines), and documents such as Urban Design Frameworks that address design intent in various subareas.

Although not required, other possible strategies that the City could pursue include:

- Consideration of transitions between urban centers and villages and surrounding areas through ongoing neighborhood planning efforts and/or amendments to zoning regulations.
- Additional station area planning efforts in new or expanded urban villages.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Under all alternatives, additional growth would occur in Seattle, leading to a generalized increase in building height and bulk and development intensity over time, as well as the gradual conversion of low-intensity uses to higher-intensity development patterns. This transition would be unavoidable and is an expected characteristic of urban population and employment growth.

In addition, future growth is likely to create localized land use compatibility issues as development occurs. However, the City's adopted development regulations, zoning requirements and design guidelines are anticipated to sufficiently mitigate these impacts. Therefore, no significant unavoidable adverse impacts to land use are anticipated.

Relationship to Plans, Policies and Regulations

GROWTH MANAGEMENT ACT

Seattle's adopted Comprehensive Plan contains the elements (i.e., chapters) required by the Growth Management Act (GMA), and the City has adopted development regulations that implement the plan. Focusing growth in urban villages, which is the Comprehensive Plan's basic strategy, is consistent with GMA planning policies that seek to prevent urban sprawl and preserve rural areas and resource lands. The City has sufficient zoned, developable land to accommodate the twenty-year population and employment targets; the ~~Draft~~ EIS ~~is~~ examines~~ing~~ different ways that forecast growth could be distributed throughout the City.

VISION 2040

The Comprehensive Plan's Urban Village strategy is consistent with *Vision 2040*'s regional growth strategy, which seeks to focus the majority of the region's growth in designated centers. *Vision 2040* designates Seattle as a Regional Growth Center/Metropolitan Center, and the City is planning to accommodate the majority of its projected growth within identified urban centers, urban villages and manufacturing/industrial centers (MICs).

KING COUNTY COUNTYWIDE PLANNING POLICIES

The City is planning to accommodate the housing and employment growth targets in the King County Countywide Planning Policies (CPPs). The majority of that growth under all ~~Draft~~ EIS alternatives would be distributed to designated urban centers, urban villages and MICs. The Update will include quantitative growth targets/planning estimates for urban centers and MICs at a minimum.

SEATTLE COMPREHENSIVE PLAN

Urban Village Strategy. All ~~Draft~~ EIS alternatives, including the Preferred Alternative, would continue and reinforce the City's adopted Urban Village Strategy, which accommodates the majority of anticipated housing and employment growth in designated urban centers, urban villages and MICs. The ~~Draft~~ EIS alternatives examine the effects of distributing varying amounts of growth to designated urban centers, ranging from 42 percent of housing and 61 percent of jobs in Alternative 1, to 66 percent of housing and ~~75~~ 72 percent of jobs in Alternative 2. Alternatives 3 and 4 distribute relatively more housing and jobs to urban villages to examine the effects of locating more growth within a ten-minute walk of light rail transit stations and frequent bus service.

Compared to Alternative 4, the Preferred Alternative would allocate less growth overall to the urban villages and centers (88 percent of housing and 81 percent of jobs) and more to areas outside of urban centers and villages (12 percent of housing and 19 percent of jobs).

Designation of Urban Villages. The boundaries of some designated urban villages could be modified somewhat under alternatives 3 ~~or~~ and 4 and the Preferred Alternative, to help focus

villages on locations within a ten-minute walk of existing or planned light rail stations or frequent bus service corridors. To respond to planned light rail stations, a new urban village could be designated at 130th/I-5, and the boundary of the existing villages near the I-90 station could be reconfigured.

Land Use Element. A change in the land use designations used on the Future Land Use Map (FLUM) for urban villages is being considered. A single designation may be applied to each type of urban village, and this would be accompanied by policies that clearly describe the desired mix of uses and density. This change would be consistent with existing Comprehensive Plan policy (LU1 and LU2). ~~A~~Two redundant policies~~y~~ (LU59 and LU60) containing criteria for rezones of single-family properties could also be eliminated; ~~these~~ similar criteria are currently contained in the Land Use Code (SMC 23.34), and this simplification would be consistent with adopted policy (LU3).

Given its resemblance in many respects to Alternative 4, the Preferred Alternative's relationship to plans, policies and regulations is most closely similar to Alternative 4, except in its different growth distributions that seek in part to support equitable growth patterns as the city grows over the next 20 years.

MITIGATION STRATEGIES

Because no significant adverse impacts are identified with respect to consistency with plans and policies, no mitigation strategies are required or proposed.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts are anticipated.

Population, Employment and Housing

IMPACTS COMMON TO ALL ALTERNATIVES

Population and Housing. Under all ~~four~~ alternatives, including the Preferred Alternative, urban centers and urban villages have sufficient development capacity to accommodate planned levels of residential growth during the planning period. All ~~four~~ alternatives guide growth toward urban centers and urban villages over other areas.

Housing affordability is an issue of concern under all ~~four~~ alternatives and is identified as a probable significant impact in this EIS. A significant portion of Seattle's households are burdened by housing costs and over 60 percent of the lowest income renter households are estimated to pay more than one-half of their income for rent and basic utilities. Ultimately, housing prices are likely to be driven by demand generated as a result of Seattle's strong job market and attractive natural and cultural amenities. The city's limited land base will likely contribute to upward pressure on housing costs. Low vacancy rates and tight inventory is also likely to contribute to higher rent trends.

Employment. Anticipated future employment growth would occur predominantly in Seattle's urban centers, manufacturing-industrial centers and hub urban villages. All alternatives provide sufficient capacity to accommodate assumed employment growth in the City's centers, villages and manufacturing-industrial centers. Transit access, demographic trends and various market factors will influence which industry sectors locate in various locations.

Displacement. As growth continues in Seattle and development accelerates to meet increasing demands for housing as well as commercial and retail space, some existing uses are likely to be redeveloped to accommodate new growth, creating a potential for displacement of existing homes, businesses and cultural institutions. Displacement of housing and jobs that anchor communities of vulnerable populations could have negative impacts on neighborhoods.

Alternative 1: Continue Current Trends (No Action)

Alternative 1 would result in a more distributed growth pattern compared to the other alternatives and would likely result in patterns of development relatively consistent with the current development pattern. Projected growth under Alternative 1 (No Action) would generate moderate potential for displacement in those urban villages with the greatest amount of vulnerable populations, relative to the other alternatives.

Alternative 2: Guide Growth to Urban Centers

Alternative 2 would result in the most concentrated growth pattern, with the Downtown and South Lake Union urban centers absorbing the most growth. Growth in areas outside urban villages would be limited. Among the alternatives, Alternative 2 would direct the least additional housing and employment growth to those urban villages with the highest risk of displacement impacts on vulnerable populations.

Alternative 3: Guide Growth to Urban Villages near Light Rail

Alternative 3 guides future growth to areas around light rail transit stations. Because Alternative 3 would concentrate growth in urban villages served by light rail stations, most of which are located in South Seattle, it has a high overall potential to displace vulnerable populations in these areas.

Alternative 4: Guide Growth to Urban Villages near Transit

Similar to Alternative 3, Alternative 4 would guide growth toward urban villages with light rail or enhanced bus service. Potential for displacement of existing residents in urban villages with the greatest amount of vulnerable populations under Alternative 4 would be relatively high and similar to Alternative 3.

Preferred Alternative

The Preferred Alternative is most similar to Alternative 4, but would guide relatively less housing growth to areas where the Equity Analysis showed a high risk of displacement and a low access to opportunity. Compared to Alternative 4, this is intended to lead to a reduced risk for adverse displacement-related housing impacts in the neighborhoods most sensitive to such impacts.

MITIGATION STRATEGIES

The following mitigation strategies are identified to address significant housing affordability issues and potential risk of vulnerable resident and business displacement:

- Tailor housing strategies to meet specific objectives and provide a balanced approach of public and private funding, incentives and regulations.
- Continue to preserve existing affordable housing through existing programs, including the Federal low-income housing tax credit program, programs funded through the voter-approved Seattle Housing Levy funds, developer contribution through the incentive zoning program, and the Multifamily Property Tax Exemption program.
- Mitigate projected impacts of growth by implementing a robust housing agenda that includes low-income housing preservation and tenant protection strategies. As an example, the Housing Affordability and Livability Agenda (HALA) is an initiative that was launched in late 2014 and is ongoing. The City is currently evaluating the impacts to affordable housing through the development of a needs assessment that will inform HALA's work.
- Address potential business displacement through tools and programs that the City already offers, including Community Development Block Grants, New Market Tax Credits, Section 108 loads, and contracts with community organizations, such as Washington CASH and Community Capital Development.
- Consider implementing a combination of strategies identified in the City's Equity Analysis that is a parallel effort to this EIS.
- Continue to conduct inclusive outreach through Seattle's Race and Social Justice Initiative (RSJI) as a platform for continuing to work towards equity in the City.

See also Section 4.3.2 of this Final EIS for reference to a proposed *Equitable Development Implementation Plan*.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Seattle will face housing affordability challenges under all ~~four~~ five alternatives. Rental costs can be expected to be highest in urban centers and hub urban villages—especially Downtown, First/Capitol Hill, South Lake Union, Ballard, Fremont and West Seattle Junction—and to rise the most in neighborhoods where existing rents are low.

Transportation

Four types of impacts were considered in this evaluation: auto and transit, pedestrian and bicycle, safety and parking. Other metrics were prepared in this analysis, including traffic operations on state highways, and travel times, walksheds and trip length for sub-areas of Seattle. These metrics are provided for informational purposes and are not used to determine significant impacts.

IMPACTS COMMON TO ALL ALTERNATIVES

Thumbnail of Draft EIS Figure 3.7–16 on page 1–24, 2035 screenline v/c ratios. A screenline is an imaginary line across which the number of passing vehicles is counted.

Auto and Transit. The City uses "screenlines" to evaluate auto (including freight) and transit operations. A screenline is an imaginary line across which the number of passing vehicles is counted. Each of those screenlines has a level of service (LOS) standard in the form of a volume-to-capacity (v/c) ratio: *the number of vehicles crossing the screenline compared to the designated capacity of the roadways crossing the screenline*. All of the screenlines are projected to meet the LOS standard for the PM peak hour under all alternatives. Therefore, no auto, freight[2] or transit impacts are expected under any of the alternatives, including the Preferred Alternative.

Pedestrian and Bicycle Network. The City has identified plans to improve the pedestrian and bicycle network through its *Move Seattle, Pedestrian Master Plan, Bicycle Master Plan* and other planning efforts. These plans are being implemented and are expected to continue to be implemented under all alternatives, including the Preferred Alternative. No significant impacts are expected to the pedestrian and bicycle system.

Safety. The City's safety goals, and the policies and strategies supporting them, will be pursued regardless of the land use alternative selected. The overall variation in vehicle trips is very small among alternatives (less than two percent). At this programmatic level of analysis, there is no substantial difference in safety among the alternatives, and no significant safety impacts are expected.

Parking. There are currently some areas of the city where on-street parking demand likely exceeds parking supply. Given the projected growth in the city and the fact that the supply of on-street parking is unlikely to increase by 2035, an on-street parking deficiency is expected under all alternatives, including the Preferred Alternative.

2 This refers to impacts related to freight operations on city arterials. Freight loading and business access are addressed subsequently.

MITIGATION STRATEGIES

The recommended mitigation strategy focuses on five main themes:

Improving the Pedestrian and Bicycle Network. The City has developed *Move Seattle*, a citywide *Pedestrian Master Plan* (PMP) and citywide *Bicycle Master Plan* (BMP) along with other plans focused on particular neighborhoods. Implementation of the projects in these plans would improve the pedestrian and bicycle environment. Also, ongoing safety programs are aimed at reducing the number of collisions, benefiting both safety and reliability of the transportation system.

Seattle has prioritized reducing vehicular demand rather than increasing capacity and reduced single occupant vehicle travel is key to the city's transportation strategy.

Implementing Transit Speed and Reliability Improvements. The Seattle *Transit Master Plan* (TMP) has identified numerous projects, including Intelligent Transportation Systems (ITS), to improve transit speed and reliability throughout the city.

Implementing Actions Identified in the Freight Master Plan. The City is preparing a revised *Freight Master Plan*, which may include measures to increase freight accessibility and travel time reliability. These projects could be implemented on key freight corridors to improve conditions for goods movement.

Expanding Travel Demand Management and Parking Strategies. The City has well-established Commute Trip Reduction (CTR) and Transportation Management Programs (TMPs), which could be expanded to include new parking-related strategies. CTR and TMP programs could expand to include smaller employers, residential buildings and other strategies.

Working With Partner Agencies. WSDOT, King County Metro, Sound Transit and PSRC all provide important transportation investments and facilities for the City of Seattle. The City should continue to work with these agencies. Key issue areas include regional roadway pricing and increased funding for transit operations.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to transportation and parking are anticipated.

Public Services

IMPACTS ON POLICE SERVICES

Since population and employment growth do not directly correlate to an increased demand for police services, none of the ~~four growth~~ alternatives, including the Preferred Alternative, would necessarily result in proportional increases in call volumes or incidence of major crimes. Therefore, no specific findings of adverse effects on response times or criminal investigations volumes are made. Demand for police services varies over time and by neighborhood, population growth and shifts in composition could influence the characteristics of crime as neighborhoods change. Although hiring under the Seattle Police Department's (SPD's) *Neighborhood Policing Staffing Plan* has been delayed, additional officers are expected to be on staff in the next several years. Increased staffing levels may require expanded precinct facilities in the future.

IMPACTS ON FIRE AND EMERGENCY MEDICAL SERVICES (EMS)

The impacts of additional growth over the next twenty years would be gradual, distributing increased call volumes across many fire station coverage areas, but with an anticipated level of increased call concentration in urban centers and urban villages where the greatest levels of employment and residential growth would occur. Such increases in citywide call volumes would be considered an adverse impact of future growth.

IMPACTS TO PARKS AND RECREATION

Population and job growth over the 20-year planning period would generate more demand for parks, recreation facilities and open space across the city. As an illustration of possible demand to serve projected 20-year growth in a way that meets ~~an~~ the existing aspirational goal of 1 acre per 100 residents, the City would need to add 1,400 acres of "breathing room" open space to its current park inventory of 6,200 acres, under all alternatives.

Downtown, First/Capitol Hill, Greenwood-Phinney Ridge and Morgan Junction do not currently meet the 1 acre of usable open space per 1,000 households goal. Under all EIS alternatives, adding more households would widen these existing gaps. Under Alternative 2, the Downtown and First/Capitol Hill urban centers would have the highest level of demand for added space and facilities to meet the household-based goal among all urban centers and villages under all alternatives. Open space goals would likely also not be met in the Northgate and South Lake Union urban centers under Alternative 2, unless additional actions are pursued to address those needs. Population growth in a possible growth emphasis area near the future I-90/East Link station and in the Mount Baker and 23rd & Union-Jackson urban villages could also contribute to increased demand for parks and recreation, up to 1.50 acres of usable open space under alternatives 3 and 4 and the Preferred Alternative. Also see clarifications and revisions to the impact analysis in Section 3.2 of this Final EIS.

Given that future growth would continue to generate additional demands upon parks/recreation and open spaces in relation to its per-capita goals, Seattle Parks and Recreation Department will update and implement its *Parks Development Plan*, striving ~~would strive~~ through the 20-year planning period to address possible shortfalls by continuing to leverage funds allocated in the Parks District to match state funding grants. The areas identified with probable outstanding needs include the following:

- ***Urban Centers.*** Downtown, First/Capitol Hill, University District, Northgate and South Lake Union
- ***Hub Urban Villages.*** Ballard, Bitter Lake, Fremont, Mount Baker and West Seattle Junction
- ***Residential Urban Villages.*** Greenwood-Phinney Ridge, Morgan Junction, Westwood-Highland Park and portions of North Rainier and 23rd & Union-Jackson urban villages in the vicinity of the future I-90/East Link light rail station
- ***Other Neighborhoods.*** ~~Whittier, Wedgewood~~ Morningside, Jackson Park, Cedar Park, Arbor Heights, Beacon Avenue S and Beach Drive areas

IMPACTS TO SEATTLE PUBLIC SCHOOLS

The latest Seattle Public Schools capital program, BEX IV, ensures adequate capacity to meet enrollment projections for the 2020~~1~~/21 school year, 1~~4~~3 years short of the comprehensive plan update planning horizon of 2035 (Wolf 2014). Student enrollment would likely continue to grow as population increases in Seattle, affecting school capacity in the long run.

Because only 34 of 117 schools (30 percent) are located in urban villages where all alternatives propose the most population growth, demand for Seattle Public Schools transportation services would likely increase. Focusing growth near light rail stations under ~~A~~alternatives 3 and 4 and the Preferred Alternative would provide better transit access to middle schools and high schools. Focusing population growth in urban villages with deficient sidewalk infrastructure in or near school walking boundaries would increase potential safety risks, which may burden some families with driving children to school who could otherwise walk if sidewalks were available. Residential areas that currently lack sidewalks are mostly concentrated in Northwest Seattle and Northeast Seattle north of N 85th Street, Southeast Seattle, South Park and Arbor Heights.

Currently no policies direct the district to purchase new property or to increase capacity in schools within urban villages, with the exception of a possible investment in a downtown school, currently under exploration.

MITIGATION STRATEGIES

Although future growth would contribute to increased demand for services and each has already-identified needs that the City anticipates addressing in coming years, the alternatives evaluated in this EIS would largely avoid generating significant adverse impacts. Future growth could ~~cause~~ generate adverse impacts relating to the availability or distribution of park/recreation facilities/amenities and open space in certain areas of the city, but not significant adverse impacts. ~~Mitigation strategies for parks/recreation are proposed to address the identified range of potentially significant adverse impacts.~~

Additional possible mitigation strategies included in Draft EIS Section 3.8 offer advisory guidance on actions that could be taken to support improvements to public services to address potential impacts that are not identified as significant adverse impacts.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to public services are anticipated.

Utilities

IMPACTS COMMON TO ALL ALTERNATIVES

The city-wide demand for utilities would be similar for all of the alternatives including the No Action Alternative and the Preferred Alternative. Depending on whether or not development occurs in concentrated areas, there potentially could be cumulative adverse impacts to localized portions of the utility system. However, both Seattle Public Utilities (SPU) and Seattle City Light (SCL) currently employ a variety of strategies to anticipate and adjust to changing demands. Both potential impacts and strategies employed by the utilities to respond to changing demand are discussed below.

SPU—Water. Currently total water system usage is declining and the water system has excess capacity. However design fire flow demands can be much greater than the average daily usage for a building. Under all alternatives, including the Preferred Alternative, there will be greater demands on localized areas of the water supply and distribution system due to redeveloped buildings being brought up to current fire codes. SPU currently employs and will continue to employ management strategies (water availability certificates, developer improvements, etc.) to meet customer needs.

SPU—Sewer and Drainage. Under all alternatives, including the Preferred Alternative, development could result in greater demands on the local sanitary sewer, combined sewer and stormwater collection systems, the downstream conveyance and the treatment facilities. There will be a greater overall need for sewage capacity with increased density. Increases in peak flow and total runoff caused by conversion of vegetated land area to impervious surfaces also create increased demand on drainage system capacity. SPU currently employs and will continue to employ management strategies (stormwater code updates, developer improvements, etc.) to meet customer needs.

SCL—Electric Power. Under all alternatives, including the Preferred Alternative, future growth and development will increase demand for electrical energy. Despite recent population and economic growth, Seattle City Light's load is fairly stable since its service territory is well established and it has administered an aggressive energy conservation program for nearly 40 years. There is no significant variation in impacts between the alternatives. SCL currently employs and will continue to employ management strategies (energy code updates, advanced meter infrastructure, etc.) to meet customer needs.

MITIGATION STRATEGIES

None of these identified impacts are concluded to be significant adverse impacts. The continued application of the City's existing practices, including those described above, would help to avoid and minimize the potential for significant adverse impacts.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to services provided by Seattle Public Utilities or Seattle City Light are anticipated.

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2.0 Description of the Proposal and Alternatives

2.1 Introduction

This chapter of the Final EIS contains the description of the proposal and alternatives as found in the Draft EIS. In addition, this updated chapter includes new information in Section 2.3 describing the Preferred Alternative and assumptions made for another optionally-included growth related analysis. New information and other corrections and revisions to this chapter since issuance of the Draft EIS, are described in cross-out (for deleted text) and underline (for new text) format.

The City of Seattle Comprehensive Plan, *Toward a Sustainable Seattle*, is a 20-year vision and roadmap for Seattle's future. It provides the framework of goals and policies addressing most of Seattle's big picture decisions on how to grow while preserving and improving quality of life in the city. This may affect where people live and where they work, but it also will affect future choices about how to improve the transportation system and how to prioritize investment in public facilities, such as utilities, sidewalks and libraries.

The urban village strategy is a key component of the plan, providing a comprehensive approach to planning for future growth in a sustainable manner. The plan identifies 32 growth areas in four categories: urban centers, manufacturing/industrial centers, hub urban villages and residential urban villages. The current plan focuses growth in these urban villages.

Toward a Sustainable Seattle was originally adopted in 1994 and has been updated over time. As required by the Washington Growth Management Act, ~~in 2015~~ the City ~~is updating~~ updated citywide growth projections in 2015 to address the 2015–2035 planning period. Through the alternatives considered in this Environmental Impact Statement (EIS), the City is considering alternative approaches to managing future growth patterns, all within the framework of the urban village strategy. The City has initiated this EIS to study the potential impacts of ~~four~~ five different alternative growth strategies, including:

- ~~a~~A no action alternative (Alternative 1) that anticipates a continuation of the urban village strategy's implementation in ways similar to current practices and with similar growth distribution patterns as has occurred in the last twenty years~~.~~; and
- ~~The three~~ Four action alternatives including the Preferred Alternative which represent a range of possible growth distributions, each of which emphasizes a different pattern of growth and could lead to different implementing actions. For example, actions, such as rezones, development standards, infrastructure investment and others, could vary depending on the City's policy preferences to

more strongly favor compact growth in some or all urban villages, and in ~~transit-served~~ areas well-served by transit. ~~or a combination of these approaches.~~ The balance of this chapter focuses on a description of these alternatives.

Proposal Overview

The City is considering text and map amendments to the Seattle Comprehensive Plan that would influence the manner and distribution of projected growth of 70,000 housing units and 115,000 jobs in Seattle through 2035, and that would influence the manner in which the City conducts its operations to promote and achieve other goals such as those related to public health, safety, welfare, service delivery, environmental sustainability and equity. The Growth Management Act requires the City's Comprehensive Plan to plan for the amount of population and employment growth that has been allocated to the City by the Washington State Office of Financial Management. This EIS evaluates the potential environmental impacts of alternative distributions of that growth throughout the city.

~~All~~ Most Comprehensive Plan elements have been ~~will be~~ reviewed and updated as part of the proposal. In many cases, proposed policy amendments reflect changes to state and regional guidance, incorporate language and editorial changes to policies to increase readability, clarify direction and remove redundancies; and add new or updated information since adoption of the current Comprehensive Plan. Other policy changes are intended to reflect evolving city policy. No changes are proposed to the adopted Neighborhood Plans in the Comprehensive Plan, nor the Container Port and Shoreline Management elements.[1]

Major policy questions and directions to be addressed in the plan update are briefly summarized below.

COMPREHENSIVE PLAN GROWTH PATTERNS AND LAND USE MAP AMENDMENTS

Pattern of Growth. Establish an updated preferred distribution of growth within the urban village framework. Alternatives analyzed in this EIS provide a basis for comparison of ~~four~~ five different growth scenarios, including a scenario that would generally continue current trends (identified as the No Action Alternative in this EIS), and a fifth alternative added to this Final EIS that is designated as the "Preferred Alternative."

Expanding Boundaries of Selected Urban Centers and Villages. Consider whether to expand boundaries of certain existing urban villages and create new urban villages in order to direct growth to places that have ~~either~~ light rail or ~~superior~~ very good bus service. Expanded boundaries of urban villages containing ~~high-frequency transit stations~~ very good transit service would be drawn to represent a 10-minute walking distance from the transit. A possible new urban village at 130th and I-5 would recognize a future possible light rail station there.

1 Although the Shoreline Management Element is a new Element in the Comprehensive Plan, it consists entirely of policies that were in the Land Use Element, and the policies are not proposed to be changed at all with this Plan Update.

Growth Estimates. Determine whether to eliminate or redefine how growth estimates are made for ~~smaller~~ urban villages, recognizing that rates of growth can vary greatly at the smaller urban village scale. The existing methods that define c~~C~~itywide and urban center growth estimates would be retained without change. The proposal for urban villages is to define growth estimates in percentage-increase terms from a 2015 baseline, for housing growth and employment growth as applicable. There are different growth estimates for hub urban villages versus residential urban villages, and differences relating to the village's access to transit, and relating to Equity Analysis conclusions (see Table 2–1 below).

- Hub urban villages are expected to grow more than residential villages, and villages with very good transit are expected to grow more than other villages in the same category. Assigning growth estimates to urban villages in this way reinforces the concept of building upon the mobility advantages provided by proximity to transit.

Table 2–1 Proposed growth estimate terms for different urban village types (for the Preferred Alternative)

	Expected Housing Growth Rate*	Expected Job Growth Rate*
Hub Urban Villages (HUVs)		
HUVs *Fremont* *Lake City*	**40%**	**50%**
HUVs w/Very Good Transit Service *Ballard* *Mount Baker* *West Seattle Junction*	**60%**	**50%**
HUVs w/High Displacement Risk & Low Access to Opportunity, Regardless of Level of Transit Service *Bitter Lake*	**40%**	**50%**
Residential Urban Villages (RUVs)		
RUVs *Admiral* *Eastlake* *Greenwood-Phinney Ridge* *Madison-Miller* *Morgan Junction* *Upper Queen Anne* *Wallingford*	**30%**	**N/A**
RUVs w/Very Good Transit Service *23rd & Union-Jackson* *Aurora-Licton Springs* *Columbia City* *Crown Hill* *Green Lake* *North Beacon Hill* *Roosevelt*	**50%**	**N/A**
RUVs w/High Displacement Risk & Low Access to Opportunity, Regardless of Level of Transit Service *Othello* *Rainier Beach* *South Park* *Westwood-Highland Park*	**30%**	**N/A**

* *Percentage growth above the actual number of housing units or jobs in 2015, except as limited by zoning capacity.*

- In urban villages that the Equity Analysis identified as having both a high risk of displacement and low access to opportunity, the urban village would be expected to grow at the lower rate for its category, even if it has very good transit service. Growth estimates are assigned accordingly. "Very good transit service" for this purpose means the presence of either a light rail station or a Rapid Ride line plus at least one other frequently-served bus route.

This proposal would define growth estimates applicable to urban villages, which would help to fulfill minimum requirements for use of the SEPA Infill Exemption (see Section 2.4 of this Chapter for more information on this exemption). See Table 2–3 and Table 2–4 on page 2–28 for the application of these growth estimate terms to the urban villages for the Preferred Alternative.

Future Land Use Map. In the urban villages, potentially replace the generalized land use designations with a single designation for each type of urban village (Residential, Hub and Urban Center). The single designation would be accompanied by policies that describe the types and intensities of uses allowed in each type of village. This change is intended to provide greater ~~clarity about~~ flexibility in defining the planned future development pattern in each type of urban village and indicate limits to the most intense growth.

POLICY AND TEXT AMENDMENTS

Revise Single Family Land Use Goals (LUG8, LUG9, LUG10) and Policies Addressing Rezone Criteria (LU59, LU60). Update the wording of LUG8, 9 and 10 with a new proposed LUG8 that does not refer to preserving and protecting low-density single-family character, but supports low height, bulk and scale, and opportunities for housing serving a broad range of households and income levels. Also, p~~P~~otentially eliminate Comprehensive Plan ~~land use~~ policies (e.g., existing policies LU59 and LU60) that establish detailed and strict criteria about when it is appropriate to change zoning from a single-family designation. This is the only zoning category that is addressed this way in the Plan and is at a level of detail that is more appropriate for the Land Use Code where similar language can currently be found.

~~**Homeownership.** Consider eliminating the goal of increasing home ownership over time as outdated and no longer applicable in Seattle.~~

Affordable Housing

- ~~Consider adding affordable housing as an appropriate use of City surplus land, along with some guidance for how to select among the various possible uses of surplus property.~~ Under Housing Goal 2 (address regional housing needs for all economic and demographic groups), a proposed policy: "Identify publicly owned sites suitable for housing, and prioritize use of sites, where appropriate, for rent/income-restricted housing for lower-income households" (see proposed Housing Element policy H2.2).

- Potentially incorporate new policies that emerge from the City's Housing Affordability and Livability Agenda. October 2015 amendments added language supporting mandatory affordable housing programs for development projects.

~~Travel Modes~~ Adoption of Mode-Share Based Level of Service Standard. ~~Develop a system for identifying the priority travel mode for particular streets.~~ The City is required to have a system that measures performance of the transportation system. As a replacement to the current "screenline"-based system that measures the road network's performance level by using traffic across several defined lines in the PM peak hour, the recommended Plan would set target levels of single-occupant vehicle (SOV) travel as a percent of the total trips being taken by persons of all travel modes (including transit, walking, bicycling, etc.). The target levels would be set differently for eight different sectors of the city, with SOV mode share objectives set to lower mode share levels than they are today (an improvement in efficiency). This is proposed as a practical response to the need to maintain the efficiency of the city's transportation network even as more growth occurs. Reduction in levels of SOV travel over time will help preserve effective capacity by reducing road-space use per-capita, meaning that passengers using transit and other mode choices will consume less road space than vehicles driven by one person. See more information in Appendix B.3.

~~Tree Cover.~~ ~~Update urban forestry goals to be consistent with the Urban Forestry Stewardship Plan. This means the Comprehensive Plan goal to increase the overall tree cover by 2037 will change from 40 percent to 30 percent.~~

Parks and Open Space Goals. Proposed revisions would discontinue the quantitatively-expressed goals for parks/open space in the current Urban Village Appendix, and replace them with a more general commitment to expand open space to meet the needs of the community, with additional details about goals and commitments to be defined at a later date by the *Park Development Plan*. Priorities and indications about standards to be based in the City's *Park Development Plan* are mentioned in the following sample of revised policies. Approximately thirty other policy statements also provide additional guidance in the proposed new Park, Recreation and Open Space Element.

P1.1 Continue to expand the City's park holdings and open space opportunities, with special emphasis on serving urban centers and urban villages that are home to marginalized populations and areas that have been traditionally underserved.

P1.2 Provide a variety of parks and open space to serve the city's growing population consistent with the priorities and level-of-service standards identified in the City's Park Development Plan.

Guidance for Prioritizing Use of Rights-of-Way Transition Spaces. The Transportation Element includes new guidance for making choices in use of spaces within rights-of-way, for use serving mobility purposes (such as bicycle lanes) or other uses such as loading goods or people, greening, storage or utility functions.

EQUITY

There is a focus on equity throughout the Plan. Each element includes background equity data points, goals and policies that speak explicitly about equity, including engagement of marginalized communities.

Through Executive Order 2014-02, Race and Social Justice Initiative, the City of Seattle states that "…equity is a cornerstone of a thriving democracy and the internal actions of local government that contribute to the health and well-being of everyone in our city." The City's Equitable Development Initiative is specifically focused on clear policy guidance for equitable growth and development that will be incorporated throughout the Comprehensive Plan. Additional discussion of equity in the context of the Comprehensive Plan and future growth and development can be found in a separate document, the Growth and Equity Analysis, available at ~~www.~~http://2035.seattle.gov/resources~~dpd~~. This document has been updated since issuance of the Draft EIS.

Although a fundamental policy issue considered in the Comprehensive Plan, equity is not an environmental issue addressed through this SEPA EIS. As described in SMC 25.05.448, SEPA Rules establish that an EIS is required to analyze only environmental impacts, and not general welfare or other social policy considerations. The EIS environmental analysis is intended to be used by decision-makers in conjunction with other policy considerations and documents in making final decisions on proposals. For additional discussion of equity and the City's Equitable Development Initiative, please see the link shown above.

ALTERNATIVES OVERVIEW

Alternatives addressed in this EIS are summarized in Figure 2–1 on the following pages.

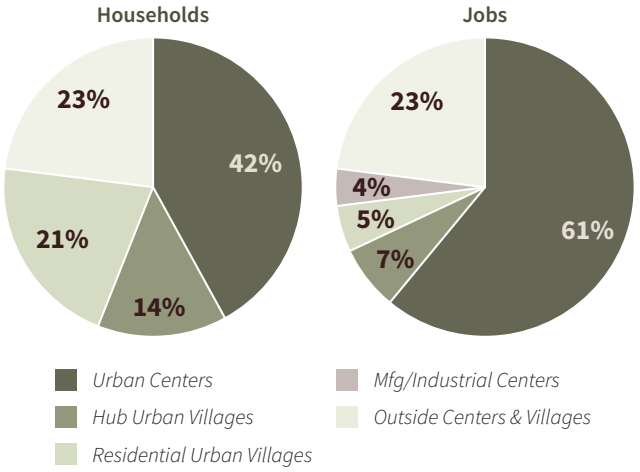
1. Continue Current Trends (No Action)
2. Guide Growth to Urban Centers
3. Guide Growth to Urban Villages near Light Rail
4. Guide Growth to Urban Villages near Transit
5. Preferred Alternative

Each alternative is described more fully in Section 2.3.

Figure 2–1 Summary of alternatives

Alternative 1
Continue Current Trends (No Action)

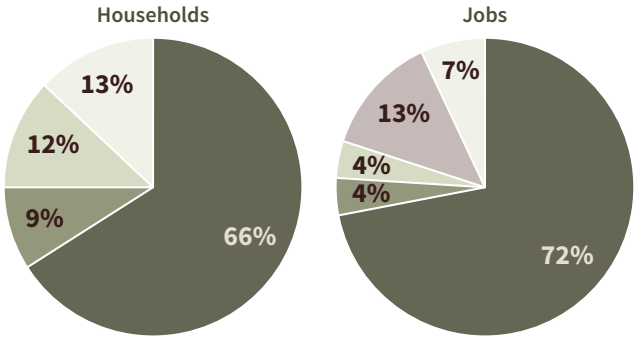
Growth will generally follow current market trends. Residential growth will continue in the urban village neighborhoods that have experienced significant growth in the past 20 years, with a relatively low level of change in other urban villages. New jobs would occur primarily in Downtown and South Lake Union.



- No change in the number, designation or size of urban villages.
- Greater residential growth emphasis in hub urban villages, in selected residential urban villages and more growth outside of urban villages.
  - Hub urban village emphases: Ballard, Bitter Lake, Lake City and West Seattle Junction.
  - Residential urban village emphases: 23rd & Union-Jackson, Aurora-Licton Springs, Columbia City, Madison-Miller and Othello.
  - Nearly 1/4 of residential growth (16,000 units) to occur outside of urban villages.
- Comparatively, urban centers would have a smaller role in accommodating residential growth and a continued focus on job growth.

Alternative 2
Guide Growth to Urban Centers

Urban centers will become magnets that more strongly attract new residents and jobs, faster than over the last 20 years. This change may lead to a significant rise in the number of people walking or biking to work, and a corresponding decline in driving and car ownership. Alternative 2 represents a significantly more concentrated pattern of new growth in the urban centers compared to past trends.



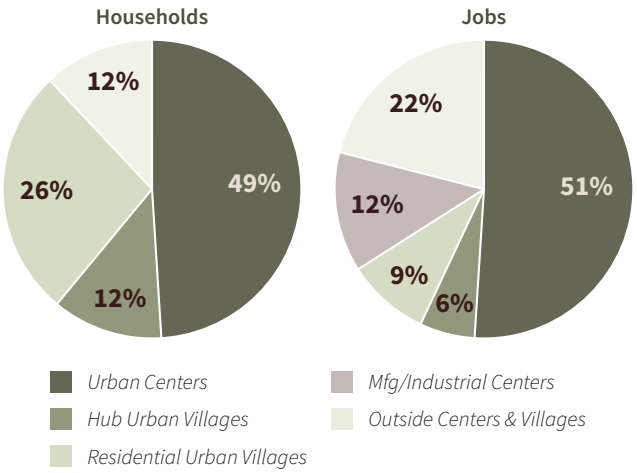
- No change in the number, designation or size of urban villages.
- More growth in urban centers, especially in Downtown, First/ Capitol Hill and Northgate and South Lake Union.
- Less growth outside urban centers, including the least emphasis on hub urban village growth.
- More mid- and high-rise housing is likely to occur than under other alternatives, given the more concentrated growth patterns.
- A higher concentration of jobs in urban centers, especially Downtown, Northgate and South Lake Union.

Figure 2–1 Summary of alternatives (cont.)

Alternative 3

Guide Growth to Urban Villages near Light Rail

An emphasis on growth in urban centers, but also in urban villages near the light rail stations. Would include boundary adjustments to urban villages with light rail stations to encompass a 10-minute walk to the station. A new village could be designated at 130th St/I-5 and ~~possible~~ reconfiguration of the Mount Baker and 23rd & Union-Jackson urban villages near the I-90 East Link Station ~~would~~ may occur.

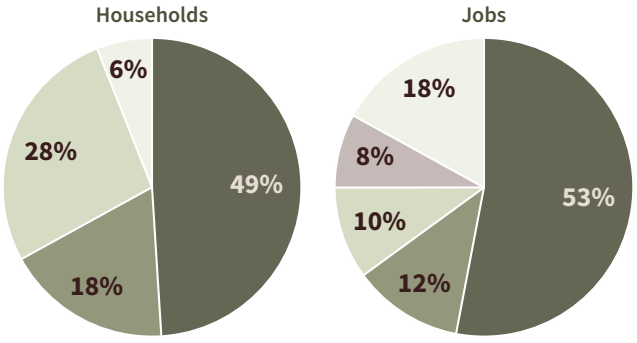


- Larger share of growth and expanded urban village boundaries near light rail stations (Mount Baker, Columbia City, North Beacon Hill, Othello, Rainier Beach, Roosevelt).
- Possible new residential urban village around the North Link 130th Street Station and possible reconfiguration of the Mount Baker and 23rd & Union-Jackson urban villages near the I-90 East Link station.
- An intermediate level of growth in urban centers that is less concentrated than assumed for Alternative 2.
- A relatively smaller share of growth in urban villages without light rail, comparable to Alternative 2.

Alternative 4

Guide Growth to Urban Villages near Transit

The greatest number of transit-oriented places—served by either bus or rail—that are preferred for growth. In addition to areas covered in Alternative 3, more growth would also be concentrated in other urban villages that currently have very good bus service. Relatively more urban villages would be subject to increased growth and possible boundary changes.



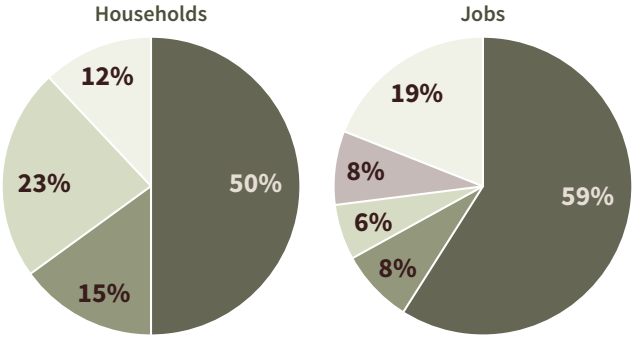
- Includes the higher-growth assumptions and expanded urban village boundaries of Alternative 3 (to capture 10-minute walksheds), and the addition of other selected areas that have very good bus service. These include areas are located in the western half of the city (Ballard, Fremont, West Seattle Junction and Crown Hill).
- Three of the four added areas are hub urban villages, which defines this alternative as having the greatest emphasis on growth in the hub urban villages.
- This assumes a smaller share of residential growth would occur outside centers and villages than all of the other alternatives.

Figure 2–1 Summary of alternatives (cont.)

Alternative 5, Preferred Alternative

Guide Growth to Urban Villages near Transit

Similar to Alternative 4, growth would be guided toward urban villages with light rail transit stations and very good bus service and the greatest number of transit-oriented places are preferred for growth. Compared to Alternative 4, relatively less residential growth would be guided toward urban villages, but some urban village boundaries would be expanded to encompass a ten-minute walk-shed from light rail stations or bus transit nodes.



- Includes the same expanded urban village boundaries of Alternative 4 except omission of the Fremont expansion area.
- Compared to the other alternatives, intermediate amount of residential growth guided within and outside of the urban centers and villages.
- Guides more employment growth to the urban centers than alternatives 3 and 4 and an intermediate amount of growth to the urban villages, relative to the other alternatives.

Planning Area

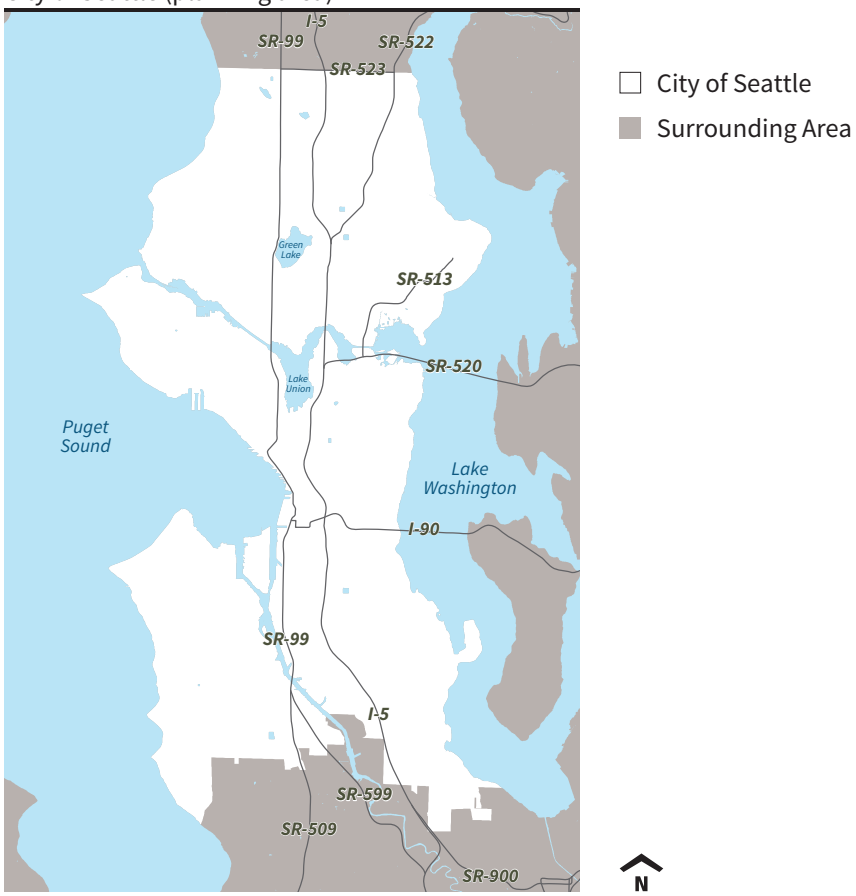
The proposal applies to the entire City of Seattle, as shown in Figure 2–2 on the following page. The City encompasses approximately 83 square miles, or 53,182 acres. The City is bounded on the west by Puget Sound, the east by Lake Washington, the north by the cities of Shoreline and Lake Forest Park and the south by unincorporated King County and the cities of Burien and Tukwila.

Objectives of the Proposal

The City's objectives for this proposal include:

- Retaining the urban village strategy and achieving a development pattern in line with it
- ~~Leverage growth~~ Seek to create a variety of housing choices and to promote healthy, complete communities
- Create jobs and economic opportunity for all city residents
- Build on regional transportation investments and balance transportation investments
- Support strategic public investment that addresses areas of need and maximizes public benefit
- Become a more climate-friendly city
- Distribute the benefits of growth more equitably

Figure 2–2
City of Seattle (planning area)



2.2 Planning Context

Seattle Comprehensive Plan

The Seattle Comprehensive Plan, *Toward a Sustainable Seattle*, is a 20-year plan that provides guidance for how Seattle will accommodate growth in a way that is consistent with the vision of the residents of the City. As a policy document, the plan lays out general guidance for future City actions. The City implements the plan through development and other regulations, primarily found in the City's zoning map and land use code. The City may also use functional plans to implement the policies in the Comprehensive Plan.

Consistent with the Washington Growth Management Act (GMA), the City adopted the Comprehensive Plan in 1994. Since then, it has been updated in an annual cycle of amendments, and in "periodic reviews" in 2004 and again in 2015. As part of the 2015 annual amendments, the City expects to adopt ~~King County's~~ an allocation that the City accommodate 70,000 new housing units and 115,000 new jobs through 2035.

The City's Comprehensive Plan consists of thirteen major elements:

1. Urban Village
2. Land Use
3. Transportation
4. Housing
5. Capital Facilities
6. Utilities
7. Economic Development
8. Neighborhood Planning
9. Human Development
10. Cultural Resource
11. Environment
12. Container Port
13. Urban Design

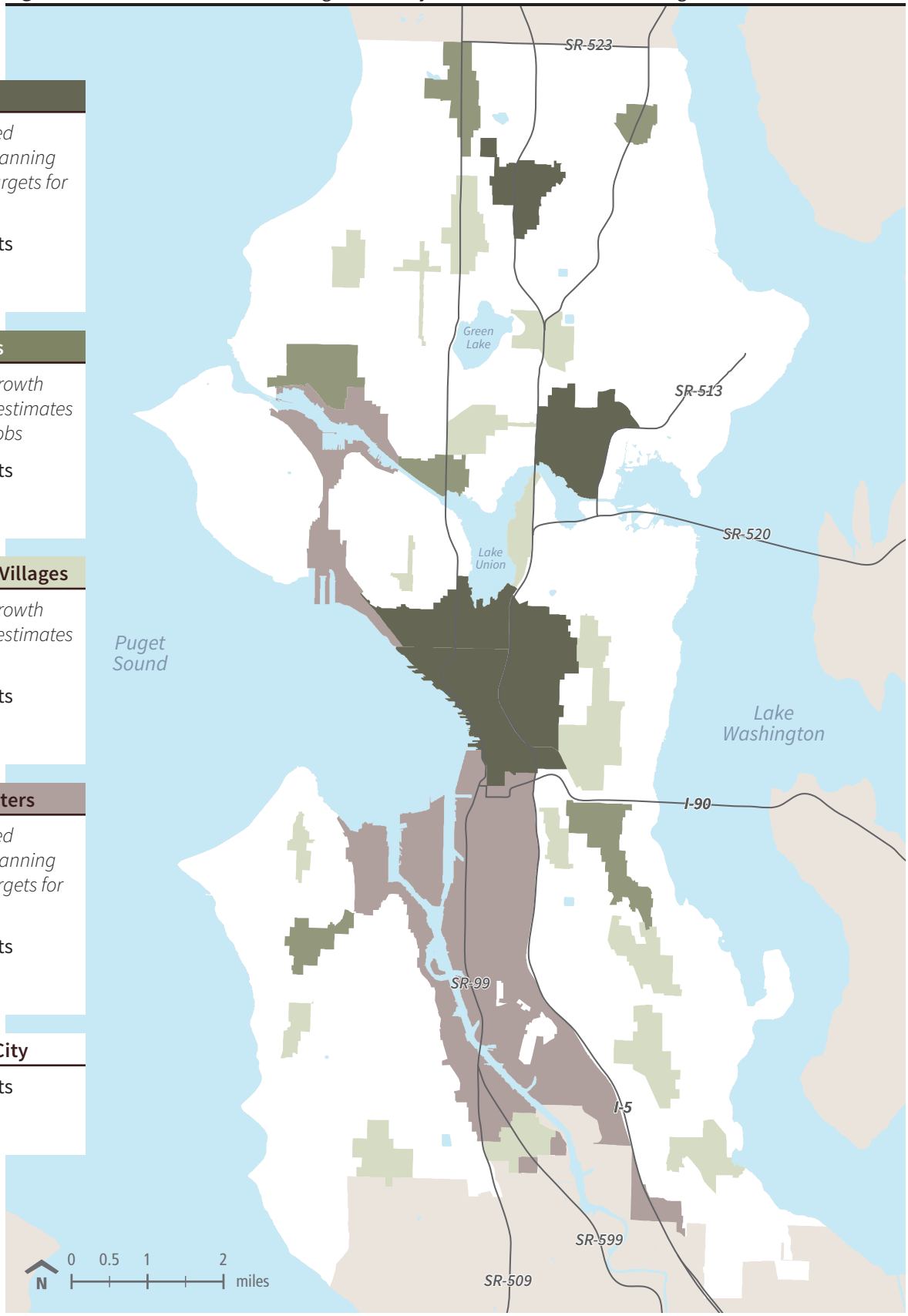
~~All~~ Many of these elements will be reviewed and updated as part of the proposal, in order to promote achievement of the City's overall Comprehensive Plan objectives. Note that no changes are proposed to the Container Port and Shoreline Management elements. The latter would be moved from its current place in the Land Use Element into its own new element.

URBAN VILLAGES

The urban village strategy is the foundation of the Comprehensive Plan and has shaped the planned pattern of future growth in the City. Four categories of growth areas are identified as shown in Figure 2–3: urban centers, manufacturing/industrial centers, hub urban villages and residential urban villages. Each urban village type has a different function and character, varying amounts and intensity of growth and different mixes of land uses. The Urban Village Element of the adopted Comprehensive Plan describes their differences:

1. **Urban centers** are the densest neighborhoods in the city and are both regional centers and neighborhoods that provide a diverse mix of uses, housing and employment opportunities. Larger urban centers are divided into urban center villages to recognize the distinct character of different neighborhoods within them.
2. **Manufacturing/industrial centers** are home to the city's thriving industrial businesses. As with urban centers, manufacturing/industrial centers are regional designations and are an important regional resource.
3. **Hub urban villages** are communities that provide a balance of housing and employment, generally at densities lower than those found in urban centers. These areas provide a focus of goods, services and employment to communities that are not close to urban centers.
4. **Residential urban villages** provide a focus of goods and services for residents and surrounding communities but do not typically provide a concentration of employment.

Figure 2–3 2015 Seattle housing units and jobs in urban centers and villages



FUTURE LAND USE MAP

The Future Land Use Map (FLUM) is a required part of the Comprehensive Plan that shows the locations of the urban villages and where different categories of designated uses, such as single family, multifamily, mixed-use, commercial and industrial are expected to occur. The FLUM is discussed in the Land Use Element of the Comprehensive Plan. The land use designations shown on the FLUM are implemented through the City's Official Zoning Map and Land Use Code. Please see Figure 2–5 for the current Comprehensive Plan Future Land Use Map.

PLANNING ESTIMATES FOR GROWTH

The proposal considered in this EIS assumes the citywide planning estimates for growth for the period from 2015 through 2035 of 70,000 new housing units and 115,000 new jobs (see Figure 2–4). In addition, the sensitivity analysis considered in this Final EIS assumes a higher growth rate than was considered in the Draft EIS. For the purpose of analysis in this EIS, planning estimates for growth are also assumed for each urban village, as described in Section 2.3.

Figure 2–4
Planning estimates for growth

DEVELOPMENT CAPACITY

Development capacity, also referred to as zoned development capacity or zoned capacity, is an estimate of how much new development could occur theoretically over an unlimited time period. It represents the difference between the amount of development on the land today and the likely amount that could be built under current zoning. Because the city has many different zones, there are specific assumptions for each zone. Residential development capacity is expressed in number of units and non-residential development capacity is expressed as number of jobs.

As shown in Table 2–2 on the following page, the existing urban centers, urban villages and manufacturing/industrial centers collectively have development capacity for 172,475 housing units and 217,172 jobs. Other capacity also exists outside these areas.

Figure 2–5 Current Comprehensive Plan Future Land Use Map

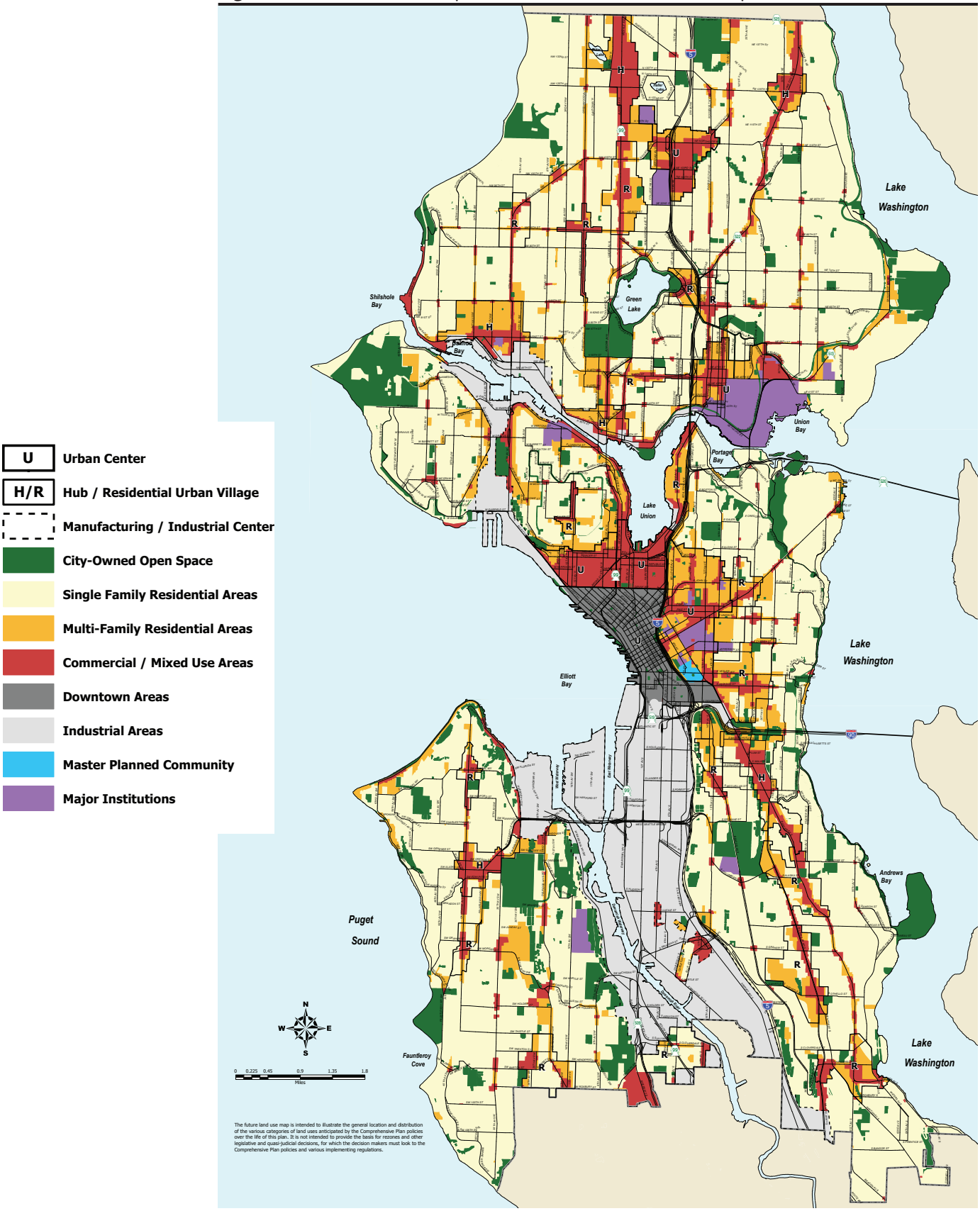


Table 2–2 Urban village development capacity

	Housing Units	Jobs
Urban Centers		
Downtown	33,512	51,764
First/Capitol Hill	19,009	3,186
University District	8,933	10,491
Northgate	10,966	14,089
South Lake Union	20,277	25,418
Uptown	4,165	4,900
Total	**96,862**	**109,848**
Hub Urban Villages		
Ballard	5,314	5,606
Bitter Lake	10,521	19,391
Fremont	1,677	515
Lake City	4,282	5,395
Mount Baker	9,276	12,868
West Seattle Junction	5,157	5,663
Total	**36,227**	**49,438**
Residential Urban Villages		
23rd & Union-Jackson	4,381	2,072
Admiral	817	66
Aurora-Licton Springs	4,072	6,099
Columbia City	3,405	1,824
Crown Hill	1,556	175
Eastlake	1,100	186
Green Lake	774	292
Greenwood-Phinney Ridge	2,295	1,395
Madison-Miller	1,493	702
Morgan Junction	583	40
North Beacon Hill	1,952	786
Othello	4463	4,001
Upper Queen Anne	848	46
Rainier Beach	4,362	751
Roosevelt	2,814	1,930
South Park	1,115	1,095
Wallingford	1,857	233
Westwood-Highland Park	1,499	149
Total	**39,386**	**21,842**
Mfg/Industrial Centers		
Greater Duwamish		27,797
Ballard-Interbay-Northend		8,247
Total		**36,044**
Total Development Capacity of Centers and Villages	**172,475**	**217,172**

Source: City of Seattle Office of Planning and Community Development, 2014.

Existing Zoning

Seattle Municipal Code Title 23 establishes general zoning classifications for land uses in the City. These can be broadly categorized into five major classifications, listed below:

- Single Family Residential
- Multi-family Residential
- Commercial
- Industrial
- Downtown

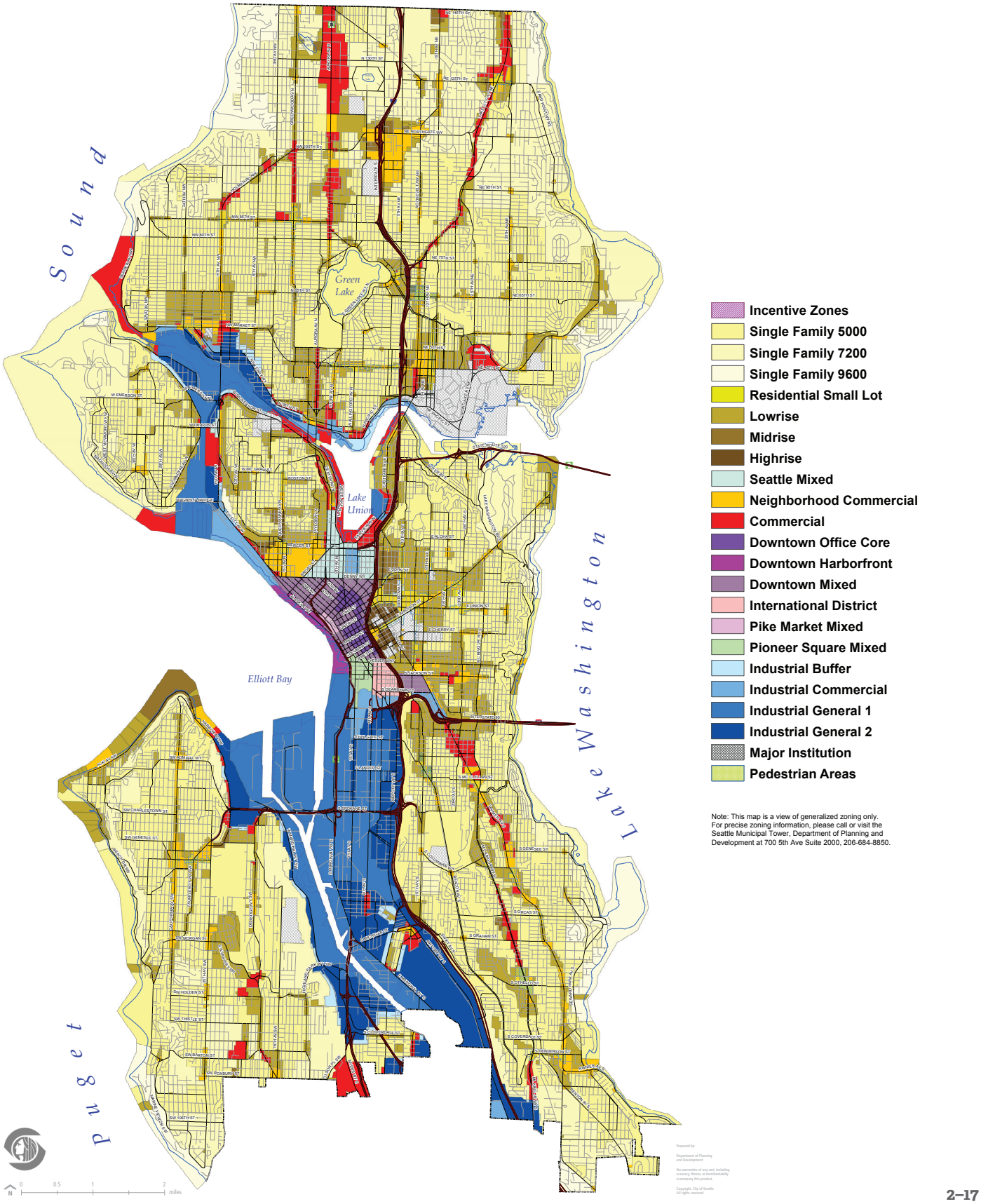
See the existing Zoning Map, Figure 2–6.

Public Outreach

The City's public outreach effort for the ~~2015~~ 2016 Comprehensive Plan update ~~is~~ intend~~s~~ed to build awareness of the project, identify issues that people are concerned about, highlight key decisions to be made and collect feedback on the different patterns of growth that are being studied. As described in the *Community Engagement Progress Report* (February 2016) ~~2013–2014~~, the City's early public engagement efforts have focused on both in-person and online strategies. Some of these are briefly summarized below:

- Open house format meetings at City Hall and other community locations, including nine community meetings with Public Outreach and Engagement Liaisons (POELs) in traditionally under-represented communities. Small meetings were held in six cultural communities: Oromo, Amharic, Cambodian, Filipino, Latino and African American.
- Partnerships with other organizations to produce lectures and panel discussions to highlight issues and invite discussion. Whenever possible an open house was held at the venue prior to the event, where people could talk with city staff. The Seattle Channel filmed events so video was available online for those unable to attend.
- Seven topic-based information sessions focused on specific elements of the Comprehensive Plan.
- One-on-one discussions and briefings to stakeholders
- Information tables at community and other public events where people gather
- A Seattle 2035 display with general information and engaging graphics was installed at six high traffic community locations such as libraries and recreation centers.
- An online branded website was created for the Comprehensive Plan update containing project information, calendar and a comment tool.
- Social media outreach through Twitter and Facebook provided general information about Seattle 2035, previews of the process and articles related to Seattle planning issues.

Figure 2–6 City of Seattle generalized zoning



Interactive Seattle 2035 display.

Following release of the Draft EIS (May 2015), outreach efforts focused on building awareness of the Draft EIS, sharing key findings and inviting comments. Major activities included:

- Information tables and materials at 13 major Seattle events, community meetings and neighborhood centers.
- Draft EIS open house and public hearing, including broadcast by the Seattle Channel on television and online.
- Seattle 2035 online open house and online survey, which presented key pieces of the Draft EIS and invited formal comment on the Draft EIS as well as more informal comment through the online survey
- Social media outreach through Facebook, Twitter, Reddit, and NextDoor to provide broad public awareness of the Draft EIS availability and how to provide comments.
- Email updates and notifications through the Seattle2035 listserv and Key Connectors from the Seattle 2035 project inbox
- Updates to the Seattle 2035 website providing information about the Draft EIS, upcoming events and links to the online open house

With release of the Draft Comprehensive Plan in July 2015, outreach efforts focused primarily on building awareness of the Draft Plan and public comment period, sharing information about key elements of the Draft Plan and inviting online and in-person comments. Key activities included:

- Five public open houses located throughout the City in the Capitol Hill, Ballard, West Seattle, Rainier Valley and Northgate neighborhoods.
- Online engagement through Consider.IT and continued outreach through social media platforms.
- Email updates and notifications to the Seattle 2035 listserv and Key Connectors from the Seattle2035 project inbox.
- Use of the Seattle 2035 website as a clearinghouse for Draft Plan information.

Active public outreach will continue to be an integral part of the comprehensive plan update planning process. Additional information about public outreach may be found in the *Seattle 2035 Community Engagement Progress Report* (February 2016 ~~January 2015~~), and at http://2035.seattle.gov/resources/.

Branded website for the Comprehensive Plan update containing project information, calendar and a comment tool.

ENVIRONMENTAL SCOPING

Specific to this EIS, the City requested public comment on the topics to be addressed in this EIS through a formal public scoping process. A scoping notice was issued on October 17, 2013 and the public comment period continued through April 7, 2014. During this period an informational meeting to describe the EIS process, including proposed topics for analysis, and to ask for comments on issues that should be considered in the EIS was held. Following issuance of the Draft EIS~~, a public comment period and public hearing will be held to invite comment on the document~~ a 45-day public comment period extended from May 4, 2015 through June 17, 2015. A Draft EIS public hearing was held on May 27, 2015 and an online open house was conducted during the entire 45-day comment period.

2.3 Proposed Action and Alternatives

The City ~~has~~ identified four alternatives for consideration in ~~this~~ the Draft EIS, and an additional alternative in this Final EIS. The alternatives are structured to evaluate differing levels of growth emphases that may occur in various areas of the city, and with differing levels of resulting land use intensities. Each alternative emphasizes different patterns of projected future growth amount and intensity among the urban centers, urban villages and areas well-served by transit~~-related areas~~.

- **Alternative 1, Continue Current Trends (No Action),** would plan for a continuation of current growth policies associated with the Urban Village Strategy along with a continuation of assumed trends that distribute growth among all of the urban centers and urban villages.
- **Alternative 2, Guide Growth to Urban Centers,** prioritizes greater growth concentrations into the six existing urban centers—Downtown, First/Capitol Hill, University District, Northgate, South Lake Union and Uptown.

The emphasis in alternatives 3 and 4 is on providing opportunity for more housing and employment growth in areas closest to existing and planned very good transit service. Specifically:

- **Alternative 3, Guide Growth to Urban Villages near Light Rail,** prioritizes greater growth concentrations around existing and planned light rail transit stations.
- **Alternative 4, Guide Growth to Urban Villages near Transit,** prioritizes greater growth concentrations around light rail stations and in urban villages with very good bus service ~~specific areas along priority bus transit routes~~.

A **walkshed** *is the distance that the average person is able to walk in ten minutes (about one-half mile).*

The boundaries of the existing urban villages would remain unchanged under both alternatives 1 and 2. Alternatives 3 and 4 and the Preferred Alternative evaluate ~~would result in~~ expansions to some urban village boundaries and the possible designation of one new urban village (at NE 130th Street/Interstate 5) in order to encompass a 10-minute walkshed around existing/planned future light rail stations and ~~priority~~ areas with very good transit service ~~routes~~. "Very good transit service" for this purpose means the presence of either a light rail station or a Rapid Ride line plus at least one other frequently-served bus route.

PREFERRED ALTERNATIVE

For this Final EIS, the City has identified a Preferred Alternative. Compared to the Draft EIS Alternatives, the Preferred Alternative is most similar to Alternative 4 in that it guides growth toward urban villages and centers with light rail stations and to places with very good transit service. The Preferred Alternative also seeks to address the equity and displacement issues identified in public comment and the Growth and Equity Analysis. In order to reduce the potential for displacement, the Preferred Alternative reduces the amount of

growth proposed to be guided toward several of the urban villages where the equity analysis showed a high risk of displacement and low access to opportunity, and distributes this growth to other urban villages and to the area outside of the urban villages. Compared to Alternative 4 (the most similar alternative), the Preferred Alternative would:

- Guide less residential growth to the urban villages, with the Mount Baker, West Seattle Junction, Columbia City, Crown Hill, Othello, North Beacon Hill, Rainier Beach and Roosevelt urban villages proposed for the greatest reductions in residential growth.
- Guide more employment growth to some urban centers and less employment to several urban villages, including Ballard, Mount Baker, Othello and Roosevelt.
- Have the same urban village expansion areas as Alternative 4, except that the Fremont expansion area in Alternative 4 is omitted in the Preferred Alternative.

~~The~~ All of the alternatives and their associated land use actions are further described below.

Alternative 1: Continue Current Trends (No Action)

Alternative 1, No Action, accommodates future growth by continuing to employ the Urban Village Strategy as over the past twenty years. This approach would encourage a substantial portion of residential and employment growth to locate in existing urban centers, an intermediate amount to hub urban villages and somewhat lesser amounts to most of the residential urban villages.

The continuation of growth trends and planning approaches is projected to lead to a broad distribution of growth across the designated urban centers and urban villages as well as in areas beyond. As they evolve, the urban centers and urban villages will continue to become more intensively developed with more residences and more retail and commercial establishments providing goods, services and amenities.

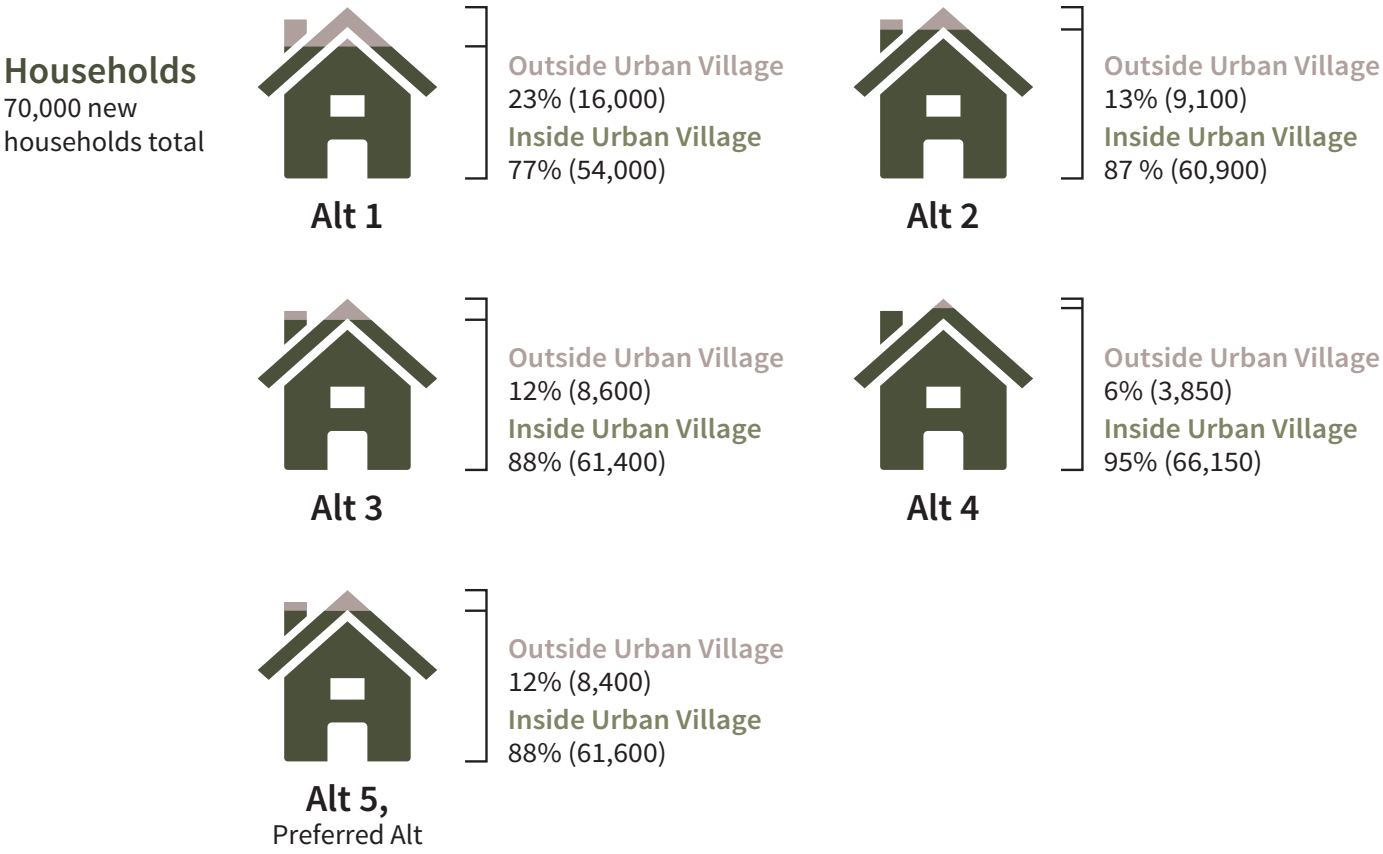
No changes to current urban village boundaries are proposed, as shown in Figure 2–8, Figure 2–9 and Figure 2–10. About 77 percent of new residential and employment growth is projected to occur within urban centers and urban villages, and 23 percent outside of the centers and villages. Compared to the other alternatives, Alternative 1 has the largest proportion of growth projected to occur outside the urban villages overall (see Figure 2–7).

Alternative 1 planning estimates of residential and employment growth for each of the designated urban centers and urban villages are shown in Table 2–3 (housing) and Table 2–4 (employment).

DEVELOPMENT CHARACTER

Under Alternative 1, the types, character and relative geographic distribution of future development are expected to occur in ways similar to that experienced over the past 20

Figure 2–7 Growth inside and outside of urban villages



years. Over time, residential and non-residential densities and intensities would continue to increase in the urban centers and urban villages. Outside of the urban centers and urban villages, growth and development would also continue, consistent with past growth patterns.

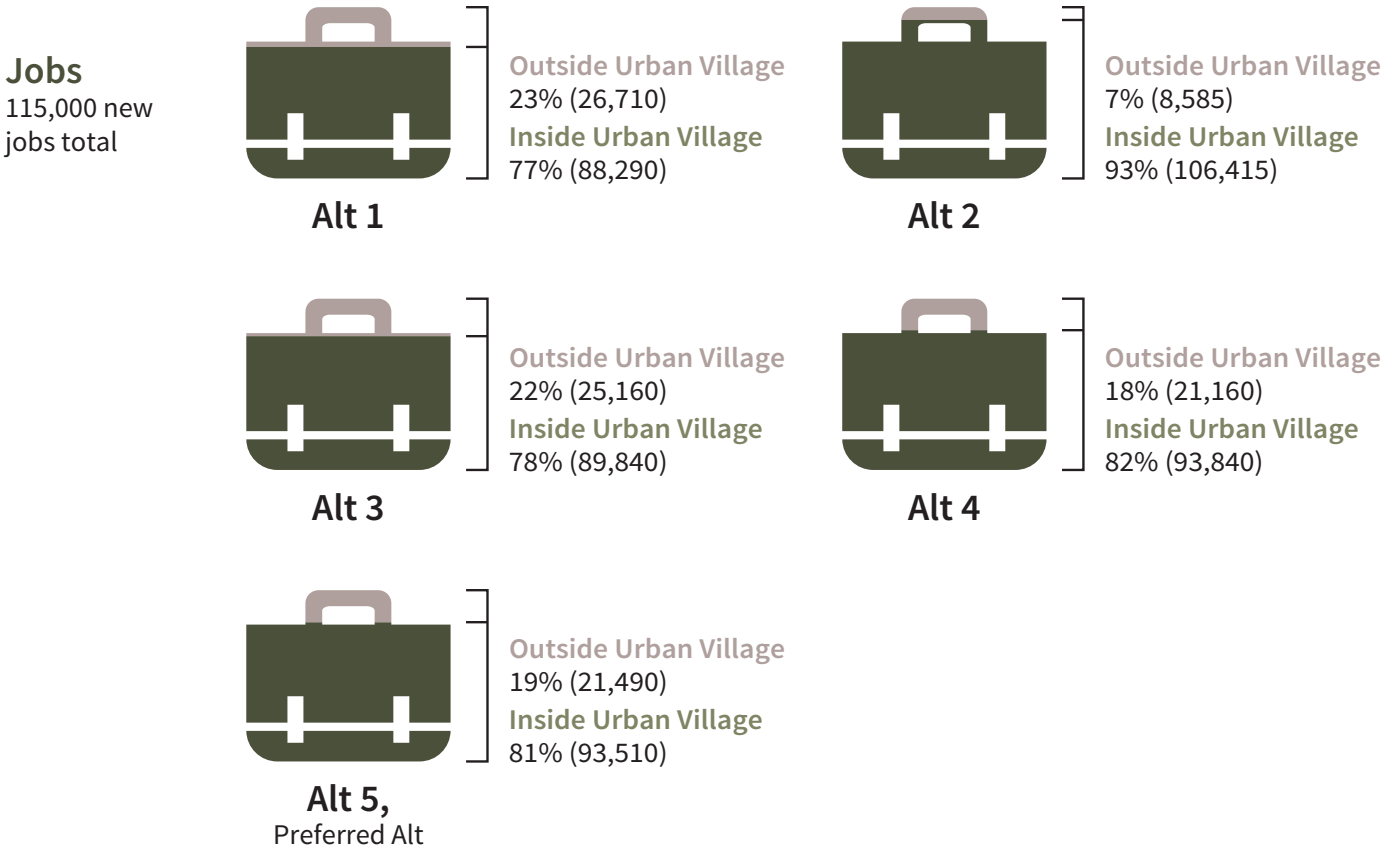
FUTURE LAND USE MAP

No changes to Future Land Use Map boundaries are proposed (as noted previously and shown in Figure 2–8).

POLICY AND REGULATORY AMENDMENTS

As shown in Table 2–5 on page 2–40, no amendments to the Land Use Code or other regulations are required to implement Alternative 1.

Figure 2–7 Growth inside and outside of urban villages (cont.)



Alternative 2: Guide Growth to Urban Centers

Under Alternative 2, future growth would be focused in the six existing urban centers to a greater degree than the other alternatives, with about 66 percent of new residential growth and 72 percent of new jobs projected to occur in the urban centers. Alternative 2 would result in the most concentrated growth pattern of any alternative, emphasizing a denser "center city" core which includes Downtown, First/Capitol Hill, South Lake Union and Uptown. Denser mixed-use cores in the University District and Northgate would also occur.

Alternative 2 planning estimates of residential and employment growth for each of the designated urban centers and urban villages are shown in Table 2–3 (housing) and Table 2–4 (employment).

DEVELOPMENT CHARACTER

Under Alternative 2, relatively high density and high intensity development would occur in urban centers. Here, most new housing would be mid- and high-rise buildings with some low-rise, all primarily on properties that currently have low-density development.

In areas outside of the urban villages, the overall type, character and distribution of future development are likely to remain comparable to today's patterns, with a prevalence of relatively low-rise, small scale development. Given the greater emphasis on dense urban center growth, a lesser amount of growth is projected to occur in the urban villages and places outside urban villages and centers. This could result in growth that in many places could be perceived as a slower pace of change than has occurred over the past twenty years.

FUTURE LAND USE MAP

No changes to Future Land Use Map boundaries are proposed (as noted previously and shown in Figure 2–8, Figure 2–9 and Figure 2–10).

POLICY AND REGULATORY AMENDMENTS

As shown in Table 2–5 on page 2–40, implementing actions under Alternative 2 to encourage focused growth in urban centers may include increased zoning flexibility and development incentives and focused public investments to support increased livability.

Figure 2–8 Urban village boundaries under alternatives 1 and 2

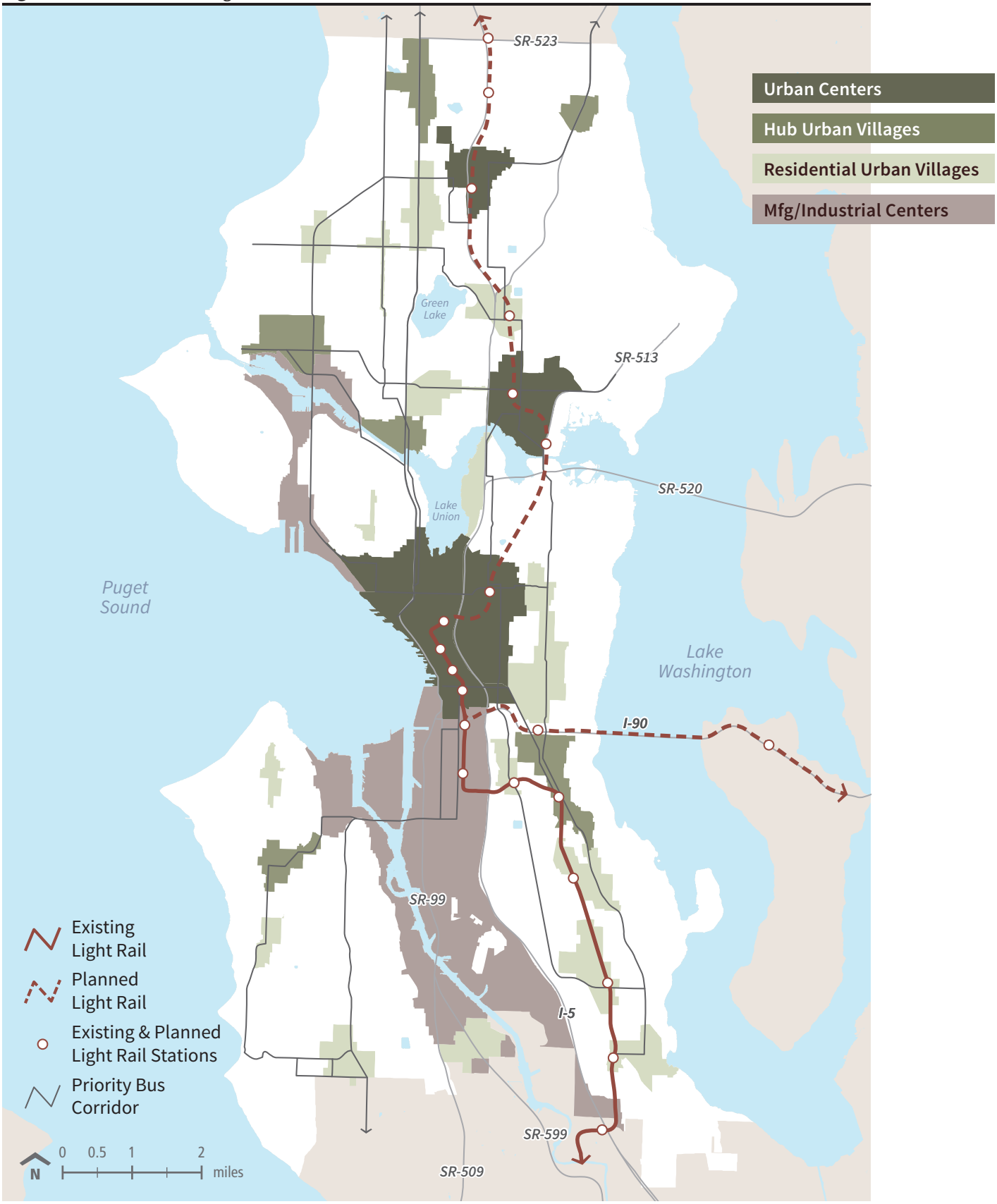


Figure 2–9 Urban village boundaries under alternatives 1 and 2 (north)

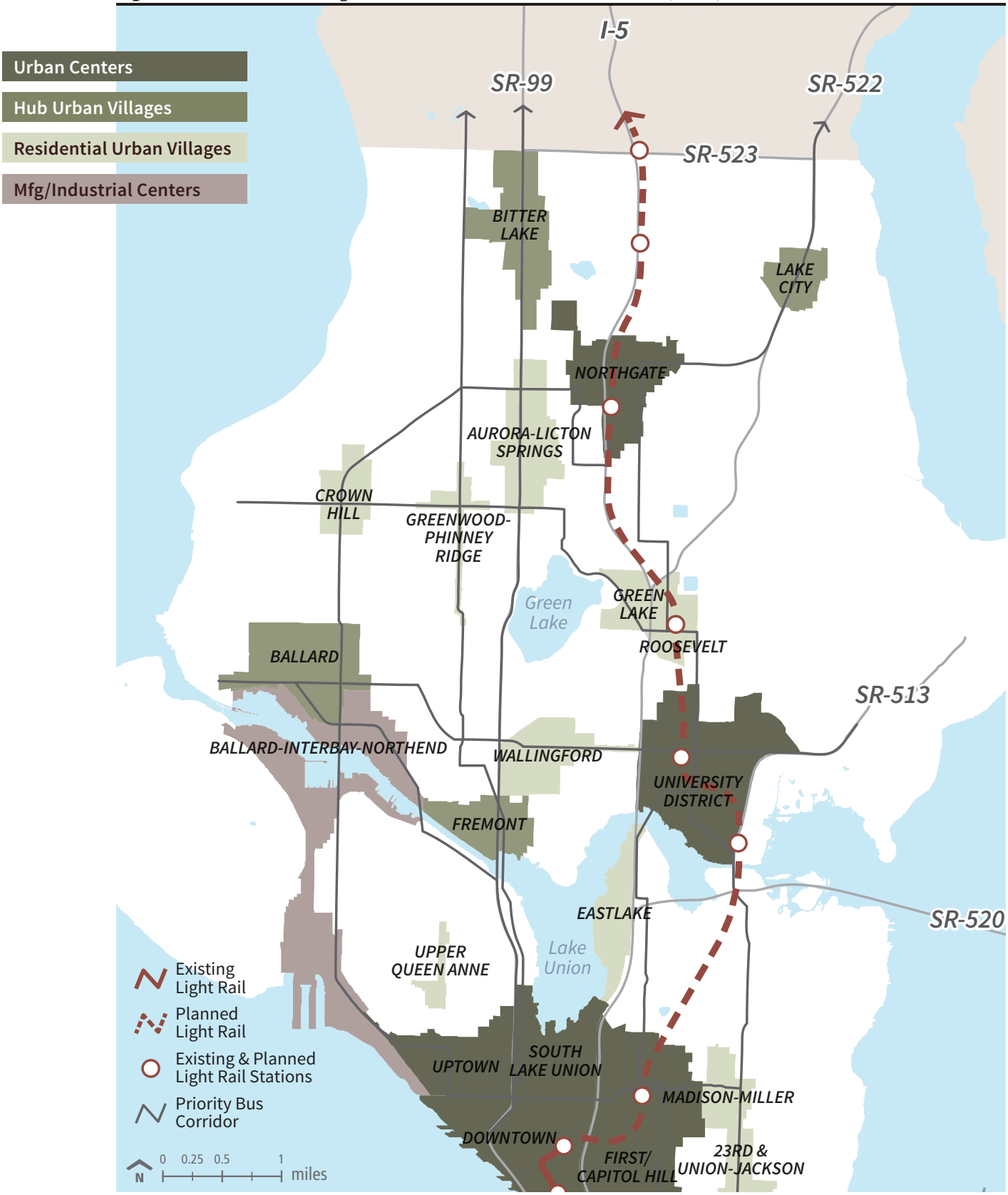


Figure 2–10 Urban village boundaries under alternatives 1 and 2 (south)

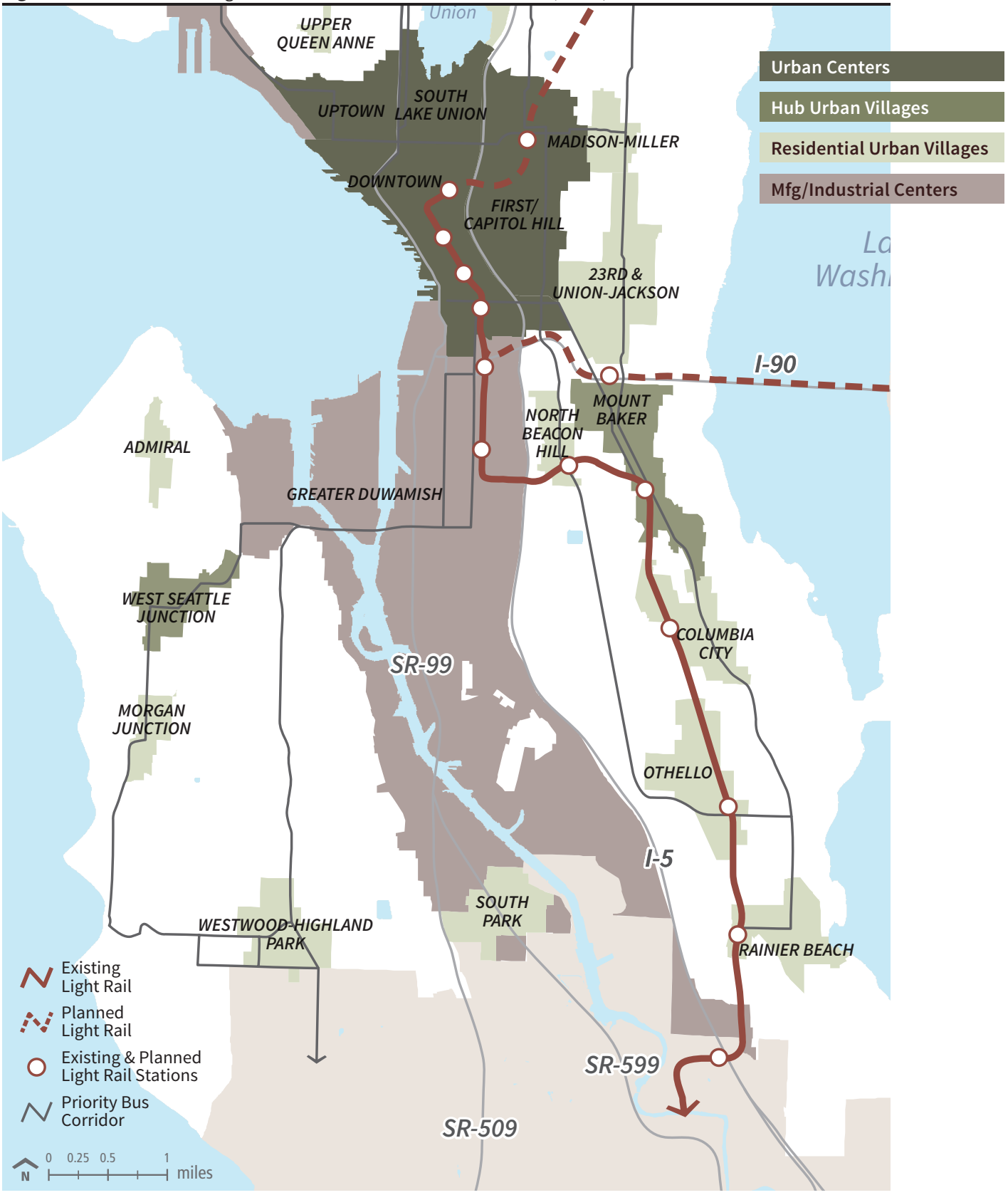


Table 2–3 Housing growth assumption

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5, Preferred Alt
Urban Centers					
Downtown	10,000	15,000	12,000	12,000	12,000
First/Capitol Hill	7,000	8,000	6,000	6,000	6,000
University District	2,700	4,000	3,500	3,500	3,500
Northgate	1,600	5,000	3,000	3,000	3,000
South Lake Union	4,700	12,000	8,000	7,500	7,500
Uptown	3,500	2,500	2,000	2,000	3,000
Total	**29,500 (42%)**	**46,500 (66%)**	**34,500 (49%)**	**34,000 (49%)**	**35,000 (50%)**
Hub Urban Villages					
Ballard	3,000	1,500	1,500	3,000	3,000
Bitter Lake	2,100	1,000	1,000	1,000	1,300
Fremont	900	700	700	1,300	1,300
Lake City	1,400	1,000	1,000	1,000	1,000
Mount Baker	700	800	3,000	3,500	1,500
West Seattle Junction	1,400	1,200	1,250	3,000	2,300
Total	**9,500 (14%)**	**6,200 (9%)**	**8,450 (12%)**	**12,800 (18%)**	**10,400 (15%)**
Residential Urban Villages					
23rd & Union-Jackson	2,200	600	1,750	1,750	2,700
Admiral	200	200	300	300	350
Aurora-Licton Springs	2,500	500	700	700	1,000
Columbia City	2,200	800	2,700	2,700	1,300
Crown Hill	100	300	300	1,200	650
Eastlake	800	300	300	300	800
Green Lake	500	500	700	700	800
Greenwood-Phinney Ridge	700	600	600	600	500
Madison-Miller	1,100	500	500	500	850
Morgan Junction	300	300	300	300	400
North Beacon Hill	200	500	1,500	1,500	750
Othello	1,700	800	2,500	2,500	850
Upper Queen Anne	600	300	300	300	500
Rainier Beach	100	500	1,500	1,500	450
Roosevelt	400	300	1,500	1,500	800
South Park	200	300	300	300	400
Wallingford	800	600	600	600	950
Westwood-Highland Park	400	300	600	600	650
Total	**15,000 (21%)**	**8,200 (12%)**	**16,950 (24%)**	**17,850 (26%)**	**14,700 (21%)**
New Residential Urban Villages					
130th/I-5			1,500	1,500	1,500

Source: City of Seattle Office of Planning and Community Development, 2016.

Table 2–4 Employment growth assumptions

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5, Preferred Alt
Urban Centers					
Downtown	30,000	33,000	25,000	30,000	35,000
First/Capitol Hill	4,000	7,000	5,000	5,000	3,000
University District	8,000	8,000	4,000	4,000	5,000
Northgate	5,000	11,000	7,500	7,500	8,000
South Lake Union	20,000	20,000	15,000	12,000	15,000
Uptown	3,500	3,500	2,000	2,000	2,000
Total	**70,500 (61%)**	**82,500 (72%)**	**58,500 (51%)**	**60,500 (53%)**	**68,000 (59%)**
Hub Urban Villages					
Ballard	2,500	1,200	1,200	4,000	3,000
Bitter Lake	1,500	500	800	2,000	2,000
Fremont	400	400	400	400	400
Lake City	1,500	900	900	1,200	600
Mount Baker	1,000	800	3,200	3,200	2,000
West Seattle Junction	800	600	800	2,500	1,600
Total	**7,700 (7%)**	**4,400 (4%)**	**7,300 (6%)**	**13,300 (12%)**	**9,600 (8%)**
Residential Urban Villages					
23rd & Union-Jackson	400	400	1,200	1,200	1,000
Admiral	50	75	50	50	50
Aurora-Licton Springs	400	400	400	1,000	600
Columbia City	1,400	600	1,400	1,400	800
Crown Hill	150	150	150	150	100
Eastlake	150	150	150	150	100
Green Lake	250	250	250	250	150
Greenwood-Phinney Ridge	400	400	400	600	500
Madison-Miller	500	500	500	500	500
Morgan Junction	30	30	30	30	30
North Beacon Hill	150	150	500	500	300
Othello	600	300	2,000	2,000	800
Upper Queen Anne	30	30	30	30	30
Rainier Beach	300	300	600	600	500
Roosevelt	400	400	1,600	1,600	500
South Park	100	100	100	300	300
Wallingford	180	180	180	180	150
Westwood-Highland Park	100	100	100	100	100
Total	**5,590 (5%)**	**4,515 (4%)**	**9,640 (8%)**	**10,640 (9%)**	**6,510 (6%)**
New Residential Urban Villages					
130th/I-5			400	400	400
Mfg/Industrial Centers					
Greater Duwamish	3,000	12,000	11,000	6,000	6,000
Ballard-Interbay-Northend	1,500	3,000	3,000	3,000	3,000

Source: City of Seattle Office of Planning and Community Development, 2016.

Alternative 3: Guide Growth to Urban Villages near Light Rail

Transit oriented development (TOD) *is typically described as a relatively high-density mixed use community that is centered around and within walking distance to a public transit station.*

Under Alternative 3, future growth would be accommodated primarily as transit-oriented development (TOD) with increased densities in areas around existing and planned light rail transit stations. Selected urban village boundaries near light rail stations would be expanded (see more details below). Future growth would also be concentrated in all urban centers, but at lower levels of intensity than Alternative 2 (see Figure 2–7).

Alternative 3 planning estimates of residential and employment growth for each of the urban centers and urban villages are shown in Table 2–3 (housing) and Table 2–4 (employment).

DEVELOPMENT CHARACTER

Under Alternative 3, the growth anticipated in urban centers would likely be a mix of mid- and high-rise development while growth in transit-oriented development nodes would likely be mid-rise. Growth in the hub urban villages would likely be mid-rise development while growth in the residential urban villages would likely be a mix of low-and mid-rise.

Areas of expanded or new urban villages would likely convert from existing lower intensity to higher intensity development. For example, if a light rail station is planned for an area currently zoned predominantly single-family, future land use actions would likely rezone the areas within a ¼ or ½ mile of the station to accommodate low-rise multifamily and possibly local-serving commercial uses.

In areas outside of the urban villages, the overall development character and pattern would likely remain as currently exists.

FUTURE LAND USE MAP

Alternative 3's proposed expansion of selected urban village boundaries to cover ten-minute walksheds of existing and planned light rail stations would affect portions of the Mount Baker Hub Urban Village and the 23rd & Union-Jackson, Columbia City, North Beacon Hill, Rainier Beach, Roosevelt and Othello residential urban villages. These changes would align with the TOD planning concept that encourages the most intensive development of locations that are in reasonable walking distance of high-capacity rail transportation stations. In addition, one possible new urban village included in Alternative 3 could be located around the NE 130th Street station. Although specific boundaries for the added and new urban village areas have not yet been defined, the approximate areas of proposed expansions and new villages are shown in Figure 2–11, Figure 2–12 and Figure 2–13.

The majority of the urban village boundaries would remain unchanged under this alternative. These include the hub urban villages of Ballard, Bitter Lake, Fremont, Lake City and West Seattle Junction and the residential urban villages of Admiral, Aurora-Licton Springs, Crown Hill, Eastlake, Green Lake, Greenwood-Phinney Ridge, Madison-Miller, Morgan Junction, Upper Queen Anne, South Park, Wallingford and Westwood-Highland Park.

Figure 2–11 Urban village boundaries under Alternative 3

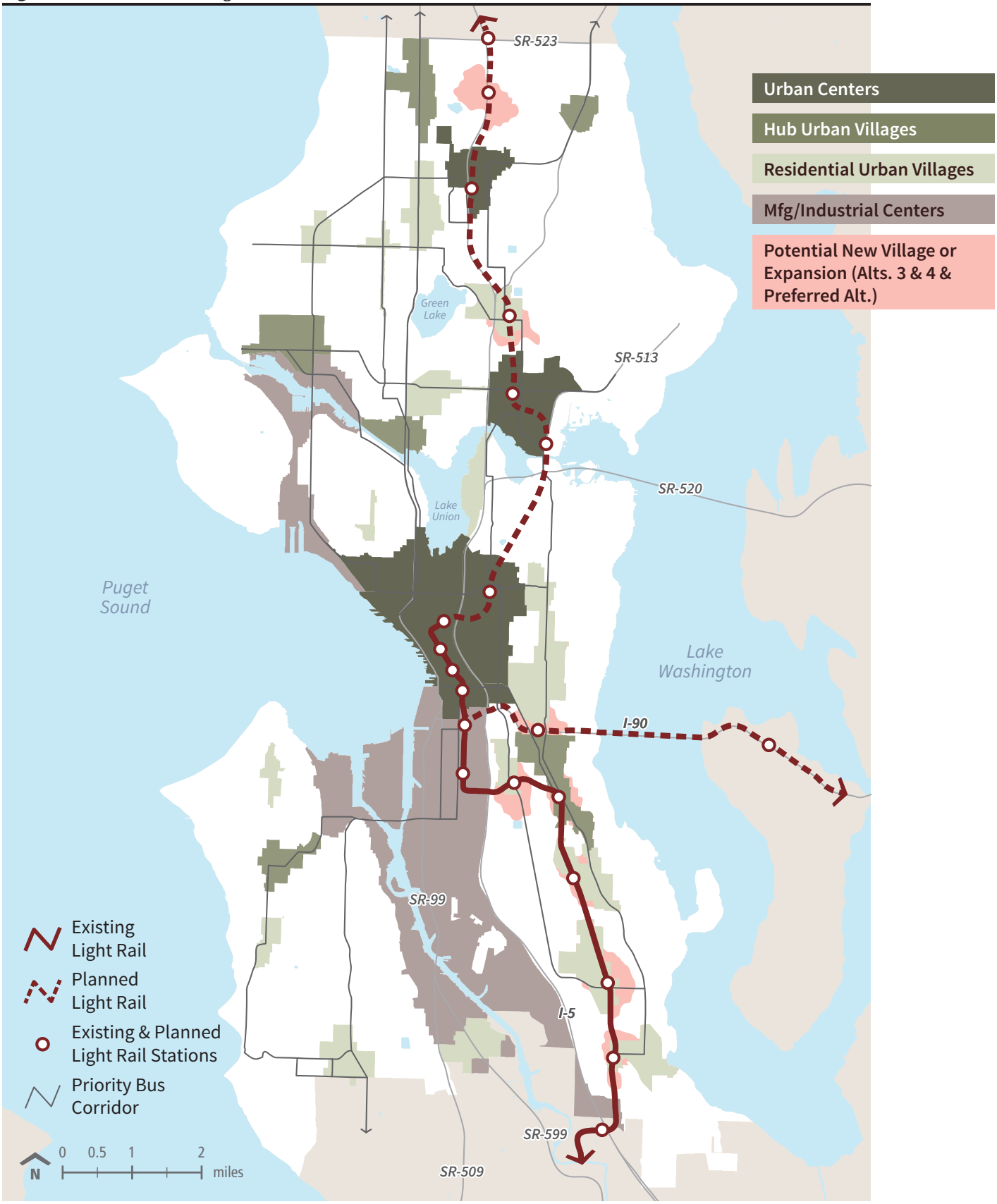


Figure 2–12 Urban village boundaries under Alternative 3 (north)

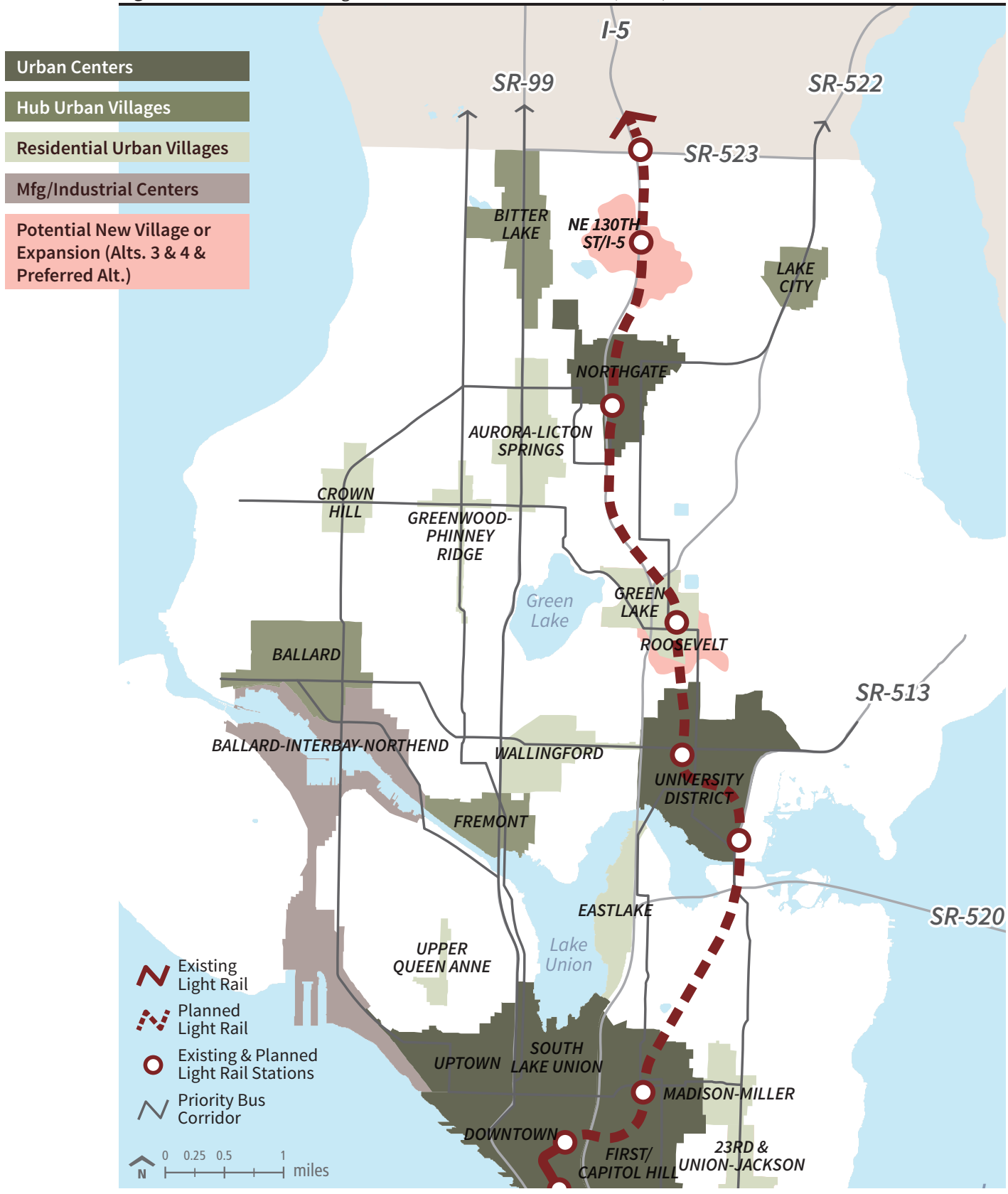
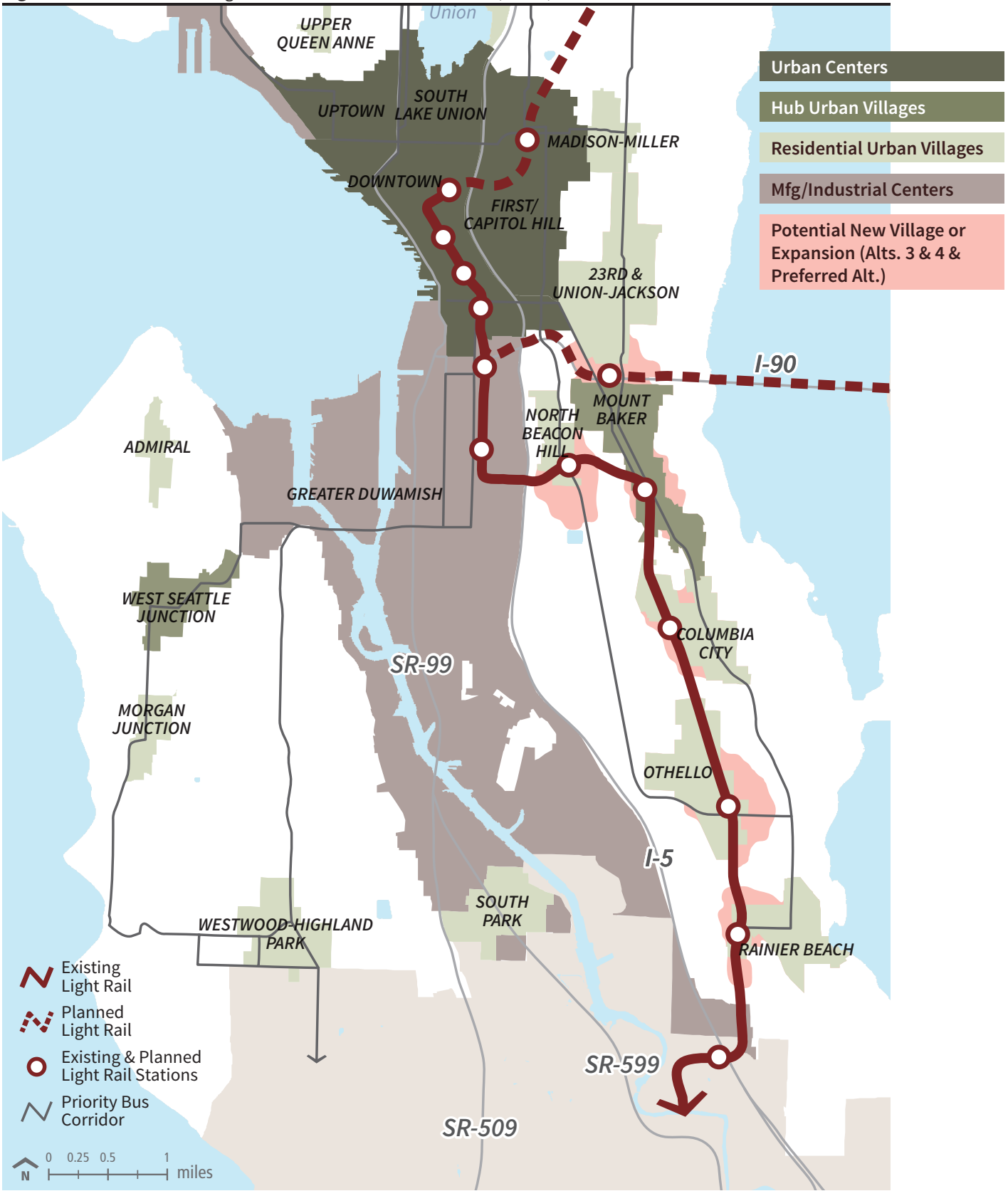


Figure 2–13 Urban village boundaries under Alternative 3 (south)



Alternative 3 would also generalize land use designations in the urban centers and urban villages to provide greater flexibility, consistent with the intent and function of the specific urban center and village, in place of the more specifically defined Future Land Use Map designations.

POLICY AND REGULATORY AMENDMENTS

Similar to Alternative 2 and as shown in Table 2–5 on page 2–40, implementing actions under Alternative 3 to encourage focused growth around existing and planned light rail stations may include increased zoning flexibility and development incentives and focused public investments to support increased livability. This would be accomplished by changing the designation of urban centers and urban villages on the Future Land Use Map so that each category (center, hub, residential) would show as a single category with a distinct color, compared to the current map, which shows major land use categories by color. The map change would be accompanied by policies that describe the types and scales of development that would be expected inside each category. The effect would be to allow more flexibility for the zoning types that could be applied in the centers and villages.

Alternative 4: Guide Growth to Urban Villages near Transit

Under Alternative 4, future growth would be accommodated around light rail transit stations and in selected urban villages along priority transit corridors with very good transit service.

Alternative 4 would include the expanded urban village boundaries of Alternative 3 with additional expansions to encompass ten-minute walksheds around selected bus transit nodes with very good transit service in the Ballard, Fremont, West Seattle Junction and Crown Hill urban villages. Like Alternative 3, a new urban village would be located around the potential NE 130th Street station as shown in Figure 2–14, Figure 2–15 and Figure 2–16. All other urban village boundaries would remain unchanged.

Under Alternative 4, about 95 percent of new residential and 82 percent of new employment growth would likely occur within the urban villages and urban centers. Compared to the other alternatives, Alternative 4 would result in the greatest amount of residential growth within urban centers and urban villages (see Figure 2–7). Alternative 4 would likely also produce a development pattern having more locations of greater growth, especially in urban villages. Compared to the other alternatives, Alternative 4 would yield more projected development in more urban villages, resulting in the largest expansion of urban village boundaries.

Alternative 4 planning estimates of residential and employment growth for each of the urban centers and urban villages are shown in Table 2–3 (housing) and Table 2–4 (employment).

Figure 2–14 Urban village boundaries under Alternative 4 and Alternative 5, Preferred Alternative

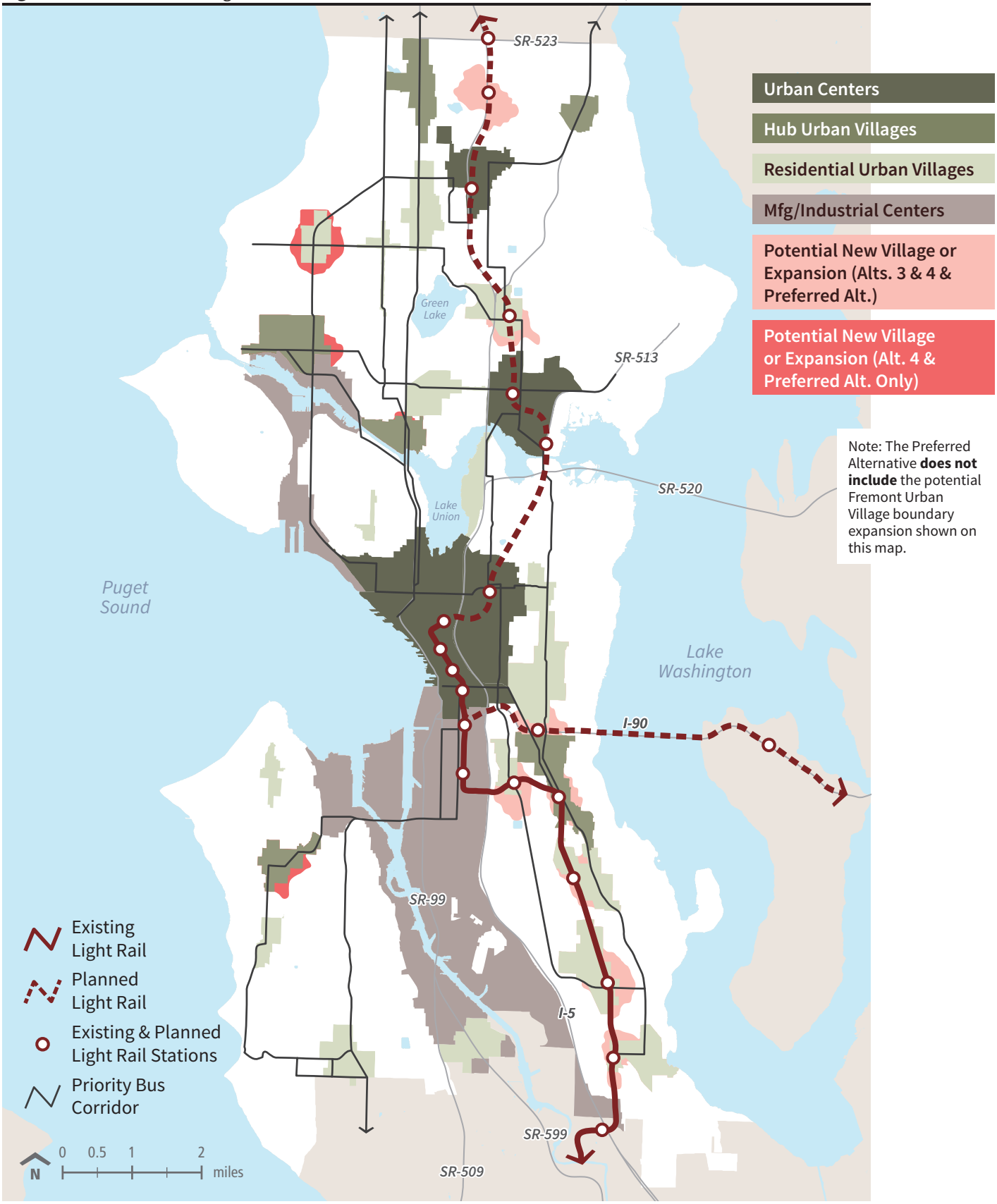


Figure 2–15 Urban village boundaries under Alternative 4 and Alternative 5, Preferred Alternative (north)

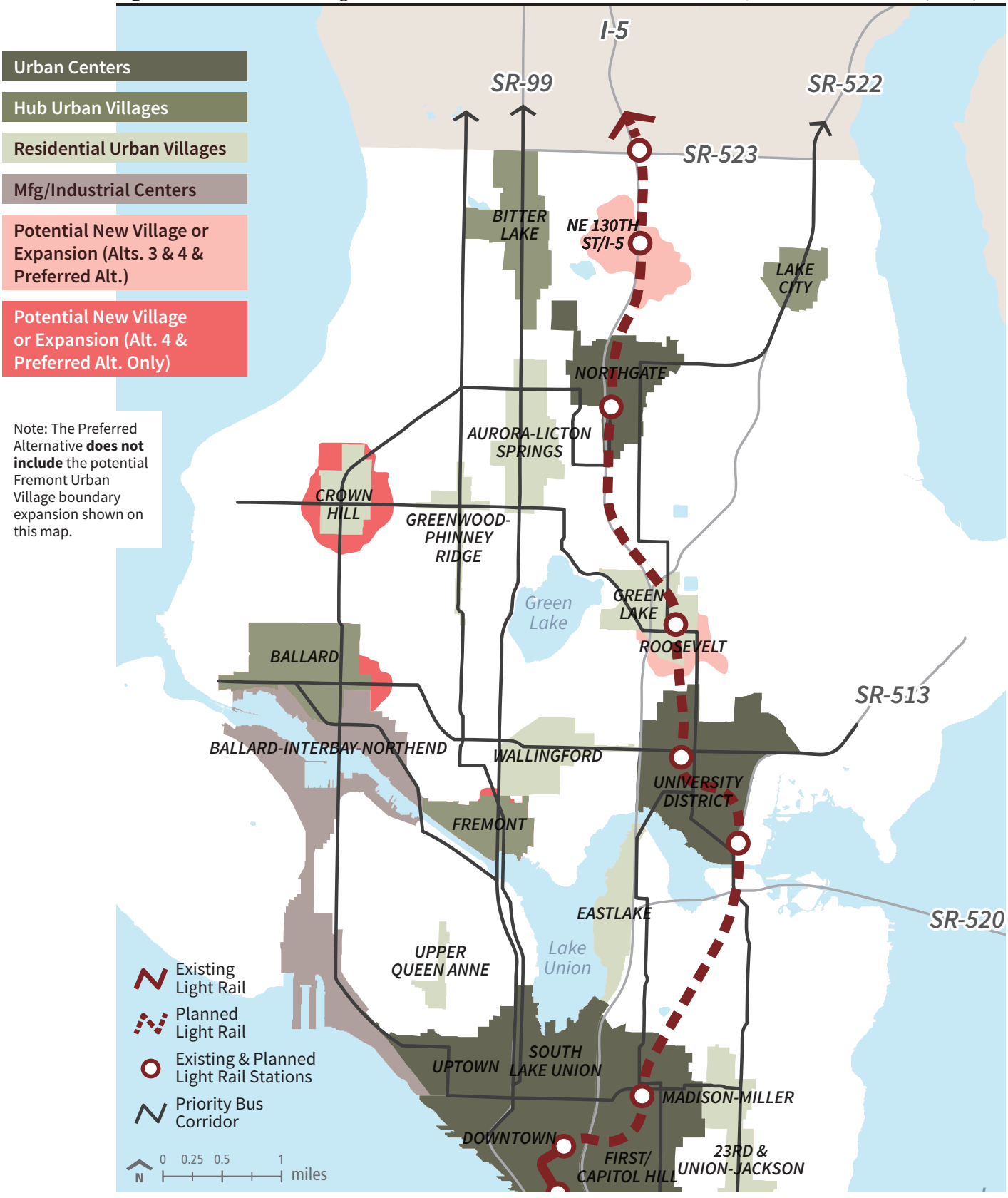
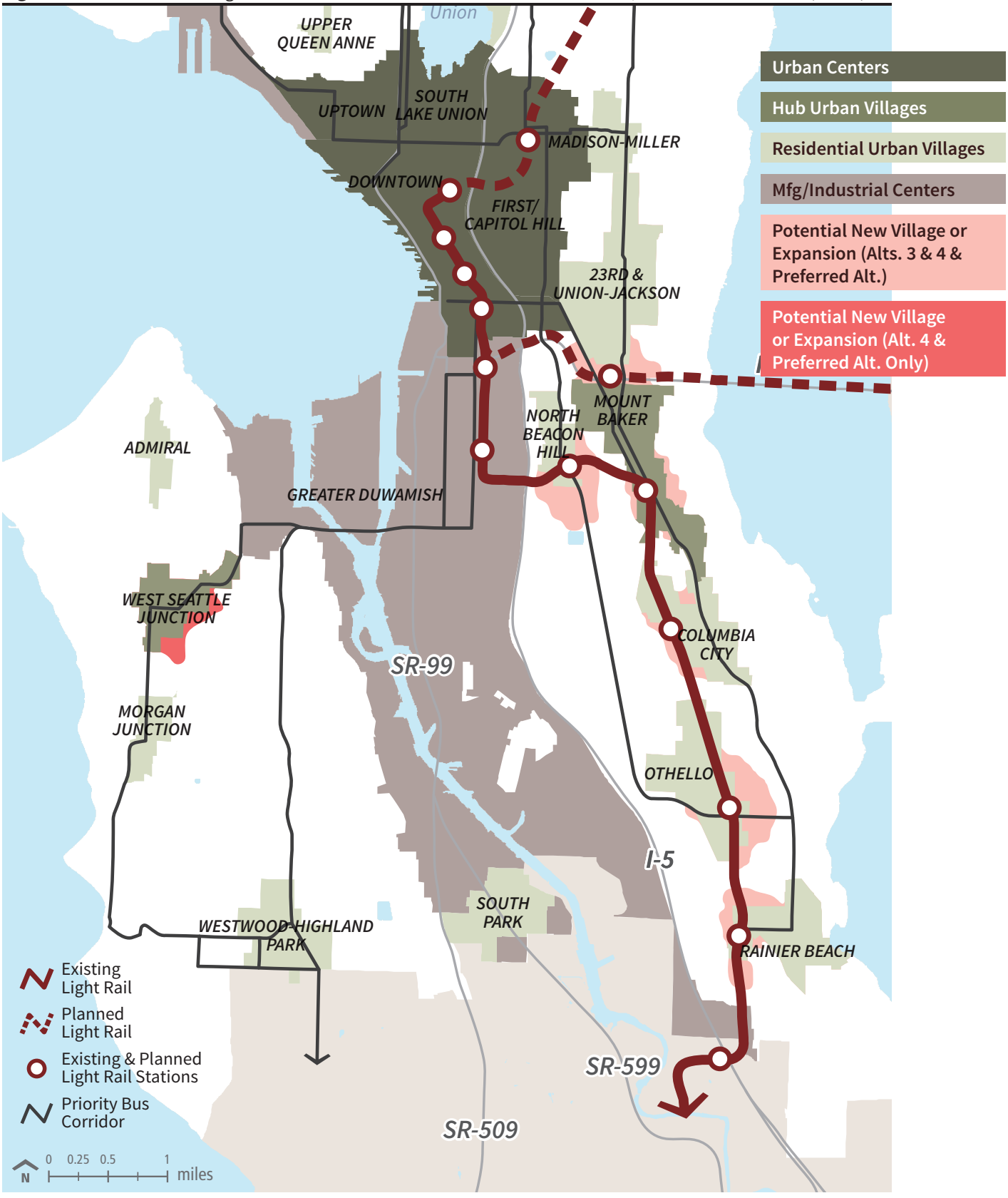


Figure 2–16 Urban village boundaries under Alternative 4 and Alternative 5, Preferred Alternative (south)



DEVELOPMENT CHARACTER

Residential and employment character would be anticipated to be similar to that described for Alternative 3. Additional urban villages affected under Alternative 4 include Ballard, Fremont, West Seattle Junction and Crown Hill.

FUTURE LAND USE MAP

Alternative 4 would include the same proposed changes as Alternative 3, plus additional expansions of urban villages to include all areas within a ten-minute walk-shed of selected bus transit nodes. These additional expansions would occur in West Seattle Junction, Ballard, Fremont and Crown Hill ~~only~~ under Alternative 4.

POLICY AND REGULATORY AMENDMENTS

Similar to Alternative 2 and 3, and as shown in Table 2–5 on page 2–40, implementing actions under Alternative 4 to encourage focused growth around existing and planned light rail stations may include increased zoning flexibility and development incentives and focused public investments to support increased livability. This would be accomplished by changing the designation of urban centers and urban villages on the Future Land Use Map so that each category (center, hub, residential) would show as a single category with a distinct color, compared to the current map, which shows major land use categories. The map change would be accompanied by policies that describe the types and scales of development that would be expected inside each category. The effect would be to allow more flexibility across zoning types that could be applied in the centers and villages.

Alternative 5: Preferred Alternative

Similar to Alternative 4, the Preferred Alternative would guide and accommodate future growth around light rail transit stations and in selected urban villages with very good transit service levels. The Preferred Alternative also seeks to address the equity and displacement issues identified in public comment and the Growth and Equity Analysis. In order to reduce the potential for displacement, the Preferred Alternative plans for somewhat less growth in urban villages where the equity analysis showed both a high risk of displacement and a low access to opportunity.

The Preferred Alternative would include the same potential expansions of urban village boundaries as Alternative 4 except for the omission of Fremont's expansion area. Similar to alternatives 3 and 4, a new urban village would be located around the potential N 130th Street station as shown in Figure 2–14, Figure 2–15 and Figure 2–16. All other urban village boundaries would remain unchanged.

Under the Preferred Alternative, about 88 percent of new residential and 81 percent of new employment growth would be guided toward the urban villages and urban centers. Compared to the other alternatives, the Preferred Alternative would guide less growth toward

the urban centers and villages than alternatives 2, 3 and 4, but more than Alternative 1 (No Action). The Preferred Alternative would be similar to Alternative 4 in that it would result in a development pattern having more locations with growth. Compared to the other alternatives, the Preferred Alternative would result in an expansion of urban village boundaries comparable to but slightly less than Alternative 4. These expansions would relate to improving efficiency of land use patterns in lands within a ten-minute walkshed from selected bus or rail transit nodes; they are not motivated by a compulsory need to boost development capacity in these urban villages.

Preferred Alternative planned estimates of residential and employment growth for each of the urban centers and urban villages are shown in Table 2–3 (housing) and Table 2–4 (employment).

DEVELOPMENT CHARACTER

Residential and employment development character under the Preferred Alternative is anticipated to be similar to that described for Alternative 4. Compared to Alternative 4, a similar but slightly lesser area of expanded urban villages would be likely to convert from existing lower intensity to higher intensity development.

FUTURE LAND USE MAP

The Preferred Alternative would include the same kinds of Future Land Use Map changes as described for Alternative 4.

POLICY AND REGULATORY AMENDMENTS

As shown in Table 2–5 on page 2–40, types of implementing actions under the Preferred Alternative would be the same as anticipated for Alternative 4, with the exact locations and types of actions determined at a later date, and subject to factors such as which preferred growth distribution is approved. As necessary, a number of these potential implementing measures could be subject to phased review under SEPA, if or when they become ripe for SEPA review.

Final EIS Section 3.1 contains an impact analysis for the Preferred Alternative, including the sensitivity analysis described above.

SENSITIVITY ANALYSIS

The Growth Management Act requires the City's Comprehensive Plan to plan for the amount of population growth that has been allocated to the City by the Washington State Office of Financial Management. That allocation is 70,000 additional housing units and 115,000 additional jobs through 2035. The proposed Comprehensive Plan plans for that additional growth and the Environmental Impact Statement (EIS) for the Plan evaluates the potential environmental impacts of alternative distributions of that growth throughout the City.

In response to the Draft EIS, citizen commenters asked the City to also include in the Final EIS a discussion about the potential environmental impacts of the Plan hypothetically assuming that more growth would occur. The City subsequently decided to study a scenario discussing the impacts that could occur assuming a growth of 100,000 housing units rather than the growth amount (70,000 housing units) allocated to the City by the State. No additional employment growth amount was defined. The SEPA rules authorize the City to include such additional, optional analysis in an EIS, and further provide that such optional analysis does not affect the adequacy of an EIS.

That analysis is referred to as a "sensitivity analysis," and its findings are presented in Final EIS Section 3.1.2, following the Preferred Alternative impact analysis in Section 3.1.1.

Policy and Regulatory Amendments

Potential implementing measures associated with each alternative are summarized in Table 2–5 below.

Table 2–5 Potential implementing measures

	Rezones	Other Zoning Code, Regulatory, Policy or Investment Strategies
Alternative 1 Continue Current Trends (No Action)	None known and none needed*	None known and none needed*
Alternative 2 Guide Growth to Urban Centers	None known and none needed* Future potential rezones are undefined but could be pursued by the City, as an implementing strategy	Complementary strategies supporting urban center growth could be pursued: • Tools for zoning flexibility • Other growth incentive tools or programs to attract new buildings construction • Public investments to aid livability and attract development A precise description of content of such strategies is not defined at this time.
Alternative 3 Guide Growth to Urban Villages near Light Rail	Change mapped designations of urban centers and urban villages on the FLUM to allow flexibility Similar to Alternative 2, except FLUM change may enable more rezones to occur inside urban villages	Same as Alternative 2
Alternative 4 Guide Growth to Urban Villages near Transit	Same as Alternative 3	Same as Alternative 2
Alternative 5, Preferred Alternative Guide Growth to Urban Villages near Transit	Same as Alternative 3	Same as Alternative 2

* Does not preclude future unrelated rezones or other comprehensive plan designation changes.

2.4 Environmental Review

PROGRAMMATIC REVIEW

SEPA requires government officials to consider the environmental consequences of proposed actions, and to consider ways to accomplish the objectives that minimize adverse impacts or enhance environmental quality. They must consider whether the proposed action will have a probable significant adverse environmental impact on the elements of the natural and built environment.

The adoption of a comprehensive plan or development regulations is classified by SEPA as a non-project (also referred to as programmatic) action. A non-project action is defined as an action that is broader than a single site-specific project, and involves decisions on policies, plans or programs. An EIS for a non-project proposal does not require site-specific analyses; instead, the EIS will discuss impacts and alternatives appropriate to the scope of the non-project proposal and to the level of planning for the proposal (see WAC 197-11-442 for detail). The analysis in this EIS may also be used in the future to help inform project level development proposals.

SEPA INFILL EXEMPTION

According to Washington State's environmental policies (see RCW 43.21c), the City may consider adjustments to "categorical exemptions" from environmental review, including for "infill development" as described in RCW 43.21c.229, if it fulfills certain requirements. Among these requirements is SEPA environmental review of a comprehensive plan in an EIS. By conducting this review, the City fulfills this obligation. ~~and~~

The EIS identifies the potential range of impacts that may occur by pursuing alternative courses of growth policy directions ranging from a continuation of current policies (Alternative 1/No Action Alternative) to strategies that would differently emphasize growth patterns among urban centers, urban villages, light rail station area vicinities and/or other transit-served vicinities. The range of impact findings also help illustrate the implications of the possible future City action that could be taken to define higher SEPA categorical exemption levels related to infill development, which would eliminate environmental review for certain size ranges of future development. Such higher exemption levels could continue until applicable levels of density or intensity of development, as defined in the Comprehensive Plan, are met.

Except as may be otherwise discussed in Chapter 3 of this EIS, the use of the SEPA infill provisions is concluded to generate essentially the same potential for adverse environmental impacts as is identified for each alternative. This reflects a conclusion that the use of the higher categorical exemption levels encouraging infill development would be likely to result in future growth in patterns that would aid in accomplishing the urban village strategy because its use would be oriented to development within the urban centers and urban

villages, and not other places. This is likely to be so regardless of which EIS alternative might be selected by decision-makers to implement the urban village strategy preferred in the Comprehensive Plan. A corollary finding of the EIS is that the range of identified environmental impacts would be able to be addressed through the implementation of the City's development regulations, other applicable requirements of the City's comprehensive plan and functional plans, or other local, state, or federal rules or laws.

The proposal is to re-establish SEPA categorical exemption levels for infill development that are the same as were in effect until repealed in 2015. These are illustrated in Table 2–6 and Table 2–7 at right.

SCOPE OF ANALYSIS

The City issued a Determination of Significance and Scoping Notice on October 17, 2013. During the scoping comment period, which extended from October 17, 2013 to April 21, 2104, interested citizens, agencies, organization and affected tribes were invited to provide comments on the scope of the EIS. During the comment period, the City held a public scoping meeting to provide information and invite comment from interested parties.

Based on the comments received during the scoping process, the City finalized the alternatives and scope of the EIS. Elements of the environment addressed in this EIS include:

- Earth/Water Quality
- Air Quality and Climate Change
- Noise
- Land Use: Height, Bulk, Scale, Compatibility
- Relationship to Plans and Policies
- Population, Employment, Housing
- Transportation
- Public Services
- Utilities

OTHER ENVIRONMENTAL REVIEW ON THE COMPREHENSIVE PLAN

~~The City may at a later date i~~In 2015, the City issued a Determination of Non-Significance for a set of amendments to the Comprehensive Plan that the City Council adopted in October 2015 ~~on actions with 2015 deadlines or that are part of the 2015 annual amendment cycle~~, including:

- Adoption of new citywide growth targets and updated inventories and analysis into the Comprehensive Plan as required by the state Growth Management Act (GMA).
- Amendment to neighborhood-specific policies in the Neighborhood Planning Element and amendments to the Future Land Use Map for the Lake City Hub Urban Village and the 23rd & Union-Jackson and Morgan Junction residential urban villages.

- Amendments to policies addressing Environmentally Critical Areas.
- Amendments to Environment Element policies addressing stormwater drainage management and permeable surfaces.
- Housing Element amendments.

Table 2–6 Proposed SEPA environmental review infill categorical exemption levels for establishing a new residential use with new construction

	Residential Uses: Number of Exempt Dwelling Units		
Zone	**Outside of Urban Centers and Urban Villages Containing a Station Area Overlay District**	**Within Urban Centers, or Urban Villages Containing a Station Area Overlay District**	**Within Urban Centers, or Urban Villages Containing a Station Area Overlay District, if Growth Targets Have Been Exceeded**
SF, RSL	4	4	4
LR1	4	200	20
LR2	6	200	20
LR3	8	200	20
NC1, NC2, NC3, C1, C2	4	200	20
MR, HR, SM	20	200	20
Downtown Zones	N/A	250	20
Industrial Zones	4	4	4

Table 2–7 Proposed SEPA environmental review infill categorical exemption levels for establishing a new non-residential use with new construction

	Non-Residential Uses: Exempt Area of Use (Square Feet of Gross Floor Area)		
Zone	**Outside of Urban Centers and Urban Villages Containing a Station Area Overlay District**	**Within Urban Centers, or Urban Villages Containing a Station Area Overlay District**	**Within Urban Centers, or Urban Villages Containing a Station Area Overlay District, if Growth Targets Have Been Exceeded**
SF, RSL, LR1	4,000	4,000	4,000
LR2, LR3	4,000	12,000[1] or 30,000	12,000
MR, HR, NC1, NC2, NC3	4,000	12,000[1] or 30,000	12,000
C1, C2, SM	12,000	12,000[1] or 30,000	12,000
Industrial Zones	12,000	12,000	12,000
Downtown Zones	N/A	12,000[1] or 30,000	12,000

1 New nonresidential development that is not part of a mixed-use development and that does not exceed 12,000 square feet is categorically exempt from SEPA. Pursuant to RCW 43.21C.229, new non-residential development that does not exceed 30,000 square feet and that is part of a mixed-use development located in an urban center, or in an urban village that contains a Station Area Overlay District, is categorically exempt from SEPA, unless the Department has determined that employment growth within the urban center or urban village has exceeded exemption limits for the center or village that the Department has established.

LEVEL OF ANALYSIS

In general, the analysis in the EIS is conducted on a citywide basis. Where information is available and would help in understanding potential impacts of the alternatives, smaller geographic units used by the City of Seattle are examined. These include, for example, urban villages, police precincts and fire service battalions. In other cases, particularly for transportation and some of the public services, this EIS defines eight analysis sectors for use in discussing potential impacts, including Northwest Seattle, Northeast Seattle, Queen Anne/Magnolia, Downtown/Lake Union, Capitol Hill/Central District, West Seattle, Duwamish and Southeast Seattle. These analysis sectors are shown in Figure 2–17 and referred to in the pertinent sections of Chapter 3.

ENVIRONMENTAL IMPACTS

For each of the alternatives, potential environmental impacts to the elements of the environment listed above are described in Draft EIS Chapter 3. Additional analysis, including analysis of the Preferred Alternative, and revisions or clarifications to the analyses in the Draft EIS, can be found in Final EIS Chapter 3 and ~~of this EIS and briefly~~ summarized in Chapter 1. Please refer to these chapters for a comparison of the impacts of the alternatives, potential mitigating strategies and significant unavoidable adverse impacts.

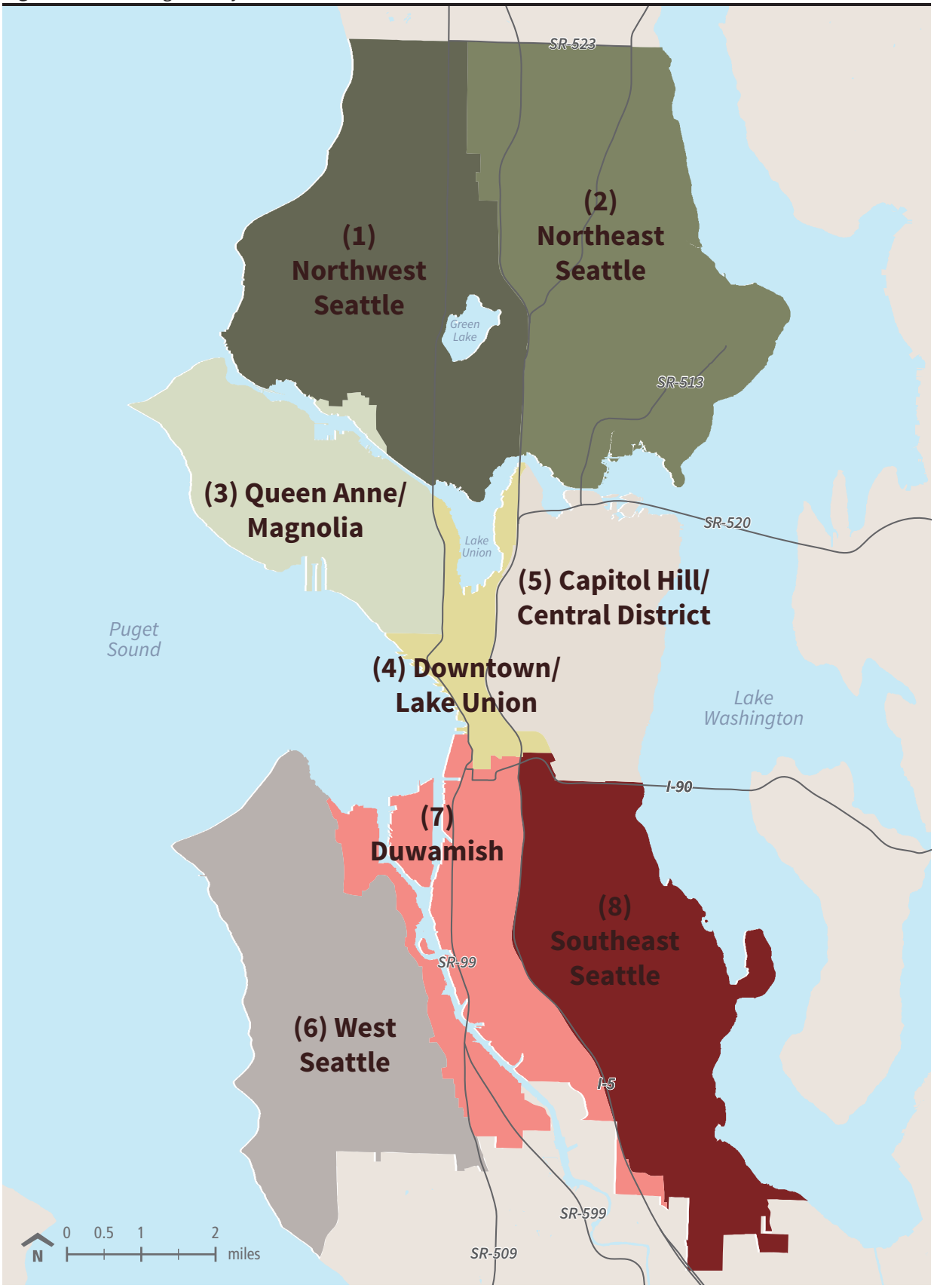
2.5 Benefits and Disadvantages of Delaying the Proposed Action

SEPA requires a discussion of the benefits and disadvantages of reserving, for some future time, the implementation of a proposal compared to possible approval at this time. In other words, the City must consider the possibility of foreclosing future options by implementing the Proposal.

From the perspective of the natural environment, there is neither benefit nor disadvantage to delaying implementation of the proposed action. Regardless of whether the proposal is adopted, future growth and development will continue and City, state and federal requirements for environmental protection will continue to apply.

From the perspective of the built environment, reserving implementation of the proposal for some future time could result in delay of the City's ability to focus future development and resource allocations to the urban centers and urban villages as portrayed in the action alternatives. Such a delay could result in relatively less development occurring in areas within a reasonable walkshed around existing and future light rail transit stations and ~~priority~~ well-served transit corridors and related increased transportation congestion. If implementation of the proposal is delayed for some future time, existing growth trends and patterns of development would likely continue.

Figure 2–17 Eight analysis sectors



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3.0 Additional Analysis, Revisions, Clarifications

This section includes an analysis of the Preferred Alternative, described in Chapter 2 of this Final EIS, and revisions and clarifications of information from the Draft EIS.

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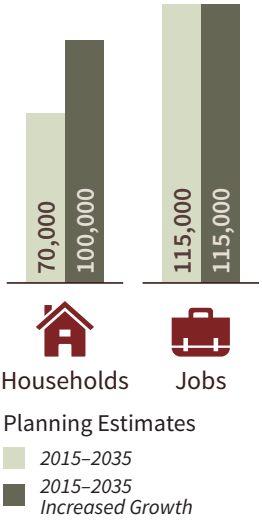
3.1 Additional Analysis

Section 3.1 describes the impacts of the Preferred Alternative for the same elements of the environment discussed in the May 4, 2015 Draft EIS. Consistent with the analysis conducted in the Draft EIS, this analysis is programmatic and, unless noted differently, follows the same methodologies described in the Draft EIS. This section of the Final EIS should be read in the context of the Draft EIS because the affected environment section is not repeated. The Preferred Alternative is described in Chapter 2 of this Final EIS.

Consistent with the Draft EIS assumptions, the growth assumptions for the Preferred Alternative are 70,000 housing units and 115,000 jobs. Section 3.1.2 also includes analysis of a hypothetically increased growth scenario that is intended to provide a sensitivity analysis of impacts for residential growth higher than the growth assumptions of the Preferred Alternative and Draft EIS alternatives defined for the Comprehensive Plan Update (see Section 3.1.2, Sensitivity Analysis on page 3.1–29).



3.1.1 Preferred Alternative

Earth and Water Quality

The analysis for this Preferred Alternative notes that growth will occur under alternatives in all urban centers and villages, and outside these areas. All areas subject to growth could potentially experience adverse impacts generated by future construction activity, and by increased density of urban uses and activities after construction. Disturbance of Environmentally Critical Areas (ECAs), deposition of disturbed soils, other pollutant washoff, erosion and adverse effects on water quality could occur, even though City-required protective measures would be required.

ECA:
Environmentally Critical Area

The greatest potential for such impacts could occur if construction is near or in identified ECAs, with a somewhat lesser potential if development occurs within the hearts of neighborhoods, most of which are long-established in their topography, street patterns, groundcover, and levels of building coverage. These are places where infill development would in many cases avoid ECAs entirely, or would modify ECAs that were already previously modified such as by use of concrete retaining walls. Assessment of development proposals on urbanized sites that have mapped ECAs would enable the City to assess potential for impacts on a site-by-site basis and allow modification of ECAs (such as in places where slope

modifications are already in place), or require that ECAs be avoided per rules such as those addressing protection of wetlands and streams.

Comparison of growth expectations among the urban centers and villages allows for an interpretation of relative impact potential differences among the alternatives. The Preferred Alternative in many places would be comparable in levels of growth expected to alternatives 3 and 4, which were the alternatives with the greatest transit-orientation of future growth. This leads to general findings that the Preferred Alternative would have an earth/water quality impact potential that is comparable to Alternative 3 and 4 in most areas.

However, the Preferred Alternative expects lower levels of growth than alternatives 3 and 4 in several urban villages in the southern half of the city, which would proportionally reduce the potential for impacts on earth and water resources in those areas (including Columbia City, Rainier Beach, and Mount Baker/North Rainier). For the latter two neighborhoods, the lower growth expectations would reduce potential for worst-case earthquake damage levels, given the presence of seismically sensitive soils.

Compared to Alternative 1 (the No Action Alternative), the Preferred Alternative in most of the potentially sensitive places would expect more growth and thus the worst-case impact potential on earth/water quality resources would generally be higher than Alternative 1.

The information in Table 3.1–1 summarizes potential critical area disturbance impact comparisons of the Preferred Alternative to other alternatives, similar to the content of Draft EIS Table 3.1-2.

The Preferred Alternative includes areas where urban villages are recommended to expand that are the same as identified for Alternative 4 (except for the omission of expansion in Fremont). These are areas where changes with future development could generate additional potential for disturbance of earth and water resources, more so than would otherwise occur under alternatives 1 or 2. However, as with other areas, the City's rules would require protective measures such as erosion controls, and buffers from resources as appropriate, that would reduce the potential for this type of adverse impact.

With respect to the possible use of SEPA infill exemption provisions (with higher thresholds for SEPA environmental review), a possible outcome of the Preferred Alternative could be the encouragement of development in urban centers and urban villages in ways that would promote the accomplishment of the City's preferred urban village strategy. Although future construction forms and trends are difficult to predict, future growth patterns emphasizing urban centers and villages could aid in reducing potential for development in more peripheral vicinities of the city that tend to be closer to sensitive earth and water resources.

MITIGATION MEASURES

None of the impacts identified for the Preferred Alternative are concluded to be significant adverse impacts and so no mitigation measures are required. The continued application

Table 3.1–1 Potential critical area disturbance impacts of the Preferred Alternative compared to other alternatives

Resource Type	Preferred Alternative (Alternative 5)
Steep Slopes/Landslide Hazards	**First/Capitol Hill:** Low potential for disturbance; same as alternatives 3 and 4 **South Lake Union:** Potential for disturbance is similar to alternatives 3 and 4; greater than Alternative 1 **Uptown:** Same as alternatives 3 and 4, and lower potential than Alternative 1 for disturbance **Eastlake:** Higher potential for disturbance than alternatives 3 or 4; same potential as Alternative 1
Peat/Settlement-Prone Soils	**Northgate:** Potential for disturbance is approximately the same as for alternatives 3 and 4, and greater than Alternative 1 **Mount Baker:** Potential for disturbance or damage reduced by approximately one-half compared to alternatives 3 and 4; but greater potential than Alternative 1 **Rainier Beach:** Potential for disturbance or damage reduced by more than one-half compared to alternatives 3 and 4; but greater potential than Alternative 1
Nearby Streams or Wetland ECAs	**Northgate:** Potential for disturbance is approximately the same as for alternatives 3 and 4, and greater than Alternative 1 **Lake City:** Potential for disturbance is similar to alternatives 3 and 4; and less than Alternative 1 **Columbia City:** Potential for disturbance or damage reduced by more than one-half compared to alternatives 3 and 4; and also a lesser potential than Alternative 1 **Morgan Junction:** Potential for disturbance slightly elevated compared to other alternatives **Westwood/Highland Park:** Potential for disturbance is similar to or slightly higher than alternatives 3 and 4.

Source: Seattle Dept. of Construction and Inspections, 2016.

of the City's existing policies, review practices, and regulations, including the operational practices of Seattle Public Utilities, would help to avoid and minimize the potential for significant adverse impacts to critical areas discussed in this section.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

None are expected for the Preferred Alternative.

Air Quality and Greenhouse Gas Emissions

AIR QUALITY

Construction-related Emissions

Future growth under any alternative would result in development of new residential, retail, light industrial, office and community/art space. Construction to support anticipated growth under the Preferred Alternative would carry with it the same types of construction related impacts described in the Draft EIS for alternatives 1–4. As described in the Draft EIS, off-road equipment and on-road trucks used to construct all new development would comply with the noted PSCAA and U.S. EPA regulations. In addition, because regulatory improvements requiring cleaner off-road equipment emissions are to be phased in over the next several years and construction related impacts are transient in nature, only minor adverse air quality impacts from construction sources are anticipated.

Land Use Compatibility and Transportation Air Quality Emissions

Under the Draft EIS alternatives and Preferred Alternative, future growth and development patterns would be influenced by Comprehensive Plan growth strategies in ways that would affect future residences' (or other "sensitive receptors") relationships to mobile and stationary sources of air toxics and particulate matter $PM_{2.5}$. The degree of potential for adverse impacts on new sensitive receptors would depend on proximity to sources, emissions from these sources and the density of future sensitive development.

The Draft EIS identifies areas of the City, including urban centers and villages, where residential development could expose residents to higher cancer risk from roadways or stationary sources. Similar to Alternative 4, the Preferred Alternative would place the emphasis for growth near transit centers, many of which have portions within 200 meters of a major highway, rail line or port terminal, particularly those in the northern portions of the city. However, because these are only limited portions of each center or villages, a majority of expected future growth in population and employment is still likely to occur outside of the area most affected by these pollution sources. Conclusions would be similar even when considering the possible use of SEPA infill exemption provisions with higher thresholds for SEPA environmental review.

Transportation Air Quality Emissions

Regional road transportation pollutant emissions under alternatives 1–4 would be substantially less than under existing background conditions (see corrected Draft EIS Figure 3.2–6 in Final EIS Section 3.2). This is because the projected improvement in fuel economy, emission controls and fuel composition will outweigh the projected increase in VMT. This would result in a beneficial future air quality outcome. It is anticipated that emissions reductions under the Preferred Alternative would be similar to those shown in the Draft EIS for Alternative 4 (see Table 3.1–2).

GREENHOUSE GAS EMISSIONS

Greenhouse gases (GHGs) would be emitted during construction activities. These emissions, while not individually altering GHG emissions significantly, would cumulatively, over 20 years, be more than a negligible contributor to GHG emissions within the city. The City's *Climate Action Plan* (City of Seattle 2013b) recognizes the relevance of construction related GHG emissions and has included actions to be implemented by 2030 to address them. These measures would address construction as well. Consequently, although construction related emissions would not be negligible, the combination of regulatory improvements and *Climate Action Plan* actions under way would lead to the construction-related GHG emissions being considered a minor adverse air quality impact. This conclusion would apply to all of the Draft EIS Alternatives and the Preferred Alternative, and if SEPA infill exemption provisions are used.

Similar to alternatives 2–4, the Preferred Alternative would have total transportation GHG emissions lower than the No Action Alternative. Similar to the Draft EIS alternatives,

Table 3.1–2 Road transportation emissions (2035)

	GHG Emissions in $MTCO_2e$						
Type of Vehicle	**2015 Existing**	**2035 Alt. 1**	**2035 Alt. 2**	**2035 Alt. 3**	**2035 Alt. 4**	**2035 Preferred Alt. 5**	**2035 Sensitivity Analysis**
Cars and Light Trucks	1,603,000	1,379,000	1,369,000	1,375,000	1,379,000	1,376,000	1,402,000
Heavy Trucks	720,000	990,000	990,000	989,000	989,000	989,000	989,000
Buses	64,000	42,000	42,000	42,000	42,000	42,000	42,000
Vanpools	2,000	2,000	2,000	2,000	2,000	2,000	2,000
Total	2,389,000	**2,413,000**	**2,403,000**	**2,408,000**	**2,412,000**	**2,409,000**	**2,435,000**

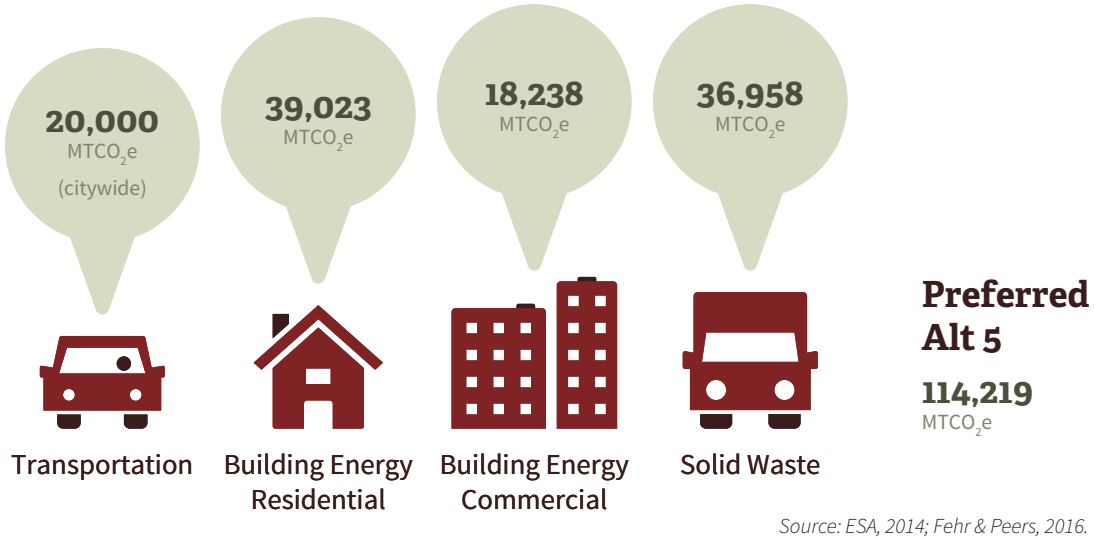
Source: Fehr & Peers, 2016.

the Preferred Alternative is expected to generate slightly higher GHG emissions than in 2015. This is due to a combination of factors: projected fuel economy would be slightly outweighed by the overall increase in VMT and change in congestion levels (i.e., travel speeds) by 2035. As the Preferred Alternative is expected to generate lower GHG emissions than the No Action Alternative, no adverse impacts are identified.

Total operational GHG emissions from the Preferred Alternative are presented in Figure 3.1–1 and Appendix B.1.[1] GHG emissions under the Preferred Alternative are likely to be similar to those under Alternative 4 and less than those of the No Action alternative. No significant adverse impacts were identified with respect to these GHG emissions. Conclusions would be similar even when considering the possible use of SEPA infill exemption provisions with higher thresholds for SEPA environmental review, which could aid in promoting the accomplishment of the City's preferred urban village strategy.

See revised GHG emissions for Draft EIS alternatives 1–4 in Final EIS Section 3.2, page 3.2–6.

Figure 3.1–1 Operational GHG emissions of the Preferred Alternative



Source: ESA, 2014; Fehr & Peers, 2016.

1 Revised transportation GHG estimate prepared by Fehr & Peers, energy and solid waste GHG estimates assumed to be the same as Alternative 4.

MITIGATION MEASURES

No mitigation strategies beyond those described in Draft EIS Section 3.2, Air Quality and Greenhouse Gas Emissions, are recommended for the Preferred Alternative.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to air quality and greenhouse gas emissions are anticipated for the Preferred Alternative. This conclusion is also accurate for the scenario if SEPA infill exemption provisions are used.

Noise

CONSTRUCTION NOISE AND VIBRATION IMPACTS

As with Draft EIS alternatives 1–4, the Preferred Alternative envisions future residential and job growth primarily within areas where transit infrastructure either exists or is planned. Implementation would result in a concentration of development within existing developed and developing areas. Resulting construction activities would have the potential to temporarily affect nearby sensitive receivers such as existing residences, schools, and nursing homes. As noted in the Draft EIS, temporary construction noise and vibration within these infill development areas, where ambient noise levels are already affected by roadway traffic and other transportation noise sources, would be less noticeable to receivers.

The Draft EIS also states that development of larger and/or higher buildings are typically the construction activities with the greatest potential for adverse construction-related noise or vibration impacts because they can involve pile driving or other similar impact-related foundation work. The Preferred Alternative guides more employment growth to the Downtown and South Lake Union urban centers than other alternatives. Development in these areas would likely be larger buildings that could require pile driving, but they are also the areas with the highest existing ambient noise levels. The City's existing controls and the mitigation identified in the Draft EIS would likely keep these impacts from being considered significant and adverse.

NOISE AND LAND USE COMPATIBILITY

As described in the Draft EIS, noise levels are typically highest close to freeways, highways and other transportation infrastructure. However, the Preferred Alternative strives, at least in part, to locate residential and employment uses near to transit to reduce vehicle miles traveled within the City. Consequently, if newly developed residences or other sensitive receptors, in the worst care, are located too close to major roadway or noisy industrial operations, additional insulation or window treatments could be warranted to avoid adverse noise impacts on residents by reducing interior noise levels to generally acceptable levels.

Comparing total expected growth distributions with alternatives 3 and 4 (the most comparable alternatives), the Preferred Alternative would have somewhat less potential for this kind of proximity-related noise impact than either alternative 3 or 4 in urban villages.

For Draft EIS alternatives 1–4 and the Preferred Alternative, roadside noise levels would increase by less than 0.5 dBA at all locations. As discussed in the Draft EIS, outside of the laboratory, a 3 dBA change is considered a just-perceivable difference. Consequently, an increase of less than 0.5 dBA would be considered a minor impact on environmental noise. However, while considered a minor impact when examined city-wide, more development could increase noise levels in some areas.

The conclusions reached above on adverse impact potential would also apply if the Preferred Alternative also included the use of SEPA infill exemption provisions with higher thresholds for SEPA environmental review. This could lead to growth in patterns that would promote accomplishment of the City's preferred urban village strategy, which could lead to denser growth patterns with a potential for adverse noise effects from nearby transportation facilities.

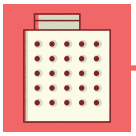
MITIGATION MEASURES

No mitigation strategies beyond those described in Draft EIS Section 3.3, Noise, are recommended for the Preferred Alternative.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to noise levels are anticipated for the Preferred Alternative.

Land Use Patterns, Compatibility, Height, Bulk and Scale



LAND USE PATTERNS

Similar to Alternative 4, the Preferred Alternative guides growth toward urban villages near transit. As with Alternative 4, the Preferred Alternative identifies the greatest number of transit-oriented places—served by either bus or rail—as preferred for growth. The number of urban villages that would be subject to growth and possible boundary changes would be similar to Alternative 4 (except with omission of the Fremont expansion area; see Figure 2–14, Figure 2–15 and Figure 2–16). Similar to alternatives 3 and 4, a new residential urban village could be created around the potential future NE 130th Street transit station.

Compared to Alternative 4, the Preferred Alternative could lead to less residential growth to the hub and residential urban villages, with the greatest reductions focused in several urban villages. Estimated residential growth in urban centers would remain the same under the Preferred Alternative as Alternative 4, except in Uptown which assumes 1,000 more households under the Preferred Alternative than Alternative 4.

The following urban villages are each estimated to have at least 500 fewer housing units when compared to the Alternative 4 housing estimates: Mount Baker, West Seattle Junction, Columbia City, Crown Hill, North Beacon Hill, Othello, Rainier Beach and Roosevelt. Conversely, the following urban centers and villages are estimated to have at least 500 additional housing units when compared to the Alternative 4 housing estimates: Uptown, 23rd & Union-Jackson and Eastlake (see Table 2–3 and Figure 3.1–2).

Probable changes to residential land use patterns under the Preferred Alternative would be generally similar to Alternative 4, except that the Preferred Alternative would distribute a lower amount of future housing growth (88 percent of total growth) to the same number of villages and centers. Of that amount, 50 percent is projected to be in urban centers, 15 percent in hub urban villages and 23 percent in residential urban villages (see Figure 3.1–14 on page 3.1–18 of this Final EIS).

Compared to Alternative 4, the Preferred Alternative would guide more employment growth to the urban centers, with a net estimated increase of 7,500 jobs in the urban centers (including an increase of 5,000 jobs in the Downtown Urban Center). In contrast, several urban villages—including Ballard, Mount Baker, Othello and Roosevelt—are each estimated to have a reduction in employment growth of 1,000 jobs or more, compared to Alternative 4 (see Table 2–4 and Figure 3.1–3). Compared to Alternative 4, this represents a higher concentration of employment growth in the urban centers (59 percent) and a lower combined concentration of future employment growth in hub and residential urban villages (14 percent; see Figure 3.1–17 on page 3.1–20 of this Final EIS). Overall, the share of employment growth in areas outside urban villages and centers under the Preferred Alternative (19%) is similar to Alternative 4.

The resulting citywide land use pattern, comparable to Alternative 4, would consist of a relatively large number of moderately-developed residential and commercial/mixed-use nodes with access either to light rail or frequent bus service. This is likely to lead to the construction of more moderate-density, moderate-height development types with a combination of multi-family, mixed-use and commercial uses over time. This would contrast with a more centralized and higher-density land use pattern with Alternative 2. Compared to Alternative 1, the Preferred Alternative would produce slightly lower concentrations of growth in certain urban villages (such as Columbia City and Othello) while resulting in higher concentrations in a majority of the urban centers.

Similar to Alternative 4, the possible creation of a new residential urban village at NE 130th Street, if it occurs and is followed by rezones, would likely result in gradual conversion of existing single-family residential and limited low-intensity commercial uses to multifamily or mixed-use land use patterns over time.

Figure 3.1–2 Preferred Alternative change in housing unit growth compared to Alternative 4

*Urban center housing unit growth assumptions are the same for Alternative 4 and the Preferred Alternative except in **Uptown**, which assumes 1,000 more households under the Preferred Alternative than Alternative 4 .*

Figure 3.1–3 Preferred Alternative change in job growth compared to Alternative 4

LAND USE COMPATIBILITY

Impacts to land use compatibility under the Preferred Alternative would be similar to those under Alternative 4. The impacts would be similarly geographically widespread due to the expansion of urban villages and the potential creation of a new village at NE 130th Street. Similar to Alternative 4, this would create a potential for localized adverse, but relatively minor, compatibility issues as existing, lower intensity uses in these urban villages transition to higher-density development forms. For example, existing single-family areas located near a major transit station would likely be rezoned to accommodate low-rise multifamily and possibly local-service commercial uses.

In areas where the urban villages would be expanded, or where new urban villages would be created, the predominantly single-family residential character of neighboring uses may make them relatively more sensitive to changes in development intensity and scale. These areas, for example, may experience more occurrences of sharper transitions in urban form as new, more intensive forms—such as townhomes and multi-family apartments—could be built alongside existing single family homes and properties. This is tempered somewhat by understanding that the Draft Comprehensive Plan in policy LU1.6 seeks to provide "harmonious transition" in such areas.

HEIGHT, BULK AND SCALE

Potential adverse impacts of height, bulk and scale under the Preferred Alternative would be similar to those under Alternative 4. Growth in the urban centers would likely be a mix of mid- and high-rise development while growth in transit-oriented development nodes would likely be up to mid-rise in scale. Growth in the hub urban villages would likely be up to mid-rise and in the residential urban villages a mix of low- and mid-rise.

Impacts of the Preferred Alternative would also occur in the urban villages identified for expansion of village boundaries (same as Alternative 4 except Fremont expansion is omitted. Zoning in the expansion areas would similarly likely be rezoned from low intensity, single-family residential uses to accommodate low-rise multifamily and possibly local-service commercial uses. Figure 3.1–4 through Figure 3.1–12 illustrate the current maximum allowed height in each of the potential urban village expansion areas. As these figures show, the areas to be added to the existing urban villages are characterized by relatively low building heights and low FAR limits. Over time, height and bulk in these areas would increase with additional development, and localized adverse bulk and scale contrasts could occur as the area transitions to a more intense development pattern.

In areas outside of the urban villages and outside of the urban village expansion areas, the overall development character and pattern would likely remain more comparable to existing bulk and scale patterns.

Figure 3.1–4 Height limits—Ballard expansion area

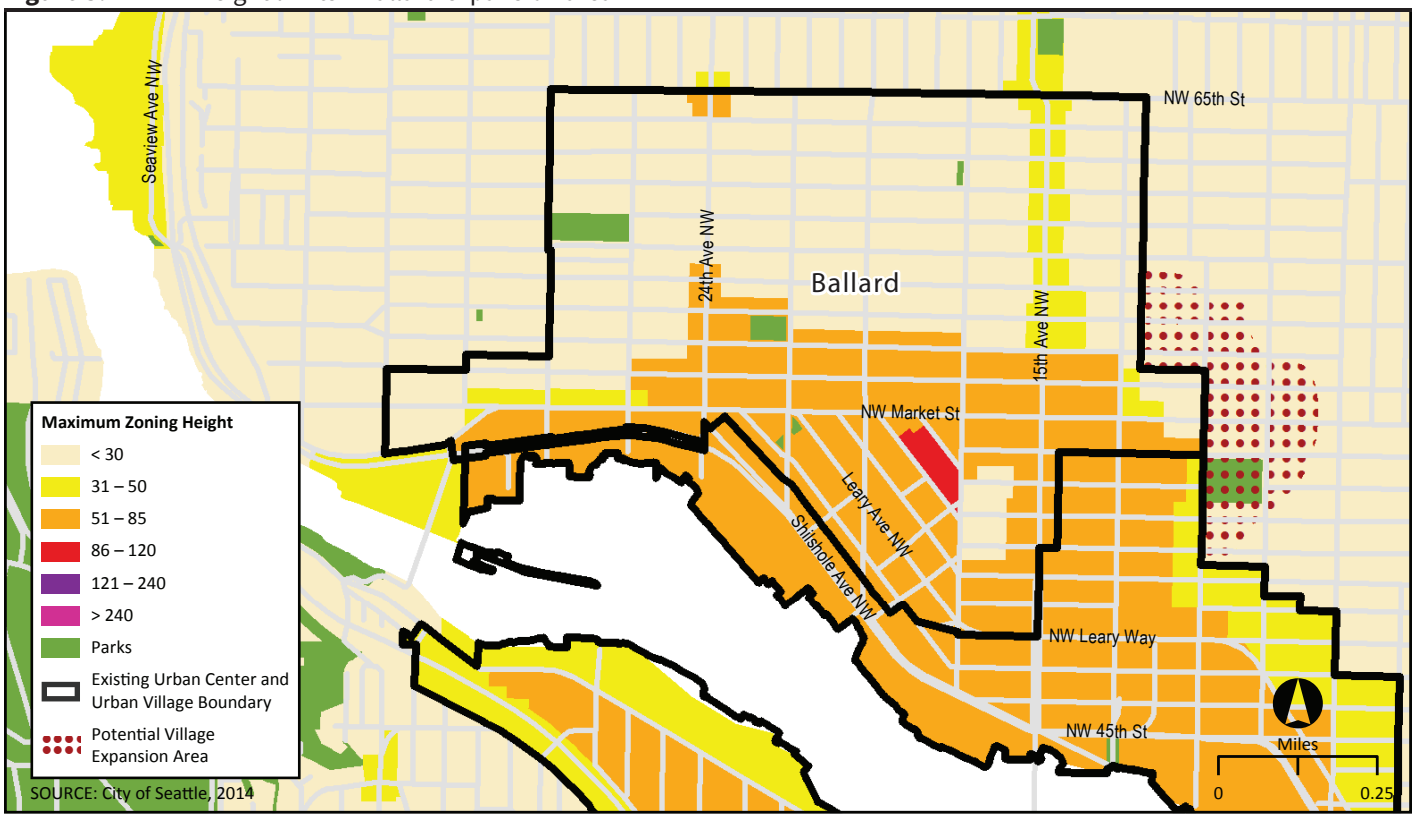


Figure 3.1–5 Height limits—West Seattle Junction expansion area

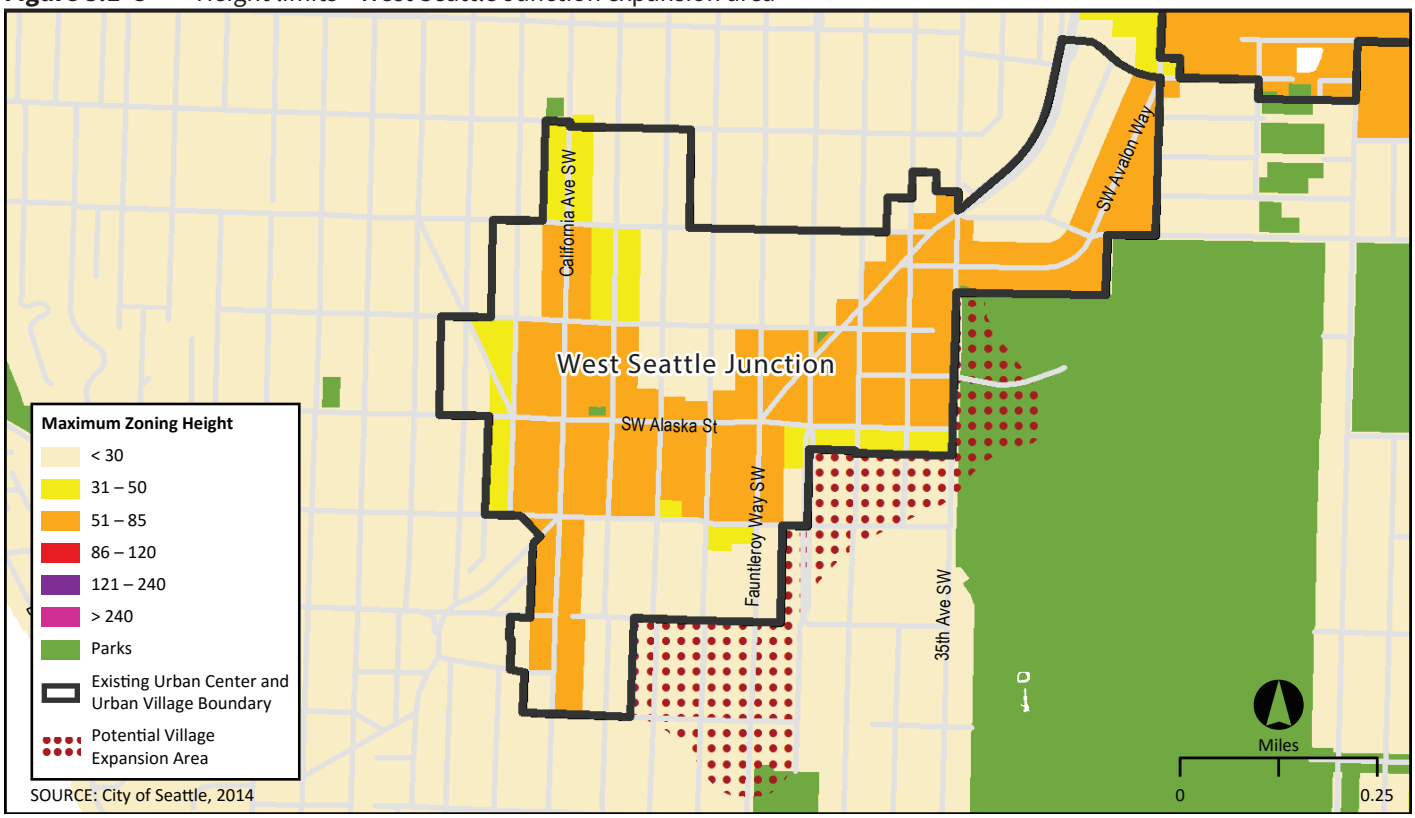


Figure 3.1–6 Height limits—Crown Hill expansion area

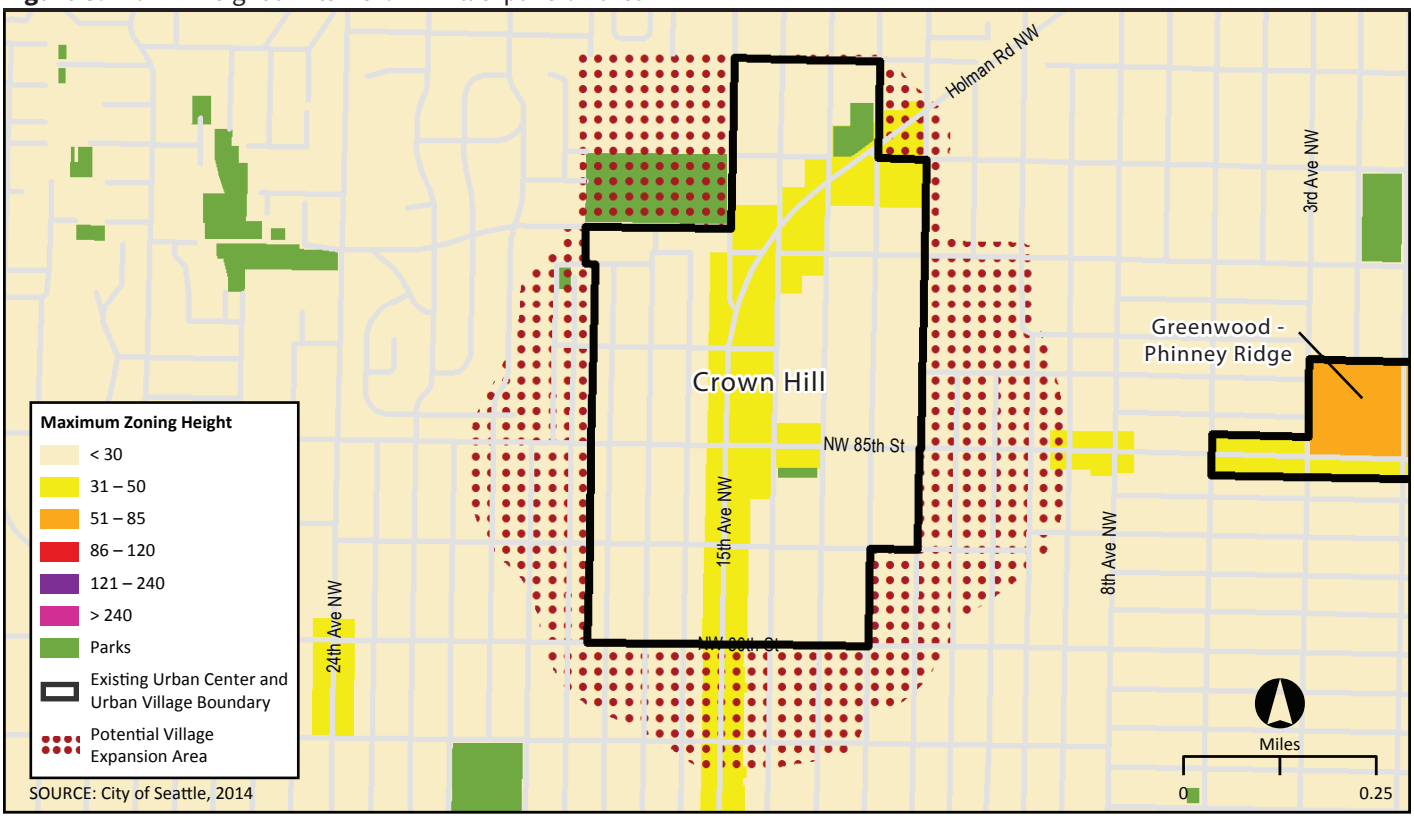


Figure 3.1–7 Height limits—North Beacon Hill expansion area

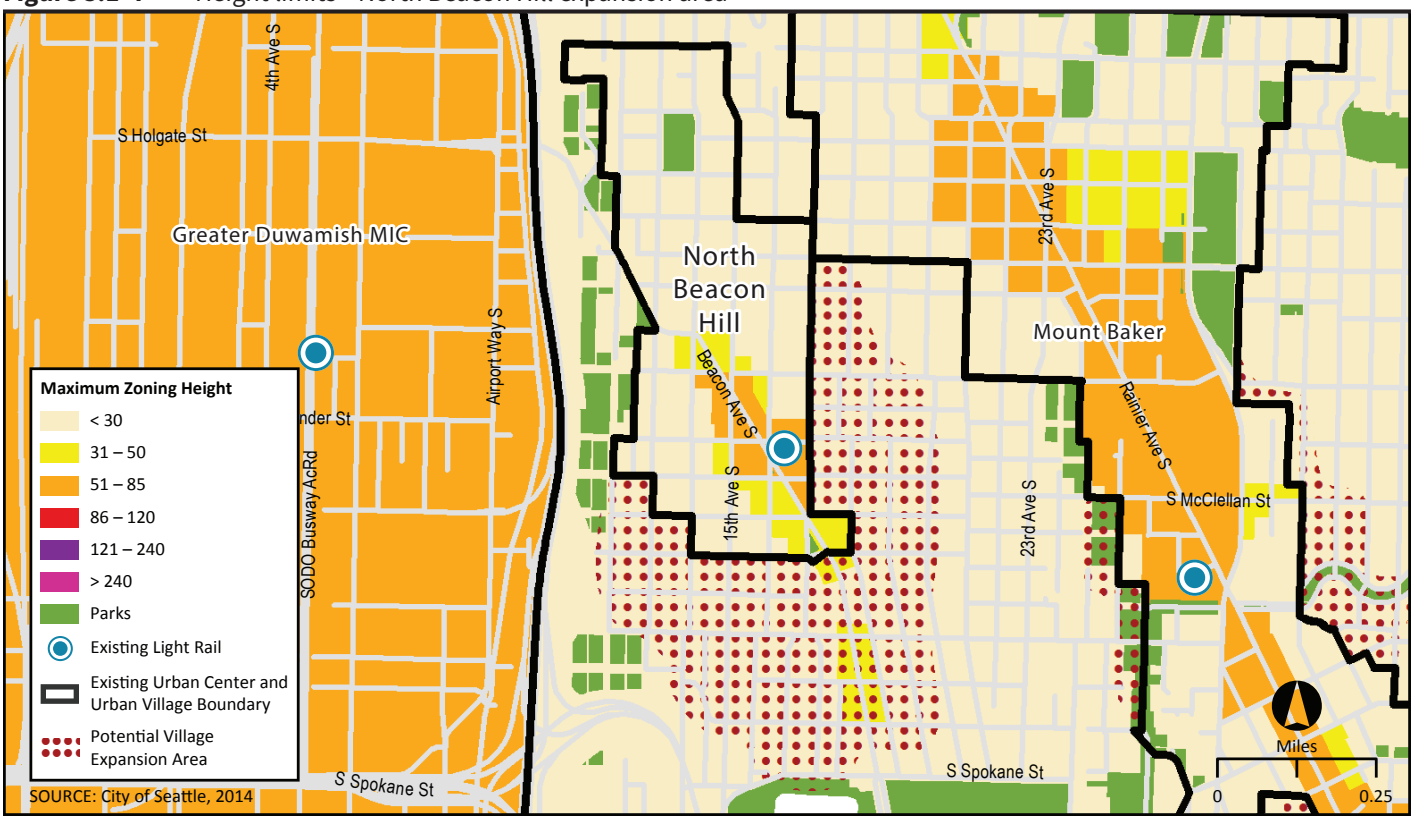


Figure 3.1–8 Height limits—Othello expansion area

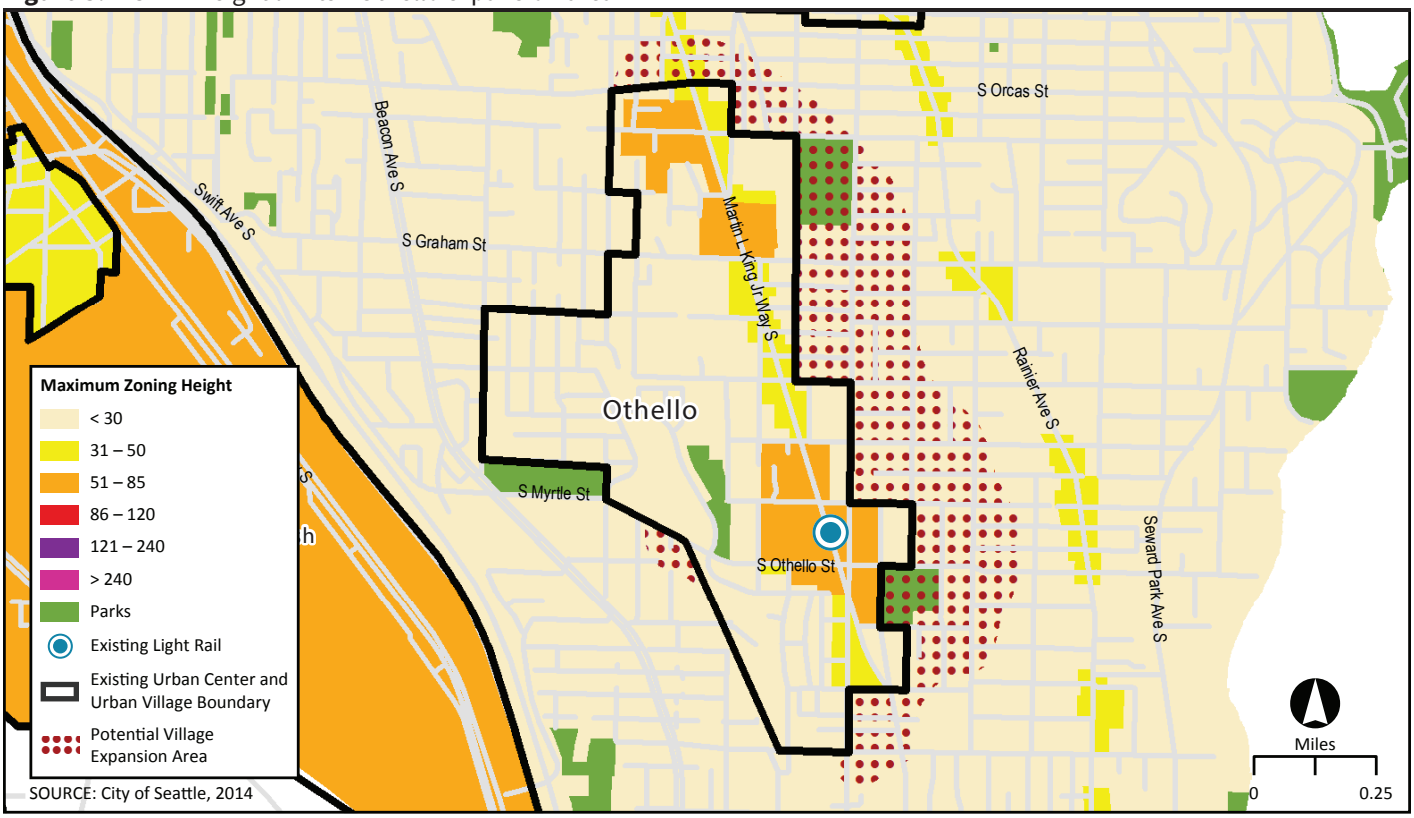


Figure 3.1–9 Height limits—Rainier Beach expansion area

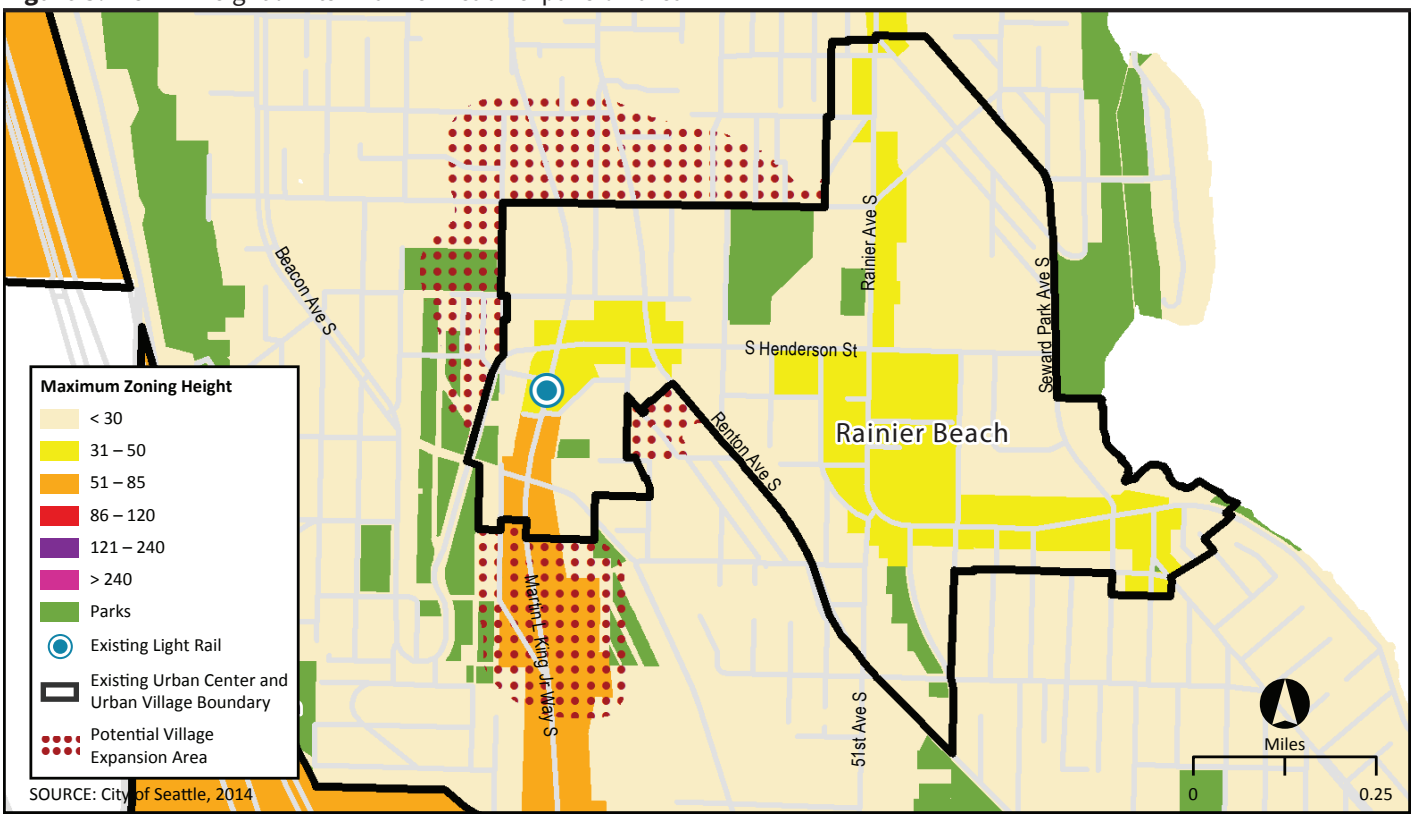


Figure 3.1–10 Height limits—Roosevelt expansion area

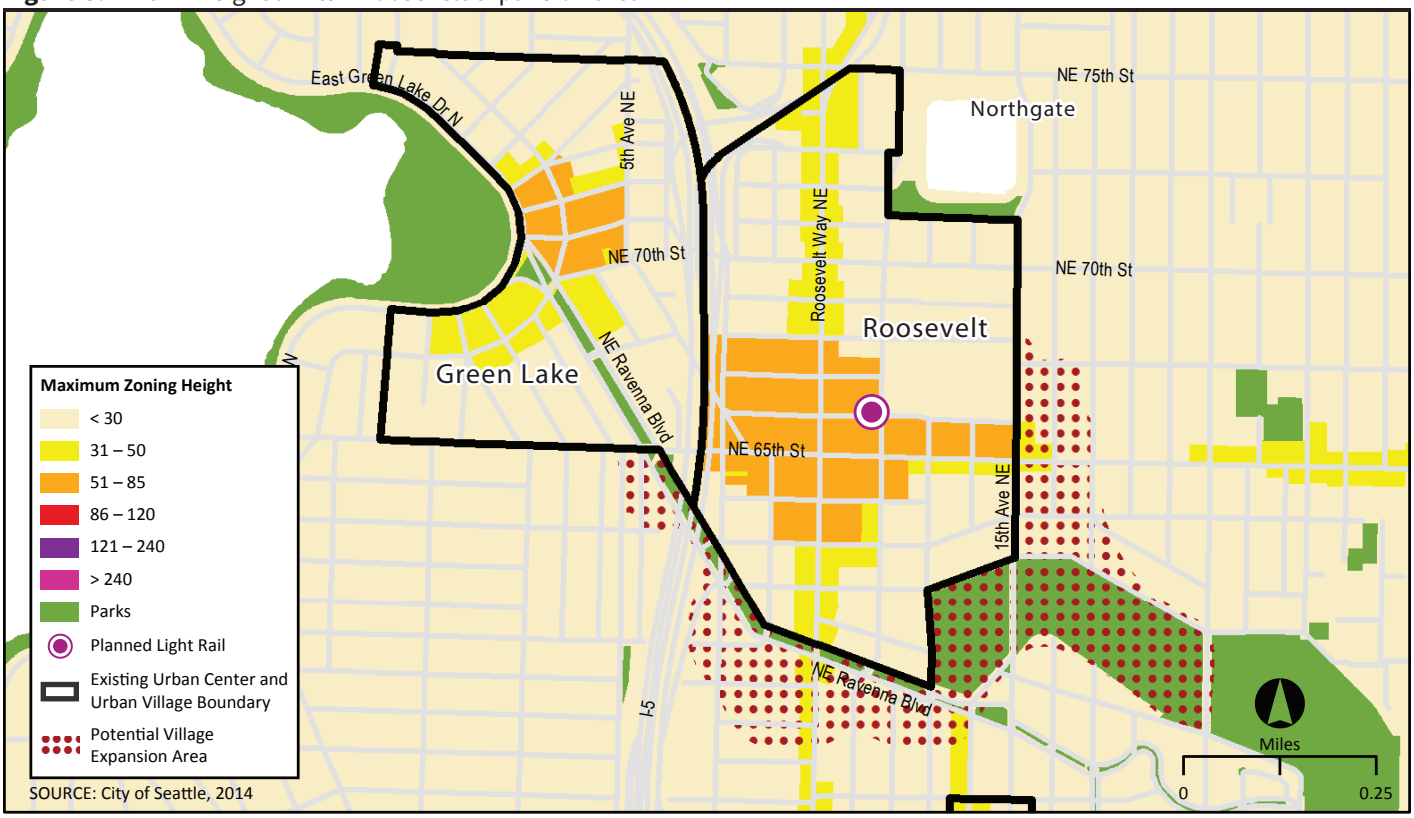


Figure 3.1–11 Height limits—NE 130th Street new urban village

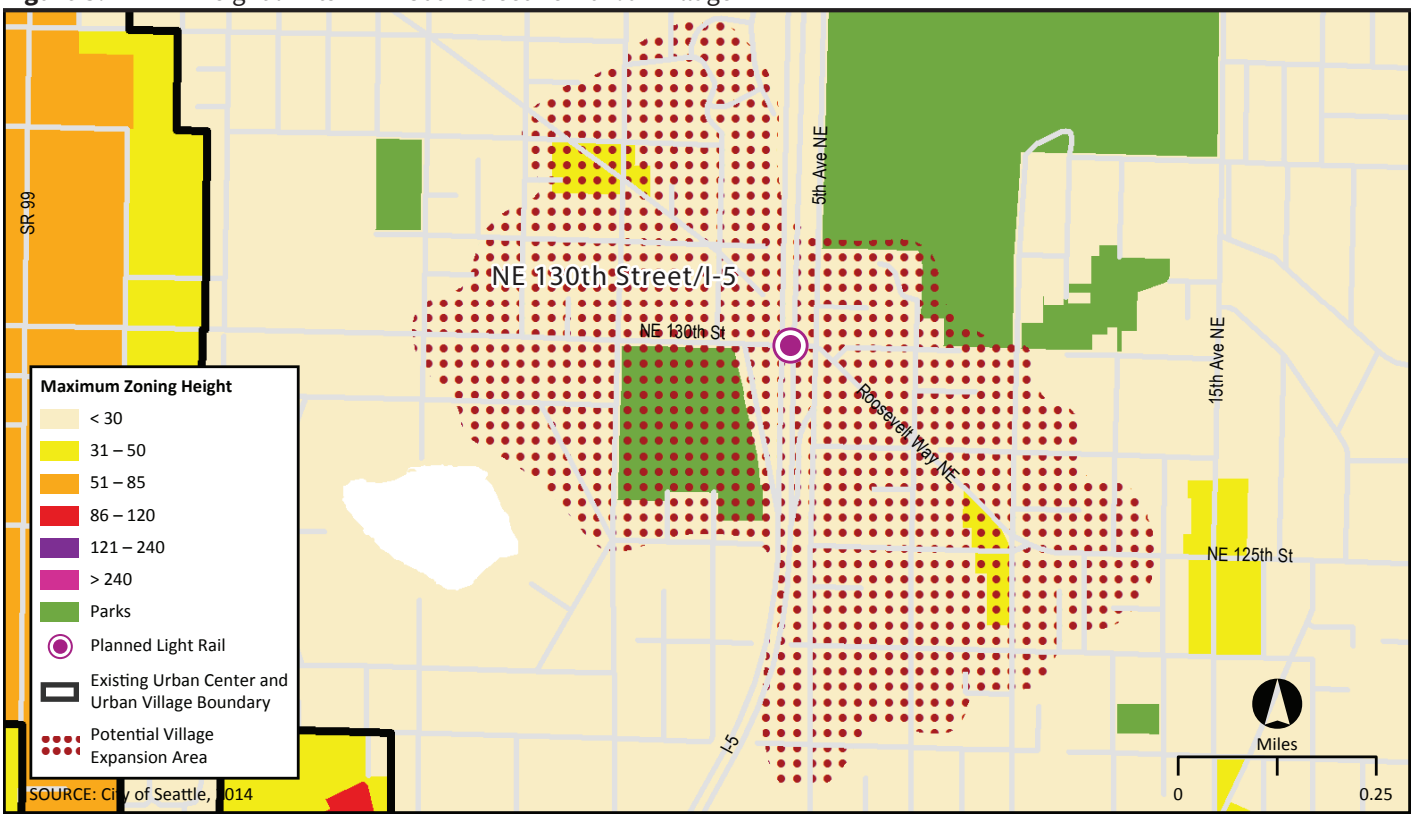
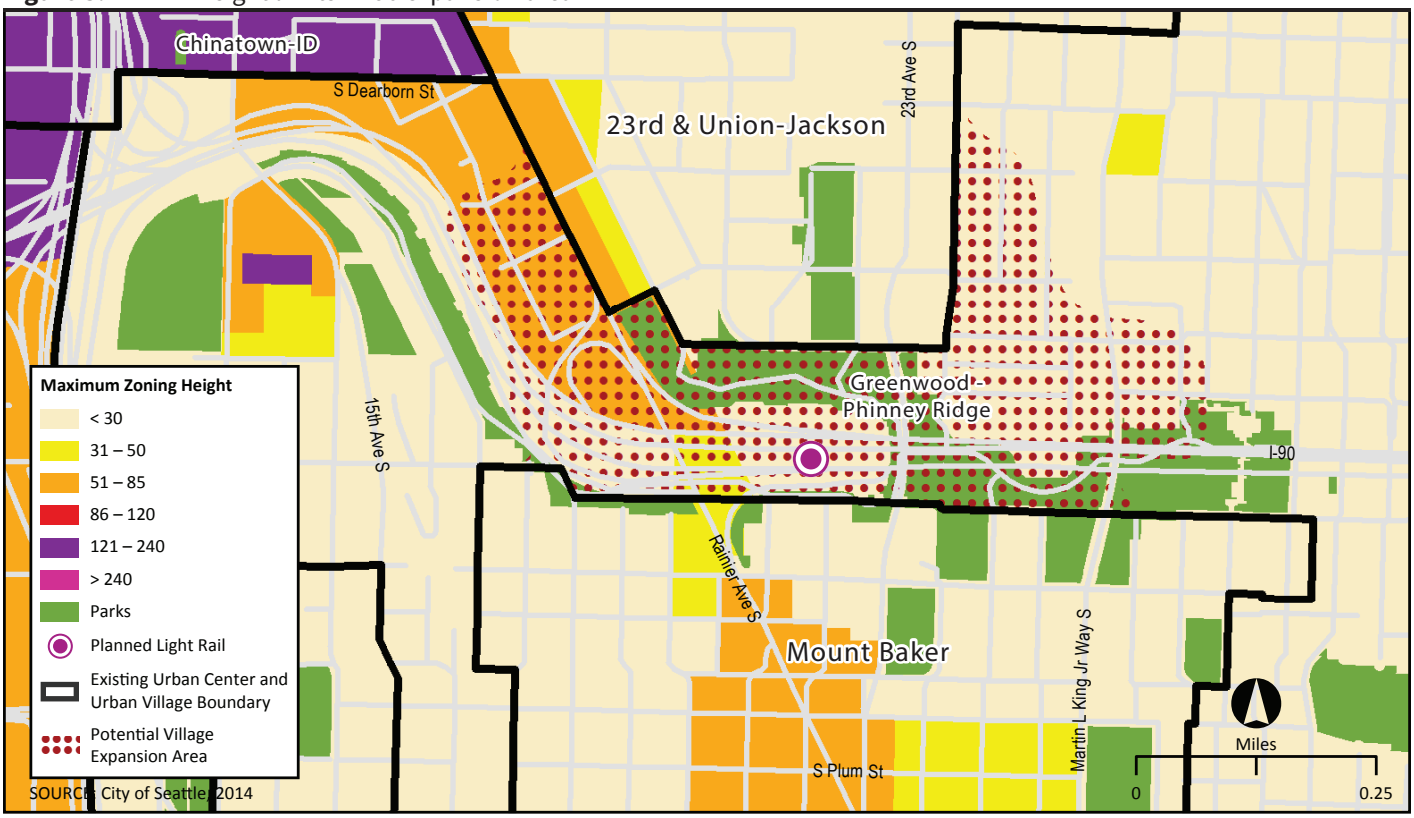


Figure 3.1–12 Height limits—I-90 expansion area



VIEWS

Impacts to views under the Preferred Alternative would be similar to those described under Alternative 4. As future development creates additional building height and bulk in urban centers and villages, there is a minor but recognized potential for localized disruption of protected views, in the worst case. The precise nature and degree of potential future view disruptions along scenic routes or from particular SEPA-protected public viewpoints would depend upon specific locational qualities and individual project designs. As applicable, individual project-level review could include detailed evaluation of potential view impacts along with opportunities to define mitigation during future land use permit application and design review processes.

EFFECTS OF OTHER POLICY CHANGES

The combination of proposed urban village expansion areas, deletion of existing policies LU59 and LU60 and changes in Future Land Use Map (FLUM) mapping practices would have similar impacts as with Alternative 4 (see discussion in Final EIS Section 3.2, page 3.2–8). Preferred Alternative expansion areas are the same as defined for Alternative 4, except with the omission of the Fremont expansion area. The potential range of adverse compatibility and height/bulk/scale impacts would be similar to those disclosed in the Draft EIS for Alternative 4.

It is also noted here that findings made as "impacts common to all alternatives" (see Final EIS Section 3.2—revisions and clarifications) with respect to the proposed method of defining growth estimates for urban villages, also apply to the Preferred Alternative.

OVERVIEW COMMENT ON LAND USE EFFECTS OF POSSIBLE USE OF SEPA INFILL PROVISIONS

Similar to conclusions reached on Draft EIS page 3.4-20, the use of SEPA infill provisions to set higher categorical exemption levels is likely to encourage future growth and development patterns consistent with the City's comprehensive plan. This means that higher exemption levels would be likely to attract new development in patterns promoting accomplishment of the preferred urban village strategy. In terms of this Preferred Alternative, this would mean encouraging growth across the spectrum of urban centers and urban villages, some of which are assumed to be expanded. This alternative also includes proposed methods of defining urban village growth estimates that would provide a means of measuring whether a preferred housing density and employment intensity has been reached. This is one of the requirements in State law that must be met in order to use the SEPA infill provisions.

The conclusions described above about land use patterns, compatibility, height/bulk/scale and view effects of the Preferred Alternative also apply if SEPA infill provisions are used.

MITIGATION MEASURES

The mitigation identified in Draft EIS Section 3.4, Land Use Patterns, Compatibility, Height, Bulk and Scale, is adequate to mitigate potential impacts to the Preferred Alternative. No new mitigation is proposed.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The Preferred Alternative is not expected to result in significant unavoidable adverse impacts beyond those described in the Draft EIS Section 3.4, Land Use Patterns, Compatibility, Height, Bulk and Scale.

Relationship to Plans, Policies and Regulations

The Preferred Alternative's relationship to plans, policies and regulations is generally consistent with what was discussed in the Draft EIS, but as also modified in this Final EIS, Section 3.2 with more overview description and discussion of the Elements contained in the Draft Comprehensive Plan from July 2015. This expanded discussion is applicable to the Draft EIS alternatives and the Preferred Alternative. The Draft EIS section discussed differences among the alternatives in a limited fashion. Given its resemblance in many respects to Alternative 4, the Preferred Alternative's relationships to plans, policies and regulations is most closely similar to Alternative 4, except in its different growth distributions that seek in part to support equitable growth patterns as the city grows over the next twenty years.

Population, Employment and Housing

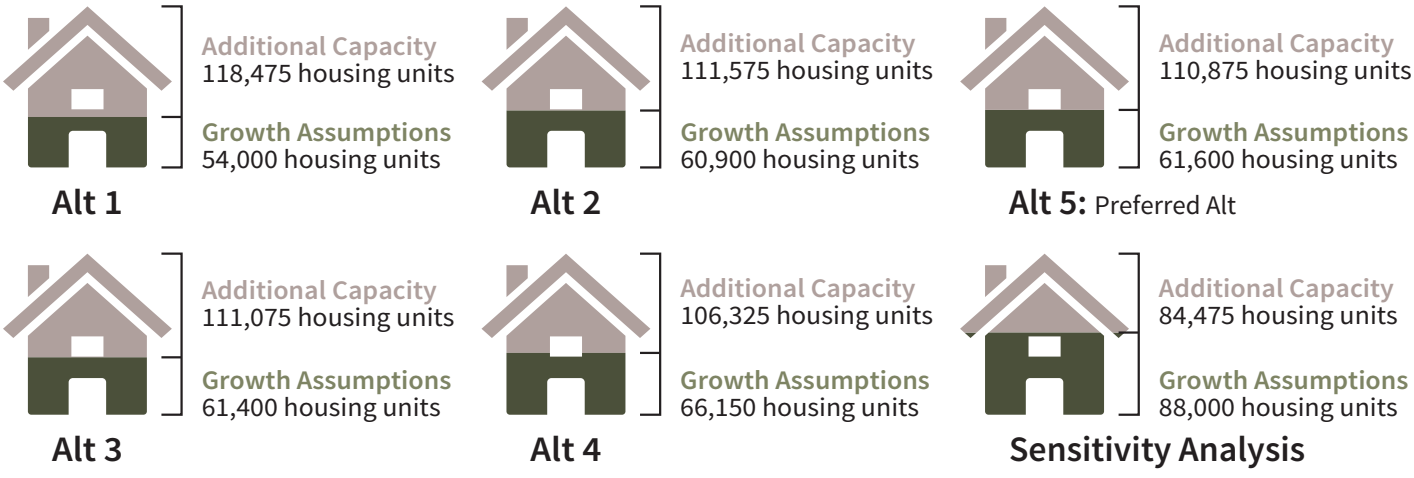
POPULATION AND HOUSING

The Preferred Alternative plans for 70,000 new housing units by 2035, which is consistent with the growth analyzed in the Draft EIS. The impacts of this increase in population will be largely the same as those impacts already discussed for Alternative 4, which guides growth to urban villages near rail and bus transit. In the Preferred Alternative, as with the four alternatives analyzed, no part of the city will exceed existing capacity for housing units (see Figure 3.1–13).

The Preferred Alternative anticipates 88 percent of growth in housing units to occur inside urban villages and centers, with 12 percent of housing unit growth outside of centers and villages. The Preferred Alternative prioritizes growth where there is frequent and reliable bus service or rail transit, and also would guide lesser growth than Alternative 4 to areas where the equity analysis showed a high risk of displacement and a low access to opportunity. This should lead to a somewhat reduced risk for adverse displacement-related housing impacts to occur in the neighborhoods most sensitive to these impacts, compared to Alternative 4. However, implementation of mitigation strategies related to such impacts should still be considered, as appropriate.

Table 3.1–3 on the following page shows the housing growth for the Preferred Alternative and the change in growth from Alternative 4. Figure 3.1–14 shows the distribution of growth by village/center type for the Preferred Alternative.

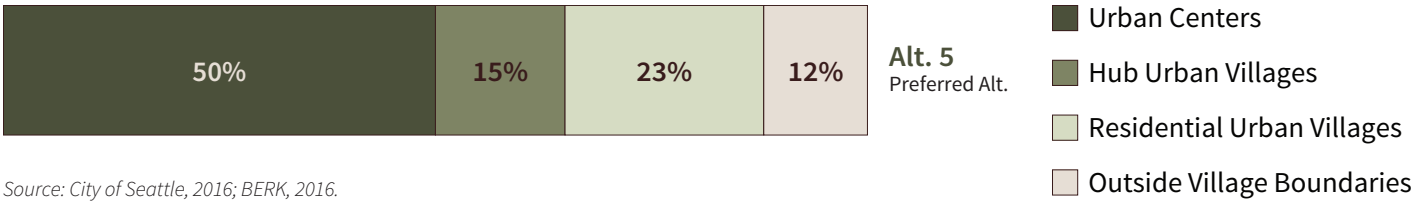
Figure 3.1–13 Urban village housing capacity and growth assumptions*



* Existing capacity within urban villages is 172,475 housing units (same for all alternatives).

Source: City of Seattle, Office of Planning and Community Development, 2016.

Figure 3.1–14 Distribution of housing growth by village/center type under the Preferred Alternative



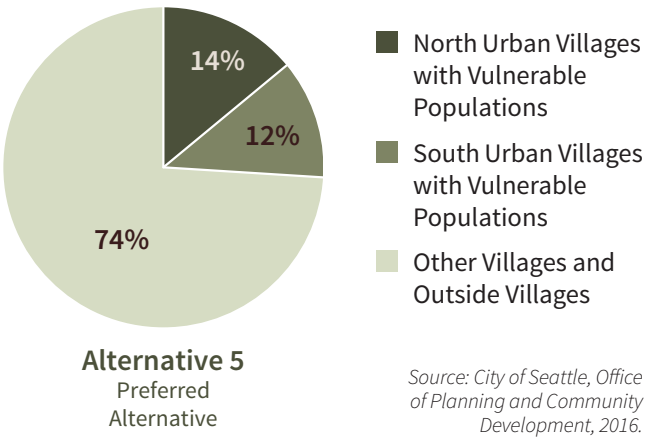
Source: City of Seattle, 2016; BERK, 2016.

Table 3.1–3 Preferred Alternative housing growth and growth shares

	Preferred Alt. Housing Unit Growth	Housing Unit Change from Alt. 4
Urban Centers	35,000	1,000
Hub Urban Villages	10,400	(2,400)
Residential Urban Villages	16,200	(3,150)
Existing	*14,700*	*(3,150)*
New (130th/I-5)	*1,500*	*0*
Outside Centers and Villages	8,400	4,550
Total	**70,000**	**0**

Source: City of Seattle, 2016; BERK, 2016.

Figure 3.1–15 Projected residential growth in areas with vulnerable populations, Preferred Alternative



Source: City of Seattle, Office of Planning and Community Development, 2016.

Compared to growth analyzed in Alternative 4, the Preferred Alternative anticipates a change in the distribution of expected housing growth in the Uptown Urban Center and in some of the hub and residential urban villages. The Bitter Lake Hub Urban Village would receive more housing than in Alternative 4, while Mount Baker and West Seattle Junction would receive less. All residential urban villages anticipate a change in growth as compared to Alternative 4. This includes reduced growth estimates for Columbia City, Crown Hill, Greenwood-Phinney Ridge, North Beacon Hill, Othello, Rainier Beach and Roosevelt, compared to Alternative 4 (see Table 2–3 and Figure 3.1–2 on page 3.1–9).

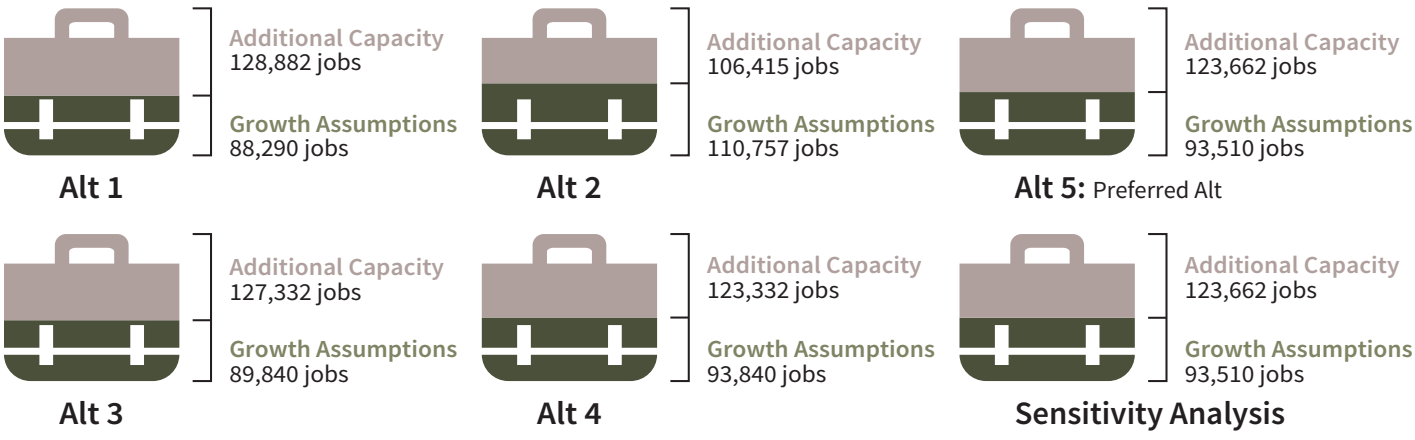
In comparison to Alternative 4's measures of growth in areas with vulnerable populations as shown in Draft EIS Figure 3.6-21, the Preferred Alternative (with or without SEPA infill exemption provisions) would lead to increased amounts and proportions of housing growth in the North End neighborhoods with vulnerable populations, and reduced amounts and proportions of growth in the South Seattle neighborhoods with vulnerable populations (see Figure 3.1–15). This is due to increased growth distributions to Bitter Lake and Aurora-Licton urban villages, with other North End villages of this kind held steady. It also represents a product of the intent of the Preferred Alternative to reduce intended growth levels in South End neighborhoods where there would be higher risk of adverse displacement impacts. However, it is worth noting that the growth distributed to the 23rd-Union Jackson Urban Village would increase from 1,750 dwelling units (Alternative 4) to 2,700 dwelling units under the Preferred Alternative.

EMPLOYMENT

The Preferred Alternative anticipates 115,000 new jobs in Seattle by 2035, consistent with the assumption for the Draft EIS alternatives. The impacts of this increase in employment would be largely the same as those impacts already discussed in Alternative 4, which guides growth to urban villages near rail and bus transit. The Preferred Alternative, however, assumes that more employment growth will occur inside the urban centers and less employment growth will occur in the urban villages than under Alternative 4. However, there would be less growth concentrated inside the urban centers than was analyzed in Alternative 2. In the Preferred Alternative, as with the four alternatives analyzed, no part of the city will exceed existing capacity for employment (see Figure 3.1–16).

The Preferred Alternative anticipates 81 percent of job growth would occur inside urban villages and centers, with 19 percent of job growth outside of centers and villages. The Preferred Alternative assumes more employment growth in the urban centers than in Alternative 4 (7,500 more jobs, with 5,000 of these jobs locating Downtown). The share of jobs in urban centers would be 59 percent, as compared to the 53 percent analyzed in Alternative 4. The Ballard, Mount Baker, Othello and Roosevelt urban villages would see a notably lesser level of employment growth compared to Alternative 4, as would certain other urban villages such as Aurora-Licton Springs and Columbia City. Employment growth in the Manufacturing/Industrial Centers under the Preferred Alternative and Alternative 4 would be comparable.

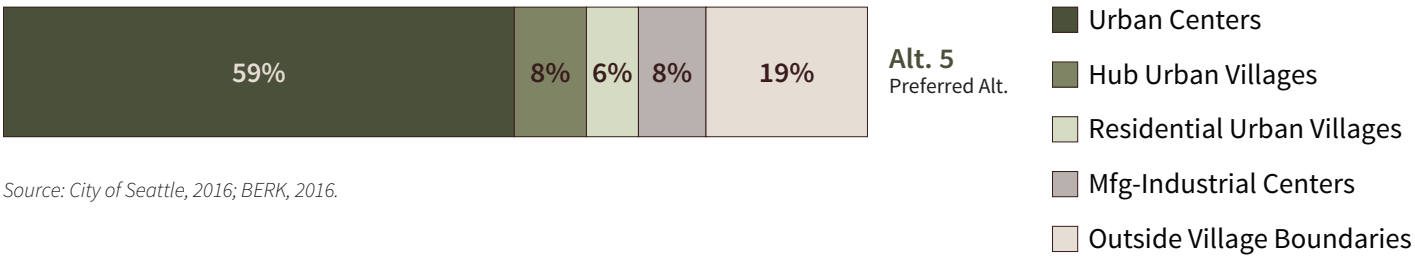
Figure 3.1–16 Urban village employment capacity and growth assumptions*



* Existing capacity within urban villages is 217,172 jobs (same for all alternatives).

Source: City of Seattle, Office of Planning and Community Development, 2016.

Figure 3.1–17 Distribution of employment growth by village/center type under the Preferred Alternative



Source: City of Seattle, 2016; BERK, 2016.

Table 3.1–4 Preferred Alternative employment growth and growth shares

	Preferred Alt. Employment Growth	Change in Employment from Alt. 4
Urban Centers	68,000	7,500
Hub Urban Villages	9,600	(3,700)
Residential Urban Villages	6,910	(4,130)
Existing	*6,510*	*(4,130)*
New (130th/I-5)	*400*	*0*
Manufacturing/Industrial Centers	9,000	0
Outside Centers and Villages	21,490	330
Total	**115,000**	**0**

Source: City of Seattle, 2016; BERK, 2016.

Table 3.1–4 shows the employment growth assumptions for the Preferred Alternative and the change in growth from Alternative 4. Figure 3.1–17 shows the distribution of employment growth by village/center type.

Impacts of job growth in the Preferred Alternative are expected to be largely the same as those analyzed in Alternative 4 of the Draft EIS. A greater concentration of jobs in urban centers is likely to contribute to added pressures on transit and could influence future transit investments as well as commuting trends. Conclusions would remain similar with or without the use of SEPA infill provisions.

MITIGATION MEASURES

Seattle currently has the land capacity and regulations in place to absorb projected future growth for housing and employment by 2035 for the growth assumptions of the Preferred Alternative. Applicable mitigation measures for the Preferred Alternative are the same as analyzed in the Draft EIS. This reflects similar conclusions and rationales discussed in the Draft EIS to define several mitigation strategies to address housing affordability and displacement, combining public and private efforts. This includes ongoing City efforts, as well as other strategies relating to the Housing Affordability and Livability Agenda (HALA) as explained in the Draft EIS Section 3.6.3.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Under the Preferred Alternative, conclusions for Significant Unavoidable Adverse Impacts regarding housing affordability would remain the same as concluded in the Draft EIS, although a differing growth distribution could contribute to a slightly reduced potential for displacement-related impacts in neighborhoods rated as having high risk of displacement and low access to opportunity.

Transportation

The travel demand model was run for the Preferred Alternative land use pattern. For this analysis, the 2035 No Action Alternative (Alternative 1) still acts as the baseline for identifying transportation impacts. In the Draft EIS, the metric used to identify impacts was the projected screenline v/c ratios. An impact was identified if a forecasted v/c ratio did not meet the LOS standards. However, the City is proposing to change the LOS standards from screenline v/c ratios to a mode share standard, as discussed in Final EIS Section 3.2, Plans and Policies. For the purposes of this analysis, both the screenline and mode shares were evaluated so that the Preferred Alternative can be compared to the alternatives evaluated in the Draft EIS.

SCREENLINES

*A **screenline** is an imaginary line across which the number of passing vehicles is counted.*

While there is a different distribution of future growth that would affect future land use patterns under the Preferred Alternative, all the screenline volume-to-capacity (v/c) ratios are expected to meet the existing LOS standards. Similar to alternatives 1 through 4, Screenline 1.11 (North City Limit—3rd Avenue NW to Aurora Avenue NW), Screenline 5.11 (Ballard Bridge), and Screenline 5.16 (University & Montlake Bridges) are projected to have v/c ratios over 1.0. However, the LOS threshold is 1.2 for these screenlines, so no significant adverse LOS impacts are identified.

The Preferred Alternative is forecasted to have lower auto volumes across screenlines in south Seattle compared to Alternative 4 because there would be lesser household and employment growth. Small increases in the v/c ratios across the Ship Canal are expected compared to Alternative 4, as increased levels of household and employment growth are assumed in north Seattle. While there is some variation in travel patterns across all alternatives, the differences in v/c ratios are minor, with no larger than a 0.06 change in v/c ratio for any one screenline in any one direction compared to alternatives 1–4 (see Table 3.1–5).

Because all screenlines are projected to meet the LOS standards under the Preferred Alternative, no significant adverse auto, freight or transit impacts are identified under the Preferred Alternative.

STATE FACILITIES

In addition to the screenline locations, auto volumes on the state facilities studied in the Draft EIS were examined under the Preferred Alternative. The Preferred Alternative is expected to have roughly equivalent auto traffic on all of the segments studied. All but one of the volume-to-LOS D capacity ratios fall within the ranges forecasted for alternatives 1–4. The one exception is SR 509 between S 112th Street and Cloverdale Street, which is expected to have a ratio 0.01 higher than the Draft EIS alternatives. Daily traffic fluctuations tend to be of that magnitude or larger and the difference may not be noticed by drivers. Moreover, the ratio would still be well under 1.0, meaning the facility would still meet WSDOT's LOS D standard. Therefore, the overall findings regarding state facilities remain the same as stated in the Draft EIS (see Appendix B.2)

Table 3.1–5 2035 PM peak hour screenline volume-to-capacity

			Alt. 1		Alt. 2		Alt. 3		Alt. 4		Preferred Alt. 5		Sensitivity Analysis	
No.	**Screenline Location**	**LOS Std.**	**NB/EB**	**SB/WB**	**NB/EB**	**SB/WB**	**NB/EB**	**SB/WB**	**NB/EB**	**SB/WB**	**NB/EB**	**SB/WB**	**NB/EB**	**SB/WB**
1.11	North City Limit—3rd Ave NW to Aurora Ave N	1.20	1.03	0.80	1.03	0.79	1.02	0.78	1.03	0.79	1.04	0.80	1.04	0.82
1.12	North City Limit—Meridian Ave N to 15th Ave NE	1.20	0.76	0.61	0.76	0.61	0.76	0.62	0.77	0.62	0.77	0.64	0.78	0.67
1.13	North City Limit—30th Ave NE to Lake City Way NE	1.20	0.96	0.83	0.98	0.82	0.96	0.83	0.96	0.83	0.97	0.84	0.97	0.84
2	Magnolia	1.00	0.56	0.57	0.55	0.56	0.56	0.56	0.56	0.55	0.56	0.56	0.58	0.56
3.11	Duwamish River—West Seattle Bridge & Spokane St	1.20	0.69	1.15	0.68	1.15	0.70	1.14	0.70	1.15	0.69	1.15	0.71	1.16
3.12	Duwamish River—1st Ave S & 16th Ave S	1.20	0.38	0.55	0.38	0.55	0.39	0.55	0.38	0.55	0.38	0.55	0.38	0.55
4.11	South City Limit—Martin Luther King Jr Way to Rainier Ave. S	1.00	0.57	0.98	0.56	0.93	0.58	0.94	0.57	0.93	0.56	0.93	0.57	0.93
4.12	South City Limit—Marine Dr SW to Meyers Way S	1.00	0.56	0.72	0.55	0.72	0.56	0.72	0.56	0.73	0.56	0.72	0.57	0.72
4.13	South City Limit—SR 99 to Airport Way S	1.00	0.58	0.74	0.58	0.75	0.59	0.76	0.58	0.75	0.58	0.74	0.59	0.74
5.11	Ship Canal—Ballard Bridge	1.20	1.19	0.72	1.15	0.69	1.16	0.70	1.17	0.73	1.18	0.72	1.21	0.75
5.12	Ship Canal—Fremont Bridge	1.20	0.79	0.71	0.78	0.70	0.78	0.70	0.77	0.71	0.79	0.71	0.80	0.73
5.13	Ship Canal—Aurora Bridge	1.20	0.94	0.82	0.92	0.82	0.91	0.82	0.91	0.83	0.92	0.82	0.94	0.84
5.16	Ship Canal—University & Montlake Bridges	1.20	0.96	1.06	0.96	1.06	0.95	1.05	0.94	1.05	0.95	1.05	0.97	1.08
6.11	South of NW 80th St—Seaview Ave NW to 15th Ave NW	1.00	0.52	0.50	0.51	0.48	0.51	0.48	0.53	0.50	0.53	0.50	0.53	0.51
6.12	South of N(W) 80th St—8th Ave NW to Greenwood Ave N	1.00	0.88	0.77	0.85	0.75	0.86	0.76	0.87	0.78	0.87	0.78	0.89	0.80
6.13	South of N(E) 80th St—Linden Ave N to 1st Ave NE	1.00	0.55	0.41	0.54	0.41	0.53	0.41	0.53	0.42	0.54	0.41	0.56	0.43
6.14	South of NE 80th St—5th Ave NE to 15th Ave NE	1.00	0.76	0.67	0.74	0.65	0.74	0.67	0.73	0.67	0.74	0.67	0.74	0.68
6.15	South of NE 80th St.—20th Ave NE to Sand Point Way NE	1.00	0.64	0.58	0.63	0.57	0.62	0.58	0.61	0.58	0.63	0.58	0.64	0.60
7.11	West of Aurora Ave—Fremont Pl N to N 65th St	1.00	0.55	0.66	0.54	0.64	0.55	0.64	0.57	0.65	0.56	0.65	0.58	0.67
7.12	West of Aurora Ave—N 80th St to N 145th St	1.00	0.56	0.66	0.55	0.65	0.56	0.65	0.56	0.66	0.57	0.67	0.58	0.68
8	South of Lake Union	1.20	0.92	0.83	0.93	0.83	0.90	0.83	0.90	0.82	0.91	0.82	0.92	0.84
9.11	South of Spokane St—Beach Dr SW to W Marginal Way SW	1.00	0.59	0.71	0.57	0.70	0.59	0.71	0.60	0.72	0.59	0.72	0.60	0.73
9.12	South of Spokane St—E Marginal Way S to Airport Way S	1.00	0.60	0.71	0.60	0.71	0.61	0.71	0.60	0.71	0.60	0.70	0.61	0.71
9.13	South of Spokane St—15th Ave S to Rainier Ave S	1.00	0.66	0.89	0.65	0.89	0.67	0.91	0.67	0.91	0.66	0.89	0.67	0.90
10.11	South of S Jackson St—Alaskan Way S to 4th Ave S	1.00	0.64	0.84	0.64	0.85	0.64	0.83	0.64	0.84	0.64	0.84	0.65	0.84
10.12	South of S Jackson St—12th Ave S to Lakeside Ave S	1.00	0.74	0.91	0.74	0.92	0.76	0.91	0.75	0.92	0.75	0.91	0.77	0.92
12.12	East of CBD	1.20	0.39	0.52	0.39	0.53	0.39	0.52	0.39	0.52	0.39	0.52	0.40	0.53
13.11	East of I-5—NE Northgate Way to NE 145th St	1.00	0.84	0.78	0.88	0.79	0.85	0.79	0.84	0.79	0.86	0.79	0.88	0.80
13.12	East of I-5—NE 65th St to NE 80th St	1.00	0.50	0.53	0.50	0.51	0.50	0.54	0.49	0.54	0.51	0.53	0.51	0.55
13.13	East of I-5—NE Pacific St to NE Ravenna Blvd	1.00	0.62	0.67	0.62	0.67	0.63	0.65	0.63	0.65	0.63	0.65	0.64	0.67

Source: Seattle's Comprehensive Plan, Toward a Sustainable Seattle, 2008; Fehr & Peers, 2016.

MODE SHARE

The existing mode share estimates have been updated with new travel survey data collected as part of the PSRC 2014 Household Survey. Therefore, the forecasted mode shares for all alternatives have been updated to reflect the revised existing mode shares (see Figure 3.1–18 on the following page).

All alternatives are forecasted to have similar mode shares by sector. The auto mode share (SOV and HOV) is forecasted to decrease between one and six percentage points from existing conditions. Transit, walk and bike mode shares are expected to increase between one and six percentage points across all alternatives. In general, the forecasted share by mode differs by no more than one percentage point between all 2035 alternatives.

IMPACT SUMMARY

The Draft EIS discussion of impacts common to all alternatives is also applicable to the Preferred Alternative, namely with respect to localized probable significant adverse parking impacts but no significant adverse pedestrian, bicycle or safety impacts. No auto, freight or transit impacts are identified for the Preferred Alternative. Also, conclusions are similar with or without use of the SEPA infill provisions.

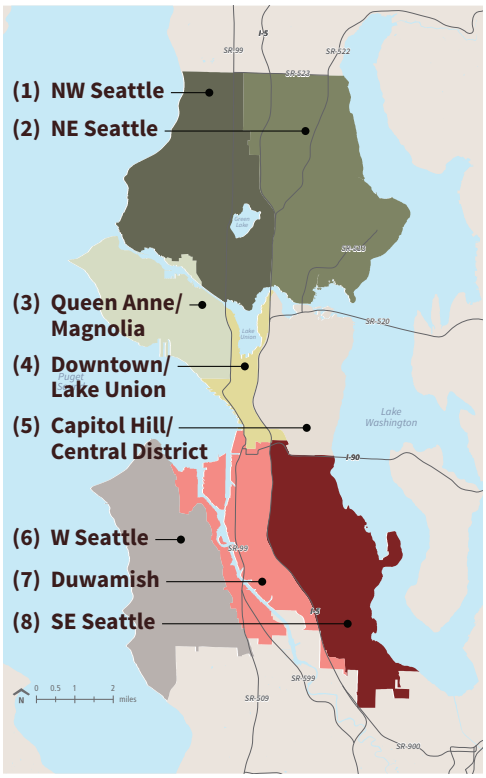
MITIGATION MEASURES

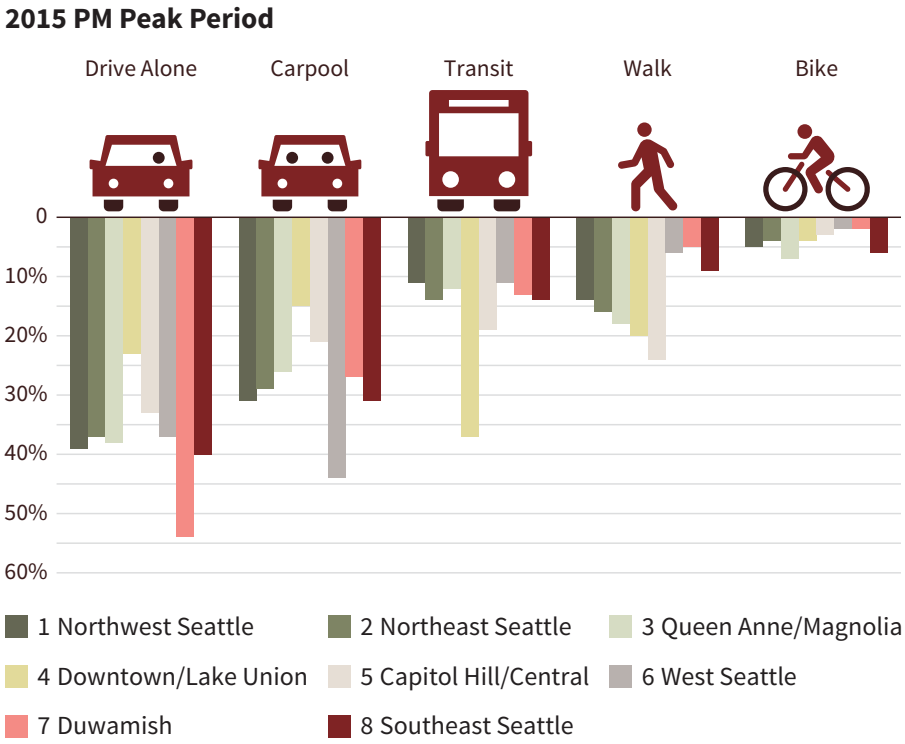
The mitigation identified in Draft EIS Section 3.7, Transportation, is relevant and adequate to mitigate potential impacts to the Preferred Alternative. No new mitigation is proposed.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The Preferred Alternative is not expected to result in significant unavoidable adverse impacts beyond those described for other alternatives in the Draft EIS Section 3.7, Transportation.

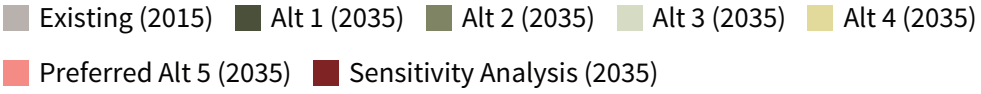
Figure 3.1–18 2015 and 2035 PM peak period mode share by sector



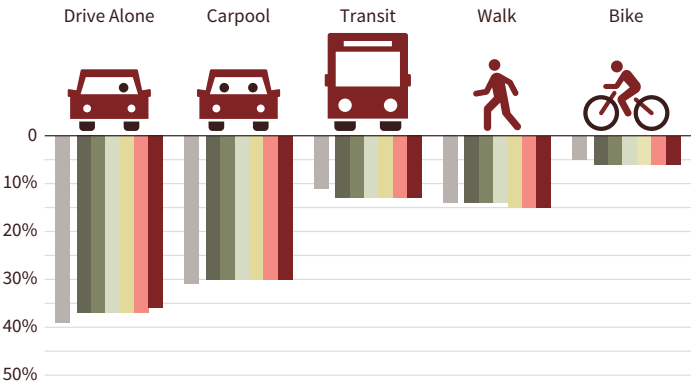


Note: Shares may not add to 100% due to rounding

Source: Project travel demand model, 2016.



2035: Northwest Seattle Sector



2035: Northeast Seattle Sector

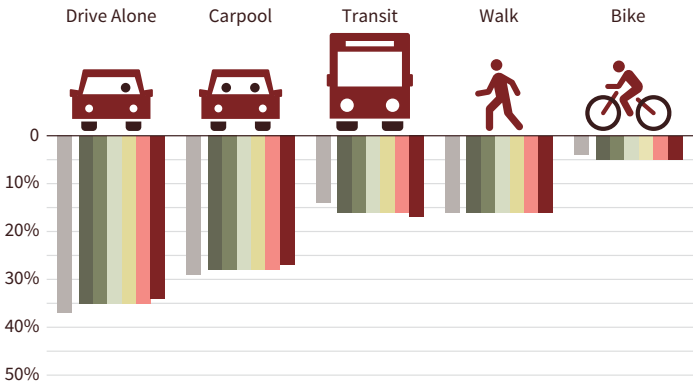
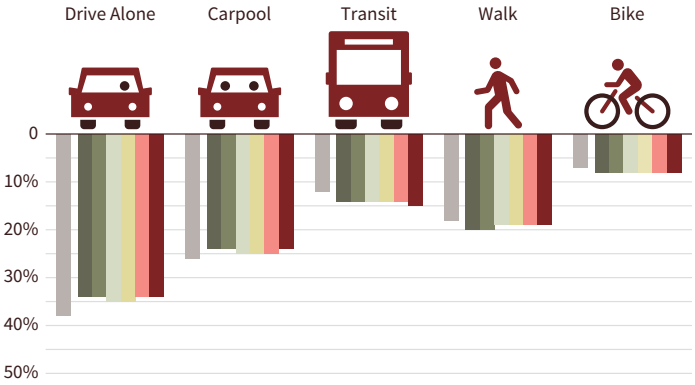
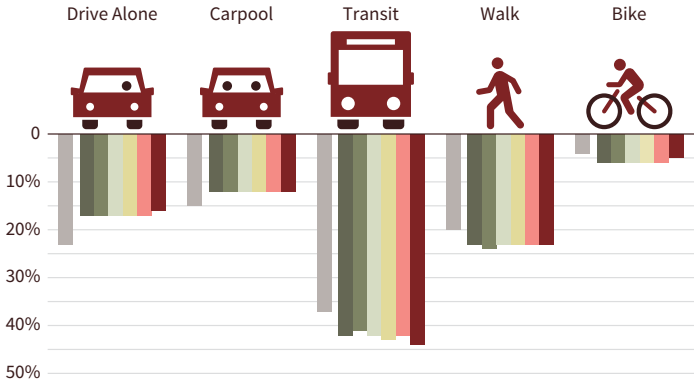


Figure 3.1–17 2015 and 2035 PM peak period mode share by sector (cont.)

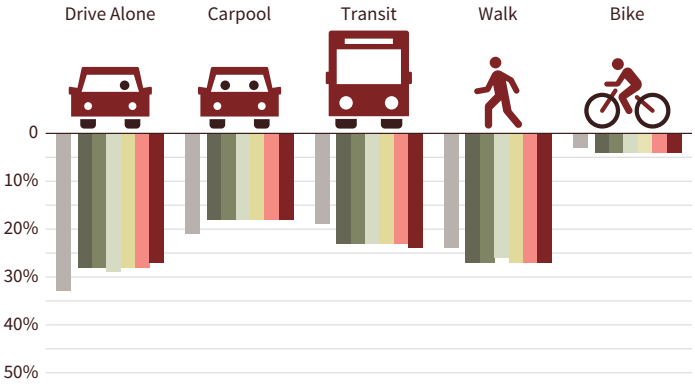
2035: Queen Anne/Magnolia Sector



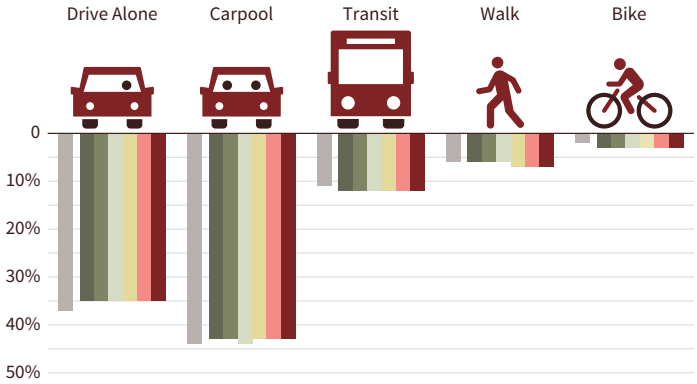
2035: Downtown/Lake Union Sector



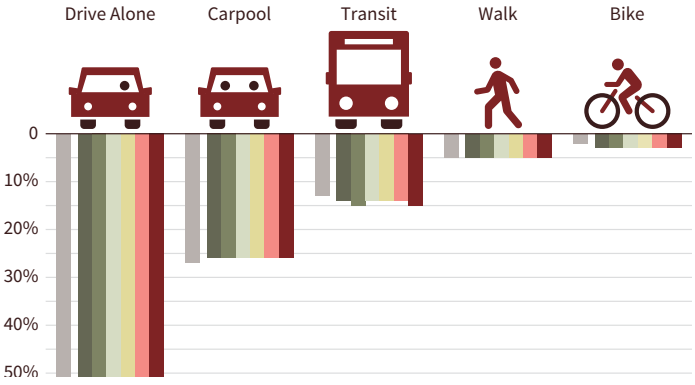
2035: Capitol Hill/Central Sector



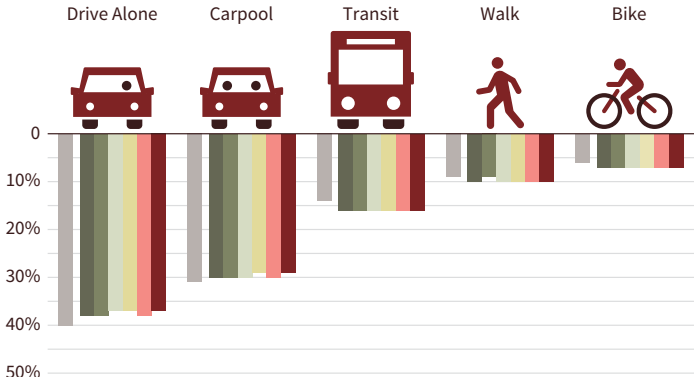
2035: West Seattle Sector



2035: Duwamish Sector



2035: Southeast Seattle Sector



Public Services

POLICE SERVICE

As noted in the Draft EIS, population and employment growth do not directly correlate to an increased demand for police services. It is not anticipated that the Draft EIS alternatives or the Preferred Alternative would necessarily result in proportional increases in call volumes or incidence of major crimes. An increase in the number of crimes may occur as the City grows over the next twenty years, though the magnitude of change in number of crimes is not known. The Draft EIS does identify a probable adverse impact to the South Precinct police facilities under alternatives 1–4. The Preferred Alternative guides less residential growth to some of the south Seattle urban centers and villages, which could reduce some of the growth pressure and related impact potential on the South Precinct police facilities relative to the other alternatives.

There are no other findings of direct adverse impacts regarding growth in service call volumes. As with the Draft EIS alternatives, the need for additional police officer staffing is likely. While it is difficult to make conclusions that the distribution of growth under the Preferred Alternative would generate different impact levels from other alternatives, planning and management of police services would be similar to all other alternatives. The Seattle Police Department would continue to respond to call volumes received, and would actively manage its efforts to address trends in call service types and locations over time. With such planning and management, no significant impacts are anticipated. Conclusions are similar with or without use of the SEPA infill provisions.

FIRE AND EMS

Similar to findings in the Draft EIS, the impacts of additional growth under the Preferred Alternative over the next twenty years would be gradual, distributing increased call volumes across many fire station coverage areas. The number of calls would likely increase the most in urban centers and villages where the greatest levels of employment and residential growth would occur. Under the Preferred Alternative, these areas would include Downtown and South Lake Union.

The Preferred Alternative, similar to Alternative 4, would distribute housing growth across the most number of places of any alternative. This means a wider array of fire stations experiencing increased call volumes and potential equipment or operational challenges possibly requiring the Fire Department to make a greater number of management decisions on how it distributes its operations to serve and respond to call volumes across the city. The identified potential citywide adverse impacts on fire and emergency services are therefore expected to be greater than for alternatives 1, 2 or 3. The Fire Department is anticipated to address additional needs by making adjustments through system-wide evaluations conducted regularly to identify trends, and by planning for new fire stations, subject to funding availability. Overall, impacts would not be expected to be more adverse than those identi-

fied for Alternative 4, and no significant adverse impacts are anticipated. Conclusions are similar with or without use of the SEPA infill provisions.

PARKS AND RECREATION

Park and recreation impacts under the Preferred Alternative are expected to be similar to Alternative 4. In contrast to Alternative 4, the Preferred Alternative would guide less housing growth to the south Seattle urban villages of Mount Baker, Columbia City, North Beacon Hill, Othello and Rainer Beach; the goal of providing additional open space would thus be proportionately reduced in these neighborhoods relative to the other alternatives. In contrast, certain other urban villages—such as 23rd & Union-Jackson, Aurora-Licton Springs and Wallingford— would see higher residential growth distributions than under Alternative 4 that would proportionately increase the desire for certain parks and open spaces closer to these areas.

Similar to Draft EIS alternatives 1–4, per the current parks/open space goals, acquisition of an additional 1,400 acres of breathing room open space would be required to satisfy the Seattle Parks and Recreation (SPR) Department's current goal of 1 acre per 100 residents. As described in the Draft EIS, currently unmet distribution goals could continue to be unmet unless SPR purchases and develops property in or near the urban villages with "gaps." SPR's current goals are aspirational, establishing an overarching policy direction for the future. And, it is also noted that the proposed Comprehensive Plan implies that such goals will be revised through the *Park Development Plan*. SPR is committed to an ongoing effort to acquire and improve open space. With continued SPR planning and implementation of the mitigation measures in the Draft EIS, the increased growth anticipated under the Preferred Alternative can be served through existing and future park and open space resources, even though gaps in geographic availability, or similar shortfalls from optimal location, size or number of parks could remain over the long-term. Similar to the findings made for Draft EIS alternatives 1–4, this outcome is interpreted to result in adverse impacts but not significant adverse impacts. While proposed mitigation strategies are not required, other possible mitigation strategies are defined on Draft EIS pages 3.8-34 to 35 (see revisions and clarifications made to this section in Section 3.2 of this Final EIS). SPR will continue to strive through the 20-year planning period to implement improvements by continuing to leverage funds allocated in the Parks District to match state funding grants. Conclusions about impacts are similar with or without use of the SEPA infill provisions.

PUBLIC SCHOOLS

Population growth and overall potential for impacts under the Preferred Alternative would be similar to that described for Alternative 4. However, compared to Alternative 4, urban villages such as Bitter Lake, 23rd & Union-Jackson, Aurora-Licton Springs, Upper Queen Anne and Wallingford would experience relatively higher growth. Also, similar to Alternative 4, the wider-spread geographic distribution of growth under the Preferred Alternative could potentially require SPS to make a greater number of management decisions on how it

distributes its operations to serve future growth. However, growth in the number of housing units may not indicate a proportionally similar growth in school-aged population. This is because most new housing units will be in multi-family structures, and units in these types of structures tend to have lower numbers of children. Given projected future residential growth trends and probable student enrollment growth, SPS will continue to actively engage in facilities planning and facilities improvements toward meeting future needs.

No significant adverse impacts to public schools are expected under the Preferred Alternative's pattern of growth for any part of the city. The Preferred Alternative's level of overall potential impacts would be similar to Alternative 4. Conclusions are similar with or without use of the SEPA infill provisions.

MITIGATION MEASURES

The mitigation identified in Draft EIS Section 3.8, Public Services, is adequate to mitigate potential impacts under the Preferred Alternative. No new mitigation is proposed.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The Preferred Alternative is not expected to result in significant unavoidable adverse impacts beyond those described in the Draft EIS Section 3.8, Public Services.

Utilities

Under the Preferred Alternative, residential development would be similar to the growth patterns anticipated under Draft EIS Alternative 4. Residential densities could be comparatively less in some urban villages, particularly those in south Seattle, and are not projected to significantly exceed the urban village growth estimates considered in the Draft EIS. For these reasons, impacts to utilities are expected to be relatively comparable to those described in Draft EIS Section 3.9, Utilities. No additional types of adverse utility impacts resulting from the Preferred Alternative are identified. Conclusions are similar with or without use of the SEPA infill provisions.

MITIGATION MEASURES

The mitigation identified in Draft EIS Section 3.9, Utilities, is adequate to mitigate potential impacts to the Preferred Alternative. No new mitigation is proposed.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The Preferred Alternative is not expected to result in significant unavoidable adverse impacts beyond those described in the Draft EIS Section 3.9, Utilities.

3.1.2 Sensitivity Analysis

Introduction

This analysis has been added to the Final EIS as an optional illustrative exercise. It considers the sensitivity of impact findings in a scenario with hypothetically increased residential growth levels beyond the Comprehensive Plan's assumed growth target of 70,000 households. The sensitivity analysis assumes 100,000 housing units, or 30,000 more units than assumed in the Draft EIS and Final EIS Section 3.1.1. No change is assumed for employment from the Preferred Alternative's 115,000 jobs target. At an approximate 43 percent increase over the other alternatives' residential growth assumption, the magnitude of this difference is considered large enough to illustrate hypothetical added degrees of impacts related to increased residential growth. The findings in this section should be understood as distinctly separate from the impact analysis findings made for the EIS alternatives, including the Preferred Alternative.

The discussion below is based on the urban village distribution assumptions similar to the Preferred Alternative, but with distribution of the estimated increases in residential growth made proportionately to the Preferred Alternative's distribution, in all urban centers and villages and outside the urban centers and villages to achieve 100,000 housing units. Table 3.1–6 shows the housing growth assumptions for all urban centers and villages under this scenario. No other changes compared to the Preferred Alternative are assumed.

This section of the Final EIS should be read in the context of the Draft EIS because the affected environment section for each element of the environment is not repeated.

Table 3.1–6 Sensitivity analysis housing growth assumption

	Sensitivity Analysis
Urban Centers	
Downtown	17,143
First/Capitol Hill	8,571
University District	5,000
Northgate	4,286
South Lake Union	10,714
Uptown	4,286
Total	**50,000 (50%)**
Hub Urban Villages	
Ballard	4,286
Bitter Lake	1,857
Fremont	1,857
Lake City	1,429
Mount Baker	2,143
West Seattle Junction	3,286
Total	**14,857 (15%)**

	Sensitivity Analysis		Sensitivity Analysis
Residential Urban Villages			
23rd & Union-Jackson	3,857	Morgan Junction	571
Admiral	500	North Beacon Hill	1,071
Aurora-Licton Springs	1,429	Othello	1,214
Columbia City	1,857	Upper Queen Anne	714
Crown Hill	929	Rainier Beach	643
Eastlake	1,143	Roosevelt	1,143
Green Lake	1,143	South Park	571
Greenwood-Phinney Ridge	714	Wallingford	1,357
Madison-Miller	1,214	Westwood-Highland Park	929
		Total	**21,000 (21%)**

	Sensitivity Analysis
New Residential Urban Villages	
130th/I-5	2,143

Source: City of Seattle, Office of Planning and Community Development, 2016.

Earth and Water Quality

With an anticipated 43 percent increase in residential growth both inside and outside of urban centers and villages, it is relatively more likely that many current sites with environmentally critical areas (ECAs) within urban centers and urban villages, and many other sites outside of those designated areas, would be subject to development. In the worst-case, during and after construction this added growth pressure could increase the incidence of situations where ECA resources experience adverse impacts. This might range from increased numbers of landslide events or local instability, to increasing cases of erosion events that could lead to soils and pollutants entering drainage courses or wetlands and affecting water quality. Increased washoff of pollutants from roads could also occur with future growth.

MITIGATION MEASURES

Given the City's adopted rules, policies and strategies for addressing and minimizing these kinds of adverse impacts, and their likelihood to continue to be functional and effective methods, the preferred mitigation strategy even for the identified level of growth would be to continue to implement development project-level reviews, continue to protect ECAs, and continue to engage in the range of planning undertaken by City departments. The combined effect would be likely to avoid or minimize most adverse impacts upon earth resources, ECAs and water quality even if growth occurred faster and more extensively than anticipated for the 20-year Comprehensive Plan period.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Although acknowledging the potential for increased incidence of adverse impacts, the findings above indicate a conclusion of no significant unavoidable adverse impacts to earth and water quality.

Air Quality and Greenhouse Gas Emissions

AIR QUALITY

Construction-related Emissions

Future growth under any alternative would result in development of new residential, retail, light industrial, office and community/art space. The sensitivity analysis assumes a greater level of residential development both inside and outside the urban centers and villages. Construction of these additional units would carry with it the same types of construction related impacts described in the Draft EIS. Off-road equipment and on-road trucks used to construct all new development would be required to comply with the noted PSCAA and U.S. EPA regulations. Even with the increase in residential development over the Draft EIS alternatives and the Preferred Alternative, the transient nature of construction-related emis-

sions and likely future regulatory improvements would likely mean that potential adverse air quality impacts from construction sources would be minor.

Land Use Compatibility and Transportation Air Quality Emissions

Under any of the alternatives, including the Preferred Alternative, future growth and development patterns would be influenced by Comprehensive Plan growth strategies in ways that would affect future residences' (or other "sensitive receptors") relationships to mobile and stationary sources of air toxics and particulate matter $PM_{2.5}$. The degree of potential for adverse impacts on new sensitive receptors would depend on proximity to sources, emissions from these sources and the density of future sensitive development. The Draft EIS identifies areas of the City, including urban centers and villages, where residential development could expose residents to higher cancer risk from roadways or stationary sources. An increased number of new housing units would proportionally increase the probability that of development would occur in areas where air pollutants are concentrated, especially major highways, railyards and port terminals.

Transportation Air Quality Emissions

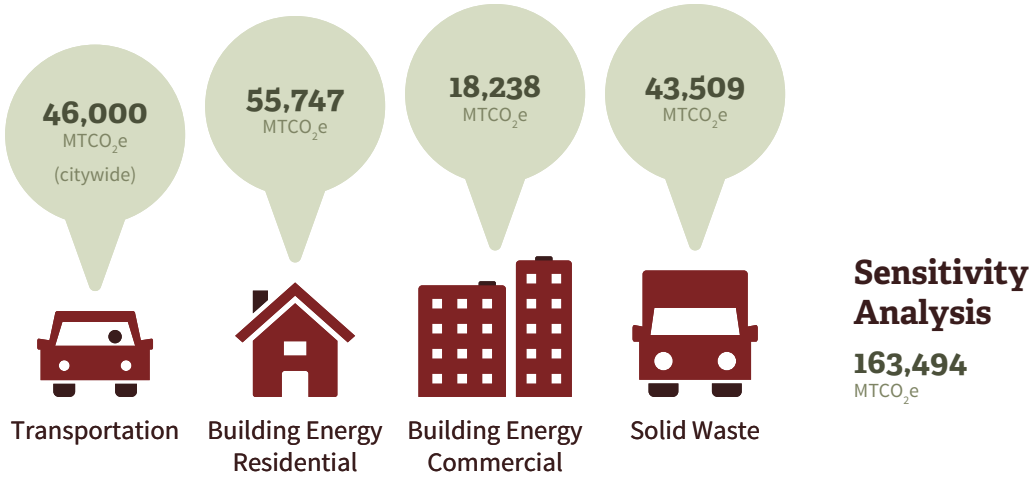
The sensitivity analysis scenario would mean more residential development and additional emissions associated with the approximately 1–3 percent more vehicle miles traveled compared to the other alternatives. However, regional pollutant emissions would still be less than under existing background conditions. This is because the projected improvement in fuel economy, emission controls and fuel composition will outweigh the projected increase in VMT. This would result in a beneficial future air quality outcome, but not to the same degree as the alternatives considered in the Draft EIS or the Preferred Alternative.

GREENHOUSE GAS EMISSIONS

The scale of global climate change is so large that one action's impacts can only be considered on a cumulative scale. It is not anticipated that a single development project or programmatic action, even on the citywide scale of the sensitivity analysis scenario, would have an individually discernible impact on global climate change. It is more appropriate to conclude that GHG emissions from future development in Seattle would combine with emissions across the state, country and planet to cumulatively contribute to global climate change.

Total operational GHG emissions from the Preferred Alternative are presented in Figure 3.1–19 on the following page and Appendix B.1. The overall GHG emissions growth in the city under the sensitivity analysis scenario is expected to be approximately 39 percent greater than the No Action Alternative due largely to increases in residential building energy consumption and solid waste generation associated with accommodating an additional 30,000 residential units compared to the other alternatives. This would represent a significant adverse impact of the sensitivity analysis scenario.

Figure 3.1–19 Operational GHG emissions of the sensitivity analysis



Source: ESA, 2014; Fehr & Peers, 2016.

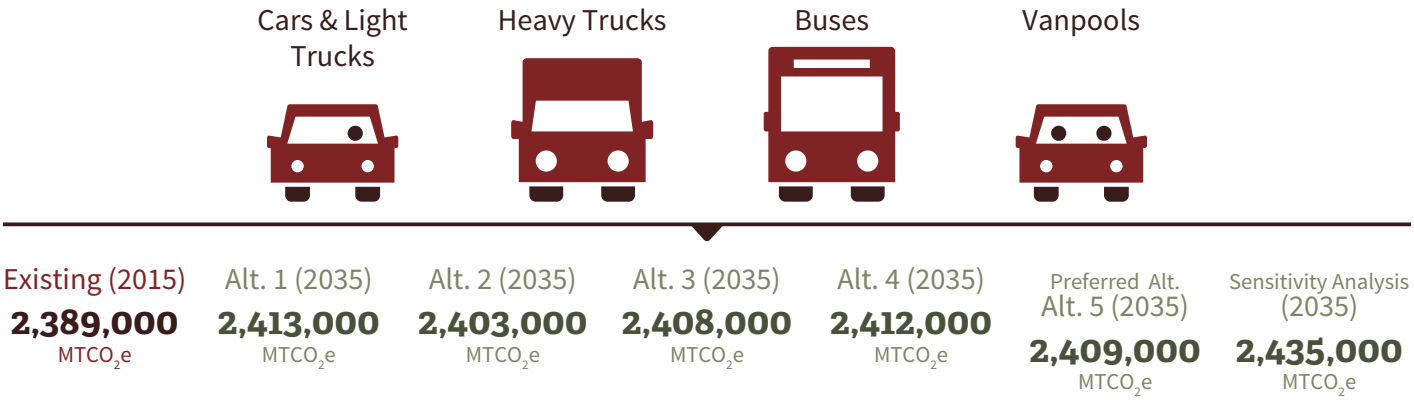
Construction-related Greenhouse Gas Emissions

Greenhouse gases (GHGs) would be emitted during construction activities. These emissions, while not individually altering GHG emissions significantly, would cumulatively, over 20 years, be more than a negligible contributor to GHG emissions within the city. With 30,000 additional housing units, proportionately more construction related GHG would be contributed. The City's *Climate Action Plan* (City of Seattle 2013b) recognizes the relevance of construction related GHG emissions and has included actions to be implemented by 2030 to address them. These measures would address additional construction as well. Consequently, although construction related emissions would not be negligible, the combination of regulatory improvements and *Climate Action Plan* actions under way would likely lead to the construction related GHG emissions being considered a minor adverse air quality impact.

TRANSPORTATION

Expected transportation GHG emissions for the sensitivity analysis scenario are shown in Table 3.1–2 on page 3.1–5. The overall GHG emissions are expected to be higher compared to the No Action Alternative by less than one percent (see Figure 3.1–20). This is due to the larger growth in households compared to the No Action Alternative. The average VMT per capita is expected to decrease from 2.9 in the Preferred Alternative to 2.8. However, the overall land use and population growth would result in higher total GHG emissions than all other alternatives, including the No Action Alternative. Therefore, the assumed higher residential growth in the sensitivity analysis scenario would result in an adverse impact. The City also has GHG emissions goals in the 2013 Seattle *Climate Action Plan* (CAP). This Final EIS sensitivity analysis indicates that absent an aggressive suite of strategies and technological advancements, the City would not meet its GHG emissions goal by 2035—this is consistent with the "business-as-usual" finding in the CAP. However, no significant adverse impacts are identified because the Action Alternatives are measured against the No Action

Figure 3.1–20 Road transportation GHG emissions of all alternatives



Source: Fehr & Peers, 2016.

Alternative. Although no significant impacts are identified from a SEPA perspective, the City will continue to pursue the strategies outlined in the CAP to make progress toward its carbon neutrality goal regardless of the alternative selected.

MITIGATION MEASURES

Available mitigation to address GHG emissions increases of the sensitivity analysis scenario would consist of measures identified in the City of Seattle Climate Action Plan. Additionally, the existing City of Seattle Comprehensive Plan contains climate change-related goals and policies within its Environmental Element. These are listed in Appendix A.1 of the Draft EIS. Goals to reduce city-wide VMT by 20 percent and reduce residential building energy use by 20 percent would help to limit the magnitude of this potential GHG emission increase compared to the No Action Alternative.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Measures contained in both the City of Seattle *Climate Action Plan* and the City of Seattle Comprehensive Plan would help to limit the magnitude of this potential GHG emissions increases compared to the No Action Alternative. However, under the sensitivity analysis scenario, such reductions would not be likely to reduce these emissions increases to a less than significant level and this impact of the sensitivity analysis scenario would be significant and unavoidable.

Noise

CONSTRUCTION NOISE AND VIBRATION IMPACTS

The Draft EIS alternatives and the Preferred Alternative envision future residential and job growth primarily within areas where transit infrastructure either exists or is planned. The sensitivity analysis scenario assumes even more growth in these urban centers and villages. Implementation of this scenario would result in a concentration of development within existing developed and developing areas. Resulting construction activities would have the potential to temporarily affect nearby sensitive receivers such as existing residences, schools and nursing homes. As noted in the Draft EIS, temporary construction noise and vibration within these infill development areas, where ambient noise levels are already affected by roadway traffic and other transportation sources, would be less noticeable to receivers than in less intensively developed areas.

The Draft EIS also states that development of larger and/or higher buildings are typically the construction activities with the greatest potential for adverse construction-related noise or vibration impacts because they can involve pile driving or other similar impact-related foundation work. With more development being focused in the urban centers and villages, these noisier activities would be likely to increase. Construction in urban centers and villages would also be likely to involve these activities adjacent (closer than 50 feet) to other buildings that may be occupied by residents or other sensitive receptors. Construction noise impacts in excess of 90 dBA within these areas are identified as a potential moderate noise impact. While the impacts from any individual project would not increase, these moderate noise impacts would be more frequent. The City's existing controls, along with the mitigation identified in the Draft EIS, are generally expected to keep these impacts from being significant, but cumulative impacts could be significant if there is a high enough concentration of construction over a sustained period.

NOISE AND LAND USE COMPATIBILITY

As described in the Draft EIS, noise levels are typically highest close to freeways, highways and other transportation infrastructure. However, all alternatives strive, at least in part, to locate residential uses near to transit to reduce vehicle miles traveled within the City. Consequently, if residences or other sensitive receptors are located too close to major roadway or noisy industrial operations, additional insulation or window treatments may be warranted to reduce interior noise levels to generally acceptable levels.

For all alternatives roadside noise levels would increase by less than 0.5 dBA at all locations. As discussed in the Draft EIS, outside of the laboratory, a 3 dBA change is considered a just-perceivable difference. Consequently, an increase of less than 0.5 dBA would be considered a minor impact on environmental noise. However, while considered a minor impact when examined city-wide, more development would likely increase noise levels in some areas. With 30,000 additional housing units, noise levels could be further increased and

more residents could be potentially living in relatively close proximity to high noise sources. To the extent this occurs, it could result in noise levels above those considered acceptable for residential and other sensitive uses built of normal construction materials.

MITIGATION MEASURES

Similar to the Preferred Alternative, the sensitivity analysis scenario impacts are not identified as probable significant adverse impacts, meaning no mitigation strategies would need to be implemented. The mitigation identified in Draft EIS Section 3.3, Noise, is sufficient to describe a range of possible noise mitigation strategies that could be pursued to address adverse noise impacts such as those identified for the EIS alternatives and in this sensitivity analysis.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Similar to the findings outlined under the Preferred Alternative, no significant unavoidable adverse impacts to noise levels are anticipated for the sensitivity analysis scenario.

Land Use Patterns, Compatibility, Height, Bulk and Scale

LAND USE PATTERNS

The sensitivity analysis scenario not only distributes residential growth to a greater number of locations than any other alternative (comparable to Alternative 4), it also distributes a higher number of housing units throughout the City. This is likely to result in a citywide land use pattern focused on more concentrated residential and commercial/mixed-use nodes that have convenient access to either light rail or frequent, reliable bus service. The concentration of higher levels of more housing units centered near transportation nodes is likely to result in the construction of a greater extent of more moderate-density, moderate-height development types with more combinations of multi-family, mixed-use and commercial uses over time. Although there would be an increase in the number of housing units designated for areas outside of urban villages, the overall development and character in these areas would likely resemble their current patterns and configurations, reflecting each area's zoning patterns and intensities. It should also be noted, however, that the Draft Comprehensive Plan also encourages greater diversity of housing possibilities and land use arrangements in low-density areas, which could address smaller lot sizes, and more accessory housing possibilities, for example. Overall, with the increased number of housing units to be built across the city—43 percent more than the Preferred Alternative—the conversion rate from existing single-family residential and limited low-intensity commercial uses to higher-intensity multifamily or mixed-uses would likely be higher under this sensitivity analysis scenario than under any EIS alternative.

LAND USE COMPATIBILITY

Given the larger number of estimated future housing units under the sensitivity analysis scenario, a relatively higher number of localized adverse, but relatively minor, compatibility issues could be expected as existing, lower intensity uses transition to higher-density development forms. Land use incompatibilities resulting from this type of transition would be less of an impact in many of the urban village cores if they already contain a mix of uses at various intensities. However, in contrast, urban village expansion areas or new urban villages with a predominantly single-family residential character could be relatively more sensitive to the anticipated changes in development intensity and scale. Under this sensitivity analysis scenario, these areas would likely experience more frequent occurrences of slightly sharper transitions in urban form as new, more intensive forms—such as townhomes and multi-family apartments—could be built alongside existing single family homes and properties.

HEIGHT, BULK AND SCALE

Potential adverse impacts of height, bulk and scale under the sensitivity analysis scenario would be similar to those described for the Preferred Alternative. However, given the larger number of housing units added under this scenario, the impacts to height, bulk and scale would be more likely to occur more frequently and across more locations than under the Preferred Alternative. Growth in the urban centers would likely be a mix of mid- and high-rise development while growth in transit-oriented development nodes would likely be mid-rise. Growth in the hub urban villages would likely be mid-rise and in the residential urban villages a mix of low- and mid-rise. Identified urban village expansion areas are characterized by relatively low building heights and low FAR limits. Over time, height and bulk in these areas would increase with additional development, and, under this scenario, localized adverse bulk and scale contrasts would likely occur more frequently as these areas transition to a more intense development pattern. In areas outside of the urban villages, the overall development character and pattern would likely be more comparable to existing bulk and scale patterns.

VIEWS

Impacts to views under the sensitivity analysis scenario would be similar to those described under the Preferred Alternative, and would occur across a similar geographic area, but in the worst case might lead to an increase in the number of potential view conflicts. As applicable, individual project-level review would include detailed evaluation of potential view impacts along with opportunities to define mitigation during future land use permit application and design review processes.

MITIGATION MEASURES

The analysis in this section identifies a range of adverse land use impacts related to the sensitivity analysis scenario. Similar to the Preferred Alternative, no impacts are identified as probable significant adverse impacts, meaning no mitigation strategies need to be defined. The City would continue to rely upon use of regulations in its municipal code, includ-

ing Land Use Code (Title 23), SEPA rules and policies (Title 25), the design review program (SMC 23.41 and related guidelines), and documents such as Urban Design Frameworks that address design intent in various subareas. The mitigation identified in Draft EIS Section 3.4, Land Use Patterns, Compatibility, Height, Bulk and Scale, is adequate to mitigate potential land use impacts. No additional mitigation is proposed.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Similar to the findings outlined under the Preferred Alternative—although a greater amount and extent of change to land use, height/bulk/scale patterns and potential effect on views is identified due to greater potential levels of development over twenty years—no significant unavoidable adverse impacts to land use are anticipated under this sensitivity analysis.

Relationship to Plans, Policies and Regulations

Because the proposed comprehensive plan policy guidance would be the same as those assumed for the Draft EIS alternatives, consistency with plans and policies would generally be the same as discussed in the Draft EIS. As discussed in Population, Employment and Housing below, the sensitivity analysis scenario assumes full use of development capacity, and even the possibility of excess demand, in some urban centers and villages. This is partly a product of how the sensitivity analysis assumptions about growth distribution were made. Draft Comprehensive Plan policies in the Growth Strategy Element address distribution of growth (see draft Goal GSG3 and supporting policies) and provide guidance for considering capacity, available services and other factors in allocating growth. These policies could provide guidance for how to effectively manage and direct growth if the City faced the scenario of addressing high growth levels and/or excess housing demand levels in particular areas.

Please see the expanded discussion of draft comprehensive plan policy guidance in this Final EIS Section 3.2. This expanded discussion is applicable to both the Draft EIS alternatives and the Preferred Alternative, and the sensitivity analysis scenario.

Population, Employment and Housing

POPULATION AND HOUSING

The additional 30,000 housing units assumed would impact some urban villages if growth would reach development capacity, if growth distributions would occur as projected in the hypothetical growth scenario for the sensitivity analysis. Table 3.1–7 shows the increased growth assumptions by village type, as well as how this growth scenario would relate to development capacity as currently defined across the City.

In addition to the 88,000 housing units assumed to be added in centers and villages, there would be another 12,000 housing units added outside of villages, according to the sensitivity analysis scenario.

Table 3.1–7 Housing growth and capacity for 100,000 new units in urban centers and villages

	Growth Assumption	2035 Remaining Capacity	Growth as % of Total Urban Village and Center Capacity
Urban Centers	50,000	46,862	52%
Hub Urban Villages	14,857	21,370	41%
Residential Urban Villages	23,143	20,624	53%
Existing	*21,000*	*18,386*	*53%*
New (130th/I-5)	*2,143*	*2,238*	*49%*
Total (Centers & Villages)	**88,000**	**88,856**	**50%**

Although there is additional housing capacity city-wide to accommodate overall assumed growth in this scenario through 2035, specific urban villages could experience growth levels that would fully use today's development capacity, and with theoretical levels of excess growth pressures. The urban centers and villages where this might occur, according to the terms of the sensitivity analysis assumptions, are identified in Table 3.1–8. In addition, other urban villages that would be nearing full use of today's development capacity include Ballard, 23rd & Union-Jackson and Upper Queen Anne.[2]

Table 3.1–8 Urban villages over capacity by 2035, per sensitivity analysis growth scenario

Urban Centers & Villages	Percent of capacity in 2035
Urban Centers	
Uptown	103%
Hub Urban Villages	
Fremont	111%
Residential Urban Villages	
Eastlake	104%
Green Lake	111%
North Beacon Hill	110%

As with the alternatives analyzed in the Draft EIS, socioeconomic and racial inequalities would still pose a challenge. It would be important to identify those populations that are vulnerable and focus on potential mitigation strategies for addressing unintended impacts of growth. Those villages where there is overlap between concentrations of vulnerable populations and housing unit growth above capacity would be the most sensitive to the impacts of this growth. The villages that would feel the greatest displacement pressures due to their vulnerable population and the strained capacity include 23rd & Union-Jackson and North Beacon Hill.

2 Urban villages with projected growth at 80% or above development capacity are categorized by current Seattle planning methodologies as nearing capacity.

EMPLOYMENT

The sensitivity analysis scenario where 100,000 housing units are added to Seattle by 2035 does not anticipate any changes to the employment assumptions, and would not result in any additional or new impacts to employment beyond those discussed in the Draft EIS and in the Preferred Alternative. In the past two decades at least, employment levels have fluctuated up and down considerably given local and national economic trends and pressures. This has meant that much employment growth can be accommodated within existing buildings that fluctuate in their vacancy levels over time. This is one factor that supports the choice of this sensitivity analysis to not analyze the hypothetical effects of potential higher-than-expected employment growth through 2035.

MITIGATION MEASURES

The sensitivity analysis scenario where 100,000 housing units are added to Seattle by 2035 would have similar impacts as those discussed in the Draft EIS. However, the impacts may be greater in some areas, or may occur in additional areas where the 30,000 additional units could locate, which could include areas within as well as outside urban centers and villages.

The mitigation identified in Draft EIS Section 3.6, Population, Employment and Housing, is adequate to mitigate most potential impacts of the sensitivity analysis scenario. In particular, programs and regulatory changes that the City could implement are identified to address housing affordability and displacement challenges in the City.

In addition, for this hypothetical sensitivity analysis scenario, other mitigation strategies could be pursued to address potential shortfalls in capacity in urban villages. These could include actions such as rezones that would either increase development capacity in the affected urban centers and villages, or in other places where growth would be most preferred.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Significant unavoidable adverse impacts in the sensitivity analysis scenario where 100,000 housing units are added to Seattle by 2035 are of the same type as those discussed in Draft EIS Section 3.6, Population, Employment and Housing, and under the Preferred Alternative. These impacts include probable challenges in housing affordability and displacement as a result of an increasing demand for housing in response to growth in households and the changing dynamics of household economic makeup in Seattle.

Transportation

A new traffic assessment was completed using the increased auto volumes projected for the sensitivity analysis scenario. Screenline and mode share findings are described below.

SCREENLINES

The screenline results are shown in Table 3.1–5 on page 3.1–22. The volume to capacity (v/c) ratio across the Ballard Bridge (Screenline 5.11) in this scenario is expected to reach 1.21, which exceeds the current 1.20 Level of Service (LOS) standard. All other screenlines would meet the LOS standards. Since household growth is assumed throughout the City, most screenline ratios would increase compared to the Preferred Alternative. Generally, the screenline's v/c ratio results are not expected to increase by more than 0.03 compared to the baseline Preferred Alternative.

Because of the identified screenline exceedance of the LOS threshold for the Ballard Bridge (Screenline 5.11) the growth scenario for the sensitivity analysis is expected to result in a significant adverse impact for autos, freight and transit.

STATE FACILITIES

In addition to the screenline locations, auto volumes on the state facilities studied in the Draft EIS were examined for the sensitivity analysis. Auto volumes on the state facility study segments are expected to be slightly higher under the sensitivity analysis, with volume-to-LOS D capacity ratios up to 0.04 higher than the Preferred and Draft EIS alternatives. However, these differences are not expected to materially change the LOS findings. In other words, no facilities that are expected to meet the LOS D standard under the Preferred and Draft EIS alternatives are forecasted to fall below the standard as a result of the increased growth tested in the sensitivity analysis (see Appendix B.2).

MODE SHARE

Because the sensitivity analysis assumes the same land use distributions as the Preferred Alternative, the forecasted mode share results would be similar. Comparatively, the sensitivity analysis scenario could result in up to a one percentage point decrease in SOV mode share and a slight increase in transit, walk or bike mode share. Overall, these mode share trends are similar to the Preferred Alternative and alternatives 1–4.

IMPACT SUMMARY

The Draft EIS included a section describing the impacts common to all alternatives. Comparable findings are made here for the sensitivity analysis scenario.

Pedestrian and Bicycle Network

As stated in the Draft EIS, the City will move forward with its Pedestrian and Bicycle Master Plans regardless of the land use alternative selected. The hypothetical 30,000 dwelling unit increase in household growth would not be expected to meaningfully change the scale of improvements needed, although the prioritization and/or phasing of improvement projects could vary. Given that the pedestrian and bicycle environment is expected to become more

robust regardless of alternative, no significant impacts are expected to the pedestrian and bicycle system.

Safety

The sensitivity analysis scenario would result in a higher number of vehicle trips than the Draft EIS alternatives and the Preferred Alternative; however, the increase would be relatively small at three percent. While collision rates would not be expected to meaningfully change based on the increase in growth, the total number of collisions would likely be higher due to the small increase in vehicle trips. Therefore, the sensitivity analysis scenario is expected to result in an adverse impact. However, given that the difference in vehicle trips is less than three percent and that the collision rates are not expected to increase, this adverse impact would not be considered as a significant adverse impact. The City will pursue its traffic safety policies and the strategies supporting it regardless of the land use alternative selected.

Parking

The Draft EIS identified a probable significant adverse parking impact for all alternatives. If a higher growth level were to occur, those potential parking impacts would be expected to be more substantial than was described for the other alternatives. The degree of the parking impacts experienced in any given neighborhood would depend on a variety of factors, such as how much off-street parking is provided by future development projects, as well as varying conditions related to car ownership and on-street parking patterns within each unique neighborhood.

Auto, Freight and Transit

The screenline analysis for the sensitivity analysis scenario identifies a probable significant adverse impact for the Ballard Bridge (Screenline 5.11). The v/c ratio across that screenline is forecasted to be 1.21 in the northbound direction, which equates to approximately 30 vehicles over the acceptable LOS threshold (as currently defined by the LOS screenline-based standard) in the PM peak hour.

MITIGATION MEASURES

Auto traffic on the Ballard Bridge could be reduced by implementing Sound Transit's Ballard to Downtown light rail project (via 15th Avenue NW) to enhance transit service along the corridor. This project is identified as a candidate project in the Sound Transit 3 package. While a Ballard to Downtown Seattle rail project was assumed in the Comprehensive Plan modeling, it followed the streetcar alignment through Fremont that was published in the City's 2012 *Transit Master Plan*. The Ballard to Downtown Seattle Transit Expansion Study has since evaluated multiple alternatives in more detail. According to that study, other alternatives that travel along 15th Avenue NW with an elevated bridge or tunnel would result in a projected 4,000 to 12,000 additional daily riders compared to the streetcar alignment initially assumed from the *Transit Master Plan*. Given the magnitude of the expected in-

crease in transit ridership, it is reasonable to assume a shift of at least 30 vehicle trips to the Sound Transit project would be possible and likely to occur during the PM peak hour. If this rail project is implemented with a 15th Avenue NW alignment, it would likely be sufficient to mitigate the identified significant adverse impact at the Ballard Bridge.

Transportation demand management *strategies seek to reduce auto trips through improved transportation options, incentives to use alternative modes and reducing driving and parking management.*

In addition to enhanced transit operations between Downtown Seattle and Ballard, auto trips could be reduced with enhanced pedestrian and bicycle facilities across the bridge and more extensive transportation demand management (TDM) strategies for the areas served by the Ballard Bridge. With one or more of these strategies in place, it is expected that a decrease in auto traffic could be achieved such that the level of service (e.g., level of congestion) experienced in 2035 would not exceed the 1.20 LOS standard that currently applies.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

As stated in the Draft EIS, parking impacts are anticipated to be brought to a less-than-significant level by implementing a range of possible mitigation strategies, such as those discussed in Section 3.7.3 of the Draft EIS. While there may be short-term impacts as individual developments are completed, it is expected that over the long term, parking demand/supply would reach a new equilibrium as some people shift to other transportation options.

The mitigation strategies identified for the Ballard Bridge screenline impact in this sensitivity analysis scenario would be expected to reduce auto volumes such that level of services standards would be met. Therefore, no significant unavoidable adverse impacts to transportation and parking would be expected for the sensitivity analysis scenario.

Public Services

POLICE SERVICE

As noted in the Draft EIS, population and employment growth do not directly correlate to an increased demand for police services. It is not anticipated that the Draft EIS alternatives or the Preferred Alternative would necessarily result in proportional increases in call volumes or incidence of major crimes. An increase in the number of crimes may occur as the City grows over the next twenty years, though the magnitude of change in number of crimes is not known. Under the sensitivity analysis scenario, the Seattle Police Department (SPD) would continue to add staff as trends in calls for service change. As with the Draft EIS alternatives, SPD would continue to analyze where best to focus its resources to respond to changes in demand for police services. Because growth would be gradual and allow time to respond and anticipate needs, no significant adverse impact on police service is expected, even with this higher rate of growth.

FIRE AND EMS

Under the sensitivity analysis scenario, a 43 percent increase in housing units (the change from 70,000 dwelling units up to a higher estimate of 100,000 housing units over twenty

years) would be expected to lead to a proportional increase in resident-based fire/emergency calls. This would add to the findings of the Draft EIS and the Preferred Alternative, which identified a similar proportional growth in call volume for an increase in the number of households over the next twenty years. These impacts would be gradual, distributing increased call volumes across many fire station coverage areas. All of the alternatives anticipate increased call concentration in urban centers and villages, and the sensitivity analysis would also expect a notable proportion of growth to occur in areas outside urban centers and villages. Taken together, the total amount of increase in demand for fire/emergency services would represent a probable significant adverse impact under this sensitivity analysis scenario.

The Draft EIS states that over the next several years, a probable continuation of recent growth trends is likely to lead to increased service demand in places where the Seattle Fire Department is monitoring the need for additional facilities and equipment. Under the increased housing scenario for this sensitivity analysis, these needs would likely accelerate and may arise sooner. The Fire Department would need to address these additional and more urgent needs by making adjustments through system-wide evaluations conducted regularly to identify trends, and by planning for new fire stations, subject to funding availability. Because the growth would be gradual, there is no indication that services could not be increased to meet the additional demand.

PARKS AND RECREATION

As with the Draft EIS alternatives and Preferred Alternative, population and job growth over the 20-year planning horizon would generate more demand for parks, recreation facilities and open space across the city. With an additional 30,000 housing units in the urban centers and villages, demand would be proportionately higher.

Under the Draft EIS alternatives, acquisition of an additional 1,400 acres of breathing room open space would be required to satisfy the Seattle Parks and Recreation (SPR) Department's aspirational goal of 1 acre per 100 residents. With 30,000 additional housing units, approximately 600 acres of additional land acquisition would be required to meet the goal. Because this scenario assumes that the majority of additional housing would be located in the existing urban centers and villages, meeting the goal through land acquisition could be challenging due to land scarcity and associated high costs; this would be particularly notable in the Downtown Urban Center, which, for example, could need as much as five acres of usable open space—or approximately five city blocks—to meet the household-based goal. Distribution goals that are currently not met would continue to be unmet, unless SPR purchases and develops new property in identified areas with gaps in service.

SPR's goals are aspirational, establishing an overarching policy direction for the future. SPR is committed to an ongoing effort to acquire and improve open space. Adding an additional 30,000 new housing units would make achieving the current goal more challenging (although that set of quantitative goals is proposed to be discontinued in the proposed

Comprehensive Plan). With continued SPR planning and implementation, the increased levels of housing growth assumed in this sensitivity analysis would result in a higher level of identified adverse impacts than the Preferred Alternative, but would not necessarily result in a finding of significant adverse impacts. Future performance would relate to how well SPR is able to obtain additional locations and provide additional parks, recreation, and open space facilities within the extent of resources that will be available to them.

PUBLIC SCHOOLS

Student enrollment is likely to continue to grow as population increases in Seattle, affecting school capacity in the long run. With an additional 30,000 housing units citywide assumed for the sensitivity analysis scenario, student enrollment would likely exceed available school facility capacity sooner and to a greater extent than under the Preferred Alternative. As noted in the Draft EIS, student population does not increase directly in proportion to overall population, but depends on other demographic and socioeconomic factors as well. Given projected future residential growth trends and probable student enrollment growth, SPS will continue to actively engage in facilities planning and facilities improvements toward meeting future needs.

The Draft EIS also states that 30 percent of schools, or 34 of 117, are located in urban villages where the additional 30,000 housing units would locate. Therefore, demand for SPS transportation services to transport students would likely increase. The sensitivity analysis scenario would place additional demands on school facilities and student transportation needs, but these would grow gradually and allow time for SPS to make adjustments to its programs to accommodate the changes. With improvements and implementation of the mitigation measures noted in the Draft EIS, no additional significant impacts are expected.

MITIGATION MEASURES

The mitigation identified in Draft EIS Section 3.8, Public Services, is adequate to mitigate potential impacts identified by the sensitivity analysis scenario. No new types of mitigation are proposed.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The sensitivity analysis scenario is not expected to result in significant unavoidable adverse impacts beyond those described in the Draft EIS Section 3.8, Public Services.

Utilities

For the sensitivity analysis scenario, the change in anticipated residential growth would not be likely to generate significantly adverse impacts on the City's water, wastewater and electrical utility systems. Each utility prepares a long range planning document that looks at level of service and capacity in similar time frames as the 20-year planning horizon of this Comprehensive Plan. Also, these forecasts are additionally updated at more frequent intervals than the Comprehensive Plan to allow for the utilities to adjust their provision of resources and system improvements in anticipation of growth. On a system wide level, each utility uses up-to-date population forecasts that are independent of the Comprehensive Plan to ensure sufficient overall reservoir, power generation and treatment plant capacity. On the network level, each utility uses the building permit process to assess localized impacts that could arise due to development projects, and requires individual developments through permitting processes to make specific utility improvements, depending on the land use. Population growth through new development in Seattle is also known to have a lower overall potential for impacts on utility system capabilities because Seattle development codes require quality and quantity controls for stormwater that often accomplish better outcomes than existing conditions, as well as improved energy efficiency and water conservation through the efficiencies of using new fixtures and meeting City codes.

Given the findings above, no additional conclusions are made with respect to mitigation measures or significant unavoidable adverse impacts on utilities under the sensitivity analysis scenario.

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3.2 Revisions and Clarifications

This section includes Draft EIS clarifications or revisions based on responses to comments presented in Chapter 4 of this Final EIS or City staff review of Draft EIS information. The clarifications and revisions are organized in the same order as the Draft EIS sections and by page numbers. Text that has been inserted or deleted since the Draft EIS is shown in cross-out underline format.

Draft EIS Section 3.2 Air Quality and Greenhouse Gas Emissions

Page 3.2-5, corrections as shown below to text.

The federal annual $PM_{2.5}$ standard has not been exceeded in the Puget Sound area since the U.S. EPA established its NAAQS in 2007. The daily federal $PM_{2.5}$ standard has not been exceeded in the Puget Sound dating back to the initiation of monitoring for this pollutant in 2001 (PSCAA 2014). The U.S. EPA recently adopted a more stringent federal standard for $PM_{2.5}$ in December 2012. All areas of Washington State are in attainment with the federal 2012 PM2.5 standards., ~~but attainment designations are not expected until December 2014.~~ Notwithstanding the continued attainment of federal PM_{10} standards, portions of the Puget Sound region continue to be designated as a maintenance area for PM_{10}. Specifically, the majority of EIS analysis Sector 7 is located within the Seattle Duwamish Particulate Matter Maintenance Area.

Draft EIS Table 3.2–2 on page 3.2–9, corrections as shown on the following page.

Page 3.2–20, corrections as shown below to text.

Transportation-related Greenhouse Gas Emissions

The approach to estimating future year transportation-related GHG emissions considers ~~two~~ three factors:

- The projected change in vehicle miles traveled (VMT)
- The projected change in fuel economy of the vehicle fleet
- The projected reduction in vehicle speeds based on congestion factors

Table 3.2–2 Ambient air quality monitoring data for monitoring stations in Seattle

Pollutant	Station	Averaging Time	~~2009 max concentration~~	~~2010 max concentration~~	2011 max concentration	2012 max concentration	2013 max concentration	2014 max concentration	NAAQS[1] Standard
Ozone	Beacon Hill (Sector 8)	8 hour[2]	~~0.049 ppm~~	~~0.043 ppm~~	0.046 ppm	0.049 ppm	0.047 ppm	0.048 ppm	0.075 ppm
		1 hour	~~1.4 ppm~~	~~1.2 ppm~~	1.1 ppm	1.0 ppm	1.8 ppm	1.1 ppm	35 ppm
Carbon monoxide (CO)	Beacon Hill (Sector 8)	8 hour	~~1.0 ppm~~	~~0.8 ppm~~	0.9 ppm	0.7 ppm	1.0 ppm	1.0 ppm	9 ppm
		24 hour	~~23 µg/m3~~	~~21.4 µg/m3~~	21.6 µg/m3	21.8 µg/m3	26.4 µg/m3	22.4 µg/m3	35 µg/m3
Fine particulate matter ($PM_{2.5}$)	Queen Anne (Sector 3)	Annual	~~5.9 µg/m3~~	~~6.3 µg/m3~~	6.3 µg/m3	5.7 µg/m3	7.0 µg/m3	6.3 µg/m3	15 µg/m3
		24 hour	~~20 µg/m3~~	~~20.4 µg/m3~~	20.8 µg/m3	23.5 µg/m3	27.1 µg/m3	21.1 µg/m3	35 µg/m3
Fine particulate matter ($PM_{2.5}$)	Olive & Boren (Sector 4)	Annual	~~5.7 µg/m3~~	~~5.9 µg/m3~~	6.4 µg/m3	6.1 µg/m3	7.5 µg/m3	N/A[3]	15 µg/m3
		24 hour	~~38 µg/m3~~	~~26.1 µg/m3~~	26.2 µg/m3	26.6 µg/m3	58.2 µg/m3	26.5 µg/m3	35 µg/m3
Fine particulate matter ($PM_{2.5}$)	Duwamish (Sector 7)	Annual	~~8.0 µg/m3~~	~~8.5 µg/m3~~	9.0 µg/m3	8.2 µg/m3	9.7 µg/m3	N/A	15 µg/m3
		24 hour	~~34 µg/m3~~	~~23.5 µg/m3~~	25.1 µg/m3	19.5 µg/m3	41.7 µg/m3	35.4 µg/m3	35 µg/m3
Fine particulate matter ($PM_{2.5}$)	South Park (Sector 7)	Annual	~~7.6 µg/m3~~	~~8.5 µg/m3~~	9.0 µg/m3	8.9 µg/m3	10.0 µg/m3	8.9 µg/m3	15 µg/m3
		1 hour	~~0.070 ppm~~	~~0.052 ppm~~	0.054 ppm	0.057 ppm	0.058 ppm	0.055 ppm	0.100 ppm
Nitrogen dioxide (NO_2)	Beacon Hill (Sector 8)	Annual	~~0.015 ppm~~	~~0.013 ppm~~	0.012 ppm	0.012 ppm	0.012 ppm	0.011 ppm	0.053 ppm
		1 hour	~~0.053 ppm~~	~~0.030 ppm~~	0.028 ppm	0.030 ppm	0.012 ppm	N/A	0.075 ppm
Sulfur dioxide (SO_2)	Beacon Hill (Sector 8)	24 hour	~~0.008 ppm~~	~~0.009 ppm~~	0.011 ppm	0.006 ppm	N/A	N/A	0.14 ppm
		Annual	~~0.002 ppm~~	~~0.001 ppm~~	0.001 ppm	0.001 ppm	0.001 ppm	N/A	0.02 ppm

NAAQs = national ambient air quality standards; NSA = no applicable standard; ppm = parts per million; µg/m3 = micrograms per cubic meter

1 NAAQS, other than ozone and particulates, and those based on annual averages or annual arithmetic means, are not to be exceeded more than once a year. The 8 hour ozone standard is attained when the 3-year average of the fourth highest daily concentration is 0.08 ppm or less. The 24 hour $PM_{2.5}$ standard is attained when the 3-year average of the 98th percentile is less than the standard.

2 The U.S. EPA revoked the national 1 hour ozone standard on June 15, 2005. This state 8 hour ozone standard was approved in April 2005 and became effective in May 2006.

3 No Data Available from PSCAA.

Sources: PSCAA, 2012b.

Page 3.2–21, corrections as shown below to text.

Vehicle Speeds in 2035. Vehicle speeds will decrease in the future as a result of increased VMT and resultant congestion on existing roadway links. Congestion factors were calculated for each vehicle type based on the US Environmental Protection Agency Motor Vehicle Emission Simulator (MOVES) Model.

Results. All four ~~2035~~ Draft EIS alternatives generate roughly the same annual GHG emissions, as shown in Table 3.2–3. Alternative 1, the No Action Alternative, is expected to have the highest GHG emissions among the Draft EIS alternatives. Alternative 2, which includes the most concentrated growth pattern, is expected to have the lowest GHG emissions among the Draft EIS alternatives. However, the variation is within one half of one percent. All of the 2035 alternatives are expected to generate ~~lower~~ slightly higher GHG emissions than in 2015. This is due to a combination of factors: projected fuel economy would be slightly outweighed by the overall increase in VMT and change in congestion levels (i.e. travel speeds) by 2035. ~~because the projected improvements in fuel economy outweigh the projected increase in VMT.~~ When evaluated in comparison to the No Action Alternative, emissions under alternatives 2, 3 and 4 would be lower and thus have no identified adverse impacts.

Draft EIS Table 3.2–3 on page 3.2–21 (Final EIS Table 3.1–2 on page 3.1–5), corrections as shown below, in Final EIS Section 3.1.1 on page 3.1–5 and in Final EIS Appendix B.1.

Table 3.2–3 Road transportation emissions (2035)

	GHG Emissions in $MTCO_2e$						
Type of Vehicle	**2015 Existing**	**2035 Alt. 1**	**2035 Alt. 2**	**2035 Alt. 3**	**2035 Alt. 4**	**2035 Preferred Alt. 5**	**2035 Sensitivity Analysis**
Cars and Light Trucks	1,603,000	~~1,233,000~~ 1,379,000	~~1,224,000~~ 1,369,000	~~1,229,000~~ 1,375,000	~~1,233,000~~ 1,379,000	1,376,000	1,402,000
Heavy Trucks	720,000	~~892,000~~ 990,000	~~892,000~~ 990,000	~~892,000~~ 989,000	~~891,000~~ 989,000	989,000	989,000
Buses	64,000	42,000	42,000	42,000	42,000	42,000	42,000
Vanpools	2,000	2,000	2,000	2,000	2,000	2,000	2,000
Total	**2,389,000**	**~~2,169,000~~ 2,413,000**	**~~2,160,000~~ 2,403,000**	**~~2,165,000~~ 2,408,000**	**~~2,168,000~~ 2,412,000**	**2,409,000**	**2,435,000**

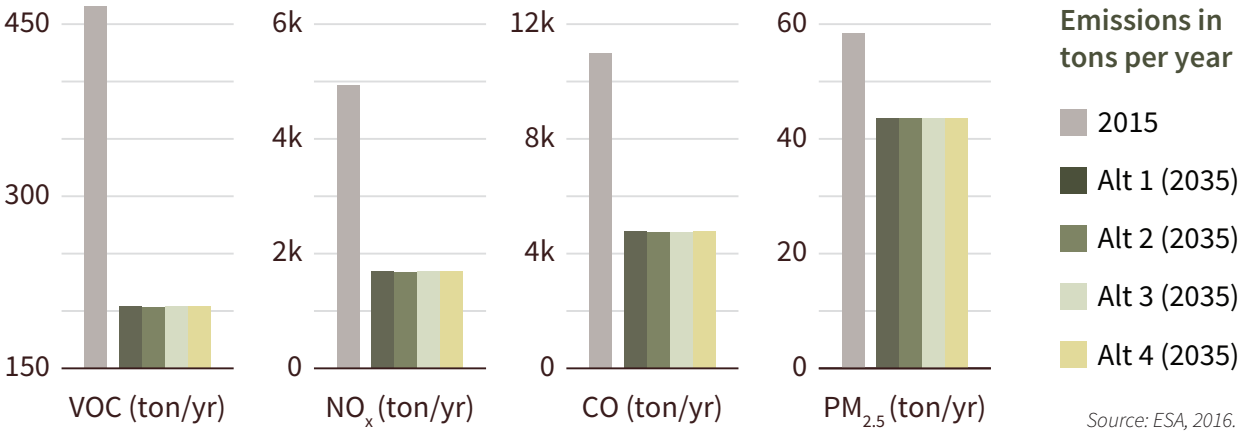
Source: Fehr & Peers, 2014; 2016.

Page 3.2–22, corrections as shown below to text.

All of the 2035 alternatives are expected to ~~generate lower~~ result in a marginal increase in air pollutant emissions than in 2015, resulting in a net ~~decrease~~ marginal increase in transportation-related air pollutant emissions. This is because the projected improvement in fuel economy ~~outweighs~~ help to limit the emissions resulting from the projected increase in VMT and increased congestion. Transportation-related air pollutant emissions under existing conditions and each of the four alternatives are presented in Figure 3.2–6 and Appendix A.1. Note that these emissions are City-wide assuming development under each alternative and do not reflect a development-specific increment attributable to each Comprehensive Plan alternative.

Draft EIS Figure 3.2–6 on page 3.2–23, corrected as shown below and in Final EIS Appendix B.1.

Figure 3.2–6 Road transportation pollutant emissions



Source: ESA, 2016.

Page 3.2–24, corrections as shown below to text.

Total Emissions

Operational GHG emissions from Alternative 1 are presented in Figure 3.2–7 and Appendix A.1. ~~No significant adverse impacts are identified with respect to these GHG emissions.~~ Alternative 1 would result in a net increase of 124,518 metric tons of CO_2e over existing (2015) conditions. The emissions ~~reductions~~ increase from Alternative 1 would be the ~~lowest~~ greatest of any of the four alternatives, largely as the result of greater predicted VMT than the other alternatives, which is a reflection of the greater number of residential development and jobs in the more peripheral urban villages.

Pages 3.2–25 and 3.2–26, corrections as shown below to text.

GREENHOUSE GAS EMISSIONS

GHG emissions under development of Alternative 2 were calculated using the same methodologies as those described for Alternative 1, but reflect the land use differences of increased density of residential development in the urban core. Operational GHG emissions from Alternative 2 are presented in Figure 3.2–8 and Appendix A.1. ~~No significant adverse impacts are identified with respect to these GHG emissions. The emissions reductions from Alternative 2 would be the greatest~~ While total GHG emissions of Alternative 2 would result in an emissions increase over existing (2015) conditions by 111,303 metric tons of CO_2e, this

increase would be the smallest of any of the four alternatives, largely as the result of reduced VMT which is a reflection of the greater number of residential development and jobs in the more central urban centers and villages. Because this increase is less than that of the No Action Alternative, it is not considered an adverse impact.

Pages 3.2–27, corrections as shown below to text.

GREENHOUSE GAS EMISSIONS

GHG emissions under development of Alternative 3 were calculated using the same methodologies as those described for Alternative 1, but reflect the land use differences of increased density of residential development in the urban core and places served by light rail. Operational GHG emissions from Alternative 3 are presented in Figure 3.2–9 and Appendix A.1. Total GHG emissions of Alternative 3 would represent an increase over existing (2015) conditions of 116,268 metric tons of CO_2e. ~~No significant adverse impacts are identified with respect to these GHG emissions.~~ The emissions ~~reductions~~ increases realized from implementation of Alternative 3 would be ~~less~~ greater than those of Alternative 2 but ~~greater~~ less than those of Alternative 1, the No Action Alternative. Because this increase is less than that of the No Action Alternative, it is not considered an adverse impact.

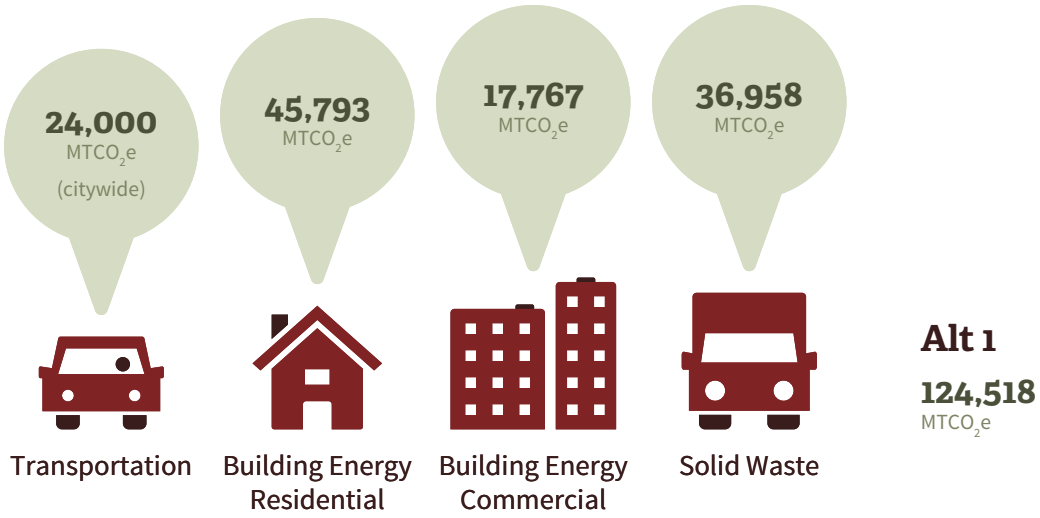
Page 3.2–27 and 3.2–28, corrections as shown below to text.

GREENHOUSE GAS EMISSIONS

GHG emissions under development of Alternative 4 were calculated using the same methodologies as those described for Alternative 1, but reflect the land use differences of increased density of residential development in the urban core and selected places served by light rail or bus service. Operational GHG emissions from Alternative 4 are presented in Figure 3.2–10 and Appendix A.1. ~~No significant adverse impacts are identified with respect to these GHG emissions.~~ Total GHG emissions of Alternative 4 would represent an increase over existing (2015) conditions of 117,219 metric tons of CO_2e. The emissions ~~reductions~~ increases realized from implementation of from Alternative 4 would be similar to those of Alternative 3. Because this increase is less than that of the No Action Alternative, it is not considered an adverse impact.

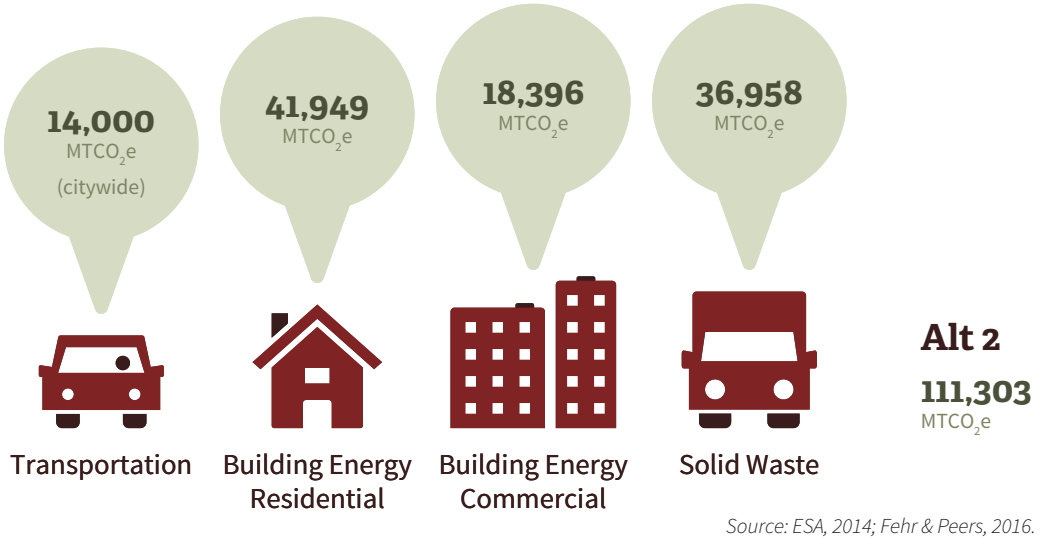
Draft EIS Figures 3.2–7 through 3.2–10 on pages 3.2–24, 3.2–25, 3.2–26 and 3.2–28, corrected as shown below and in Final EIS Appendix B.1.

Figure 3.2–7 Operational GHG emissions of Alternative 1



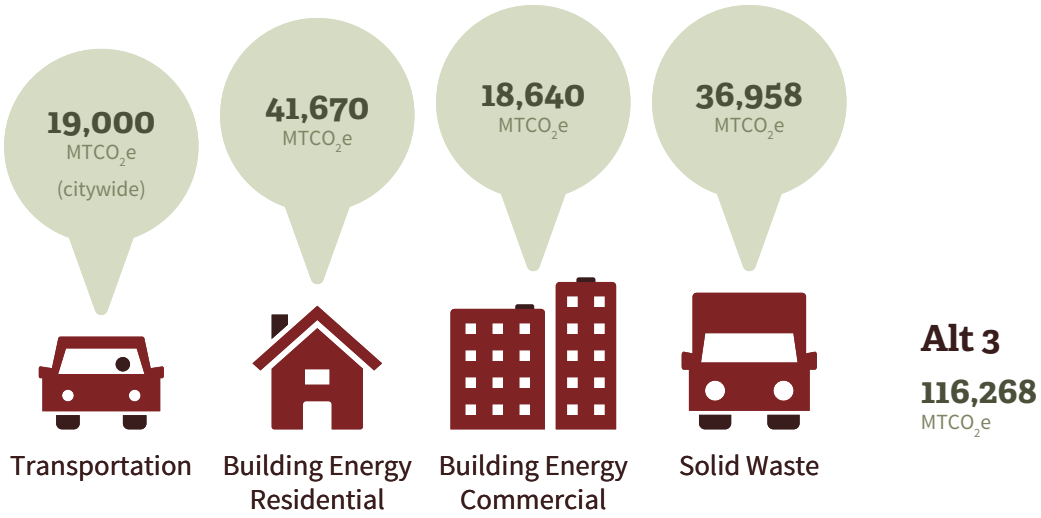
Source: ESA, 2014; Fehr & Peers, 2016.

Figure 3.2–8 Operational GHG emissions of Alternative 2



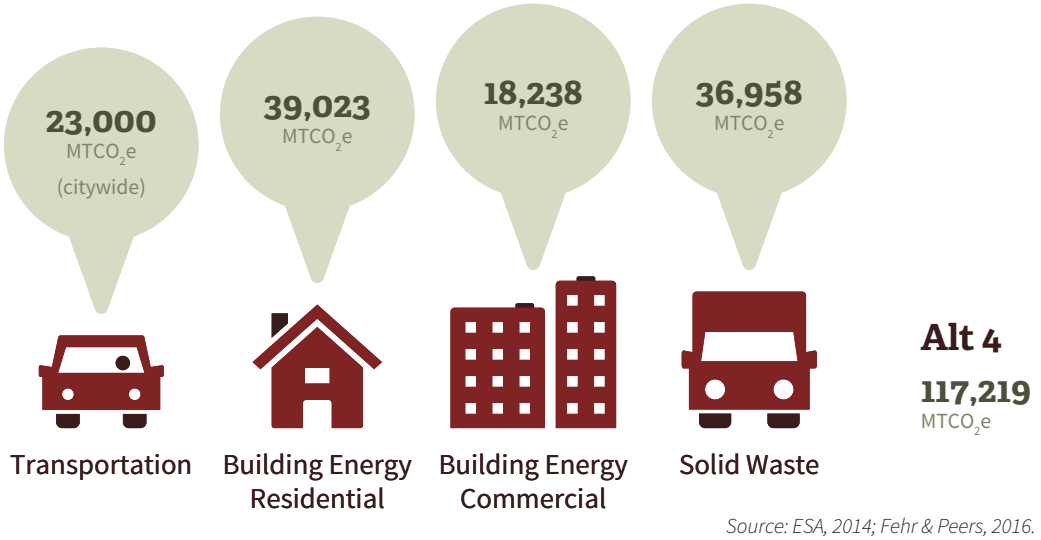
Source: ESA, 2014; Fehr & Peers, 2016.

Figure 3.2–9 Operational GHG emissions of Alternative 3



Source: ESA, 2014; Fehr & Peers, 2016.

Figure 3.2–10 Operational GHG emissions of Alternative 4



Source: ESA, 2014; Fehr & Peers, 2016.

Draft EIS Section 3.4 Land Use: Patterns, Compatibility, Height, Bulk and Scale

Page 3.4-19, new text under Impacts Common to All Alternatives as shown below.

GROWTH-ESTIMATES

The proposal in Final EIS Chapter 2 includes a method for defining urban village growth estimates. These are similar to the "growth targets" in the prior Comprehensive Plan. They are proposed to be defined in terms of percentage growth levels over a 2015 baseline level, and would represent benchmarks of the preferred density and intensity levels for each urban village. See Chapter 2 for additional description of details.

In terms of policy, the proposed growth estimates would provide a logically-defined basis for growth distribution to urban villages that would directly relate to the broader goals and policy objectives of the Comprehensive Plan. This demonstrates intentionality in how growth is meant to be distributed by the City through implementation of its Comprehensive Plan, and thus no internal inconsistencies within the Plan are identified.

In terms of potential for adverse land use impacts, defining the growth estimates on a percentage-over-baseline basis reduces the potential of "over-assigning" or "under-assigning" growth amounts distributed among the urban villages. Conceptually, if paired with effective growth management strategies over the next 20 years, this approach could help to avoid excessive levels of overall growth-related land use impacts from occurring in any given urban village. If this occurred, it could be concluded as likely to result in positive impacts, or fewer adverse impacts, than might result from growth estimates defined by other methods. However, it is also noted that the growth estimates by themselves create few obligations for mandatory changes in City growth management policies if they are exceeded: 1) there would be a need to cease use of SEPA "infill thresholds" (refer to Section 2.4) if estimates are exceeded in an urban village (e.g. causing more future developments in that village to undergo SEPA review); and 2) in a non-mandatory fashion, exceedances of growth estimates in a given urban village would suggest that the City should examine other strategies or actions to possibly take to manage or respond to growth levels.

Page 3.4-31, new text under Effects of Other Policy Changes as shown below.

When considering the nature of different land use policy changes described earlier in this section, it is noted that the combination of proposed urban village expansion areas, deletion of existing policies LU59 and LU60, and changes in Future Land Use Map (FLUM) mapping practices could lead to two kinds of future land use changes:

1. Within Urban Village boundaries, there would be a greater possibility that land currently zoned Single Family could be rezoned to other zone designations, most typically anticipated to be multifamily residential zones or other low-density residential zones

that might allow variations in housing types or forms. This reflects the removal of a near-prohibition of any Single Family rezones with the LU59 and LU60 policy change, and an increased flexibility to propose redesignations and rezones of land due to the FLUM mapping changes. This could be possible within several urban villages that have Single Family zoned land, such as those illustrated in Draft EIS Figures 3.4-14 through 3.4-17. A rationale for changes in such areas could include their walkable proximity to frequent transit service. Adverse impacts with regard to compatibility, height, bulk and scale would be similar to those already disclosed in this section (see the first paragraphs under "Land Use Compatibility" and "Height, Bulk and Scale" for Alternative 3, page 3.4-26, for example). It is noted that future rezones would be subject to the rezone criteria and the Single Family zone designation criteria in Title 23 (see SMC 23.34), which could be a limiting factor and a decision-making factor in whether such rezones would occur. These criteria impose limitations on rezones from Single-Family designations, with content that is very similar to contents of LU59 and LU60.

2. In areas where expanded urban village boundaries could newly encompass land currently zoned Single Family, there would be a greater possibility that this land could be rezoned to other zone designations, most typically anticipated to be multifamily residential zones or other low-density zones that might allow variations in housing types or forms. The rationale for this type of land use change would reflect the intent to encourage denser patterns of residential living in places (Urban Villages) where there is very good transit service, thus encouraging land use and transportation efficiencies. Adverse impacts would be similar to those already disclosed in this section (same citation as above, page 3.4-26). Future rezones would be subject to the rezone criteria and the Single Family zone designation criteria in Title 23 (see SMC 23.34), which could be a limiting factor and a decision-making factor in whether such rezones would occur.

These disclosures of possible adverse impacts are made to clarify the range of future possible outcomes given the combination of land use policy reforms that are proposed under Alternative 3.

Page 3.4-35, new text under Alternative 4 Effects of Other Policy Changes as shown below.

Similar to additional disclosures made for Alternative 3, rezones from Single Family zones to other zones could occur on such properties within Urban Village boundaries, or in recommended expansion areas for Urban Villages defined for Alternative 4. In addition to those identified for Alternative 3, expansion areas could include area within the Ballard, Fremont, West Seattle Junction, and Crown Hill urban village vicinities (see Figures 3.4-20 through 3.4-22). The potential range of adverse impacts would be similar to those disclosed earlier in this section for alternatives 3 and 4, with a broader possible geographic range of change given the additional neighborhood expansion areas listed above.

Draft EIS Section 3.5 Relationship to Plans and Policies

Page 3.5–1, correction due to changes in the Draft Comprehensive Plan as shown below to text.

- ~~Adjusting the quantitative tree canopy goal in the Environment Element to be consistent with the 2013 Urban Forest Stewardship Plan.~~

Page 3.5–8, new text following the Comprehensive Plan discussion as shown below.

July 8, 2015 Draft Comprehensive Plan

On July 8, 2015, the City issued the Draft Comprehensive Plan for public review and comment. Proposed changes in the Draft Comprehensive Plan reflect new local, state and regional policy guidance; incorporate language and editorial changes to policies to increase readability, clarify direction and remove redundancies; add new or updated information since the adoption of the current plan; and address key policy topics raised during the planning process. A summary of each Draft Comprehensive Plan element is provided below. The Shoreline Management and Container Port elements and Neighborhood Plan contents are not proposed for any changes and are not further addressed.

LAND USE AND GROWTH STRATEGY ELEMENTS

The Land Use and Growth Strategy elements in the Draft Comprehensive Plan guide future land use and development patterns in the City. The Growth Strategy Element is a new element, consisting primarily of goals and policies from the adopted Urban Village Element. In general, the Growth Strategy Element continues and reinforces the City's urban village growth strategy, which accommodates the majority of anticipated housing and employment growth in designated urban centers, urban villages and manufacturing/industrial centers. Major policy topics include planning for growth, urban village strategy, distribution of growth, urban design[1], and annexation. Updated goal and policy guidance include having strategies that prepare the City for the challenges and opportunities of growth; accommodate 80 percent of the city's growth in designated centers and villages; and that maintain and enhance the city's unique character and sense of place.

Similar to the Growth Strategy Element, the draft Land Use Element also updates and carries forward existing general policy guidance for the Future Land Use Map, land use designations, development standards and incentives. Major policy topics include the Future

1 Many of the goals and policies from the adopted Urban Design Element have been incorporated into the draft Growth Strategies Element.

Land Use Map, uses and special uses, general development standards, off-street parking, incentives, and land use areas.

Please see also the discussion of the Urban Village Strategy and Land Use elements in Draft EIS Section 3.5.

HOUSING

The purpose of the Housing Element is to establish goals and policies that respond to the housing needs of all Seattleites and contribute to the building of vibrant, resilient, cohesive communities throughout the city.

In general, policy language in the draft Housing Element is consistent with the direction of the current element. Major topics addressed include equal access to housing, supply of housing, diversity of housing, housing construction and design and affordable housing. Updated policy language addresses housing diversity, affordability and displacement. With respect to home ownership, proposed policy guidance promotes financially sustainable strategies to provide homeownership for low-, moderate- and middle income households. It also considers allowing additional housing types in single-family zones that are located inside urban villages.

TRANSPORTATION

The Transportation Element guides transportation investments in the City to equitably serve future residents and support the City's urban village growth strategy. In general, policy language in the draft Transportation Element continues the overall direction of the current element, with updated language to recognize new city priorities and changes to regional and state requirements. Major topic areas include integrating land use and transportation, making the best use of the streets we have, transportation options, environment, supporting a vibrant economy, connecting to the region, operating and maintaining the transportation system, measuring level of service and funding. Updated policy guidance emphasizes that new mobility strategies, focusing beyond the addition of general purpose vehicle capacity must be applied, particularly since adding new lanes to existing arterials in a built-out urban area such as Seattle would have significant financial costs, environmental impacts and community disruption.

Related to this direction, proposed policy guidance establishes the City's intent to consider establishing a level-of-service standard that addresses non-motorized modes. This direction recognizes that widening arterials is not a practical or feasible way of accommodating growth in a mature, developed urban environment (given factors such as space constraints) and is not consistent with the overall goals of the Comprehensive Plan.

For additional description and discussion of the proposed change to level-of-service standards, please see Appendix B.3.

CAPITAL FACILITIES & UTILITIES ELEMENTS

The Capital Facilities and Utilities elements provide guidance for the City's network of capital facilities and utilities. Capital facilities include police and fire stations, transportation, parks, schools, libraries, the Seattle Center, neighborhood service centers, health clinics and City office space. Utilities include power, water, wastewater, stormwater, natural gas, waste management and communications. Capital facilities and utilities are provided by the City and by non-City organizations. While non-City organizations are not required to meet the goals and policies of the Comprehensive Plan, the City works in collaboration with partner agencies through such activities as joint planning, funding support and shared use of City-owned property.

In general, policy language in the draft Capital Facilities and Utilities elements is consistent with the direction of the current elements. It should be noted that the topic of parks and open space, which is addressed in the current Capital Facilities Element, has been moved to a new Parks and Open Space Element in the Draft Comprehensive Plan, see the discussion of this element below. Major policy topics in the Capital Facilities Element include strategic investment, facility operations and maintenance, facility siting, facility design and construction and relationship with non-city entities. Major topics addressed in the Utilities Element include service delivery, utility resource management, utility facility siting and design, coordination within the right-of-way and relationships with non-city utilities. New proposed policy language provides greater emphasis on equitable delivery of services, resiliency, carbon neutral services, energy conservation and affordability.

ECONOMIC DEVELOPMENT

The draft Economic Development element provides direction about how to maintain and grow Seattle's economy in a way that benefits individuals throughout all income levels, industry sectors and communities. This element indicates that the City will strive to reduce income inequities and to address policies that contribute to or create inequity.

Major policy topics include commercial districts, industry clusters, business climate and entrepreneurial and small business development. New policy guidance focuses on vibrant commercial centers in urban centers and villages, a comprehensive approach to strengthen neighborhood businesses districts, support for technology and innovation entrepreneurs, and promoting local small businesses.

ENVIRONMENT

The draft Environment element provides policy direction to support the health and sustainability of the natural environment while the City grows. Proposed goals and policies seek to protect the climate and restore the natural environment in ways that can improve human health, create wildlife habitat, generate jobs and reduce the burdens of a degraded environment.

Major policy topics include the natural landscape, water resources, climate and environmental justice. Consistent with adopted policy, proposed policy guidance would maintain the current 40% tree canopy coverage goal. New policy guidance emphasizes reducing risk and adapting to climate change impacts, ensuring that environmental benefits and burdens are equitably distributed, and considering the costs and benefits of policy options on different communities.

PARKS AND OPEN SPACE

The Parks, Recreation and Open Space Element is a new element that addresses parks and open space in Seattle. The element states that the city-owned park and recreation system comprises about 11 percent of the total city land area. Identified benefits of parks and open space include the potential to improve human health, provide wildlife and vegetation habitat, and contribute to economic vitality.

Major policy topics include access to open space, park activities maintaining park facilities and major open space attractions. Proposed policies seek to provide a variety of outdoor and indoor spaces throughout the city, to identify realistic goals for the City's future open space system, to continue to provide a variety of recreational programming, to maintain safe and welcoming public spaces, and accommodate regional interest in major facilities while respecting the neighboring community. The element recognizes that the City is not the only entity that provides open space in the city and that open space can take a variety of forms. The Plan proposes discontinuing the current numeric goals for open space, but indicates new goals should be developed, which would occur through ongoing parks planning efforts conducted primarily by the Parks Department.

Examples of major open space attractions identified in the Draft Comprehensive Plan include the Washington Park Arboretum, Woodland Park Zoo, Kubota Gardens, Seattle Aquarium, Magnuson Park, Olympic Sculpture Park, and Seattle Center.

ARTS AND CULTURE

The draft Arts and Culture Element is a new element that incorporates many of the goals and policies from the adopted Cultural Resources Element. The draft element outlines goals and policies related to the arts and cultural and historic preservation and support the expansion of cultural venues, activities, and the arts as Seattle grows.

Major policy topics include public art, creative economy, youth development, cultural space and placemaking, and historic preservation. Draft policy guidance seeks to enhance support for artists, creative professionals and cultural organizations; improve access to arts education; support affordable cultural spaces in all neighborhoods; and preserve assets of historic, architectural, archaeological or social significance. With respect to historic preservation, recommended policy language is intended to maintain or enhance the strength of existing policy guidance through language that is more direct and supportive of cultural and historic preservation than existing plan language.

COMMUNITY WELL-BEING

The draft Community Well Being Element is a new element that builds from the existing Human Development and Economic Development elements. Draft goals and policies focus on human relationships, educational opportunities, health care, public safety, and cultural diversity.

Major topic areas include supportive and healthy communities; access to food and shelter; healthy growth, aging and lifestyles; lifelong learning; public safety; a multi-cultural city; and coordination of services. New proposed policy guidance would promote activities to increase community participation by young people and older residents, support access to healthy and affordable food for all people, support schools' efforts for culturally competent disciplinary practices, support programs to help people who had dropped out of high school to achieve education and employment goals, and support youth-based job training opportunities.

DISCUSSION

Core values and principles identified in both the adopted and Draft Comprehensive Plan include race and social equity, economic opportunity and security, environmental stewardship, community and sustainability.

As summarized above, the Draft Comprehensive Plan update carries forward the urban village strategy, the city's fundamental approach to accommodating anticipated growth. Some of the key goals of the urban village strategy are to accommodate future growth in an orderly and predictable way, promote efficient use of public investments and retain the character of less dense single family neighborhoods outside of urban villages. The Draft Comprehensive Plan builds on this fundamental approach, with policy updates that recognize changed conditions, new information, emerging policy issues and changed state and regional requirements. The Preferred Alternative supports and carries forward these policy goals and directions described in the Draft Plan, and also includes the environmental protection rationales that are described below.

Recognizing that an overall objective of the Comprehensive Plan is to guide future growth and decisions in a manner that reflects the City's core values and fundamental urban village strategy, existing goals and policies focus on measures that eliminate or minimize the potential impacts of growth on the natural and built environment. From a SEPA environmental perspective, the proposed goals and policies will continue this focus and are likely to result in beneficial impacts. No significant adverse impacts are anticipated. In some cases, the potential for adverse impacts would depend on how policies are implemented. Future regulations or other implementing actions may be subject to a separate SEPA environmental review process.

Page 3.5-12, new text under the Urban Forest Stewardship Plan discussion clarifying the relationship of the Preferred Alternative to tree cover as shown below.

Compared to Alternative 4, the Preferred Alternative would expect a greater level of household growth outside of Urban Centers or Urban Villages than any alternative except Alternative 1. This would mean a higher potential to disturb existing trees that may be present in the lower density areas, and thus a higher potential for adverse impacts to trees than Alternative 4, even though City rules with respect to significant trees would continue to apply.

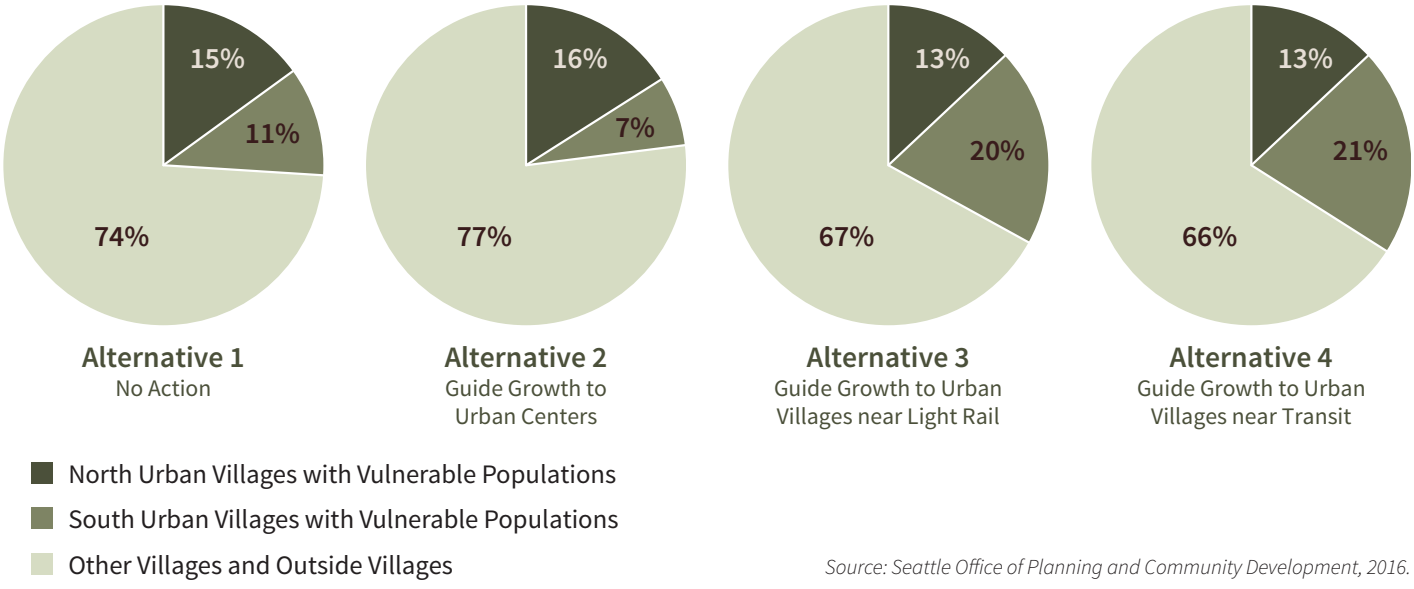
Draft EIS Section 3.6 Population, Employment and Housing

Page 3.6–21, corrections as shown below to text.

Figure 3.6–21 compares the amount of housing growth projected to occur in urban villages with vulnerable populations under each alternative. The share of growth projected for urban villages with vulnerable populations ranges from ~~22~~ 23 percent of total growth (Alternative 2) to ~~32~~ 34 percent of total growth (Alternative ~~3~~ 4). Also, when comparing the difference between the shares of growth projected for north versus south end urban villages with vulnerable populations, Figure 3.6-22 illustrates that the south end villages of this kind are projected to accept a ~~6–7~~ 7–8 percent greater share of residential growth than the north end villages with vulnerable populations (for alternatives 3 and 4), or as much as a ~~10~~ 9 percent lesser share of projected growth under Alternative 2. The projected residential growth shares are somewhat more balanced under Alternative 1. These observations generally illustrate how residential growth pressures could be experienced differently across the city depending upon how preferred growth policies are chosen.

Draft EIS Figure 3.6–21 on page 3.6–22, corrected as shown below.

Figure 3.6–21 Comparison of projected residential growth in areas with vulnerable populations, by alternative



Source: Seattle Office of Planning and Community Development, 2016.

Page 3.6–24, corrections as shown below to text.

Displacement of existing residents: As shown in Figure 3.6–21, the projected growth under Alternative 1 would generate moderate potential for displacement in urban villages with the greatest amount of vulnerable populations, given the identified ~~25~~ 26 percent share of total residential growth allocated to that kind of urban village. Future housing growth in these urban villages would be relatively evenly divided between North and South Seattle, resulting in moderate potential for displacement in each of these areas, relative to the other alternatives.

Page 3.6–27, corrections as shown below to text.

Displacement of existing residents: Among the alternatives, Alternative 2 would direct the least additional housing growth to those urban villages with the highest risk of displacement impacts on vulnerable populations, a ~~22~~ 23 percent share of the total as shown in Figure 3.6–21. By concentrating new housing growth in city's densest neighborhoods, Alternative 2 would likely help to relieve development pressure in areas with high potential for displacement. However, this growth potentially affecting vulnerable populations would be more concentrated in the northern areas of the city (16 percent share in northern neighborhoods versus a ~~6~~ 7 percent share in the southern neighborhoods).

Page 3.6–29, corrections as shown below to text.

Displacement of existing residents: As shown on Figure 3.6–21, Alternative 3 would generate a relatively high potential for displacement of residents in urban villages with the greatest amount of vulnerable populations. With respect to south Seattle neighborhoods of this kind, Alternative 3 would have the second greatest potential for displacement impacts (on par with Alternative 4). This would relate to the intent to emphasize growth in urban villages served by light rail stations.

Page 3.6–31, corrections as shown below to text.

Displacement of existing residents: As shown in Figure 3.6–21, potential for displacement of existing residents in urban villages with the greatest amount of vulnerable populations under Alternative 4 would be relatively high, compared with alternatives 1 and 2, and would be similar to Alternative 3. Alternative 4 would generate the highest potential for displacement impacts both overall and in South Seattle urban villages with the greatest amount of vulnerable populations, although the potential for displacement impacts in similar urban villages in North Seattle would be moderate and ~~only slightly higher than~~ the same as Alternative 3.

Draft EIS Section 3.7 Transportation

Page 3.7–9, corrections as shown below to text.

Seattle designates certain areas as Restricted Parking Zones (RPZ), as shown in Figure 3.7–7. These zones have time-limited parking available to the public. Residents with eligible addresses can apply for a permit to use the curb parking in their neighborhood ~~without~~ beyond the signed time limits for up to 72 hours maximum. The aim is to balance the parking needs of the public and the residents and ease parking congestion in certain locations. There are 31 zones in Seattle, with an additional 2 zones during University of Washington Husky game days.

Page 3.7–46, clarification of Table 3.7–8 title and content in Summary of Impacts as described below.

A couple of comments on the Draft EIS questioned the contents of Draft EIS Table 3.7–8 largely based on its title. The table was meant to briefly re-cap the analytic findings as to the presence or absence of significant adverse impacts but its title is too general. The table uses check marks to denote the findings of significant adverse parking impacts, but indicates no other significant adverse impacts. This table's title is updated to read "Summary of significant adverse impacts" and its legend is similarly updated to denote presence or absence of "Significant Adverse Impact" or "No Significant Adverse Impact."

Page 3.7–51, corrections as shown below to text.

Potentially significant adverse impacts are identified in this Draft EIS. However, the parking impacts are anticipated to be brought to a less-than-significant level by implementing a range of possible mitigation strategies such as those discussed in Section 3.7.3. While there may be short-term impacts as individual developments are completed (causing parking demand to exceed supply), it is expected that over the long term, the situation would reach a new equilibrium as drivers shift to other modes or to using off-street parking facilities. With implementation of a range of possible mitigation strategies addressing parking impacts. ~~Therefore~~, no significant unavoidable adverse impacts ~~to transportation and parking~~ are expected.

Draft EIS Section 3.8 Public Services

Page 3.8–16, correction to Table 3.8–3 as described below.

Draft EIS Table 3.8–3, "Significant open space gaps by EIS analysis sector," is corrected for the NE Seattle analysis sector, as follows: in the column headed "Open Space Gap in Over Half of Urban Center or Urban Village" the findings should read "Northgate, University District." This is illustrated in Draft EIS Figure 3.8–11, which correctly showed the University District gap.

Page 3.8–27, corrections and new text under Impacts Common to All Alternatives as shown below.

~~P~~Overall, the amount of existing Parks land is adequate to serve the projected population and job growth through 2035. However, the distribution of various population and job growth over the 20-year planning period is likely to result in some level of non-significant adverse impacts ~~would generate more demand for parks, recreation facilities and open space across the city.~~ Findings described in the balance of this section for parks and recreation are evaluated as representing adverse environmental impacts but not significant adverse impacts. This reflects an EIS conclusion that possible geographical gaps and shortfalls in amounts of parks/recreation/open space provision that could be present over many years, in comparison to current aspirational goals, would represent an adverse outcome that cannot be ensured to be remedied for all affected portions of the city. However, it must also be noted that discussion in the City's current Comprehensive Plan Element (page 5.6) states a conclusion that "The City currently provides a good citywide system of libraries, parks and recreation facilities which are available and accessible for use by all the City's residents… While additions to these facilities would enhance the City's quality of life, such additions are not necessary to accommodate new households." This statement is likely to remain valid as the city continues to grow over the next 20 years, because of the inherent value and quality of the extensive variety, distribution and size of relevant facilities across the city. Thus, it supports a broader conclusion that impacts of anticipated growth can be addressed by the entire system's capacity and range of available services, and as augmented by SPR's planning and implementing future improvements, without incurring significant adverse impacts upon parks, recreation, and open space.

Page 3.8–28, clarification and new text as shown below.

~~Significant~~ When measured against current goals (refer to Draft EIS Table 3.8–2), open space gaps that currently exist in single family areas in Northwest Seattle (Sector 1; ~~Whittier~~ including but not limited to the Greenwood-Phinney Ridge, North Park and Broadview neighborhoods), Northeast Seattle (Sector 2; ~~Wedgewood~~ including but not limited to the Morningside, Jackson Park and Cedar Park neighborhoods), ~~and~~ West Seattle (Sector 6; Beach Drive and Arbor Heights areas) and Southeast Seattle (Sector 8; Beach Avenue S vicinity) ~~are all likely to~~ could continue under all alternative scenarios, unless additional actions are pursued to address those ~~needs.~~ gaps. SPR will continue to strive through the 20-year planning period to address gaps by seeking to obtain parks and open space and improve them as appropriate.

Similarly, open space gaps in urban centers and villages as shown in Table 3.8–3 could continue unless additional actions are pursued. These include: Downtown, First/Capitol Hill, University District, Northgate, Ballard, Bitter Lake, Fremont, Mount Baker, West Seattle Junction, Greenwood-Phinney Ridge, Morgan Junction and Westwood-Highland Park. Distribu-

tion goals that are currently not met ~~would probably~~ could continue to be unmet until Parks purchases and develops property in those urban villages. To the extent that future park/open space improvements are made in or near these areas, however, such "gaps" could be reduced over time. SPR will continue to strive through the 20-year planning period to address these "gaps" by seeking to obtain parks and open space and improve them as appropriate.

It should be noted that these analytic findings are made in comparison to expressions of City parks goals that were present prior to Draft EIS publication and continue to be present within the latest 2015 version of the Comprehensive Plan. However, the proposed Comprehensive Plan (Policy P1.2) implies that priorities and level-of-service standards will be updated with respect to parks and open space in the *Park Development Plan*. Seattle Parks and Recreation (SPR) will begin work on this functional plan in 2016. This sort of refinement of goals, policies and objectives is a necessary step to best direct the City's parks/open space planning efforts, and it reflects an intent to maintain effective policy guidance by the Comprehensive Plan in this functional planning category. It is acknowledged, however, that exact content of new parks/open space planning goals, both in quantitative and qualitative terms, are not defined at this time. When proposed, they may be subject to future SEPA review.

Page 3.8–29, correction as shown below to text.

See discussion under Impacts Common to All Alternatives on page 3.8–27. Under Alternative 1 (No Action), the projected growth levels across the city would be distributed in a manner comparable to growth patterns over the last twenty years. The discussion under Impacts Common to All Alternatives addresses areas with ~~potentially significant~~ identified adverse impacts.

Page 3.8–33, correction as shown below to text.

Although future growth over twenty years would contribute to increased demand for services and certain facilities from these service providers, and each has already-identified needs that the City anticipates addressing in coming years, the alternatives evaluated in this EIS would ~~largely~~ avoid generating significant adverse impacts. Thus, no proposed mitigation strategies are defined. ~~Future growth could cause adverse impacts relating to the availability or distribution of park/recreation facilities/amenities and open space in certain areas of the city. Mitigation strategies for parks/recreation are proposed, to address the identified range of potentially significant adverse impacts.~~

"Other Possible Mitigation Strategies" are also included below to offer advisory guidance on actions that could be taken to support improvements that would address existing conditions that could be remedied by a combination of continued departmental management choices and execution of improvements fitting within capital improvement funding capabilities.

Each of the service providers studied here actively manages how its operations and facilities are allocated to serve its customers. However, their responsiveness and ability to deliver services in certain ways could potentially be constrained due to funding availability when competing for available resources to provide capital improvements, or when City decision makers decide how to allocate the available resources among potential improvements.

~~Proposed Mitigation Strategies~~

~~Given that future growth across the city would continue to generate additional demands upon parks/recreation and open spaces in relation to its per-capita goals, Parks would strive through the 20-year planning period to address possible shortfalls by continuing to leverage funds allocated in the Park District to match state funding grants. The areas identified with outstanding needs include the following:~~

- ~~***Urban Centers:*** Downtown, First/Capitol Hill, Northgate and South Lake Union~~
- ~~***Hub Urban Villages:*** Ballard, Bitter Lake, Fremont, Mount Baker and West Seattle Junction~~
- ~~***Residential Urban Villages:*** Greenwood-Phinney Ridge, Morgan Junction, Westwood-Highland Park and portions of Mount Baker and 23rd & Union-Jackson Urban Villages in the vicinity of the future I-90/East Link light rail station~~
- ~~***Other Neighborhoods:*** Whittier, Wedgewood and Beach Drive~~

Other Possible Mitigation Strategies

PARKS AND RECREATION

- Update Comprehensive Plan and *Park Development Plan* goals and policies related to the acquisition of new park lands and development of usable open space within existing parks.

Page 3.8–34, correction as shown below to text.

FIRE AND EMERGENCY SERVICES

- The Fire Department could take steps to obtain funding for and construction of a new fire station in South Lake Union.
- The Fire Department could take steps to address additional equipment assignment and/or other changes to address possible operational challenges identified as possibly present at the Broadview-Bitter Lake-Haller Lake fire stations under existing conditions.
- When siting new fire stations, the Fire Department should coordinate with SDOT to take into consideration roadway design and possible increased traffic congestion that could affect response times.

Draft EIS Section 3.9 Utilities

Page 3.9–10, corrections as shown below to text.

Separated Sewers

Under all scenarios, including Alternative 1 (No Action), development could result in greater demands on the local sewer collection system, the downstream conveyance and the treatment facilities. Increased sewer flow is related to increased water consumption. There would be a greater overall need for sewage capacity with increased density, but no significant adverse location-specific impacting conditions are identified in this review. Potential impacts to specific locations may be identified during plan review for individual projects. These potential impacts would be mitigated through developer-installed sewer improvements as described in the Existing Management Strategies section of Draft EIS Section 3.9.

Separated Drainage

Under all scenarios, including Alternative 1 (No Action), future development would result in increased flow and/or improvements to portions of the drainage system. Increases in peak flow and total runoff caused by conversion of vegetated land area to impervious surfaces would ~~create increased demand on drainage system capacity~~ be managed by developer installed stormwater controls, ~~but~~ therefore no significant adverse location-specific impacting conditions are identified in this review. Potential impacts to specific locations may be identified during plan review for individual projects. These potential impacts would be mitigated through developer installed on-site stormwater management facilities and developer storm drain improvements as described in the Existing Management Strategies section of Draft EIS Section 3.9.

Page 3.9–12, corrections as shown below to text.

SPU—WATER

Water System Planning. Water supplies are assessed every 6 years as part of the *Water System Plan* updates. The most recent *Water System Plan* update forecasts water demand to remain below current yield well beyond 2040. The *Water System Plan* analysis included review of three climate change scenarios and determined that these scenarios would have little to no cost impacts (SPU 2012).

Pages 3.9–12 and 3.9–14, corrections as shown below to text.

SPU—SEWER AND DRAINAGE

Sewer Treatment Planning. Sewage treatment is provided by King County Wastewater Treatment Division (WTD). King County WTD assesses treatment capacity as part of the *Regional Wastewater Services Plan* Comprehensive Reviews. Capital needs are identified during each review to accommodate forecasted demand. The 2013 Comprehensive Review analyzed flow projections through 2060.

Developer Sewer Improvements. In areas that are not designated as capacity constrained, developers are required to demonstrate that the downstream system has sufficient capacity for additional flow. Some parts of the City are served by sewers that are less than 12-inch diameter, see Figure 3.9–7. These areas are likely at or near their capacity and downstream pipes from new development would have to be upgraded to a minimum 12-inch diameter. Improvements to selected flow lines would be identified as development occurs. These improvements are identified through plan review and paid for by developers. Redevelopments may also reduce per-capita sewer demand, as newer, low- or no-flow plumbing fixtures and equipment replaces older, less efficient, installations. Over the last 25 years sewer base flows with the City's sewer system have decreased even as population has increased, due to reductions in potable water usage (SPU 2015b). These practices will help reduce the overall impact to the wastewater system.

Page 3.9–14, corrections as shown below to text.

Seattle Stormwater Code. Current stormwater regulations require new development and redevelopment to mitigate new impervious surfaces and pollution generating surfaces with flow control and/or water quality treatment. City of Seattle stormwater regulations protect people, property and the environment from damage caused by stormwater runoff. The stormwater codes satisfy the City's obligation to comply with Washington State Municipal Stormwater Permit—National Pollutant Discharge Elimination System (NPDES) Permit, issued by the Washington State Department of Ecology.

City and State regulations now require on-site stormwater management. Redevelopment of properties that were previously developed without stormwater flow control and treatment facilities must reduce runoff and non-point source pollution to at or below current levels. On-site stormwater management practices include: retaining existing trees, planting new trees, amending soils to restore soil infiltration and water holding, reducing impervious surfaces, and installing facilities to store and infiltrate stormwater runoff (SPU 2015a). ~~The stormwater regulations address how stormwater from development needs to be controlled and treated using on-site stormwater management including green stormwater infrastructure (GSI) and other measures.~~ The City code also identifies erosion control requirements

for construction and grading activities. The erosion control, flow control and treatment requirements help to maintain or improve the conditions of the downstream system and discharge location and reduce the overall impact of development. Cumulatively it is anticipated that as properties in the City are redeveloped stormwater runoff and transport of pollutants to streams, lakes and the combined sewer system will decrease. ~~New development that complies with these regulations, standards and practices will help reduce the overall impact to the drainage system. Redevelopment that replaces existing impervious surface and provides flow control can reduce runoff rates even below current levels.~~

Pages 3.9–14 and 3.9–15, corrections as shown below to text.

Advanced Meter Infrastructure. In 2016, Seattle City Light will ~~complete~~ begin deployment of Advanced Meter Infrastructure to replace the existing manually read analog meters.

Capital Project and Resource Planning. ~~Seattle City Light~~SCL's Six-Year *Strategic Business Plan* (updated every two years) and state-mandated *Integrated Resource Plan* (updated every two years) provides the utility the capacity to establish a roadmap for insuring adequate retail revenue, and necessary physical infrastructure and energy resources to meet the City's demand due to projected economic or population growth (SCL 2014a).

As part of the *Integrated Resource Plan*, SCL continues to track the impacts of climate change. SCL is also developing a *Climate Change Vulnerability Assessment and Adaptation Plan* for the utility. As results of these research projects become available, they will be included in the *Integrated Resource Plan* and updates to the *Adaptation Plan* (SCL 2014b).

Taking into account anticipated conservation measures, overall demand growth is forecast to average 0.4 percent annual growth through 2035 (SCL 2015). SCL is continually seeking out new renewable resources in the region and acquires them to meet customers' needs for safe, reliable, clean energy. Recent acquisitions include biomass and landfill gas.

Draft EIS Chapter 4.0 References

Page 4–4, corrections as shown below to text.

Seattle City Light (SCL). 2014a. *2015–2020 Strategic Plan Updates.* http://www.seattle.gov/light/stratplan/.

Seattle City Light (SCL). 2014b. *2014 Integrated Resource Plan*. http://www.seattle.gov/light/news/issues/irp/.

Seattle City Light (SCL). 2015. *Integrated Resource Plan Process*. http://www.seattle.gov/light/news/issues/irp/.

Page 4–7, new text following the Seattle Public Utilities 2014 as shown below.

Seattle Public Utilities (SPU). 2015a. *Draft 2016 Stormwater Code and Manual.* http://www.seattle.gov/dpd/codesrules/changestocode/stormwatercode/projectdocuments/default.htm.

Seattle Public Utilities (SPU). 2015b. *Protecting Seattle Waterways, Vol.2, Long Term Control Plan.* http://www.seattle.gov/util/EnvironmentConservation/Projects/SewageOverflowPrevention/IntegratedPlan/index.htm.

4.0 Comments and Responses

Chapter 4 of this Final Environmental Impact Statement (Final EIS) contains public comments provided on the Draft EIS during the 45-day comment period and provides response to those comments. The comment period for the Draft EIS extended from May 4, 2015 through June 17, 2015.

Section 4.1 includes all public comments received through all sources other than the public hearing, including letters, emails, the online open house, comment cards and social media. Section 4.2 contains all comments received at the May 27, 2015 public hearing.

Section 4.3 contains all responses to comments contained in Section 4.1 and 4.2. Responses to the non-public hearing comments are found in Section 4.3.1. In addition, because many of the comments touched on common issues and themes, responses to frequently raised issues are provided in Section 4.3.2. Responses to public hearing comments can be found in Section 4.3.3.

For ease of reference, comments identified in Section 4.1 are collectively referred to as **comment letters** *in this Final EIS. It is understood that the term "letter" encompasses the many different avenues for providing comment.*

4.1 Public Comments

This section begins with a complete list of comment letters in alphabetical order, showing the assigned letter number. Specific comments in each of the comment letters have been identified and numbered in the margin.

Table 4–1 Public comments received during the comment period

No.	Name (Last, First)	Agency/Organization	Received
Public Agencies *Note: organized alphabetically by agency*			
1	Hayes, Patty; Taniguchi, Harold	King County Department of Transportation, Public Health – Seattle and King County	06/17/2015
2	Gellings, Joseph	Port of Seattle	06/18/2015
3	Becker, Alex; Bishop, Sarah; Lippek, Sarah; Wallace, Danielle	Seattle Human Rights Commission	06/18/2015
4	Hunter, Mitchell; Marnia, Marxa; Scott, Gunner; Paget, Shoshana	Seattle LGBT Commission	06/18/2015
5	Fixen, Leif; Zemke, Steve	Seattle Urban Forestry Commission	06/18/2015
6	Griffith, Gregory	Washington State Department of Archaeology & Historic Preservation	06/18/2015

Table 4–1 Public comments received during the comment period (cont.)

No.	Name (Last, First)	Agency/Organization	Received
Community Organizations and Interest Groups *Note: organized alphabetically by organization*			
7	Clinkscales, Andrea	Cascade Bicycle Club	06/18/2015
8	Barker, Cindi; Wall, Irene	City Neighborhood Council	06/18/2015
9	Thaler, Toby	Fremont Neighborhood Council	06/18/2015
10	DeJong, Mary	Friends of Cheasty Greenspace at Mt. View	06/18/2015
11	Howe, Darrell	Friends of Frink Park	06/17/2015
12	Zemke, Steve	Friends of Seattle's Urban Forest	06/18/2015
13	Williams, Spencer	Futurewise	06/18/2015
14	Ho, Joanne	Haller Lake Community Club	06/18/2015
15	Kelly, Kji	Historic Seattle	06/18/2015
16	Kooistra, Marty; Schott Bresler, Kayla	Housing Development Consortium of Seattle-King County	06/18/2015
17	Akita, Andrea; Winkler-Chin, Maiko	InterIm CDA, Seattle Chinatown International District Preservation and Development Authority	06/18/2015
18	Batayola, Teresita	International Community Health Services	06/17/2015
19	Motzer, Sandra	Lake City Neighborhood Alliance	06/18/2015
20	Bailey, Thatcher; Miller, Norma	Lake2Bay Coalition	06/18/2015
21	Parham, Tim	Othello Station Community Action Team	06/16/2015
22	Greenwich, Howard	Puget Sound Sage	06/18/2015
23	Bertron, Cara	Seattle Chinatown International District	06/18/2015
24	Fleck, Mary; Ike, Elaine	Seattle Green Spaces Coalition	06/17/2015
25	Ahlness, Mark; Dahn, Denise; Watson, Rebecca	Seattle Nature Alliance (1)	06/18/2015
26	Dahn, Denise	Seattle Nature Alliance (2)	06/17/2015
27	Tuttle, Cathy	Seattle Neighborhood Greenways	06/17/2015
28	Gardheere, Ubax	South Communities Organizing for Racial/Regional Equity	06/18/2015
29	Pickford, Owen	The Urbanist	06/18/2015
30	Johnson, Rob; Quinn, Lisa	Transportation Choices Coalition, Feet First	06/18/2015
31	Barnes, Kim; Helmick, Amanda; Reidel, Mike; Schlichter, Mary	Westwood-Highland Park Residential Urban Village Committee, Westwood-Roxhill-Arbor Heights Community Council	06/18/2015
Citizen Comment *Note: organized alphabetically by last name*			
32	Abendroth, Terry		05/26/2015
33	Abolins, Talis	Advocates Law Group	06/18/2015
34	Allen, Tim		05/22/2015
35	Allen, Tom		06/18/2015
36	Allred, Jonathan		06/05/2015

Table 4–1 Public comments received during the comment period (cont.)

No.	Name (Last, First)	Agency/Organization	Received
37	Anonymous (1)		05/06/2015
38	Anonymous (2)		05/11/2015
39	Anonymous (3)		05/11/2015
40	Anonymous (4)		05/11/2015
41	Anonymous (5)		05/11/2015
42	Anonymous (6)		05/12/2015
43	Anonymous (7)		05/13/2015
44	Anonymous (8)		05/13/2015
45	Anonymous (9)		05/15/2015
46	Anonymous (10)		05/15/2015
47	Anonymous (11)		05/20/2015
48	Anonymous (12)		05/22/2015
49	Anonymous (13)		05/25/2015
50	Anonymous (14)		05/26/2015
51	Anonymous (15)		05/27/2015
52	Anonymous (16)		05/27/2015
53	Anonymous (17)		05/27/2015
54	Anonymous (18)		05/28/2015
55	Anonymous (19)		05/28/2015
56	Anonymous (20)		05/28/2015
57	Anonymous (21)		05/28/2015
58	Anonymous (22)		05/28/2015
59	Anonymous (23)		05/28/2015
60	Anonymous (24)		05/28/2015
61	Anonymous (25)		05/29/2015
62	Anonymous (26)		05/29/2015
63	Anonymous (27)		05/31/2015
64	Anonymous (28)		06/01/2015
65	Anonymous (29)		06/01/2015
66	Anonymous (30)		06/01/2015
67	Anonymous (31)		06/02/2015
68	Anonymous (32)		06/02/2015
69	Anonymous (33)		06/04/2015
70	Anonymous (34)		06/04/2015
71	Anonymous (35)		06/08/2015
72	Anonymous (36)		06/08/2015
73	Anonymous (37)		06/10/2015
74	Anonymous (38)		06/10/2015
75	Anonymous (39)		06/12/2015
76	Anonymous (40)		06/14/2015
77	Anonymous (41)		06/14/2015
78	Anonymous (42)		06/14/2015
79	Anonymous (43)		06/15/2015
80	Anonymous (44)		06/16/2015
81	Anonymous (45)		06/16/2015
82	Anonymous (46)		06/16/2015
83	Anonymous (47)		06/16/2015
84	Anonymous (48)		06/16/2015
85	Anonymous (49)		06/16/2015
86	Anonymous (50)		06/17/2015

Table 4–1 Public comments received during the comment period (cont.)

No.	Name (Last, First)	Agency/Organization	Received
87	Anonymous (51)		06/17/2015
88	Anonymous (52)		06/17/2015
89	Anonymous (53)		06/17/2015
90	Anonymous (54)		06/17/2015
91	Anonymous (55)		06/17/2015
92	Anonymous (56)		06/18/2015
93	Anonymous (57)		06/18/2015
94	Anonymous (58)		06/18/2015
95	Anonymous (59)		06/18/2015
96	Anonymous (60)		06/18/2015
97	Anonymous (61)		06/18/2015
98	Anonymous (62)		06/18/2015
99	Anonymous (63)		06/18/2015
100	Anonymous (64)		06/18/2015
101	Anonymous (65)		06/18/2015
102	Anonymous (66)		06/18/2015
103	Anonymous (67)		06/18/2015
104	Anonymous (68)		06/18/2015
105	Anonymous (69)		06/18/2015
106	Anonymous (70)		06/18/2015
107	Anonymous (71)		06/18/2015
108	Anonymous (72)		06/18/2015
109	Anonymous (73)		06/18/2015
110	Arnold, Connie		05/13/2015
111	Ausink, Donald		05/28/2015
112	B., D.		05/14/2015
113	Bachhuber, Eric		06/03/2015
114	Bailey, Sally		05/19/2015
115	Barber, John		06/18/2015
116	Bennett, John		06/18/2015
117	Best, Brooke		06/18/2015
118	Bond, Charles		06/17/2015
119	Bonjukian, Scott		06/01/2015
120	Boroughs, Joslin		06/17/2015
121	Bostock, Janine		05/06/2015
122	Bouse, Judy		05/15/2015
123	Boyle, Mike		05/15/2015
124	Boyle, Susan		06/18/2015
125	Brailey, Jenny		05/15/2015
126	Brick, Andrew		05/05/2015
127	Brown, Koffee		06/18/2015
128	Brushwood, Christine		06/17/2015
129	Bryan, Amanda		05/27/2015
130	Bryant, Jasmine		05/13/2015
131	Busch, Brandon		06/17/2015
132	Canamar, Robert		06/11/2015
133	Casper, Dianne		06/14/2015
134	Celt, Stephanie		06/18/2015
135	Chang, Albert		06/18/2015
136	Cito, Brian		05/19/2015

Table 4–1 Public comments received during the comment period (cont.)

No.	Name (Last, First)	Agency/Organization	Received
137	Cochrane, Ric		05/29/2015
138	Cohen, Jackie		05/13/2015
139	Cohn, Steven	Seaview Pacific Consulting	06/15/2015
140	Coltrane, Mary		06/12/2015
141	Colvin, Ansel		05/17/2015
142	Connell, Anne; Connell, Tim		06/18/2015
143	Connolley, Lisa		05/20/2015
144	Cook, Jeffrey		06/08/2015
145	Cox, Connie		06/17/2015
146	Cracolici, Jonathan		06/18/2015
147	Crane, Paul		06/17/2015
148	Cutler, David		06/18/2015
149	Dailey, James		05/20/2015
150	Darnell, Joel		06/18/2015
151	Dexheimer, Derek		05/17/2015
152	Dockery, Janet		06/18/2015
153	Dodge, Adam		06/13/2015
154	Doom, C		06/18/2015
155	Dorais, David		05/13/2015
156	Dowell, Chris		05/28/2015
157	Down, Adrian		05/28/2015
158	Duthweiler, Diane		06/18/2015
159	Eddy, Lee		06/16/2015
160	Eide, Christopher		06/16/2015
161	Ellis, Brian		06/01/2015
162	Enns, Lisa		05/21/2015
163	Fenno, Greg		05/20/2015
164	Fesler, Stephen		06/18/2015
165	Fillius, Jenny (1)		05/14/2015
166	Fillius, Jenny (2)		06/17/2015
167	Flatt, Art		05/13/2015
168	Fleming Jr., Robert M.		05/27/2015
169	Fleming, Bob		06/17/2015
170	Foedisch, Robert		05/29/2015
171	Foltz, Mark		06/13/2015
172	Folweiler, David		06/17/2015
173	Fragada, Tony		06/18/2015
174	Franzen, Carol		05/16/2015
175	Friedman, Gus		06/16/2015
176	Friesen, Jeremy		05/06/2015
177	Gale, Kristy		05/28/2015
178	Gautreau, Gary		05/28/2015
179	Gebert, Matt		05/15/2015
180	Gebremicael, Yemane		06/18/2015
181	Glass, Gabrielle		05/13/2015
182	Glickstein, Don (1)		06/02/2015
183	Glickstein, Don (2)		06/02/2015
184	Glickstein, Don (3)		06/18/2015
185	Goldenberg, Eldan		06/18/2015
186	Goodman, Jeremy		05/10/2015

Table 4–1 Public comments received during the comment period (cont.)

No.	Name (Last, First)	Agency/Organization	Received
187	Grembowski, Megan		05/26/2015
188	Gruen, Deric		06/17/2015
189	Guerin, Keith		05/17/2015
190	Gulden, Don		06/17/2015
191	Gyncild, Brie (1)		06/09/2015
192	Gyncild, Brie (2)		06/09/2015
193	H., Amy		05/16/2015
194	Hall, Andra		05/13/2015
195	Hall, Steve		06/18/2015
196	Hallstrom, Eileen		06/10/2015
197	Harris, Nancy K.		06/18/2015
198	Heidner, Liz		06/02/2015
199	Helm, Nancy		06/07/2015
200	Henrikson, Lars		05/14/2015
201	Herman, G.		06/15/2015
202	Hill, Gregory		06/18/2015
203	Hittman, Suzanne		05/17/2015
204	Ho, Aric		06/16/2015
205	Holland, Mark		06/18/2015
206	Holt, Sharon		06/17/2015
207	Hurley, Donald		06/02/2015
208	James, Nathan		06/18/2015
209	Jarem, Clarissa		06/18/2015
210	Jenkins, Devon		06/16/2015
211	John, Esther		06/16/2015
212	Johnc12		06/08/2015
213	Johnc936		06/08/2015
214	Johnson, Darrin		05/18/2015
215	Johnson, Julie		06/18/2015
216	Johnston, Terri		06/18/2015
217	Jones, Norma; Jones, Mike		06/13/2015
218	Jonson, Richard		05/11/2015
219	Kaku, Brian		06/03/2015
220	Kasperzyk, Davidya		06/18/2015
221	Keller, Kathryn		06/17/2015
222	Kelley, Debra		06/09/2015
223	Kelly, Thomas		06/18/2015
224	Kiley, Barbara		05/18/2015
225	Kirschner, Bryan (1)		05/27/2015
226	Kirschner, Bryan (2)		06/15/2015
227	Kirsh, Andrew		06/18/2015
228	Kirsis, Lori		06/17/2015
229	Klemisch, Stephen		05/24/2015
230	Klingele, Rick		06/17/2015
231	Koch, Mary		05/13/2015
232	Kwok, Dave		06/08/2015
233	Lamb, Peter		06/18/2015
234	Langhans, Aileen		06/17/2015
235	LaRose, Philip		05/15/2015
236	Larsen, Tom		06/18/2015

Table 4–1 Public comments received during the comment period (cont.)

No.	Name (Last, First)	Agency/Organization	Received
237	Lau, Betty		06/15/2015
238	Lavassar, Dan		06/18/2015
239	Leighty, Carl		06/10/2015
240	Leon, Carl		05/13/2015
241	Letourneau, Pete		06/09/2015
242	lewis, malinda		05/15/2015
243	Littlefield, Ron		06/11/2015
244	Louis, Mary		06/18/2015
245	Lubarsky, Zachary		06/18/2015
246	Lucio, Jessica		06/18/2015
247	Lund, Garry		05/29/2015
248	M., F.		05/22/2015
249	Mack, Eden		06/16/2015
250	MacKinnon, Roberta		06/17/2015
251	Marshall, Kate		05/13/2015
252	Martin, Dottie		05/16/2015
253	Mas, Charles		06/14/2015
254	McDougall, Connie		05/15/2015
255	Melvin, Linda		05/28/2015
256	Miller, Robin		06/18/2015
257	Mitchell, Ben		06/09/2015
258	Mitchell, Daniel		06/16/2015
259	Moore, Julia		06/16/2015
260	Moreau, Paul		05/14/2015
261	Morrill, Richard		06/11/2015
262	Morris, Arvia		06/18/2015
263	Morrison, Patrick		05/31/2015
264	Mucik, Rhys		06/18/2015
265	Nelson, Shannon		06/18/2015
266	Nicolae, Roxana		06/18/2015
267	Nissen, Anna		06/18/2015
268	Noone, I.M.		06/14/2015
269	Oldfin, Thomas		05/28/2015
270	Olds, Jonathan (1)		06/10/2015
271	Olds, Jonathan (2)		06/17/2015
272	Oliver, Pike		06/17/2015
273	Olson, Leanne		06/16/2015
274	Onesty, Dawn		05/16/2015
275	Osaki, David		06/17/2015
276	Owens, Robert		06/17/2015
277	Oxman, Michael		06/16/2015
278	Parda, Don		05/13/2015
279	Patterson, Merle		06/10/2015
280	Pearsall, Matthew		06/18/2015
281	Pedersen, Marvin		05/21/2015
282	Perkins, John; Weaver, Julenet		06/18/2015
283	Persak, John		06/18/2015
284	Portzer, Karen		05/13/2015
285	Prinz, Pat		05/31/2015
286	Quinn, Ken		06/01/2015

Table 4–1 Public comments received during the comment period (cont.)

No.	Name (Last, First)	Agency/Organization	Received
287	Quirindongo, Rico		06/18/2015
288	Randels, Robin		06/18/2015
289	Ravanpay, Ali		05/16/2015
290	Reichlin, Kanani		05/27/2015
291	Reuter, Rebecca		06/17/2015
292	Robinson, Chris		06/17/2015
293	Rodda, Bryce		06/18/2015
294	Roehr, Christian		06/18/2015
295	Roth, Arlene		06/18/2015
296	Ruby, Mike		06/17/2015
297	Sandercock, Maria		06/11/2015
298	Schwartz, Dick		05/19/2015
299	Schweinberger, Sylvia		05/13/2015
300	Shapiro, JP		06/18/2015
301	Sharp, Nicholas		05/16/2015
302	Shaw, Russell		06/01/2015
303	Shera, Sydney		05/13/2015
304	Sheridan, Mimi	Sheridan Consulting Group	06/17/2015
305	Siegelbaum, Heidi		06/18/2015
306	Singler, Joan		06/17/2015
307	Skaftun, Emily		06/17/2015
308	Smith, Clayton		06/18/2015
309	Smith, David		06/13/2015
310	Smithe609, Smithe609		06/08/2015
311	Smolar, Dee		05/20/2015
312	Stacishin, Liza (1)		06/09/2015
313	Stacishin, Liza (2)		06/17/2015
314	Staeheli, Margaret		06/18/2015
315	Stahl, Mike		06/10/2015
316	Stern, Robby		06/14/2015
317	Stetkiewicz, Chris		05/26/2015
318	Stevens, Don		06/05/2015
319	Stevens, Odessa		06/17/2015
320	Stewart, Jackie		06/10/2015
321	Suni, Eric		06/17/2015
322	Sutherland, Loretta		06/17/2015
323	Taylor, Holly		06/18/2015
324	Taylor, Patrick		06/17/2015
325	Thompson, Thor		05/21/2015
326	Thorp, Daniel		05/28/2015
327	Tobin, Carol		06/17/2015
328	Turnbull, Cass		06/18/2015
329	Turnbull, John		06/15/2015
330	Van Cleve, Janice		05/13/2015
331	Vanderpool, Scott		05/13/2015
332	Vayda, Genevieve		06/18/2015
333	Wadsworth, Benj		05/13/2015
334	Warner, Richard		06/17/2015
335	Watras, Alicia		06/01/2015
336	Way, Thaisa		06/17/2015

Table 4–1 Public comments received during the comment period (cont.)

No.	Name (Last, First)	Agency/Organization	Received
337	Weatbrook, Catherine		06/17/2015
338	Weissman, Jeffrey		05/13/2015
339	Welch, Sarah		06/17/2015
340	Whalen, David		05/06/2015
341	Wheeler, Charles		05/28/2015
342	Whisner, Jack		06/12/2015
343	Williams, Ruth		06/18/2015
344	Wilson, John Arthur (1)		06/17/2015
345	Wilson, John Arthur (2)		06/17/2015
346	Wong, Michael		06/08/2015
347	Zeng, Lu		06/12/2015
348	(No Last Name), Andrew		06/07/2015
349	(No Last Name), Annie		06/13/2015
350	(No Last Name), Betsy		06/18/2015
351	(No Last Name), Cary		05/29/2015
352	(No Last Name), Charles		05/28/2015
353	(No Last Name), Chris		05/14/2015
354	(No Last Name), Connie		05/28/2015
355	(No Last Name), Daniel		05/13/2015
356	(No Last Name), Gary		05/28/2015
357	(No Last Name), Jeff		05/15/2015
358	(No Last Name), Jenny		06/17/2015
359	(No Last Name), Laura		06/11/2015
360	(No Last Name), M.		06/18/2015
361	(No Last Name), Peter		06/18/2015
362	(No Last Name), Rita		05/12/2015
363	(No Last Name), Roxana		06/17/2015
364	(No Last Name), Sharon		05/26/2015
365	(No Last Name), Shipra		06/15/2015
366	(No Last Name), Trevor		06/02/2015

No.	Name/Handle	Source	Agency/Organization	Received
Social Media *Note 1: Comments are presented in order received in order to preserve threads.* *Note 2: Comments 377, 410, 425, 428, 435 and 437 are threads that include multiple individual comments* *Note 3: Social media comments focused solely on advertising the Comp Plan EIS were not included*				
367	@SEAsouthern	Twitter		05/04/2015
368	@MikeLindblom	Twitter		05/04/2015
369	Zach Lubarsky	Facebook		05/05/2015
370	@djterasaki	Twitter		05/05/2015
371	@OverlakeAlumni	Twitter	Overlake Alumni	05/05/2015
372	Billy King	Facebook		05/06/2015
373	Brian Stewart	Facebook		05/06/2015
374	David Whalen (1)	Facebook		05/06/2015
375	@davidcutler_sea	Twitter		05/06/2015
376.1	Noah Miname	Facebook		05/07/2015
376.2	David Whalen (2)	Facebook		05/07/2015

Table 4–1 Public comments received during the comment period (cont.)

No.	Name/Handle	Source	Agency/Organization	Received
376.3	Gary Theo Schultz (1)	Facebook		05/07/2015
376.4	Jeff Nissen (1)	Facebook		05/07/2015
376.5	Hugo Hamerlinck	Facebook		05/07/2015
376.6	Gary Theo Schultz (2)	Facebook		05/07/2015
377	David Sucher	Facebook		05/08/2015
378	@bruteforceblog (1)	Twitter		05/08/2015
379	@bruteforceblog (2)	Twitter		05/08/2015
380	@MaishaBarnett	Twitter		05/09/2015
381	John Paul DeGennaro	Facebook		05/11/2015
382	Up and Coming	Blog		05/13/2015
383	Kyrtin	Blog		05/13/2015
384	MF1986	Blog		05/13/2015
385	bif	Blog		05/13/2015
386	Wallingfordian	Blog		05/13/2015
387	Maple Leafer	Blog		05/13/2015
388	Greenwood neighbor	Blog		05/13/2015
389	How Much Is Enough	Blog		05/13/2015
390	UR	Blog		05/13/2015
391	malinda lewis	Blog		05/13/2015
392	Mileg67	Blog		05/13/2015
393	Cass Turnbull	Blog		05/13/2015
394	@jgoold13	Twitter		05/13/2015
395	@HERNANDOstax	Twitter		05/13/2015
396	@SHJ_Kamishibai	Twitter		05/13/2015
397	Allison Agostinelli	Blog		05/14/2015
398	John Bannion	Blog		05/14/2015
399	prudentequity	Blog		05/15/2015
400	@bruteforceblog (3)	Twitter		05/15/2015
401	Don Perera	Blog		05/18/2015
402	John Barber	Blog		05/19/2015
403	Sovann Nem	Facebook		05/21/2015
404	Ken Thomas	Facebook		05/21/2015
405	@WillSeattle (1)	Twitter		05/21/2015
406	@WillSeattle (2)	Twitter		05/21/2015
407	Lisa Connolley	Facebook		05/25/2015
408	Jeff Nissen (2)	Facebook		05/25/2015
409.1	@SNGreenways (1)	Twitter	Seattle Greenways	05/25/2015
409.2	@SNGreenways (2)	Twitter	Seattle Greenways	05/25/2015
409.3	@GlenBikes	Twitter		05/25/2015
410	@bruteforceblog (4)	Twitter		05/25/2015
411	@Nick_Etheredge (1)	Twitter		05/25/2015
412	@Nick_Etheredge (2)	Twitter		05/25/2015
413	@Nick_Etheredge (3)	Twitter		05/25/2015
414	@NEGreenways	Twitter	NE Seattle Greenways	05/25/2015

Table 4–1 Public comments received during the comment period (cont.)

No.	Name/Handle	Source	Agency/Organization	Received
415	Tom Mullen	Facebook		05/26/2015
416	Hillary Pittard	Facebook		05/26/2015
417	Susan Renee Mason Laskowska	Facebook		05/26/2015
418	@AngelaKBoyd	Twitter		05/27/2015
419	Donna Hartmann-Miller	Facebook		05/28/2015
420	@bruteforceblog (5)	Twitter		05/28/2015
421	@GordonOfSeattle (1)	Twitter		06/02/2015
422	@seabikeblog	Twitter	Seattle Bike Blog	06/02/2015
423	@Seattle_Tourism	Twitter	Premier Attractions	06/03/2015
424.1	@asclepiusgal	Twitter		06/03/2015
424.2	@SeattleParks	Twitter	Seattle Department of Parks and Recreation	06/04/2015
425	@andrewgmac (1)	Twitter		06/04/2015
426	Denise Dahn	Facebook		06/05/2015
427.1	@bruteforceblog (6)	Twitter		06/06/2015
427.2	@cruickshank (1)	Twitter		06/06/2015
427.3	@bruteforceblog (7)	Twitter		06/06/2015
427.4	@cruickshank (2)	Twitter		06/06/2015
428	@andrewgmac (2)	Twitter		06/08/2015
429	@GordonOfSeattle	Twitter		06/11/2015
430	Mark Olinger	Facebook		06/12/2015
431	Jack Whisner	Facebook		06/12/2015
432	Dave Duwel	Facebook		06/12/2015
433	@UrbanistOrg (1)	Twitter	The Urbanist	06/12/2015
434.1	@Nick_Etheredge (4)	Twitter		06/12/2015
434.2	@Nick_Etheredge (5)	Twitter		06/12/2015
434.3	@UrbanistOrg (2)	Twitter	The Urbanist	06/12/2015
434.4	@UrbanistOrg (3)	Twitter	The Urbanist	06/12/2015
434.5	@UrbanistOrg (4)	Twitter	The Urbanist	06/12/2015
434.6	@UrbanistOrg (5)	Twitter	The Urbanist	06/12/2015
434.7	@UrbanistOrg (6)	Twitter	The Urbanist	06/12/2015
435	@SNGreenways (3)	Twitter	Seattle Greenways	06/13/2015
436.1	@UrbanistOrg (7)	Twitter	The Urbanist	06/16/2015
436.2	@UrbanistOrg (8)	Twitter	The Urbanist	06/16/2015
436.3	@mjgiarlo	Twitter		06/16/2015
436.4	@eldang	Twitter		06/16/2015
437	@bruteforceblog (8)	Twitter		06/18/2015
438	@feetfirst_wa	Twitter	Feet First	06/18/2015

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King County

Public Health
Seattle & King County
Office of the Director
401 Fifth Avenue, Suite 1300
Seattle, WA 98104-1818
206-296-4600 Fax 206-296-0166
TTY Relay: 711
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Department of Transportation
Harold S. Taniguchi, *Director*
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201 South Jackson Street
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June 17, 2015

Gordon Clowers, Senior Planner
City of Seattle Department of Planning and Development
700 5th Avenue, Suite 1900
PO Box 34019
Seattle, WA 98124-4019

Seattle 2035 Comprehensive Plan Update Draft Environmental Impact Statement

Dear Mr. Clowers:

1 King County's Department of Transportation and Public Health – Seattle & King County appreciate the opportunity to review the Draft Environmental Impact Statement (DEIS) for the Seattle 2035 Comprehensive Plan Update. We support guiding growth to Seattle's urban centers and villages in order to maximize transit efficiency. We generally prefer Alternative Four with its emphasis on growth in transit-oriented urban villages since this appears to have the greatest likelihood of maximizing transit investments and reducing greenhouse gas emissions.

We applaud the City of Seattle for recognizing the role the City plays in the region by accepting a large share of King County's projected growth. All of the cities in King County must take on this responsibility if we are to continue to protect our valuable farm, forest, and rural lands well into the future. We believe Alternative Four is the best plan for accommodating growth because it connects land use directly to transit including both bus and rail. Alternative Four recognizes the opportunities in both new and existing urban villages to absorb growth in a form that is not auto-dependent. We support this vision for the future as it is environmentally sustainable and offers the best choices for housing options within the City.

2 One of the top priorities for both King County and Seattle has been addressing issues of race, equity, and social justice. We appreciate the City's efforts in the Growth and Equity Analysis and encourage you to continue a strong focus on social equity regardless of your choice of a

2 cont. growth alternative, particularly in how it will affect the displacement of marginalized populations.

3 We recognize that the DEIS is required to analyze only environmental impacts and not general welfare or other social policy considerations; however, we encourage the City to continue to analyze and develop effective mitigation strategies that will not only minimize displacement of marginalized and over-burdened populations but will increase access to opportunity and improve health and well-being. We strongly support focusing growth in centers and urban villages along transit corridors because it will help to bring our region closer to reaching regional and state transportation, environment, and climate change goals.

Seattle's Equity Analysis states that "alternatives 3 and 4 would likely cause the greatest displacement of marginalized populations." Since Seattle expects to add 70,000 housing units by 2035, it is critical that this growth is accommodated in a way that is sustainable, transit accessible, and inclusive of health and equity considerations. The City of Seattle needs to move forward with a plan that takes into account the analysis of displaced residents in terms of changes in travel patterns and costs and housing affordability to ensure the greatest impacts to vulnerable populations are mitigated. These mitigation programs and policies should be integrated within the plan.

4 We encourage the City to continue its focus on the effects of land use decisions on already burdened populations. For example, the types of buffers noted in the DEIS may not be adequate to mitigate exposures to potential air pollution discharges from industrial sources and exposure to these releases may pose health risks to residents downwind. It will be important to balance protection for present residential and retail business land uses in communities such as Georgetown and South Park with potential future growth in the Duwamish Manufacturing/Industrial Center.

5 We also note that Seattle's industrial centers serve the region as a location of family wage jobs. Protection and expansion of this employment base serves to mitigate potential economic displacement in Seattle. To that end, we appreciate the opportunity to contribute to the update of Seattle's Freight Master Plan as part of King County's commitment to regional freight mobility planning.

6 The City of Seattle and King County have led the region in climate change planning. As you know, climate change is expected to affect the physical and mental health of people in the region, especially groups that are more vulnerable to health impacts, such as children, people over age 65, economically disadvantaged individuals, socially isolated individuals, and people with existing health conditions. Climate change impacts such as extreme weather events, flooding, sea-level rise, and increased temperatures may lead to significant health impacts. It will be important to continue to consider how to strengthen strategies to improve and promote healthy environmental conditions such as improved opportunities for transit and non-motorized travel and tree cover strategies.

7 Public transportation will be critical to managing impacts related to the growth scenarios. We are committed to working with the City to maximize the effectiveness of transit as the plan unfolds. To that end, we suggest establishing a staff-level interagency charter that complements the agreements we have in place and outlines processes for future collaboration around land use and transportation planning.

For additional information or clarification of any of these issues, please contact Ngozi Oleru at Ngozi.Oleru@kingcounty.gov for issues related to Public Health, or Peter Heffernan at Peter.Heffernan@kingcounty.gov for issues related to transportation.

Sincerely,

Harold Taniguchi, Director
King County Department of Transportation

Patty Hayes, Director
Public Health - Seattle and King County

cc: Kevin Desmond, General Manager, Metro Transit Division, Department of Transportation (KCDOT)
Chris Arkills, Transportation Policy Advisor, King County Executive Office
Ngozi Oleru, Director, Environmental Health Division, Department of Public Health
Peter Heffernan, Intergovernmental Relations, KCDOT

To Whom It May Concern,

Please find below comments prepared by the Port of Seattle. Please contact Joseph Gellings, gellings.j@portseattle.org, (206) 787-3368 or Geri Poor, poor.g@portseattle.org, (206) 787-3778 with any comments or questions.

1 A general comment about the EIS exercise is that it is difficult for stakeholders to engage in a discussion about impacts of the Comprehensive Plan Update prior to the release of any drafts of the update.

2 The EIS contains a few references to the need for the completion of the Freight Master Plan to obtain a list of priority projects for freight movement. Please note that such a project list is already available in the Draft Industrial Areas Freight Access Project prepared by SDOT and the Port.

3 The travel time analysis would benefit from showing times to major regional trip generators outside the City, such as Sea-Tac Airport.

4 The section on Partner Agencies (p. 3.7.48) could also add Port of Seattle, a partner providing freight transportation facilities.

5 We would appreciate more details about the methodology used for the pedestrian project priorities maps, Figures 3.7-2 and 3.7-3. The results inside the Duwamish MIC seem arbitrary such as a very short project near the entrance to Port Terminal 30 and an absence of priority for Holgate Avenue, one of a small number of east-west streets that cross the BNSF mainline railroad tracks.

Note: comment submitted via online open house on 06/18/2015

1963 – 2015 · *52 years of championing human rights and fostering a just future*

June 18, 2015

Transmitted by email to:

Re: Growth and Equity Analysis of Seattle 2035 Comprehensive Plan

Dear Department of Planning and Development,

1 We, the Seattle Human Rights Commission (the "Commission"), write to share our support for the work accomplished by the Seattle 2035 Growth and Equity Analysis (the "Equity Analysis") and the efforts of the City of Seattle (the "City") to use an equitable development framework to achieve racial and social equity. The Commission would also like to share our concern about the potential adverse human rights impacts of the City's growth alternatives, specifically in the lack of adequate prevention, mitigation and remediation displacement policies to protect the rights of vulnerable populations to adequate housing.

The Commission urges the City to address Growth and Equity Analysis findings, and requests that international human rights standards be incorporated in the Seattle 2035 Comprehensive Plan (the "Comprehensive Plan") in order to correct Seattle's historical and present inequities.

2 On December 10, 2012, the City of Seattle was declared to be a Human Rights City, committing itself to protect, respect and fulfill the full range of inherent human rights for all, as set forth in the Universal Declaration of Human Rights ("UDHR"), the International Covenant on Economic, Social and Cultural Rights ("ICESCR"), and numerous other international human rights treaties. The City should affirm its commitment to human rights by prioritizing their application in its 2035 Comprehensive Plan. In particular, the City should consider the following human rights articles when adopting its final plan:

- ***Article 25, UDHR: Right to adequate standard of living and health and well-being oneself and of one's family, including food, clothing, housing and medical care and necessary social services***
  - Displacement and lack of access to opportunity fundamentally undermine the right to an adequate standard of living, which includes a right to adequate housing. The following aspects of the right are to be taken into consideration when considering adequacy of housing: (a) Legal security of tenure; (b) Availability of services, materials, facilities and infrastructure; (c) Affordability; (d) Habitability; (e) Accessibility; (f) Location; and (g) Cultural adequacy [1].
  - Displacement may also violate this right by pushing marginalized populations into "food deserts" where they lack access to nutritious, healthy food. Article 12 of the ICESR furthers states that individuals have the right to "continuous improvement of living conditions."
- ***Article 24, UDHR: Right to rest and leisure; reasonable limitation of working hours***

[1] (See, e.g., Universal Declaration of Human Rights, art. 25(1), G.A. Res. 217A (III), U.N. Doc. A/810 (1948); International Covenant on Economic, Social, and Cultural Rights, art. 11(1). See also International Convention Relating to the International Status of Refugees, art. 21, U.N. Office of the High Comm'r for Human Rights, Fact Sheet No. 21, The Human Right to Adequate Housing, http://www.ohchr.org/ Documents/Publications/FS21_rev_1_Housing_en.pdf.

2 cont.

- Displacement, coupled with lack of access to quality public transit and long commuting times to places of employment, diminishes quality of life by reducing leisure time and time spent with family. Furthermore, high costs of housing and low wages lead some to work two jobs or more in order to meet basic needs, thereby making this right nearly unattainable.

- ***Article 27, UDHR: Right to freely participate in cultural life of community***
  - Displacement and lack of access to opportunity undermine community cohesion and cultural centers of life. The inability to participate in cultural life has a particularly negative impact on immigrant and refugee communities, in addition to other historically socioeconomically marginalized communities. As stated above, a reduction in leisure time also diminishes the ability of a person to participate in the cultural life of a community.
- ***Article 6, ICESCR: Right to employment and Article 7, ICESCR: Right to education***
  - Both employment and education are human rights that are integral to accessing opportunity and achieving upward social mobility, especially for historically marginalized communities. People must be able to access employment and educational opportunities in order to enjoy these human rights.

3 In review of the four alternatives compared in the Equity Analysis, each alternative is likely to subject marginalized populations to increased displacement or to perpetuate populations' limited access to opportunity to varying degrees. The Commission does not believe that displacement is an inevitable outcome of growth. Consequently, the City should consider modifying or adding to the current alternatives options aiming to prevent and reduce displacement. Furthermore, when prevention is impossible and other options to prevent displacement have failed, the City must adopt strong mitigation and remediation policy strategies in order to full protect affected communities.

4 As the Equity Analysis findings show, growth-related displacement risk is greatest in neighborhoods that have historically been home to communities of color. Growth-related development and rising housing costs creates a greater displacement risk for those who are more likely to experience discrimination and less able to withstand cost of living increases. For some communities, such as low-income communities, communities of color, and communities with lower English proficiency, increased displacement risk adds an additional barrier to historically marginalizing policies and practices. The Equity Analysis determines that public investment will be necessary in order for marginalized populations to benefit from growth without displacement in each of the four proposed alternatives. The Commission believes **this investment is crucial in order to make Seattle a place that all its residents can call home.**

5 The City should also aim to increase marginalized populations' access to determinants that influence social, economic, and physical well-being. As discussed in the Equity Analysis, many communities in Seattle historically lack **access to education, economic opportunity, transit, civic infrastructure, public health facilities and healthy food**, all of which are enumerated as human rights. In each of the proposed growth alternatives, there is some potential to expand access to opportunity for historically marginalized populations. **To respect, protect and fulfill human rights, the City should adopt a plan that maximizes access to opportunity and minimizes displacement risk, while also working to prevent socioeconomic stratification.**

6 The Commission believes that the City has the opportunity to embed within its growth strategy the advancement of human rights for all residents. To do this, the Commission recommends that the City include concrete strategies to prevent displacement, increase access to opportunity, and mitigate and remediate adverse impacts related to displacement within the 2035 Comprehensive Plan.

6 cont. The adoption of the 2035 Seattle Comprehensive Plan is an opportunity to affirm Seattle's commitment to human rights by explicitly incorporating international human rights law and by making it a place where everyone, regardless of their race or ethnicity, income level, language or cultural background, can have the opportunity to live happily, healthily, and freely.

Respectfully,

Danielle Wallace, Economic, Social, and Cultural Rights Task Force Chair

Alex Becker, Co-Chair

Sarah Bishop, Co-Chair

Sarah Lippek, Co-Chair

Seattle LGBT Commission: Recommendations on Seattle 2035 Growth and Equity Public Review Draft

Seattle LGBT Commission/Seattle Office for Civil Rights | June 2015
Drafted by Gunner Scott, Shoshana Paget, Marxa Marnia, and Mitchell Hunter
Seattle LGBGT Commission's City Planning & Neighborhood Services & City Resources Task Force

City of Seattle

Edward B. Murray, Mayor

Seattle LGBT Commission

Commissioners

Lisa Love
CO-CHAIR
Marxa Marnia
CO-CHAIR
NaaSira Adeeba
Gilbert Archuleta
Luzviminda U.Carpenter
Brennon Ham
Doug Hamilton
Mitchell Hunter
Mac McGregor
Breona Mendoz
Shoshana Paget
Deb Salls
Gunner Scott
Susan Snyder
KJ Williams

Recommendations for Seattle 2035 Comprehensive Plan Draft: Growth and Equity Public Review Draft

- Mayor Edward B. Murray
- Seattle City Council
- Diane M. Sugimura, Director, Department of Planning and Development
- Tom Hauger, Department of Planning and Development
- Kristian Kofoed, Department of Planning and Development
- The Seattle Planning Commission
- Patricia Lally, Department Director, Seattle Office of Civil Rights

Introduction

Social Equity: Twenty years ago, the City of Seattle included *Social Equity* as one of the four core values of the *Comprehensive Plan, Toward a Sustainable Seattle*. This was bold for 1994 and it included clear statement that in promoting equal opportunity for "all of its people" the city would not tolerate discrimination, including for Lesbian, Gay, Bisexual community members. (*Transgender people fall under Gender Identity and Gender Expression and while it may have been inferred then, it was not explicitly stated in the 1994 document.)*
We would advocate for the explicit inclusion of Gender Identity and Gender Expression along with Sexual Orientation in any current and future policies, practices, planning, guidelines, and ordinances as it relates to social equity, non-discrimination, or any other policy that addresses equal opportunities, access, and/or participation.

> *In order to promote equality, justice and understanding, the City will not tolerate discrimination in employment or housing on the basis of race, color, age, gender, marital status, sexual orientation, political ideology, creed, religion, ancestry, national origin or the presence of any sensory, mental or physical disability. The City will aim for a society that gives its residents equal opportunities to participate in, and benefit from, economic growth.*

Since the 1994 *Comprehensive Plan, Toward a Sustainable Seattle* document was enacted, the City has increased its focus on racial equity including equitable growth development primarily through the Office for Civil Rights. We wholeheartedly support and will continue to advocate for this bold statement though we believe it is neither strong enough nor does not go far enough.

1 Racial equity should be the largest lens through which any policies, practices, planning, guidelines, and ordinances are examined. Our City, our children, youth, adults, seniors, and families are as complex as we are diverse and many live at the intersections of race, gender, sexual orientation, gender identity, gender expression, ability, language, and income. Without an analysis that includes the diversity of these intersections, the marginalized populations, including and especially racial/ethnic individuals, are made invisible and further marginalized. Until this well-intentioned but dated analysis is conducted from a thorough intersectional perspective, these marginalized communities are forced to raise their voices and step up to challenge the systematic and institutional policies and practices that keep racial and social disparities in place.

1 cont.

The objective of these recommendations is to inform our elected officials, Department of Planning and Development, Seattle Planning Commission, RSJI, and the general public about:

- The need for inclusion of an *Intersectional* framework to address Social Equity in addition to the Racial Equity Lens.
- The need for explicit inclusion of language, data, and strategies, of gender, sexual orientation, gender identity and gender expression, languages, and income in the framework and analysis for growth and equity in the Seattle 2035 Comprehensive Plan.
- The need for recommendations and subsequent adoption of policies, practices, and strategies that use an intersectional framework highlighting specific impacts and outcomes for LGBT children, youth, adults, seniors, and families.

Recommendations: Key Terms

Marginalized Populations

- Include LGBT (lesbian, gay, bisexual, and transgender) populations
- Include Disabled and Differently Abled populations

Recommendations: Overarching Analytical Framework

2

Inclusion of an Intersectional Analysis with traditional EIS approach and the RSJI's Racial Equity Toolkit (RET)

An *Intersectional Analysis* allows for the premise that people live multiple, layered identities, and their experiences are derived from social relations, history and the operation of structures of power. People are members of more than one community at the same time and more than one social identity therefore can simultaneously experience oppression and privilege in any community and as any social identity.[1]

> *"Intersectional analysis aims to reveal multiple identities, exposing the different types of discrimination, inequity, and disadvantage that occur as a consequence of the combination of identities." 2*

An intersectional analysis examines the manner in which racism, sexism, homophobia, biphobia, transphobia, heterosexism, classism, ableism, and other systems of oppression and discrimination create inequities that structure the relative positions of individuals and communities creating and maintaining marginalized populations. This analysis takes into account the historical, social and political contexts while still recognizing unique individual and community cultural experiences resulting from overlapping different identities and experiences.

Historical Context

LGBTQ people, like many other marginalized communities, have long-standing, historic experience of systematic and institutional discrimination. While there are many current laws in place offering legal protections, culture has not yet caught up in many cases and conditions have not changed enough--LGBT people are still invisible, marginalized, and the impact of that systemic discrimination is still felt today for LGBT youth, adults, and families. This is especially evident when issues of race, ethnicity, citizenship, economics, and age also intersect for individuals and families. Cultural images and the status quo of business-as-usual both within the City and across the State continue to be dominated by inequality and portray all too often heterosexual images and reflect heterosexual data, practices, and values as the norm.

1 Intersectionality: A Tool for Gender and Economic Justice. (2004, August 1). Retrieved June 6, 2015, from https://lgbtq.unc.edu/sites/lgbtq.unc.edu/files/documents/intersectionality_en.pdf

2 Ibid.

2 cont.

The City of Seattle has been an early pioneer in protecting LGBT individuals. In 1973, Seattle passed a non-discrimination ordinance protecting gay and lesbian individuals later in 1977, the Mayor declared a Gay Pride Week for June of that year. While the ADA, American Disability Act, gave protections to differently-abled citizens, there was no mention of transgender people. It was not until 1996 that the ADA interpreted "Sexual Orientation" broadly enough to encompass issues of Gender and Gender Identity.

Seattle has also had its fair share of homophobia and anti-LGBT rights proposals. The community fought to keep a 1977 ballot measure named Initiative Thirteen off the books. Not only would this initiative have overturned the existing non-discrimination ordinance, but also would have allowed the "mere accusation of homosexuality to be the basis for dismissal from a job or eviction from a residence."

In 1986, gay rights opponents in our state introduced proposals at the state level that would have banned gays and lesbians from working in schools and government offices, thankfully these proposals were defeated as well.

In 1989 the City of Seattle established by ordinance the Seattle Commission for Sexual Minorities to serve as part of the Office for Civil Rights. There have been name changes carried by ordinance since then from Seattle Commission for Lesbians and Gays to the Seattle Lesbian, Gay Bi-sexual and Transgender Commission. The duties and rules of order have changed very little if at all.

Even with protections and advocacy organizations established there was still the need for vigilance and perseverance in supporting positive policies regarding the LGBTQ community. Hands Off Washington (HOW), a project of the Washington Citizens for Fairness (WCF) was just such a state-wide advocacy organization. From 1993 to 1997. WCF, a coalition of concerned citizens and organizations, charged themselves with preserving the civil rights of all Washington citizens. HOW was created to specifically oppose initiatives 608 and 610, which sought to limit the rights of Washington citizens and legalize discrimination based on sexual orientation.

February of 2006, Governor Gregoire added protections for Sexual Orientation to the State statute RCW 49.60. Later in 2009 RCW 49.60.040 defined Sexual Orientation broadly to include Transgender and Gender Non-Conforming individuals under Gender Identity and Expression: to read:

> *(26) "Sexual orientation" means heterosexuality, homosexuality, bisexuality, and gender expression or identity. As used in this definition, "gender expression or identity" means having or being perceived as having a gender identity, self-image, appearance, behavior, or expression, whether or not that gender identity, self-image, appearance, behavior, or expression is different from that traditionally associated with the sex assigned to that person at birth.*

While anti-LGBT measures have been defeated, lingering sentiment against LGBT people still continues today. These sentiments may not be the majority viewpoint or as visible publically, but through stereotypes and opinions stemming from misinformation or ignorance, they still persist. It has been just a little over 40 years since the first public affirmation of LGBT people by the City of Seattle, but only nine years since the state of Washington added LGBT protections and just three years since marriage equality. In the overall arc of changing society and undoing myths, negative stereotypes, and attitudes, that is still just a short period of time. [3]

While many laws and policies have changed for the better, the societal and cultural changes have not kept

3 "Washington – Sexual Orientation and Gender Identity Law and Documentation of Discrimination." Williams Institute. 1 Sept. 2009. Web. 10 June 2015. <http://williamsinstitute.law.ucla.edu/demographics/washington/appendix-0909-47/>.

2 cont.

pace. Today, there are still bias crimes and discrimination being committed against LGBT people, some are in the form of violence, particularly hate crimes in the Capitol Hill neighborhood, which has been a cultural and business center for the LGBT community for decades, and others are in the form of discrimination such as denying a transgender woman access to her own bank account.[4]

Demographic Trends

The lack of data inclusive of LGBT people and families at this stage of developing the 2035 Comprehensive plan and in particular in the Growth and Equity Framework draft is evidence of continued invisibility by systematic and institutional discrimination. While this may not be overt or intentional, the fact remains the needs of LGBT individuals and families are not part of the analysis.

Right now, there is a serious change happening in areas of the city that have historically housed LGBT businesses, community gatherings, and where some of the LGBT community have lived, particularly in Capitol Hill, as well as neighborhoods such has Central District and Beacon Hill that have had people of color and in particular, LGBT people of color. That is not to say that LGBT people are not in all neighborhoods of Seattle.

Today, there is more data on LGBT youth, adults, and families, while it may not be to the specificity of data on non-LGBT/straight people, it is credible and used by various non-profit advocacy organizations, the media, and state, local, and federal agencies.

- Metropolitan Statistical Areas (MSAs) ranks Seattle as #5 in the top five of cities with adults who identify as LGBT at 4.8% of the city's population and 4% for the state of Washington overall.[5]
- Over 31,000 residents identify as LGBT adults, this is not including LGBT youth or the children of LGBT families. Which is roughly compares to the population size of the Queen Anne neighborhood.
- 2010 Census data for Washington found that 12% of same-sex couples were raising children in King County.[6] In addition, overall census data has found that "Among those raising children, 28% of householders in same-sex couples are non-White compared to 24% of householders in different-sex married couples."[7]
- More than one in five same-sex couples (20.6%) are interracial or interethnic compared to 18.3% of different-sex unmarried couples and just 9.5% of different-sex unmarried couples.[8]

A 2014 brief from the Office of Planning, Research and Evaluation[9], Administration for Children and Families, U.S. Department of Health and Human Services found that:

> "Analyses of nationally representative, population-based surveys suggest that LGBT people are more likely to face economic difficulties than are non-LGBT people. Analyses focusing on couples and controlling for demographic characteristics have found that both male and female same-sex couples are more likely to be in poverty than are different-sex married couples."

4 "Transgender Woman Says She Wasn't gave Access to Own Bank..." Transgender Woman Says She Wasn't given Access to Own Bank... Web. 10 June 2015. <http://www.kirotv.com/news/news/transgender-woman-says-she-was-refused-service-ban/nmTts/>.

5 Gates, GJ. 2015. Comparing LGBT Rankings by Metro Area: 1990 to 2014. Los Angeles, CA: Williams Institute, UCLA School of Law.

6 *Ibid.*

7 Gates, Gary. "Same-sex Couples in Census 2010: Race and Ethnicity." Same-sex Couples in Census 2010: Race and Ethnicity. Williams Institute, UCLA School of Law, 1 Apr. 2016. Web. 10 June 2015. http://williamsinstitute.law.ucla.edu/wp-content/uploads/Gates-CouplesRaceEthnicity-April-2012.pdf.

8 "Washington – Sexual Orientation and Gender Identity Law and Documentation of Discrimination." Williams Institute. 1 Sept. 2009. Web. 10 June 2015. http://williamsinstitute.law.ucla.edu/demographics/washington/appendix-0909-47.

9 Ibid

2 cont.

Analyzing data from the American Community Survey (ACS) by the Williams Institute[10] some key finding nationally include:

- "Regardless of race or ethnicity, individuals in same-sex couples have higher unemployment rates and higher rates of college completion compared to their counterparts in different-sex couples."
- "Racial/ethnic minority individuals in same-sex couples tend to live in areas where there are higher proportions of individuals of their own race or ethnicity."
- "African-American individuals in same-sex couples report lower median incomes than African-Americans in different-sex couples."
- "1 out of 5 Latino/and API individuals in same-sex couples are non-citizens (20%, 19%). In general, individuals in same-sex couples are more likely to be U.S. citizens (by naturalization or birth) than those in different-sex couples."

Data from the 2011 National Transgender Discrimination Survey [11] included the following key findings:

- "Discrimination was pervasive throughout the entire sample of transgender respondents, yet the combination of anti-transgender bias and persistent, structural racism was especially devastating."
- "Transgender people of color in general fare worse than white participants across the board, with African American transgender respondents faring worse than all others in many areas examined."
- "Transgender respondents of all races lived in extreme poverty. Our sample was nearly four times more likely to have a household income of less than $10,000/year compared to the general population."
- "Respondents reported various forms of direct housing discrimination — 19% reported having been refused a home or apartment and 11% reported being evicted because of their gender identity/expression."
- "Respondents reported less than half the national rate of homeownership: 32% reported owning their home compared to 67% of the general population"

Recommendations: Data Analysis

It is our strong recommendation that demographic trends include an examination of LGBT data and that the findings are part of the overall analysis and planning for the City.

In addition, we recommend the City include survey questions that allow for individuals to identify their sexual orientation and their gender identity, with additional gender categories that will capture gender beyond just male and female. We can provide appropriate questions used as best practices in national surveys. With the passage of the Affordable Care Act, medical providers and to some extent by extension insurance providers have been required to collect data on Sexual Orientation and Gender Identity, (SOGI) of individuals since 2014.

3

Recommendations: Equitable Development Framework for Growth

The Department of Planning & Development (DPD) in conjunction with the Race and Social Justice Initiative (RSJI) core team have developed a framework analysis that acts as a new tool to fill in the gaps unaddressed[12] by the mitigation measures derived from the Puget Sound Regional Council's (PSRC) Principles of Equitable Development.

We understand that the Growth and Equity Analysis identifies two major issues in need of mitigation. The first major issue: Seattle's population of marginalized peoples, defined in categorical triad as low-income, people of color, and English-language learners,[13] lack stability and resilience in the face of displacement pressures.

10 Kastanis, Angeliki, and Bianca Wilson. "Race/Ethnicity, Gender and Socioeconomic Wellbeing of Individuals in Same-sex Couples." Race/Ethnicity, Gender and Socioeconomic Wellbeing of Individuals in Same-sex Couples. The Williams Institute, UCLA School of Law, 1 Feb. 2014. Web. 10 June 2015.

11 Grant, Jaime M., Lisa A. Mottet, Justin Tanis, Jack Harrison, Jody L. Herman, and Mara Keisling. Injustice at Every Turn: A Report of the National Transgender Discrimination Survey. Washington: National Center for Transgender Equality and National Gay and Lesbian Task Force, 2011.

12 Public Review Draft (May 2015, pgs. 3-4, 10)

13 Public Review Draft (May 2015, pg. 10) and http://www.psrc.org/assets/8720/EquityPrinciplesFinal2012.pdf

3 cont.

The second major issue: Seattle is a city with an inequitable distribution of healthy and safe neighborhoods characterized as having high quality of life amenities and services. And where those neighborhoods exist they are not equitably accessible to the senior, disabled, and non-English speaking populations as they are to a younger, able-bodied, English-speaking population.

Our Concerns

4

The LGBT Commission is concerned that while combining a traditional EIS approach with RSJI's Racial Equity Toolkit is an appropriate first step, it is still missing a critical avenue to deeper insights that would be provided by including an intersectional analysis to the assessment matrix. We agree with racial justice as the foundation on which we must address social inequities. However, we also believe, that including intersectionality in the final analysis will not only capture the multiple identities of marginalized groups but it will also illuminate the ways institutional inequities, associated with individual identities, are reinforced and compounded to effectively lessen access to the key determinants of well-being.

The LGBT Commission takes issue with the narrowed scope of 'historically marginalized communities' as presented in the draft Growth and Equity Analysis which excludes the LGBT community as both a marginalized group and as a social and business stakeholder. The LGBT community with the GSBA--one of the largest and the longest established LGBTQ chambers of commerce in the country, has been rendered invisible at this stage of the draft analysis. Such disregard for the needs of Seattle's LGBTQ population and the recommendations made by this commission in regards to the Equity and Growth Analysis and its eventual implementation are striking and untenable. We find our absence unacceptable as we are stakeholders, citizens and intersectional communities also affected by the success or failure of the mitigation measures identified in the draft analysis.

Where PSRC envisions Social Equity to mean "…that those affected by poverty, communities of color, and historically marginalized communities have leadership and influence in decision making processes, planning, and policy-making,"[14] we are clear that in addition to representing a historically marginalized community, the LGBT Commission has also been underutilized with regard to leadership and influence in decision making processes, planning, and policy-making.

Here is a prime example related to LGBT inclusion in contributing guidance to the use of parks as public amenities.

Developing Healthy and Safe Neighborhoods

We recently submitted recommendations regarding the proposed smoking ban in parks to the Department of Parks and Recreation and in-person to City Council Member Jean Godden. Our recommendation for the proposed smoking ban in parks was for a partial ban, rather than a full ban, that summarily consisted of fully marked smoking areas and revisions to the Code of Conduct language (See *Banning Smoking in Seattle Public Parks* in the appendix.) The partial ban recommendations were intended to help prevent racial and economic profiling as well as to reduce avenues for discriminatory yet legal technicalities. These recommendations represent the Commission's effort to help the development of safe and healthy neighborhoods to be more inclusive, particularly with regard to parks as public amenities. These intersectional recommendations were disregarded.

The interest of the LGBT Commission in the inclusivity of the growth planning process for the City of Seattle cannot be understated. As described previously, we believe that adding an intersectional analysis to the overarching analytical framework would create a more robust Equitable Development Framework. Our second concern is that the mitigation measures may be self-undermining.

14 http://www.psrc.org/assets/8720/EquityPrinciplesFinal2012.pdf

4 cont.

"Public investments can meet the needs of marginalized populations when the market will not and can help them benefit from future growth." [15]

Using public investments as a matter of promoting and protecting the institutional willingness to invest in social equity seems a well-intentioned way to increase equitable access to services by broadening and providing more avenues to place-based key determinants of social, physical, and economic well-being for those of marginalized populations. The LGBT Commission is further concerned that the goals and mitigation measures of the Equitable Development Framework, while visionary and broadly comprehensive it may not be sustainable. Cooperation and participation by the public and private, while encouraged, cannot be required or easily managed. A proposed solution for future growth may very well be undermined by an internal dependence on strong private sector cooperation.

As indicated by its prevalence in the first 10 pages of the public review draft, it is clear that the efforts of equitable growth in terms of cultural competence and access are inextricably tied to market success. An assumption of the Equitable Development Framework is that in another circumstance, other than Seattle's current context of rapid growth and escalating house prices[16], market forces alone *would* be able to produce equitable growth. Given that the private sector is categorically pay-to-play, this assumption seems questionable.

"Achieving equitable growth will require implementation of programs and investments that are designed to create community stability and economic mobility for current residents in areas where new development could lead to displacement and where marginalized populations currently lack access to opportunity." [17]

Funding for equitable growth seems to be heavily dependent on the strength of the market. The implementation of programs and community investments is requisite for success and the very real consequences of failure are palpable. At best, programming is underfunded or subjected to funding decreases with funding waning over time. At worst, elements of a highly networked plan could be cut entirely or never implemented due to funding priorities. This directly exposes these proposed growth alternatives to vulnerabilities that contradict the language and intention of equitable growth.

The Equitable Development Framework would be internalizing market instability by pegging equitable growth and access efforts to the success of the market. A deep attachment of this kind is problematic on two fronts. First, it would frustrate the feasibility of economically capturing the public benefit of the two-sector partnership. Second, tying growth equity to market success would simultaneously promote social insecurity aggravating equity and access work, which is critical to inclusion, instead of mitigating the perceptions and expectations of exclusion by these marginalized communities. Homo- bi- and trans-phobia continues to persist and is severely compounded by an individual's status as non-white, low-income, and/or English-language learning, the LGBT Commission sees that the City of Seattle could position itself as a leader in driving municipal-level cultural shifts. The Seattle LGBT Commission asks that the City of Seattle protect its commitment to equitable growth and access from the inevitable downturn of the economic cycle. We suggest that a fund be allocated and protected from the volatilities of market-based priorities and that along these lines alternative funding sources are secured to ensure a long-term, real commitment to the efforts outlined in the draft.

5

Our Ask

The LGBT Commission requests a formal, written answer to the following question:

- How does DPD in concert with the RSJI Core Team intend to protect the mitigation measures specifically, and the equity and access efforts more broadly, from the well-known consequences of internalizing a reliance on market strength?
- How does the DPD in concert with the RSJI Core Team intend to include the needs of LGBT children,

15 Public Review Draft (May 2015, pg. 6)

16 Public Review Draft (May 2015, pg. 9)

17 Public Review Draft (May 2015, pg. 9-10)

5 cont.

youth, adults, seniors, and families as well as differently-abled/disabled children, youth, adults, and seniors in the Seattle 2035 Comprehensive plan?

6

Recommendations: Attachment B Equitable Development Measures

1. Advanced Economic Mobility and Opportunity	Example Program
1.2 Education, training and new entry-level jobs should include outreach and training for the LGBTQ community, specifically for people of color and people who identify as transgender or gender non-conforming.	
1.3 Education and job training should include programs for outreach into the LGBTQ community, specifically for those facing employment barriers due to gender identity, expression, people of color, and those who have faced job discrimination.	▪ Seattle Transgender Economic Empowerment Project ▪ YouthCare/YouthBuild ▪ Peace for the Streets by Kids for the Streets
1.4 Removal of barriers should include increased enforcement of anti-discrimination laws, and emphasize safe workspaces.	▪ SOCR
1.5 Should include programs that promote fair housing for LGBTQ, disabled persons, and people of color, and support for people in those communities in finding housing.	▪ SOCR Fair Housing Campaign
1.6 Funding for financial literacy education and assistance programs that work within the LGBTQ community, especially for those in unstable housing situation or who are transitioning into housing.	▪ Senior Services
2. Prevent Residential, Commercial, and Cultural Displacement	**Example Programs**
2.1 Explicit language and programs to protect marginalized populations including protections for LGBTQ partners, partners who identify as transgender, gender non conforming, disabled, married or otherwise.	▪ SOCR Fair Housing Campaign
2.2 Programs to preserve long-term housing affordability should support affordability for those in low-income housing, the working poor and those in the middle class.	
2.3 Funds earmarked for home repair loans and down payment assistance for LGBTQ homeowners in unstable or uncertain situations: recognizing that many LGBTQ persons, particularly transgender and people of color, face increased difficulty in gaining and maintaining employment and earning a living wage pre- post- and through transition.	▪ Habitat for Humanity - Pride Build Program
2.4 and 2.5 Community development in areas and neighborhoods recognized as safe and friendly to LGBTQ people and families. Develop and establish an LGBT Centers and a Health and Well-being Center for the LGBTQ community.	▪ Greater Seattle Business Association (GSBA)
2.6 and 2.7 Explicitly include LGBTQ cultural districts, including businesses and areas that are central to the LGBTQ community in analysis and as an integral part of a sustainable growth plan.	▪ Seattle's LGBT Commission ▪ Greater Seattle Business Association (GSBA)
2.8 Engage LGBTQ community leaders and organizations in analysis, planning and implementing a stronger equitable growth plan for Seattle	▪ Seattle's LGBT Commission ▪ Ingersoll ▪ Entre Hermanos ▪ Gay City ▪ Greater Seattle Business Association (GSBA) ▪ Gender Justice League

6 cont.

	▪ LGBTQ Allyship ▪ People of Color Against AIDS Network ▪ Trikone-Northwest ▪ Northwest Two Spirit Society ▪ Pride Foundation ▪ Northwest Network ▪ Senior Services
3. Build on Local Cultural Assets	**Example Programs**
3.1 Preserve and strengthen centers of LGBTQ community like Capitol Hill and the Central District.	▪ Capitol Hill LGBT Task Force ▪ Greater Seattle Business Association (GSBA) ▪ Gay City ▪ Entre Hermanos ▪ Life Long
3.2 Specifically include LGBTQ cultural networks.	▪ Gay City Arts ▪ Three Dollar Bill Cinema ▪ Flying House Productions
3.3 Specific inclusion of LGBTQ in marginalized populations, and investments in LGBTQ organizations and coalitions.	▪ Seattle LGBT Commission ▪ Gay City ▪ NW Network ▪ LGBTQ Allyship ▪ Clinics providing culturally appropriate health care ▪ Coalition for Inclusive Health Care
4. Develop Healthy and Safe Neighborhoods	**Example Programs**
4.1 Public amenities specifically to include public safety institutions recognizing the unique risks for LGBTQ citizens, LGBTQ safe and friendly schools, and culturally-appropriate healthcare for LGBTQ persons, youth, seniors and disabled and differently-abled people. Programs to support LGBTQ safety and safety for people who identify as a part of multiple marginalized populations	▪ Country Doctor/Carolyn Downs Community Clinic ▪ Sea Mar Community Health Centers ▪ Seattle Counseling Service ▪ Community Centers (including community swimming pools ▪ Seattle Parks and Recreation Department ▪ Senior Services and affiliated Senior Centers
5. Equitable Access to All Neighborhoods	**Example Programs**
5.1 Specifically include LGBTQ and people who identify as part of multiple marginalized populations, particularly people of color, those whose who identify as transgender, seniors, those who are disabled, students/apprentices, and those in specialized job training, and employment programs	▪
5.3, 5.5, 5.6 Affordable and sustainable housing is made available for people in multiple socio-economic classes, low-income to middle class,	▪

6 cont.

including access for the LGBTQ community, a Community Center particularly people of color, those who identify as transgender, senior, youth and disabled or differently abled persons.	
5.7 Specifically include education and enforcement of fair housing laws and anti-discrimination policy for LGBTQ persons, people who identify as transgender, people of color, seniors, youth and disabled persons.	▪ SOCR Fair Housing Campaign

Appendix

City of Seattle

Edward B. Murray, Mayor

Seattle LGBT Commission

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Gunner Scott
Susan Snyder
KJ Williams

TO: Board of Parks, Office of Mayor Edward Murray, & City Council of Seattle

FROM: Seattle LGBT Commission

DATE: May 11, 2015

SUBJECT: Banning Smoking in Seattle Public Parks

Dear Board of Parks Commissioners,

We, the Seattle LGBT Commission (the "Commission"), oppose a ban for smoking in all areas of public parks in the City of Seattle (the "City"). The Commission is concerned a complete ban on smoking in parks would unfairly target homeless youth and young adults. We do support the adoption of a partial smoking ban in particular areas of the parks which could include children's play areas, picnic areas, near water fountains, and beaches.

Many of Seattle's homeless youth and adults who do not have access to private outdoor space utilize parks, particularly in the downtown area. The American Journal of Preventative Medicine reports that approximately 73% of homeless citizens report some type of tobacco use, many as a means to reduce stress. The 2015 One Night Count of homeless individuals living in Seattle found that some 2, 813 were living outside and without shelter.[i] Of those 2, 813 an approximate 20 to 40% identify as LGBTQ.[ii] Count Us In 2015, a survey aimed specifically at youth and young adults, found 824 homeless youth and young adults living in King County, 22% of which identify as LGBTQ.[iii]

The Commission is concerned that enforcement of the complete smoking ban in City parks will be disproportionately enforced and focused in the downtown area, as evidenced by the Seattle Parks and Recreation Memorandum sent March 19, 2015. The Memorandum states that "most enforcement actions are expected to occur in the parks in the downtown core," which include Occidental Park, Victor Steinbrueck Park and Westlake Park.[iv]

As part of the downtown core, these parks also serve a large number of Seattle's homeless population. With so many of Seattle's homeless using parks, especially downtown parks, the Commission is concerned that enforcement of a complete ban on smoking will force many out of city parks and increase the criminalization of homeless individuals because of so called "quality of life" crimes. This will also cause an undue burden on Seattle's Police department having to enforce this proposed ban.

The Commission recognizes the City's legitimate concerns regarding the health and environmental risks of secondhand smoke, and many park users' desire to visit these public spaces without encountering people smoking or using other tobacco products.

The Commission writes in support of the implementation of a partial smoking ban in all public City parks. The City of Seattle Parks and Recreation Code of Conduct (060 7.21.00, section 3.2.1), currently prohibits the "chewing, smoking or other tobacco use within 25ft of other park patrons and play areas, beaches, playgrounds or picnic areas."[v]

The Commission recommends amending this rule to ban smoking in designated areas only, to remove the "within 25ft" condition and add installation of signage indicating that certain areas, including playgrounds, picnic areas, trails, p-patches, and structures, as well as,

athletic fields, water fountains, some park benches and any other areas where children, families, youth and young adults congregate, are non-smoking areas.

The Commission also suggests the development of designated smoking areas in all public parks, along with clearly posted smoking guidelines. Smoking areas should include a space to be social, for instance a covered structure or benches, and ash receptacles. Additionally, the Commission also recommends the City invest in smoking cessation programs developed specifically for LGBTQ youth, homeless youth, and homeless adults, recognizing the increased difficulty of accessing resources and the cessation of smoking while homeless.

The Commission urges the Board of Parks and Commissioners to reject a complete ban of smoking in City parks, and instead adopt a partial ban that respects the rights of both non-smokers and tobacco users to access and enjoy the City of Seattle's parks.

Thank you,

Lisa Love
Co-Chair

Marxa Marnia
Co-Chair

Shoshana Paget & Gunner Scott
LGBT Commission's City Planning, Neighborhood Services & City Resources Task Force

[i] Seattle/King County Coalition on Homeless 2015 One Night Count Results: homelessinfo.org

[ii] National Coalition to End Homelessness: http://nationalhomeless.org/issues/lgbt/

[iii] Count Us In 2015: https://tf008v2.storage.googleapis.com/Count-Us-In-2015-Rpt.pdf

[iv] Seattle Parks and Recreation Memorandum: March 19, 2015

[v] Parks Code of Conduct 060 7.21.00, section 3.2.1

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Susan Snyder
KJ Williams

Seattle Urban Forestry Commission

June 10, 2015.

Gordon Clowers
Department of Planning and Development
700 5th Avenue, Suite 2000
Seattle, WA 98124

RE: Comments on the Draft EIS for the Seattle 2035 Comprehensive Plan

Dear Mr. Clowers,

The Seattle Urban Forestry Commission wishes to address the following concerns about the draft Environmental Impact Statement (EIS) for the Seattle 2035 Comprehensive Plan.

1

1. <u>Impacts on the Urban Forest due to Increased Density</u>

The draft EIS does not evaluate the impacts on Seattle's urban forest by adding 120,000 new residents, 115,000 new jobs, and 70,000 housing units to Seattle by 2035. Only one page's worth of print out of the approximately 400 pages is devoted to potential impacts on the urban forest and it basically says that there is no problem because we have the Urban Forest Stewardship Plan and provisions in SMC 25.11. It is the Commission's view that this is not accurate. The draft EIS provides no direct or detailed evaluation of the yearly or cumulative loss of urban forest canopy due to development and growth and the associated impacts on air pollution and human health, noise, storm water runoff, wildlife habitat, open space, or heat island effects.

The draft EIS on p 3.5-11 states: *"The Urban Forest Stewardship Plan's goal's and the implementing regulations in SMC 25.11 would apply to development that occurs under all EIS alternatives and would help to mitigate for the potential removal of all trees and reduction of canopy cover with future development. In this respect, the growth patterns examined under all alternatives would be able to be implemented while remaining consistent with the UFSP's goals."*

Unfortunately, there is no environmental analysis of the specific impacts or costs associated with canopy loss occurring during development. There is no analysis of how much canopy loss would occur and what the cost would be or who would pay for replacing canopy lost during development. The current City Comprehensive Plan calls for no net loss of canopy. If the City does not know how much canopy is being lost through development it cannot accurately assess whether it is meeting the no net loss goal let alone gaining canopy each year.

1 cont.

The Urban Forestry Commission addressed this issue on the need for more detailed data from DPD on tree loss in a letter adopted June 25, 2014.
http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/ADOPTEDDPDReportingLetter062514.pdf

The letter stated in part:

"The Commission has discussed several ideas to improve submittal documentation and final reporting for projects under DPD's permitting.

- *Currently, the City, through OSE and the Urban Forestry Interdepartmental Team, keeps track of the number of trees planted and removed on public property every year. The Commission recommends tracking trees lost on private property undergoing development to assist in determining where we are gaining or losing trees and canopy. This would add information to the overall city canopy coverage assessment data. By knowing more about canopy trends on different types of land, we can better direct policy and programming to ensure we are on track to meet our 30% goal.*

- *What would help the City better understand what is happening with tree canopy protection and enhancement is to require that all development projects submit an Urban Forest Canopy Impact Assessment prior to any construction project being approved. The Urban Forest Canopy Impact Assessment would include a map of the property with the trees numbered, canopy area of trees drawn, and trees to be removed clearly labeled. Under current guidelines it would minimally require that all trees 6 inches DBH (diameter at breast height) or larger be inventoried on the property. The suggested data points required would be:*
  - *Species: speaks to size of canopy and amount of storm water benefit.*
  - *DBH: speaks to age of tree and canopy coverage.*
  - *Tree Height: speaks to canopy volume and amount of environmental benefit.*
  - *Canopy Width (area): speaks to canopy volume and amount of environmental benefit.*
  - *Tree Condition: speaks to overall forest health and environmental impacts.*
  - *Photographs of the trees on the parcel and adjacent properties.*
  - *Canopy coverage as a percent of area pre- and post-project development.*

- *Landscape Plan Requirements could include calculations for percent canopy coverage at 20 years and soils volume provided for each tree.*

- *The annual UFSP Progress Report to the Mayor and City Council could include canopy coverage for different development zones.*

Implementing some or all of these operational steps would greatly help to evaluate whether or not we are doing enough to reach our 30% canopy goal."

2

2. **Inadequate Tree Protection in Current Code**

A second issue is that the Commission believes that the current tree protection ordinance in SMC 25.11 is inadequate to meet the goals of achieving a 30% canopy by 2037. It has so stated in several letters to the Seattle City Council and Mayor, including the letter dated July 15, 2014.
http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/ADOPTEDDPDOrdinancetoCMBagshaw071514final.pdf

In that letter the Commission stated:

"In 2009, City Council issued Resolution 31138 instructing "...the Department of Planning and Development to submit legislation by May 2010 to establish a comprehensive set of regulations and incentives to limit the removal of trees and promote the retention and addition of trees within the City of Seattle on both private and public property..."

We would like to reiterate the statement made in our August 2010 recommendation: Bold action, consistent with Resolution 31138, is needed to achieve Seattle's tree canopy coverage goal of 30% by 2037. And because the majority of trees in Seattle are in residential property, an updated tree ordinance is key to implement the 2013 Urban Forest Stewardship Plan as adopted by City Council last September.

DPD released a first proposal in 2010 and a second proposal in 2012. It is now almost five years since the Resolution and DPD is still working on a tree ordinance for trees on private property. There was a significant amount of time and energy invested by the community in this process. This length of time tends to frustrate the public as they look for guidance on tree measures.

We urge you use your leadership in Council's Seattle Public Utilities and Neighborhoods Committee to:

1. *Encourage DPD to resume work on this important element of a comprehensive urban forestry strategy for Seattle with a more defined timeline than the one currently shown on their website.*
2. *To develop an improved public education and outreach approach that engages Seattle's diverse stakeholder communities.*
3. *Require a reporting of how the new proposal addresses the DPD specific elements of the Resolution: a. The 15 elements of Section 1;*
4. *b. The four elements of Section 2; and*
5. *c. The section for requirements for institutions, City facilities, public facilities, and schools."*

It is now another year later and there has been no further action on passing an updated tree ordinance.

3

3. **Removal of the Current 40% Canopy Cover Long-Term, Aspirational Goal**

The third issue the Commission is concerned with is that the Draft EIS said that the Seattle 2035 Comprehensive Plan would eliminate the City's long-term goal of a 40% tree canopy in the current comprehensive plan and replace it with the Urban Forest Stewardship Plan goal of 30% by 2037.

3 cont.

That seems to be the intent of the language on p 3.5-1 that says *"Adjusting the quantitative tree canopy goal in the Environment Element to be consistent with the 2013 Urban Forest Stewardship Plan."* That would reduce the current overall long-term goal of 40% in the Comprehensive Plan by 25%. There is no discussion of the impact of that change both in the short-term or long-term and the ability to pursue a 40% aspirational goal after 2035. A long-term goal of 40% canopy cover and a 2035 goal of 30% canopy by 2037 is a step toward that larger goal.

The Commission addressed the issue of the long-term canopy goal of 40% in its comments on the current Comprehensive Plan in a letter dated May 11, 2011. http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/AdoptedCompPlanUpdateRecommendation051111.pdf

The language proposed by the Commission was adopted by the Seattle City Council and is in the current Comprehensive Plan under ENVIRONMENT ELEMENT H Seattle's trees E23: *"Achieve no net loss of tree canopy coverage, and strive to increase tree canopy coverage to 40 percent, to reduce storm runoff, absorb air pollutants, reduce noise, stabilize soil, provide habitat, and mitigate the heat island effect of developed areas."*

4. **Additional comments**

4

- The 2013 Urban Forestry Stewardship Plan is not listed in the references. http://clerk.seattle.gov/public/meetingrecords/2013/plus20130911_18d.pdf

- The benefits of trees mentioned on p 3.5-11 under the heading Urban Forestry Stewardship Plan fails to mention a number accepted benefits of trees including documented health benefits of a healthy urban forest; reducing storm water runoff; impacts on wildlife habitat; and impacts on birds, insects, other animals and associated plants.

In summary, the Commission believes that the draft EIS does not address a number of impacts that could be caused by the different growth scenarios as a result of tree canopy loss from increased development. Much more analysis is given to view impacts and noise impacts while ignoring potential significant impacts caused by increased tree canopy loss.

SMC 25.11 is seriously outdated and needs updating like many other cities including Portland, Oregon; Lake Forest Park, WA; Atlanta, GA; and Vancouver, BC have done to protect and increase their green urban forestry infrastructure. So called protection of exceptional trees under SMC 25.11 is based on a complaint system and is unfortunately not protecting exceptional trees.

The Urban Forest Stewardship Plan cannot address reaching a 30% canopy goal without adequate information as to the amount of canopy that is being lost during development. The Commission recommended DPD to implement an Urban Forestry Canopy Impact

4 cont.

Assessment for all their projects and so far has not responded to the Commission's letter of recommendation or indicated any intention to do so.

And eliminating by oblique reference the long-term, aspirational canopy goal of 40% as adopted by the Seattle City Council in the current Comprehensive Plan without any discussion of its impact on Seattle's future urban forest is unacceptable. The long term 40% canopy goal should remain in the plan and reference that the 30% goal by 2037 is a stepping stone to the larger goal and not the final goal.

Thank you, for the opportunity to comment.

Sincerely,

Leif Fixen, Chair

Steve Zemke

cc: Mayor Edward B. Murray, Council President Burgess, Councilmember Bagshaw, Councilmember Godden, Councilmember Harrell, Councilmember Licata, Councilmember Okamoto, Councilmember Rasmussen, Councilmember O'Brien, Councilmember Sawant, Jessica Finn Coven, Diane Sugimura, Brennon Staley, Eric McConaghy.

Sandra Pinto de Bader, Urban Forestry Commission Coordinator
City of Seattle, Office of Sustainability & Environment
PO Box 94729 Seattle, WA 98124-4729 Tel: 206-684-3194 Fax: 206-684-3013
www.seattle.gov/UrbanForestryCommission

Allyson Brooks Ph.D., Director
State Historic Preservation Officer

June 18, 2015

Mr. Gordon S. Clowers
Senior Urban Planner
City of Seattle
Department of Planning and Development
P.O. Box 34019
Seattle, Washington 98124-4019

In future correspondence please refer to:
Log: 061615-12-KI
Re: Seattle Comprehensive Plan Update and DEIS

Dear Mr. Clowers:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the Seattle Comprehensive Plan Draft Environmental Impact Statement (DEIS). The DEIS has been reviewed by DAHP staff on behalf of the State Historic Preservation Officer (SHPO) in regard to potential impacts to significant cultural and historic resources (including buildings, structures, sites, districts, objects, and landscapes) in the city.

From the DEIS we understand that the City identified four alternative development scenarios amongst designated urban centers, urban villages and transit-related areas. These alternatives include:

(1) Continue Current Trends (No Action),
(2) Guide Growth to Urban Centers,
(3) Guide Growth to Urban Villages near Light Rail, and
(4) Guide Growth to Urban Villages near Transit.

As a result of our review, the following comments and recommendations are provided for your consideration:

1 1) In general, we are concerned that the DEIS and potential impact of the comprehensive plan implementation on cultural and historic resources is not adequately addressed. Our review of the draft found these resources mentioned only in the context of impacts of noise and vibration arising from construction pile-driving.

2 2) Elsewhere, we come to understand in reading section 3.4 Land Use: Height, Bulk, Scale, Compatibility, that impacts from development occurring to cultural and historic resources will be ameliorated by the "...effects of the City's codes and programs in preventing or otherwise reducing the potential for adverse effects." In essence, we interpret this as meaning that the City will rely on the work and authority of the Historic Preservation Program and the Landmarks Preservation Board as guardian of the city's heritage

2 cont. resources. While we acknowledge the effectiveness and accomplishments of the City's nationally recognized Historic Preservation Program, we advocate that the care and stewardship of Seattle's heritage be considered a ***city-wide policy and responsibility***, not "siloed" in the preservation program.

3 3) Another major concern is that the comprehensive plan should articulate and implement goals, policies, and actions that are ***proactive*** in protecting the city's heritage resources. Relying on landmark nominations and SEPA reviews for protection of Seattle's historic built environment not only places the Historic Preservation Program in a reactive mode, it also undermines predictability in the development process and ultimately diminishes the resource base itself and the city's vibrancy.

4 4) We recommend that the DEIS more fully address the potential impact of the comprehensive plan implementation on cultural and historic resources. Most, if not all of the elements of the environment addressed in the DEIS affect and/or are affected by preservation of cultural and historic resources.

5 5) We recommend that the comprehensive plan include goals, policies, and strategies that support specific actions resulting in preservation of the city's significant cultural and historic resources. It is important to recognize that most, if not all, of the plan's elements have a direct and/or indirect effect on historic preservation activity and the city's cultural and historic resources. Examples include chapters on housing, land-use, capital improvements, parks & recreation, economic development, neighborhood character, and sustainability.

6) Given the impacts and contributions that historic preservation work has made to the city's economy, character, and quality of life since enactment of the Landmarks Preservation Ordinance, we recommend that a comprehensive planning element specifically pertaining to historic preservation be developed and incorporated into the updated comprehensive plan.

Like other elements of the plan, the historic preservation element should include goals, policies, and specific strategies supporting preservation efforts in the city. Given ever-increasing development pressures on historic properties, a historic preservation planning element is essential, particularly in light of the comp plan's directing growth into urban centers and villages. Many of these targeted growth centers coincide with City Landmark and National Register of Historic Places designated districts and properties.

6 7) An urgent need for the DEIS, the comprehensive plan, and the Department of Planning and Development to address is creating and implementing a systematic and comprehensive approach for reviewing, protecting, and mitigating land use actions on archaeological, cultural, and historic properties.

We know from records and previous experience that the city is likely rich in retaining such sites within the corporate limits. These resources are protected by state and federal statutes. However, the city does not have policies and procedures in place that speak to the value of protecting these resources nor how they are to be treated in its environmental review and land-use decision making process. Implementing guidelines

6 cont. and procedures is a proactive approach that provides stakeholders with notice and predictability in planning and development thereby avoiding costly delays. These policies and procedures should be developed in consultation with interested and affected stakeholders, most notably Native American Tribes, having an interest in such resources.

7 In summary, past decades have witnessed the contribution that historic preservation programs have made to Seattle's robust economy, quality of life, and strong sense of place. However, preservation work and achievements occur as a result of strong partnerships and close coordination with a wide range of interests.

Therefore, we strongly recommend integrating historic preservation planning goals, policies, and actions into the city's updated comprehensive plan. Also, the DEIS needs to acknowledge and identify the many linkages that historic preservation has to other elements of the environment and the impact of the four alternatives to cultural and historic resources. Finally, urgent City action is needed to implement a process for reviewing and addressing impacts to archaeological and cultural resources by planning and developing actions.

Thank you for the opportunity to review and comment on the DEIS. We look forward to reviewing subsequent documents as the comprehensive planning update unfolds. Should you have any questions please feel free to contact me at greg.griffith@dahp.wa.gov.

Sincerely,

Gregory Griffith
Deputy State Historic Preservation Officer

C: Sally Bagshaw, City Council
Tim Burgess, City Council
Jean Godden, City Council
Karen Gordon, City Historic Preservation Officer
Cecile Hansen, Chairwoman, Duwamish Tribe
Bruce Harrell, City Council
Kji Kelly, Historic Seattle
Nick Licata, City Council
Dennis Lewarch, Suquamish Tribal Historic Preservation Officer
Chris Moore, Washington Trust for Historic Preservation
Steve Mullen-Moses, Snoqualmie Nation
Laura Murphy, Muckleshoot Tribe
Ed Murray, Mayor
Mike O'Brien, City Council
John Okamoto, City Council
Tom Rasmussen, City Council
Kshama Sawant, City Council
Eugenia Woo, Historic Seattle
Richard Young, Tulalip Tribes

cascade BICYCLE CLUB

June 15, 2015

City of Seattle
Dept of Planning & Development
Attn: Gordon Clowers
700 5th Avenue, Suite 2000
Seattle, WA 98124

Re: Seattle Comprehensive Plan Update Draft EIS Comments

We greatly appreciate the opportunity to comment on the Seattle Comprehensive Plan Update Draft EIS. The Cascade Bicycle Club (Cascade) is a regional nonprofit with nearly 16,000 members. Our mission is to improve lives through bicycling. We strongly believe that future growth must be accommodated in a way that makes it easier for Seattle residents and workers to bike, walk, and use transit.

1 **Cascade supports Alternative 4, which guides growth to urban villages with light rail or frequent bus service and has the highest capacity to produce more compact, bikeable, walkable, and transit-friendly communities.** We favor Alternative 4 as, compared to the other alternatives, this option results in the greatest amount of growth (95% of new residential and 82% of new employment) within urban centers and urban villages. Alternative 4 also produces the largest expansion of urban village boundaries and a development pattern in which more locations receive growth. We support expansions to encompass ten-minute walksheds around selected bus transit nodes in the Ballard, Fremont, West Seattle Junction, and Crown Hill urban villages and a new urban village located around the potential NE 130th Street Link Light Rail station. The City should also ensure that it is safe and comfortable to bike within a 3-mile bikeshed in and around the urban centers and urban villages.

2 **Cascade suggests employing multimodal Level Of Service to ensure these urban villages can enjoy multiple mobility options.** Seattle must be bold and look beyond the ostensible auto-centric Level of Service standards. We applaud the City for developing two alternatives that focus growth around transit around present and future Link light rail stations. But access to transit alone does not make a community successful. Station links to the first and last mile of trips is critical. Correspondingly, the City must expand access to safe infrastructure for bicycling and walking as promised in the Bicycle Master Plan and the Pedestrian Master Plan. Beyond simple reference of modal plans in the DEIS, we would like the FF to thoroughly examine biking and walking.

3 **We are concerned with the nine year old PSRC 2006 Household Travel Survey data used in the travel demand forecasting for mode share, average trip length, and VMT.** Furthermore, bicycling as a viable mode choice receives very little attention throughout the DEIS. We would like as much analysis for bicycling, walking, and transit as is provided for automobiles and parking. We recommend the City use the PSRC 2014 Household Travel Survey data in the FEIS.

4 **Cascade is concerned that Alternative 4 will result in displacement of those living in existing low-density housing.** Overall, Alternative 4 has the greatest displacement potential by allowing more growth to be spread over a larger portion of the city and in areas currently developed at lower densities. The City must begin policy and planning work now to address this phenomenon, which will impact vulnerable populations in South Seattle urban villages but also middle-income residents all throughout the City. While housing is the largest household expense, transportation is the second largest household expense. The City must create proactive policies that reduce the risk of displacement due to housing costs and ensure access to affordable transportation choices.

5 **We would like the City to ensure that the Seattle Comprehensive Plan Update is consistent with other recent Seattle planning efforts and expand on them**. The Climate Action Plan, the Bicycle Master Plan, and the Pedestrian Master Plan have all engaged many residents on issues of growth, development, and transportation. Much good work has been completed. The alternatives proposed in the DEIS should make space for the actualization of the goals adopted in these various plans. For example, the Climate Action Plan establishes a 25% drive alone rate by 2035. The FEIS must study this goal and others to determine if actualization is possible within the proposed growth scenarios.

6 **Cascade would also like confirmation that the alternatives will accomplish Vision Zero. Seattle has proposed to eliminate serious injuries and fatalities by 2035.** We would like to see further discussion about which alternative provides the best opportunity to make it safer for the most vulnerable users to walk and bike to their destinations.

7 Overall, we support Alternative 4, but would like to see the issues identified above studied further in the FEIS. Thank you for the opportunity to comment on how and where Seattle could grow over the next twenty years, the effects to the built environment and alternative transportation, and how the City could address transportation impacts.

Sincerely,

Andrea Clinkscales, AICP, PMP
Principal Planner
Cascade Bicycle Club

Attachements: Addendum to Seattle Comprehensive Plan Update Draft EIS Comments (5)

Addendum to Seattle Comprehensive Plan Update Draft EIS Comments

Below are additional and specific comments organized by Transportation Element page number:

8 **3.7-5**
Figure 3.7-4 //
In reference to the *Existing bicycle facilities as of 2013* map, much has been built in the last two years. A current map as of 2015 that includes a specific designation for protected bike lanes and cycle tracks would greatly aid analysis.

9 **3.7-3 to 3.7-8**
Figures 3.7-2 to 3.7-6 //
The disparate Pedestrian Master Plan, Bicycle Master Plan, and Transit Master Plan maps were produced by different organizations, at different times, and in different formats. A collective map overlaid with all three modes would be especially useful for this analysis.

10 **3.7-9**
A correction is needed to the Restricted Parking Zone (RPZ) Program section. Residents eligible for the RPZ Program *cannot* park "without time limits" in their neighborhood. There is a 72-hour maximum for any vehicle in any zone. The City's Traffic Code stipulates that no vehicle can be parked on a city street for longer than 72 hours regardless of RPZ permit, see SMC 11.72.440.[1] The RPZ permit allows a vehicle in a 2-hour zone to park up to 72 hours, but not longer.

While we support policies that encourage sustainable transportation and transportation choices, this policy is contradictory in that it forces permit holders to drive, or at least arbitrarily move, their vehicle at least once every three days to avoid ticket and fees. Accordingly, we would like a comprehensive review and update to the RPZ program.

11 **3.7-21**
Figure 3.7-10 //
To accompany the *Analysis locations and 20-minute walkshed boundaries* map, a table listing the relative walkshed areas in square miles would greatly aid comparison of the eight analysis sectors. However, if you provide a walkshed analysis, you must also provide a bikeshed analysis. A map and table depicting bikesheds and relative areas would aid transportation network analysis comparison of the eight analysis sectors.

3.7-26
The walkshed discussion here references a table in Appendix A.4, which contains the number of households and retail jobs within each 2015 walkshed. As mentioned in *3.7-21*, we would like to see a similar companion table for each 2015 bikeshed.

12 **3.7-27**
Figures 3.7-12 to 3.7-13 //

[1] http://www.seattle.gov/transportation/parking/parking72hour.htm

12 cont.

These graphics are very useful in comparing sectors. It may be more helpful to depict mode share per Urban Center, Hub Urban Village, Residential Urban Village, and MIC.

3.7-35

Figures 3.7-17 to 3.7-24 //

13 These graphics summarizing the number of households and retail jobs within each 20-minute walkshed in 2035 have the potential to be great. However, the individual graphs are very small and contain an immense amount of information. It's visually difficult to determine real differences between Existing and Alternatives 1-4 and which performs better in each category.

With the *Households & Retail Employment within 20-Minute Walkshed* graphics, it would be helpful to know the area in square miles of each walkshed for comparison purposes. Again, here we would like to see bikesheds.

14 Regarding the utility of the graphics, nowhere in the text is a multimodal transportation goal clearly stated. The DEIS focuses on automobile travel and parking. We would like the following questions more clearly addressed in the body of the document: Are we trying to decrease travel times, increase the area of walksheds, diversify mode share, and/or reduce average trip length and VMT per capita? Without a tally or score on each graphic, it's difficult to determine which alternative performs the better in each category.

3.7-44

15 We are concerned that many of the analyses in this chapter are based on the travel demand forecasting model, which is rooted in PSRC's 2006 Household Travel Survey results. The Household Travel Survey data are nearly 10 years old and 2014 data were finalized and released in February 2015. ***Though the recent release of the 2014 data likely conflicted with the release of this DEIS, we request that the FEIS incorporates the 2014 data.*** 2014 mode shares for biking, walking, and transit increased significantly since 2006. Without this reflected in the DEIS, the analysis is limited and outdated.

We also question the validity of the travel demand forecasting model, which assumes little to no change (3-4%) in non-SOV mode share in 20 years despite 120,000 new people and 115,000 new jobs by 2035. We expect that under any growth alternative, non-SOV mode share will increase more than 4% in 20 years. We also expect that in 20 years, bike mode share would increase more than 1% and that walk mode share will increase more than 3% increase.

A quick analysis of the preliminary 2014 Household Travel Survey findings show that between 2006 and 2014, combined bike, walk, and transit mode share increased by 4.4% in only 9 years. Based on this data, we would expect some 10% combined bike, walk and transit mode share by 2035.[2]

Moreover, the Bike Master Plan sets a goal of quadrupling bike ridership between 2014 and 2030, and increasing commute mode share.[3]

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[2] http://www.psrc.org/assets/12282/HouseholdTravelSurveyBPAC20150225.pdf

[3] http://www.seattle.gov/transportation/bikemaster_materials.htm

15 cont.

Coordinated land use and transportation policies such as the Alternatives 1t 4 growth strategies typically lower VMT per capita by providing more people with additional transportation choices and shortening trip lengths. More analysis here is needed.

3.7-45

16 The VMT per Capita Citywide section states that "Citywide, the PM peak period VMT per capita is expected to decrease from 3.3 miles in 2015 to 2.9 miles by 2035 under all four alternatives." That is only 0.4% with an added 120,000 new people and 115,000 new jobs over 20 years. If VMT then essentially stays stable with a very minor decrease, it defies logic that non-SOV mode share increases are so small.

This phenomenon is supported on page 3.7-48, under the Pedestrian and Bicycle System Improvements section, which states that: "there is a well-documented link between improved, safer bicycle and pedestrian accessibility and reduced demand for vehicle travel (CAPCOA 2010)".

3.7-46

Table 3.7-8 //

17 This DEIS seems to show a preference to parking issues over other transportation issues. We note that the Parking section of these pages has more analysis than Pedestrian and Bicycle Network and Safety. We questions the validity of the statement, "It is reasonably expected that such areas would experience a larger increase in parking demand under the action alternatives than under the No Action Alternative, constituting a possible parking impact." If parking demand is expected to increase by virtue of growth, then it is safe to say that demand for bicycle and pedestrian infrastructure will also increase, leading to a larger increase in bicycle and pedestrian mode split than projected. Table 3.7-8 is overly simplistic in this case; it is impossible that there is impact to parking without impact to autos, freight, transit, pedestrians, bicycles, and safety.

3.7-47

18 The Mitigation Strategies section is also overly simplistic in that it relies heavily on modal plans and TDM to decrease vehicle demand. Since the phrase "if implemented" is included under the Improving the Pedestrian and Bicycle Network section, we would like to see policy language that emphasizes the need for more funding and a faster implementation strategy. At present, for example, Move Seattle proposes to cover 50% of the Bike Master Plan projects over the next 10 years.[4] Also, each growth alternative will have very different implications to the level of bicycle and pedestrian infrastructure required to serve new residents and workers.

19 On Expanding Travel Demand Management and Parking Strategies, we highly support CTR and TDM initiatives to expand new parking-related strategies. CTR and TMP programs must begin to evolve substantially toward smaller employers, residential buildings, and more innovative strategies. CTR, TDM, and TMPs must continue to innovate to encourage more biking and walking commute trips.

3.7-48

20 We agree that regional roadway pricing and increased funding for transit operations is critical under the Working With Partner Agencies section. We would like to see language added here regarding increased funding for bicycle and pedestrian infrastructure.

[4] http://www.seattle.gov/transportation/docs/LevyProposalBrochure%2052015WEB.PDF

3.7-48

21 We highly support the following statements under Pedestrian and Bicycle System Improvements:

> "Development codes could also be modified to include requirements for wider sidewalks, particularly along greenways and green streets, to promote walking and bicycling.
>
> "In conjunction with other funding sources, new private and public development could pay for a share of PMP and BMP improvements."

We would also like to see policy language discussing roadway repair post residential and commercial construction. This is a major issue for bicyclists who use damaged lower volume streets to connect to arterials.

3.7-48

22 On Speed and Reliability Improvements, we would like to see policy language about designing, planning, and constructing concurrent multimodal projects to save time and budget so that projects in the Bike Master Plan and Pedestrian Master Plan can be built more quickly.

3.7-48

23 We highly support all the strategies listed in the Travel Demand Management and Parking Strategies section.

3.7-50

24 The short discussion of SmartTrip programs in Whatcom County and Portland, OR is helpful. On the statement that Portland "program has been demonstrated to reduce the SOV rate of new residents by about nine percent." We would like to know in how many years Portland SmartTrip achieved this reduction?

3.7-50

25 We highly support all the Potential Mitigation Measure Implementation discussed in this section.

3.7-51

26 We question the Significant Unavoidable Adverse Impacts section of the DEIS. Bicycle and pedestrian travel is not mentioned here. However, the statement "while there may be short-term impacts as individual developments are completed (causing parking demand to exceed supply), it is expected that over the long term, the situation would reach a new equilibrium as drivers shift to other modes." This statement contradicts other statement discussed above that claim there will be little to no non-SOV mode shift in the next 20 years. We would like to see these incongruences cleaned up in the FEIS.

City Neighborhood Council

Neighborhood Planning and Land Use Committee (NPLU)
Draft Proposal to the CNC

June 18, 2015

Seattle Department of Planning and Development
Attn. Gordon Clowers, Senior Planner, 700 Fifth Avenue, Suite 1900
Seattle, WA 98124
Re: NPLU Comments on DEIS for Seattle Comprehensive Plan Update

The CNC's Neighborhood Planning and Land Use Committee (NPLU) members recently met on June 16 and offer the following comments and requests for further analysis in the Final EIS for Seattle 2035 Comprehensive Plan. [1]

DEIS GLOBAL ISSUE

1 During the scoping period, the requested the alternatives look at different growth assumptions, not merely different locations for accommodating one assumption (70,000 hh, 115,000 jobs) and we suggested that given the infrequency of these major updates, that the EIS look beyond 2035 to start the analysis of the next wave. This approach was rejected on the basis that the EIS would be testing the "worst case scenarios" which presumably meant if the 70K/115K predictions came to pass, that would be the "worst case." In September 2014, DPD released the Development Capacity Report which showed that the city has the capacity with no zoning changes, to accommodate 223,713 housing units and 231,745 jobs. While full build out is not likely to occur in every neighborhood, some areas could experience rapid redevelopment in excess of their assigned estimates as has happened Ballard and could create significant impacts not disclosed in the DEIS.

The FEIS should re-evaluate the environmental impacts that would be generated by achieving build out conditions or at least up to the 80% of capacity[2] under existing zoning. That would come closer to bracketing the potential impacts and ensure that this programmatic EIS does its job of addressing the worst case scenario. This would give decision makers a heads-up about the policy and investment choices needed to actually accommodate growth in Seattle.
Overall transparency of the environmental review process could have been improved if a draft of the Comprehensive Plan had accompanied the Draft EIS.

2 Descriptions, however detailed, of the 4 alternatives are not a substitute for the Plan itself which may introduce additional alternatives or combinations and specific policy language not addressed in the DEIS. Presumably this would be corrected in the Final EIS.

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[1] Note: These comments were prepared at the NPLU Committee's June 16 meeting after significant review of the DEIS. The DEIS comment deadline occurred between CNC meeting cycles, therefore this item will not appear on the CNC agenda until the June 29 meeting for consideration. The CNC has not taken any formal action on this proposal.

[2] The city's policy is to set growth targets no to exceed 80% of development capacity per the September 2014 Development Capacity Report.

LAND USE ELEMENT (Section 3.4)

3 **SEPA infill exemption** provisions are not clearly defined. At page 3.4-19, it states "...the density/intensity limits are not precisely defined at this time. However, they would be stated in terms that would allow for ongoing monitoring of density / intensity outcomes..." If, as also stated, they will be set by policy choices at a later date, how would the impact of this proposal be adequately evaluated? This should be clarified in the final EIS. Belief that city programs, rules and requirements will be sufficient to ward off significant adverse impacts may not be based on past performance.

4 **Removal of LU 59 and LU 60** are described as being acceptable because "very similar" land use regulations are in place for rezones to single family. While it is clear this will remove a step in the SF rezone process, it is unclear what other changes are intended, even though this is discussed at length in Alternates 2 and 3. On p 3.4-24, it states that "However, by removing approval criteria, it would provide more flexibility for zoning in single family areas and multifamily areas nearby, potentially allowing a greater variety of residential uses in and near SF areas." That is a very different concept than removing a procedural step or just letting the land use code execute "very similar policies." This creates uncertainty because the land use code is constantly amended, whereas the Comprehensive Plan is more stable. It seems clear that once the language is removed from the Comp Plan, another argument could be made that it cannot exist in the code without authorization in the Comp Plan.

Note that removal of LU59 and LU 60 appear to be called out for alternatives 2 and 3, less clearly for Alternative 4 and not called out for Alternative 1. But in the Policies section 3.5, it seems that it would apply to all alternatives. Please clarify. When the city mapped the urban village boundaries, a commitment was made not to remove SF zoning in all Residential Urban Villages. This appears to be inconsistent with the city's policies on engagement and outreach.

5 **FLUM** land use designation policy changes are only called out for Alternatives 3 and 4. Section 3.5 on Policies does not indicate that the proposal is limited to 2 of the 4 alternatives. **3.4-31.**
There is no discussion of impacts for this change in section 3.4. This needs to be addressed, as the predictability of land use will change dramatically for land owners within UC's and UV's. Currently land can be an investment with a known quality. Making it subject to policy decisions as to the "types and intensities of uses allowed in each type of village" and would only provide "a generalized indication of preferable types and patterns of future development in the respective villages" may indicate that predictability and commonly understood expectations are no longer relevant. Further analysis appears to be necessary.

6 **Mitigation Strategies** - No mitigation is defined for the conditions described on 3.5-15 first paragraph, adjacencies which potential cause adverse impacts. Mitigation should be explained. **3.4-35 and 3.4-36.**

7 **Significant Unavoidable Adverse Impacts.** The final summary assessment says "In addition, future growth is likely to create localized land use compatibility issues as development occurs. However, the City's adopted development regulations, zoning requirements and design guidelines are anticipated to sufficiently mitigate these impacts." That seems unlikely, as the city is experiencing these impacts today, under a slower growth model for the past 15 years, and the codes are not doing a good job at mitigating impacts. A start was made on this same page with improvements, but they do not address all the impacts mentioned throughout this section.

RELATIONSHIP TO PLANS, POLICIES AND REGULATIONS (Section 3.5)

8 **Growth Estimates.** The DEIS does not explain the rationale for no longer assigning growth estimates at all urban villages. Even if it is not required by the GMA, this practice was a foundation for acceptance of the urban village strategy along with policies committing to monitoring, reporting and mitigating problems when growth fell short of or in excess of that expected (or estimated). There appears to be so much land use policy change coming with this new planning cycle that tracking performance information will be essential to understanding how the policies are being implemented including to know if growth is being "directed" where desired. The Comprehensive Plan should continue to assign growth estimates at every urban village level and outside of urban villages. The Development Capacity Report has already provided the background for these estimates. Also note on page 3.5-1, the third bullet is confusing as it states a desire to both use and not use estimates /targets for "urban villages." If the intent was to eliminate targets for residential urban villages, we question this change in policy. At a minimum, we urge the city not step away from the current system until "the precise methodology and benchmarks that would be used to gauge the performance of UV's in place of numerical growth estimates" has been determined and accepted by affected neighborhoods. This methodology should be included as a mitigation in the FEIS.

9 **SEPA Categorical Exemptions.** The discussion at 3.4-19-20 is another reason that growth targets must be set for all urban villages. This EIS will be used to alter the thresholds for SEPA review based on "density and intensity" limits that are not yet defined. Presumably this categorical exemption would only be lifted in cases where growth has exceeded the ascribed targets. Thus if there are no targets, there would be no requirements for SEPA review of individuals projects regardless of their cumulative effects on any residential urban village. The potential for significant impacts under this SEPA loophole are great and should be evaluated in the FEIS.

10 **Proximity to transit.** Setting zoning (hard to change) based on transit service (easy to change) is a bad idea. If the two must be interrelated, the FEIS should address how that linkage would work. At a minimum, if linkages cannot be established, then mitigation factors should be included.

11 **FLUM Simplification.** The effects of "simplifying" the FLUM is not make clear. The rezone procedural steps that would be affected or effected by this change, and the underlying intent and potential impacts of this change on established zoning in each urban village needs further explanation in the FEIS.

PUBLIC UTILITIES (Section 3.8)

12 **SPU.** Overall the discussion of potential impacts to the water, sewer, and storm drain systems lacks the specificity for a decision maker to conclude that either the city has sufficient capacity to accommodate the projected growth or it does not. It particularly lacks analysis at the sector level, and certainly at the urban village level such that the acknowledged "localized impacts" are glossed over. These could be significant impacts, such as persistent sewer backups or flooding in some areas which would certainly be exacerbated by additional development. Similarly the proposed mitigation strategies of relying on current codes and regulations is unpersuasive given the city in currently under a consent order to resolve a long standing issue of noncompliance with combined sewer over flows limits. Figure 3.9-7 shows that the great majority of the city is served by sewers that are under 12-inch diameter and says these areas are "likely at or near their capacity." Please define the proposed mitigation or mechanism for upgrading nearly the entire collection system to handle 70,000 new households and numerous additional office buildings, and other commercial development to host 115,000 more jobs and the projected cost and financing for this expense. This is a social justice issue given the ever increasing utility rates changed by SPU and the extra taxes levied on those bills.

13 The discussion of water supply references a 20 year PSRC/OFM projection but does not explain what 20 year period this covers. Also there is **no discussion of the effects of climate change on water supply**. We are all

13 cont.

aware of the lack of snowpack and increasing periods of drought conditions. The FEIS should address the water supply issue in more detail both as it relates to drinking water and hydropower generation.
The DEIS states that, "Redevelopment that replaces existing impervious surface and provides flow control can reduce runoff rates even below current levels." What is not described is when development adds more impervious surface than previously existed on a lot and thus actually increased the amount of runoff and pollutants. The cumulative impacts to street flooding, and water quality degradation from 70,000 housing units and 115,000 jobs should be explored in much more detail. Please clarify the amount of displacement of pavement versus covering over of pervious open space and removing trees. The DEIS is silent.

14 **City Light.** Energy management strategies such as advanced meters monitor use but do not produce power to meet new demand. Hoping that people will buy more efficient appliances may not be sufficient mitigation. The FEIS should discuss more specifically the reliance on conservation versus generation or outside power purchases to meet the demands of the projected (or more) population and jobs growth. More details should be provided on the assumptions made in projecting industrial and commercial energy demand to create the 115,000 new jobs projected including if any of those are particularly energy intensive.

PUBLIC SERVICES (Section 3.8)

15 **Police.** The DEIS states on page 1-24, that "...population growth does not directly correlate to increased demand for police." While a direct correlation might be difficult to draw, it is obvious that an increased population/jobs of 120k/115k will put a strain on existing resources and would need to be addressed. Yet that statement is taken as a reason to not do any type of analysis of needed capacity increase.
Interestingly, the statistics for police response are expressed in terms of crime and response per 100,000 people. With the potential for 120K additional people, annual crime would most likely increase by over 616 for violent crime and over 5,030 offenses for property crime. The FEIS should provide more analysis of future need for police including what triggers a need to add personnel and precincts and where they might be needed.

16 The assumption made for the East and West precincts, in the two areas heavily targeted for growth in Alternatives 2- 4, were said to be at capacity, but the issue of housing potential additional staff is listed as "ongoing planning will help determine staffing and related facility needs, if any, in the coming year". The FEIS should provide more specific projections of need for police facilities under these two alternatives. This is related directly to the city's race and social justice initiative.

17 Police emergency response time is discussed and only 2 of the 5 precincts meet the response time goals, 2 have longer response times and 1 is not quantified. The possible reasons cited for the longer response times are larger geographic areas and congested arterials. The impact of traffic congestion is not discussed in the body of the DEIS but is buried in Appendix A-5, and a potential solution is to add officers. Response time for Fire and EMS is discussed in more detail, so it would be inconsistent to call out traffic as issues for one segment of Public Service but not to assume that another segment would have the same problem negotiating traffic.

18 Also missing from the entire discussion is the access to hospitals specifically, what will the growth conditions do to impact quick access to hospitals. If the fire truck arrives to a stricken person within the targeted response time yet the transporting EMS truck cannot get from the location to the hospital, we have failed in this essential life service.

19 **Fire and EMS.** South Lake Union, Broadview-Bitter Lake, Denny Regrade, Alki/Admiral and Rainier Valley fire stations are listed (3.8-13) as likely to experience greater demand but only the first two stations are addressed in section on impact mitigation strategies at page 3.8-34. This seems like an oversight.

20 The discussion of the impacts on emergency services across the four alternatives is inconsistent and perplexing. Alternative 1, which doesn't direct growth differently, lists greatest growth in SLU, but the Downtown UC residential growth estimate is more than double that of SLU (page 2-22). The assessment is "In such areas, this growth would result in increased service call volumes. In the worst case, this could

20 cont. contribute to slower average response times..." But then, in Alternative 2, where growth is actually direct to Urban Centers, the assessment becomes "could contribute to somewhat greater adverse impacts on fire and emergency service due to higher demand". So we went from a "would" condition to a "could" condition when the density is concentrated. In Alternative 3, the DEIS concluded "the increase in service demands in places including the Downtown and SLU urban centers...would be less than identified for Alternate 1" How can this be? The analysis appears to be incorrect.

21 The DEIS makes no mention of potential impacts to fire service for Lake City. A recent investigation of level of service (response time) and capacity for Engine 39 (single fire engine assigned to fire house 39) indicated that the total number of responses are increasing, and response times are increasing with the increased need to have other fire stations respond when Engine 39 was not available. This is all due to increased aid calls with no aid or medic unit assigned to station 39. The current zoning in Lake City and along the Lake City corridor both north and south is allowing the construction of 4 to 8 story apartment buildings which cannot be properly served by an engine truck. Continued growth in conjunction rapidly changing demographics will require an aid/medic unit and a ladder truck in order to provide adequate fire service in the near future and well before 2035.

22 The discussion of mitigation for fire and emergency services shortfalls is couched with words like "however, their responsiveness and ability to deliver services in certain ways could potential be constrained due to funding availability when competing for available resources to provide capital improvements, or when City decision makers decide how to allocate the available resources among potential improvements". This could be said of all public services and suggests that the FEIS should more clearly spell out what the expected added burdens on the general fund budget will be from the targeted growth and what additional tax revenues this growth will contribute to the general fund.

23 **Parks .**The DEIS acknowledges a shortfall of parks space, but does not clarify that it would require growing the parks system by 22% to achieve Comp Plan goals. The mitigation statement talks about striving for funding, but there is no analysis of where the city will find 1,400 acre of land to acquire or why we are still behind this target even after two large levies.

24 Specifically the FEIS should explain how the University District UC will meet its goals. Is this due to the UW campus being considered neighborhood green space? The FEIS should provide a reference to the campus master plan that shows changes that could reduce open space in the future if that is to be considered part of the urban center open space inventory.

25 The mitigation strategies for meeting parks and open space goals at 3.8-34 and 3.8-35 need further clarification. Please clarify this statement: "Update Comprehensive Plan goals and policies related to the acquisition of new park lands and development of usable open space within existing parks". The FEIS should be more specific to evaluate if the "mitigation measure" would actually mitigate.

26 The overall tone of the proposed mitigation is actually a watering-down of standards and substituting non-park facilities for actual parks and open space. This is how livability in Seattle will be further eroded. Unbelievably, after all the preceding discussion about the difficulty of meeting the Comp Plan Parks goals, it was determined that "no significant unavoidable adverse impacts to public service are anticipated from projected population and employment growth." This must be addressed in the FEIS.

27 **Schools.** The DEIS does not accurately reflect the current picture of school facility needs for Seattle Public Schools, now, or in the future. Seattle Public Schools' enrollment has grown substantially faster than expected over the past 7 years (~7,000 new students and ~22 schools added since 2007). In 2014, there are 1300 (3-4 schools worth) more children in SPS schools north of Downtown and in West Seattle than was expected in projections created in 2012. Enrollment for 2015 is already expected to be ~53,000, which is 2000 more than stated in the EIS. Population growth, housing development, and the implementation of the SPS Neighborhood Assignment are some of the impacts that have dramatically increased enrollment. Both the current status of SPS building capacity and the future impacts are not accurately or adequately portrayed.

Several issues should be incorporated into the Comprehensive Plan and FEIS:

28 1. The City and the District are now required by a motion of the Growth Management Planning Council to engage in cooperative planning for school facilities. The City's plan for implementation of this directive should be described.

29 2. The assumptions around where school children will reside as population increases, and thereby where schools are needed to be sited, needs further analysis. In recent years we have seen the greatest growth in schools located in single family neighborhoods.

30 3. The statements made about the number of school buildings available are already outdated when using 2010 or even 2012 enrollment projections or facility use data. This must be addressed.

31 4. Updated enrollment projections by neighborhood and school need to be completed in order to provide a more accurate picture of what is currently in use, and what will be needed through 2035.

a. WA state basic education law requires that classrooms for K-3 will need to be 17 students starting in 2017. The current projected capacity of schools use a factor of 24 or 26 students per classroom. Approximately 20 more school buildings will be needed to meet the state mandate for class size in K-3.

b. Contrary to the statement on page 18 of the EIS, the plan under BEXIV does not adequately provide capacity through 2020 even without accommodating K-3 class size reductions. (The District has stated this fact in public meetings.)

c. There is a resurgence of public school children in single family homes and neighborhoods, particularly North of Downtown and in West Seattle. Many schools are maxed out with 26 student classrooms (or more) with no room to add additional portables.

32 5. The City plans to build a Universal Preschool Program, and there is no plan for the siting or building of these preschool facilities.

TRANSPORTATION (Section 3.7)

33 **Screenline Methodology is Too Opaque**. Seattle is notorious for its traffic congestion and traffic delay is one measure of environmental impact that is most familiar to the majority of residents and employees working in the city. The Final EIS should therefore provide citizens and non-traffic engineer experts with a comprehensible tool to evaluate the impacts of the growth alternatives. The current Level of Service by Screenlines and Vehicle Miles Traveled per Capita (VMT/C) are metrics which conceal, rather than reveal impacts. VMT/C may be useful to compare major metro areas with each other but only dilute the fact that total vehicle miles traveled around Seattle will increase and that also increases greenhouse gas emissions from more cars taking longer to get to their destinations.

The FEIS should display the actual increase in peak volumes by the number of cars and the percent of increase over 2015 conditions as shown in the example below. The capacity and peak hour volume counts are taken from the Transportation Appendix for three screenline segments. This table allows the reader to comprehend the impacts of future traffic, either a modest increase or a huge one, and shows which segments will be over capacity (gray cells in this example.)

33 cont.

Compare peak hour increases 2015 to 2035 Table A.4-16 to A. 4-17							Alternative 2					
	Capacity		Pm Peak Hr Vol		Capacity		Pm Peak Hr Vol					
	2015				**2035**				# inc. count		% increase	
Screen Line Segment	EB/NB	*WB/ SB*	*EB/NB*	*WB/ SB*	*EB/NB*	*WB/ SB*	*EB/NB*	*WB/ SB*	*EB/ NB*	*WS/ SB*	*EB/NB*	*WS/SB*
1.11 Greenwood Ave	1940	1940	1120	840	1940	1940	1760	1210	640	370	57.14%	44.05%
1.11 3rd NW	770	770	470	380	770	770	800	650	330	270	70.21%	71.05%
1.11 Aurora	2100	2000	1680	1220	2100	2000	2420	1850	740	630	44.05%	51.64%
7.11 Fremont Place	1940	1940	690	930	1940	1940	810	1030	120	100	17.39%	10.75%
7.11 N 39th	770	770	570	680	770	770	580	730	10	50	1.75%	7.35%
7.11 N 46th	1540	1540	890	850	1540	1540	890	970	0	120	0.00%	14.12%
7.11 N 50th	770	770	420	650	770	770	580	730	160	80	38.10%	12.31%
7.11 N 65th	770	770	230	250	770	770	230	260	0	10	0.00%	4.00%
10.11 Alaskan Wy S.	1540	1540	430	680	2140	2040	730	1750	300	1070	69.77%	157.35 %
10.11 Viaduct / Tunnel	6080	6080	5190	5440	3940	3940	3960	3960	-1230	-1480	-23.70 %	-27.21 %
10.11 1st Ave S.	2040	2040	400	630	2040	2040	1240	1730	840	1100	210.00 %	174.60 %
10.11 2nd Ave S.	1540	1540	480	270	1540	1540	830	520	350	250	72.92%	92.59%
10.11 4th Ave S.	2920	1940	1350	1470	2920	1940	1350	1790	0	320	0.00%	21.77%

34 **Capacity Models.** The DEIS states that with the exception of the Ballard Bridge, all major arterials have sufficient capacity to absorb much more traffic in the peak hour. Given the congestion experienced during peaks today which now extend many hours of the day, this seem incredible. The mystery is revealed in the Transportation Appendix A.4-26 where it appears that the standard model for determining capacity has been "boosted" to give most of Seattle's signalized roadways an extra 20% capacity. An additional 30% capacity was assigned to the Fremont, University and Montlake Bridges. The justification is that SDOT adjusts the "green time" on signal lights to push more cars in one direction. In the FEIS, there should be a comparison using the national standards. The FEIS should also provide details on the impacts of maximizing green time in one direction (EB/NB) on the OTHER (WB/SB) direction where cars stack up on residential streets unable to get onto the arterial. The amount of diversion of cars from arterials to surface streets should also be considered. The FEIS should include information on when (year and season) and where the traffic counts were taken that were used in adjusting the capacity model. If statistically limited data was used, the FEIS should detail how the extrapolation to averages were achieved.

35 **Intersection Delay.** The FEIS should also include representative examples of levels of service as measured in intersection delay at key intersections such as Denny Way and 6th Avenue where Aurora Avenue exits into downtown. SDOT should select other key intersections in each of the sectors and urban villages for this analysis.

36 **Transit Ridership Modeling and VMT/C Assumptions.** Table A.4-14 2035 Transit Priority Corridors assumes that Corridor 11 (Ballard Downtown rail) will exist. This is not funded in either SDOT or Sound Transit's 6 year CIP so it should not be assumed in order to predict transit trips from this urban center.

37 The use of TrendLab+tool for estimating a reduction in vehicle miles traveled appears to be a rose colored glasses view and the FEIS should not rely on such speculation especially when predicting a decrease in vehicle ownership or predicting mode split. The FEIS should assume that existing conditions will continue in order to reveal a "worse case" scenario which a programmatic EIS should do. For example use current data on trends in vehicle ownership. According to information provided by the city budget office the number of cars in Seattle is increasing, not decreasing (imput from car tab revenue.) These increases may under report car ownership because a percentage of car owners do register their cars outside the city or King County to avoid paying extra fees.

2012 - 2013 ownership increased 1.9%
2013 - 2014 ownership increased 3.5%

38 **Transit Capacity Data is missing.** Transit ridership is shown to increase significantly however there is no estimate of the additional transit service that will be required to absorb this demand. The FEIS should include information on how much more service would be required either by sector, priority corridor, and citywide to achieve the predicted mode splits. The impact of additional transit service on arterial capacity should also be assessed and included in FEIS.

39 **Accidents and Other Delay.** Please define how traffic models account for capacity restrictions and delay due to any increased frequency of accidents, lengthy construction related delays or long periods of inclement weather. Page 3.7-43 A shows the potential for between 40%-70% increase in auto travel times which is significant and must increase GHG emissions. Table 3.7.5 excludes express lane volumes on 1-5 and I-90. This suggests that if express lanes are blocked or given over to transit in the future, that could push the mainlines over the "D" LOS measurement. This should be explored in the FEIS. The Aurora Bridge is described on page A.4-27 in Table 1 as having 3 uninterrupted lanes however this is not really the case in the AM peak when the western lane become a right turn to Queen Anne creating significant slowdowns and dangerous conditions, and in the PM peak, the eastern lane backs up at the 39th St. exit.

SOCIAL EQUITY

40 The Growth and Equity document related to the analysis of impacts due to displacement and restricted access to opportunity appears to be based upon demographics trends between 1990 and 2010 and do not acknowledge that there has been drastic change in Seattle's north end demographics which will have major implications for the implementation of this policy.

41 The FEIS should include a discussion on the potential competition for funding for needed infrastructure and social services between the proposed 130th St. rail station new urban village, and the existing Broadview/ Bitter/Haller Lake urban village and the Lake City urban village.

Thank you for considering these comments when preparing the Final EIS and the Draft Comprehensive Plan.

Sincerely,

Irene Wall

Cindi Barker, NPC Co-Chair
Irene Wall, NPC Co-Chair
CNC Neighborhood Planning and Land Use Committee

Note: These comments were prepared at the NPLU Committee's June 16 meeting after significant review of the DEIS. The DEIS comment deadline occurred between CNC meeting cycles, therefore this item will not appear on the CNC agenda until the June 29 meeting for consideration.
The CNC has not taken any formal action on this proposal.

June 18 2015

City of Seattle Department of Planning and Development
Attn: Gordon Clowers
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124
Gordon.Clowers@seattle.gov
And c/o 2035@seattle.gov

Re: Comments on SEPA DEIS for the Seattle Comprehensive Plan Update titled "Seattle 2035: Your City, Your Future."

Dear Mr. Clowers:

Thank you for the opportunity to comment on the above referenced SEPA DEIS. The policies to be adopted in this decision making process do indeed have the potential to significantly affect our city's future.

Assumptions

1 The Seattle 2035 DEIS addresses growth management issues. It is explicitly assumed throughout the document that growth will continue in an upward trajectory similar to that which has occurred in the past few years. This is an unwarranted assumption.

2 The relationship of the proposed actions to the GMA allocation of housing and population targets is complex and largely conducted away from the view of the public. This DEIS discusses those targets repeatedly but does not explain how the City obtained these numbers, or how they will be changed in the future. Worse, the DEIS states at p. 2-34:

> The City may at a later date in 2015, issue a Determination of Non-Significance for a set of amendments to the Comprehensive Plan on actions with 2015 deadlines or that are part of the 2015 annual amendment cycle, including:
> - Adoption of new citywide growth targets and updated inventories and analysis into the Comprehensive Plan as required by the state Growth Management Act (GMA).
>
> …

This premature SEPA determination is wholly inappropriate. Please remove it and instead include an explanation of the applicable law and policy, and how DPD plans to implement it, and how that action relates to the decisions made in the Seattle 2035 update.

3 Need to Assess Projections and Likely Impacts in Light of Past Performance

One of the biggest failures of SEPA has been the lack of monitoring the results of mitigation and other actions: Did projected changes in the natural and built environments come to pass as predicted? Were the impacts laid out in each EIS accurately assessed? Were proposed mitigation measures implemented and effective?

SEPA was adopted in 1971, almost 45 years ago. Seattle's land use planning and decision making has gone through the EIS process before. The answer to the above questions should be summarized so that both the City and its citizens will know what to expect from the current process.

4 One set of past City planning and policy actions that needs far more attention in this EIS is neighborhood planning. The City's failure to keep those plans updated and implemented is reflected in the paucity of references to them in the DEIS. The work of the Neighborhood Plan Advisory Committee that the Council hoped would revitalize the process a number of years ago is not mentioned. The concept at the core of Seattle's Comprehensive Plan—urban villages—was initiated in concert with the neighborhood planning process. The City cannot now expect neighborhoods to accept a continuation—with expansion under Alternatives 2, 3 and 4—of the one while the other has been wholly abandoned.

5 Range of Alternatives

There are no alternatives that reduce rather than increase impacts. DPD needs to include an alternative that has fewer impacts than the no action alternative, or at least include specific actions—such as concurrency policies—that would "significantly mitigate these impacts." WAC 197-11-440(6)(a).

6 Concurrency

Throughout the DEIS, mitigation measures are given for identified impacts. Mitigation largely consists of existing programs by DPD and other City Departments. Missing is **any** mention of the use of GMA "concurrency" policies to mitigate for impacts of future development facilitated by the proposed policy changes. WAC 365-196-840. Instead, DPD envisions the opposite—use of this EIS to exempt future projects from any further review. ("SEPA Infill Exemption Provisions (RCW 43.21c.229)—Future Possible Action," P. 3.4-19). This process will result in more impacts, not less.

7 Gentrification

Even though the word is never used, it is admitted in the DEIS that gentrification will continue to occur in Seattle. P. 3.6-20 et seq.; Section 3.6.4; Equity Analysis. It is admirable that DPD admits that "Seattle will face housing affordability challenges under all four alternatives."

Thank you for your consideration,

Toby Thaler
Fremont Neighborhood Council
Chair, Land Use and Transportation Committee
4212 Baker Ave. NW
Seattle, WA 98107
206 697-4043

Dear DPD,

1 Yes, Seattle is growing. Yes, it should increase its forest canopy and, if possible, natural area acreage. But, it also needs to reduce SOV dependency and increase community connectivity. And its citizens need hyper-local (within 1/8 mile) access to nature in a diversity of neighborhoods with a diversity of experience types. The concepts of new urbanism and biophilic cities allow humans engaging with/in and through urban nature to be compatible.

2 Within population dense urban environments, everyone benefits from regular access to nature, but not everyone can leave the city or travel a half mile or more to visit it. Many of our natural areas are not usable and when they are accessible, they are typically in more affluent neighborhoods. As the city grows, trail and boardwalk access INTO nature — not just on its perimeter — needs to be provided within the city. This will promote the following positive environmental agendas: less traffic, a healthier population, and less recreational pressure on rural natural areas that have high habitat value.

Access to nature in Seattle must be diverse: we cannot expect everyone to walk quietly and meditate in the woods. We must allow play areas for children, walking trails, bicycle trails, jogging trails, and ADA accessible trails for both motorized and non-motorized wheelchairs and accessibility devices. We also need to allow the city to be flexible and have a policy supporting pilot projects that are likely to be successful in order to maintain its innovation and promote the value and health of natural areas.

Please consider the valuable meta-benefits of access to nature on our citizens and regional natural areas as part of your policies.

Thank you,

Mary DeJong, Co-founder & Chair, Friends of Cheasty Greenspace/MtView

on behalf of the The Friends of Cheasty Greenspace/MtView

www.cheasty.org

Note: comment submitted via email on 06/18/2015

1 We agree with the statement made below by the Seattle Urban Forestry Commission and would like these to be part of the public comment record. We would also like to add to the discussion regarding canopy, to include mid-story shrub layers as well as ground cover vegetation and not only trees.

Thanks,

Darrell Howe – President
Friends of Frink Park
3211 S Washington St
Seattle, WA 98144

June 10, 2015.

Gordon Clowers
Department of Planning and Development
700 5th Avenue, Suite 2000
Seattle, WA 98124

RE: Comments on the Draft EIS for the Seattle 2035 Comprehensive Plan

Dear Mr. Clowers,

2 The Seattle Urban Forestry Commission wishes to address the following concerns about the draft Environmental Impact Statement (EIS) for the Seattle 2035 Comprehensive Plan.

1. Impacts on the Urban Forest due to Increased Density

The draft EIS does not evaluate the impacts on Seattle's urban forest by adding 120,000 new residents, 115,000 new jobs, and 70,000 housing units to Seattle by 2035. Only one page's worth of print out of the approximately 400 pages is devoted to potential impacts on the urban forest and it basically says that there is no problem because we have the Urban Forest Stewardship Plan and provisions in SMC 25.11. It is the Commission's view that this is not accurate. The draft EIS provides no direct or detailed evaluation of the yearly or cumulative loss of urban forest canopy due to development and growth and the associated impacts on air pollution and human health, noise, storm water runoff, wildlife habitat, open space, or heat island effects.

The draft EIS on p 3.5-11 states: The Urban Forest Stewardship Plan's goal's and the implementing regulations in SMC 25.11 would apply to development that occurs under all EIS alternatives and would help to mitigate for the potential removal of all trees and reduction of canopy cover with future development. In this respect, the growth patterns examined under all alternatives would be able to be implemented while remaining consistent with the UFSP's goals."

Unfortunately, there is no environmental analysis of the specific impacts or costs associated with canopy loss occurring during development. There is no analysis of how much canopy loss would occur and what the cost would be or who would pay for replacing canopy lost during development. The current City

2 cont.

Comprehensive Plan calls for no net loss of canopy. If the City does not know how much canopy is being lost through development it cannot accurately assess whether it is meeting the no net loss goal let alone gaining canopy each year.

The Urban Forestry Commission addressed this issue on the need for more detailed data from DPD on tree loss in a letter adopted June 25, 2014. http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/ADOPTEDDPDReportingLetter062514.pdf

The letter stated in part:

"The Commission has discussed several ideas to improve submittal documentation and final reporting for projects under DPD's permitting.

Currently, the City, through OSE and the Urban Forestry Interdepartmental Team, keeps track of the number of trees planted and removed on public property every year. The Commission recommends tracking trees lost on private property undergoing development to assist in determining where we are gaining or losing trees and canopy. This would add information to the overall city canopy coverage assessment data. By knowing more about canopy trends on different types of land, we can better direct policy and programming to ensure we are on track to meet our 30% goal.

• What would help the City better understand what is happening with tree canopy protection and enhancement is to require that all development projects submit an Urban Forest Canopy Impact Assessment prior to any construction project being approved. The Urban Forest Canopy Impact Assessment would include a map of the property with the trees numbered, canopy area of trees drawn, and trees to be removed clearly labeled. Under current guidelines it would minimally require that all trees 6 inches DBH (diameter at breast height) or larger be inventoried on the property. The suggested data points required would be:

Species: speaks to size of canopy and amount of storm water benefit.

DBH: speaks to age of tree and canopy coverage.

Tree Height: speaks to canopy volume and amount of environmental benefit.

Canopy Width (area): speaks to canopy volume and amount of environmental benefit.

Tree Condition: speaks to overall forest health and environmental impacts.

Photographs of the trees on the parcel and adjacent properties.

Canopy coverage as a percent of area pre- and post-project development.

· Landscape Plan Requirements could include calculations for percent canopy coverage at 20 years and soils volume provided for each tree.

2 cont.

· The annual UFSP Progress Report to the Mayor and City Council could include canopy coverage for different development zones.

Implementing some or all of these operational steps would greatly help to evaluate whether or not we are doing enough to reach our 30% canopy goal."

Inadequate Tree Protection in Current Code

A second issue is that the Commission believes that the current tree protection ordinance in SMC 25.11 is inadequate to meet the goals of achieving a 30% canopy by 2037. It has so stated in several letters to the Seattle City Council and Mayor, including the letter dated July 15, 2014. http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/ADOPTEDDPDOrdinancetoCMBagshaw071514final.pdf

In that letter the Commission stated:

In 2009, City Council issued Resolution 31138 instructing "…the Department of Planning and Development to submit legislation by May 2010 to establish a comprehensive set of regulations and incentives to limit the removal of trees and promote the retention and addition of trees within the City of Seattle on both private and public property…" >

We would like to reiterate the statement made in our August 2010 recommendation: Bold action, consistent with Resolution 31138, is needed to achieve Seattle's tree canopy coverage goal of 30% by 2037. And because the majority of trees in Seattle are in residential property, an updated tree ordinance is key to implement the 2013 Urban Forest Stewardship Plan as adopted by City Council last September.

DPD released a first proposal in 2010 and a second proposal in 2012. It is now almost five years since the Resolution and DPD is still working on a tree ordinance for trees on private property. There was a significant amount of time and energy invested by the community in this process. This length of time tends to frustrate the public as they look for guidance on tree measures.

We urge you use your leadership in Council's Seattle Public Utilities and Neighborhoods Committee to:

1. Encourage DPD to resume work on this important element of a comprehensive urban forestry strategy for Seattle with a more defined timeline than the one currently shown on their website.

2. To develop an improved public education and outreach approach that engages Seattle's diverse stakeholder communities.

3. Require a reporting of how the new proposal addresses the DPD specific elements of the Resolution:
a. The 15 elements of Section 1;

4. b. The four elements of Section 2; and

5. c. The section for requirements for institutions, City facilities, public facilities, and schools."

It is now another year later and there has been no further action on passing an updated tree ordinance.

2 cont.

3. Removal of the Current 40% Canopy Cover Long-Term, Aspirational Goal

The third issue the Commission is concerned with is that the Draft EIS said that the Seattle 2035 Comprehensive Plan would eliminate the City's long-term goal of a 40% tree canopy in the current comprehensive plan and replace it with the Urban Forest Stewardship Plan goal of 30% by 2037.

That seems to be the intent of the language on p 3.5-1 that says "Adjusting the quantitative tree canopy goal in the Environment Element to be consistent with the 2013 Urban Forest Stewardship Plan." That would reduce the current overall long-term goal of 40% in the Comprehensive Plan by 25%. There is no discussion of the impact of that change both in the short-term or long-term and the ability to pursue a 40% aspirational goal after 2035. A long-term goal of 40% canopy cover and a 2035 goal of 30% canopy by 2037 is a step toward that larger goal.

The Commission addressed the issue of the long-term canopy goal of 40% in its comments on the current Comprehensive Plan in a letter dated May 11, 2011.

http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/AdoptedCompPlanUpdateRecommendation051111.pdf

The language proposed by the Commission was adopted by the Seattle City Council and is in the current Comprehensive Plan under ENVIRONMENT ELEMENT H Seattle's trees E23:

"Achieve no net loss of tree canopy coverage, and strive to increase tree canopy coverage to 40 percent, to reduce storm runoff, absorb air pollutants, reduce noise, stabilize soil, provide habitat, and mitigate the heat island effect of developed areas."

Additional comments

The 2013 Urban Forestry Stewardship Plan is not listed in the references.
http://clerk.seattle.gov/public/meetingrecords/2013/plus20130911_18d.pdf

The benefits of trees mentioned on p 3.5-11 under the heading Urban Forestry Stewardship Plan fails to mention a number accepted benefits of trees including documented health benefits of a healthy urban forest; reducing storm water runoff; impacts on wildlife habitat; and impacts on birds, insects, other animals and associated plants.

In summary, the Commission believes that the draft EIS does not address a number of impacts that could be caused by the different growth scenarios as a result of tree canopy loss from increased development. Much more analysis is given to view impacts and noise impacts while ignoring potential significant impacts caused by increased tree canopy loss.

SMC 25.11 is seriously outdated and needs updating like many other cities including Portland, Oregon; Lake Forest Park, WA; Atlanta, GA; and Vancouver, BC have done to protect and increase their green urban forestry infrastructure. So called protection of exceptional trees under SMC 25.11 is based on a complaint system and is unfortunately not protecting exceptional trees.

2 cont. The Urban Forest Stewardship Plan cannot address reaching a 30% canopy goal without adequate information as to the amount of canopy that is being lost during development. The Commission recommended DPD to implement an Urban Forestry Canopy Impact Assessment for all their projects and so far has not responded to the Commission's letter of recommendation or indicated any intention to do so.

And eliminating by oblique reference the long-term, aspirational canopy goal of 40% as adopted by the Seattle City Council in the current Comprehensive Plan without any discussion of its impact on Seattle's future urban forest is unacceptable. The long term 40% canopy goal should remain in the plan and reference that the 30% goal by 2037 is a stepping stone to the larger goal and not the final goal.

Thank you, for the opportunity to comment.

Sincerely,
Leif Fixen, Chair
Steve Zemke

Note: comment submitted via email on 06/17/2015

1 The Friends of Seattle's Urban Forest wants to express its support for the comments submitted by the Seattle Urban Forest Commission. They can be seen here: http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/ADOPTEDCompPlandraftEISLetter.pdf

We agree that removing the aspirational long term goal from the Comprehensive Plan of 40% canopy cover is wrong. A 30% goal by 2037 is a step toward that 40%. The Seattle City Council voted twice to support a 40% long term goal in the Comprehensive Plan and no reason is given for removing it and no analysis is given as to the impact on Seattle's urban forestry canopy or the cost to the city in terms of green infrastructure services in the future if it is removed. What is the long term impact and infrastructure cost of reducing the urban forest canopy goal from 40% to 30%.

2 It is erroneous to state that SMC 25.11 and the Urban Forestry Stewardship Plan are adequate to ensure that a 30% canopy goal can be reached by 2037. No analysis has been done as to the loss of canopy and trees in the urban forest caused by adding 70,000 housing units and 120,000 new residents and 115,000 new jobs. Canopy is lost during development but the Department of Planning and Development unlike other city departments is not doing a tree inventory and canopy loss assessment during development. The Seattle Urban Forestry Commission has asked DPD to perform and tabulate an Urban Forest Canopy Impact Assessment on all development. Without accurately knowing what is being lost and what is being replaced it is impossible to do an accurate assessment whether we are gaining or losing canopy. What would be the cost of DPD doing a canopy impact assessment on development projects as recommended by the Seattle Urban Forestry Commission?

3 Seattle's current tree ordinance SMC 25.11 does not require permits to remove trees, require replacement for most trees removed, require notice to remove trees and allows 3 trees to be removed every year on private property. It says exceptional trees can not be cut down unless a hazard tree but only operates on a complaint basis which is not working. Other municipalities have much stronger tree protection ordinances. Exceptional trees are removed without any tracking occurring. The system is not working.

4 There is no analysis of the impact that increased growth will place on Seattle's urban forest and to say that the current system will handle increased tree loss from growth impacts has no basis to back it up.

5 Seattle is not now on track to meet it's 30% canopy goal and increased development makes it even less likely. As noted in an analysis the Friends of Seattle's Urban Forest made last year (http://friends.urbanforests.org/2014/07/08/can-seattle-reach-30-tree-canopy-goal-2037/) based on data for tree replacement done by Portland , Oregon we are not on track to reach 30%.
The analysis states that "12,414 new average medium size trees need to be planted in Seattle each year to reach a 30% canopy goal by 2037. This assumes each year there is also no net loss of canopy as the baseline and that 100% of the planted trees survived which is unrealistic.. These trees are in addition to replacing any lost during development or removed from private property or removed in the public sector like street trees or park trees." Current tree planting are only about 2000 -3000 at most that are documented.

So the question for this EIS is how many trees and what amount of canopy will be lost during development of 70,000 housing units?

How many trees and what size will be replaced for the trees lost?

5 cont. How much building will occur for the 115,000 jobs and how many trees and what amount of canopy will be lost?

What amount of canopy and trees will be replaced?

What will be the cost for replacing canopy lost to development?

Who will pay for replacing the lost canopy and trees?

6 The Plan calls for adding 1400 acres of open space to the city. Where will this open space come from, what will it cost and who will pay for it?

Overall again and again the plan optimistically states that we can address all the increased growth. Yet just on roads everyone know it takes a lot longer to get around the city than just a few years ago based on the recent growth we've had.

7 As long as current residents have to continue pick up the costs for increased growth through higher taxes on property Seattle becomes a much less livable city and forces out lower income people who can't afford higher housing costs. There is a need to implement developer impact fees to pay for low income housing, road repair, public transit, schools and other impacts on basic city infrastructure. What are the projected costs of providing increased city services over the next 20 years and how much more can residents expect to pay in increased costs if developers are not required to pick up the increased costs due to growth?

How much can we expect property taxes and utility bills to increase to pay for these added infrastructure service needs due to the projected growth if developers to not pick up the costs for growth so that growth pays for growth?

What will be the projected median price for a home in 20 years and what impact will the increased growth have on that cost?

How much can we expect rents to increase over the next 20 years with the projected growth over what they would be without the projected growth?

8 The draft EIS needs to do a better job of projecting the costs associated with growth. Right now it just seems to say over and over that there is no problem and that we will do just fine. That is not acceptable and doesn't provide a realistic assessment to Seattle residents of the potential cost of the projected growth.

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Note: comment submitted via email on 06/18/2015

25 YEARS futurewise
Building Communities & Protecting the Land

Letter No. 13

June 18, 2015

City of Seattle Department of Planning and Development
Attn: Gordon Clowers
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124

Re: *Draft Environmental Impact Statement* & *Growth and Equity Analysis* for the Seattle Comprehensive Plan Update

Dear Mr. Clowers:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Seattle Comprehensive Plan Update's Growth Alternatives. Futurewise works to ensure that Washington State's cities are vibrant, equitable and healthy. Creating great cities takes coordinated action at various scales and through public and private market actions.

The sustainability of our cities – as measured by both the quality of life they provide today, and the long-term environmental protection they promise to future generations – will determine the success of our region. Considering the host of social and environmental challenges we currently face – including global warming, air quality concerns, water quality, food and energy security, poverty and declining social equity – our communities must be part of the solution.

1 Recent growth in Seattle has proven there is demand for compact, complete communities. Ultimately, the Urban Village strategy has been successful in locating growth in our centers and villages. Now, it is time for the City to commit to a renewed focus on how to continue this pattern in a more equitable, distributed way to avoid continued disparity in levels of service and outcomes based race, ethnicity, language or geography. For this reason, we do not believe Alternative 1 is a viable strategy to achieve the core values identified by the City.

2 The attached table summarizes the potential impacts of Alternatives 2, 3 and 4 on five outcomes which are critical to supporting health, equity and the environment in Seattle. These components have been chosen because of their multiplier impact and relationship to other identified outcomes and include:

A. Prevent displacement and increase access to opportunity,
B. Maximize opportunities for equitable development throughout the city,
C. Take proactive action to achieve climate and environmental resiliency,
D. Integrate planning, design, investment, and implementation to deliver holistic placemaking, and
E. Balance community benefits and burdens through growth, goals, policies, and investments.

As shown in the table, no one Alternative provides a total solution to the challenge of growing equitably and sustainably – all have both positive and negative outcomes.

3 Of the alternatives presented, Futurewise supports **an amended Alternative 4: Guide Growth to Villages near Transit** because it provides the best opportunity to leverage our past investments, support transportation choice, and produce diverse and affordable housing. However, Alternative 4 places more growth in areas with high risk of displacement. We are asking the City to expand the number of villages targeted for growth to place more growth in high opportunity areas, as well as to

3 cont. ensure that there are programs, policies and investment strategies included in the plan that will address displacement risk and ensure that all Seattle residents will benefit from future growth and change. These strategies should include aggressive affordable housing investments, protection for locally-owned businesses and better support for our most vulnerable families.

Additionally, there is analysis and information which impacts these outcomes that has not been fully explored in the Draft Environmental Impact Statement. Before a preferred alternative is chosen, we urge you to consider and expand on the following:

4 1. **Give equal consideration to health and equity impacts.** While the DEIS considers environmental impacts and some quality of life impacts, health and equity is a critical component for the future of our city. While not legally binding, using the Equity Analysis in the same way that the remainder of the DEIS is used is the only way to achieve the core value of Race and Social Justice. This equity lens should go beyond displacement to analyze other areas of disparity such as, jobs, health, food access, transportation choice and safety, education and adjudication.

5 2. **Target additional high opportunity neighborhoods for growth.** As demonstrated by the Equity Analysis, opportunity is not equally distributed throughout Seattle. None of the alternatives fully capitalize on the potential benefits of targeting additional growth in these high opportunity areas. The preferred alternative should include a broader distribution of growth which targets existing high opportunity areas.

6 3. **Include a greater focus on the total impacts of growth.** The DEIS in general does a good job of comparing the relative impacts related to the different alternatives. However, the DEIS is deficient in identifying the overall impacts of growth independent of alternative. These absolute impacts are critical in terms of policy development and mitigation. This approach does not sufficiently capture the overall impacts we will see with 120,000 new residents in demand for housing, transportation, and other critical facilities and services. Our city's ability to absorb this growth requires mitigation of these total impacts regardless of alternative.

7 4. **Analyze economic displacement risk**. Vulnerable communities are not only negatively impacted by residential displacement. Individuals and communities are affected by business and job loss when an area experiences high growth, redevelopment and changing demographics. As areas gentrify, it is hard to retain commercial viability when the historic customer base is displaced or when rising rents and redevelopment make a neighborhood unaffordable for a locally owned business.

8 5. **Maintain the goal of homeownership and incorporate the impact of the alternatives on homeownership**. The DEIS states that homeownership is an "outdated" goal and therefore no longer needs sufficient in-depth analysis or mitigation. In Seattle, there is significant disparity in homeownership by race and ethnicity, and this disparity is increasing rapidly. In 2013, 51% of white households owned their homes, while only 25% of Black or African American households owned their homes. From 2000 to 2013 the rate of black homeownership in the city decreased over 10 percentage points. Other communities of color have similarly disparate rates of homeownership, such as 22% of Native Hawaiian and Other Pacific Islanders, 18% of "other" races and only 25% of

8 cont. Hispanic or Latino households. This is critical because homeownership is an important strategy to increase the stability, wealth and financial security of some families. Dismissing this as a goal or focus of analysis while this disparity exists is unacceptable.

9 6. **Explore neighborhood jobs/housing balance.** Much of Seattle has not seen the economic growth and prosperity of neighborhoods like South Lake Union and Downtown. Residents in many neighborhoods have repeatedly expressed the need for economic development and increased jobs in their communities. This expands economic opportunity for all and reduces commute distances and trips. The DEIS does not adequately address the geographic distribution of job growth by alternative and provide mitigation strategies which will improve economic conditions in those areas which have not participated in our recent economic growth. All jobs are not the same; beyond the number of jobs, understanding the industry or job type related to skills and wages is critical to ensuring that all villages have a diverse and viable job base.

10 7. **Need a housing choice analysis.** As with jobs, not all housing units are equal. A diverse population needs diverse housing stock, in terms of affordability, size, and neighborhood amenities. For example, communities of color typically have larger family sizes and without producing these units, the City will continue to displace these families and be unable to attract and retain a diverse population. A more detailed view of the impact of these alternatives on the type and affordability of new housing units is needed.

11 8. **Recognize and account for a wider range of community assets.** Many low-income neighborhoods develop rich social networks with cultural, social and religious ties to support one another and provide needed services such as childcare, transportation and support mutual political and civic engagement and economic development. These networks are critical for low-income populations to survive. Disrupting these activities through displacement can be devastating for families with limited resources. Acknowledging and accounting for these types of community assets and the impact of growth and displacement on them should be included in the DEIS.

12 9. **Expand the earth and water analysis to include impacts on public health.** The DEIS examines growth impacts on air quality, natural systems. The linkage between these impacts and public health should be more explicit. As the air quality assessment acknowledges the link to cancer risk, other health impacts of environmental quality should also be included.

13 10. **Revise transportation impact models.** As the City choses a preferred scenario for the Final Environmental Impact Statement, the transportation impacts should be calculated using more up-to-date travel behavior which better accounts for recent trends in mode-split and other transportation factors.

14 11. **Recognize a variety of placemaking typologies for Urban Villages.** Updating the FLUM designations and zoning codes to produce greater clarity and flexibility should be explored. However, many residents feel that all new development is too similar and that the unique character of Urban Villages are being diminished. Ensuring that any streamlined development regulations protect and respond to these variations should be prioritized. Additionally, examining growth

14 cont. impacts on Urban Village historic and cultural resource including structures, vistas and institutions should be added.

15 12. **Expand monitoring of growth by village**. Currently, the City monitors housing and job growth towards targets by Urban Center and Village. As the city continues to grow through infill development, it is important to track capacity utilization, not just progress towards the growth target. This should be supplemented with annual updates with detailed demographic and economic data by village to measure progress towards growth targets, total capacity utilization and to monitor for any potential adverse impacts like displacement. This information should be used to adjust policies, prioritization and investment to respond to changing conditions on a more regular basis.

16 13. **Explore impacts to other government services such as the departments of Planning, Housing and Neighborhoods.** As the DEIS looks at the impact of growth on our schools, parks, public safety, utilities and other services, the DEIS should examine the need for other government services. As demonstrated over the past twenty years, providing neighborhood planning city-wide has been difficult to accomplish and maintain. Targeting growth in a wider-range of geographic areas will require more planning and implementation resources which should be considered and mitigated.

17 The DEIS and Growth and Equity Analysis have gone a long way in addressing the challenges that our city is facing in a robust way. Overall, we feel that the DEIS and Equity Analysis are useful documents which will help Seattle prepare for future growth and address long-standing service gaps. It is a sophisticated analysis that highlights some of the different experiences across Seattle in services, risks, and opportunities.

We feel, however, that the analysis can be expanded and improved in the ways listed above. We ask that you consider these additional items for review as you develop the preferred alternative and set the policies and goals which will implement the preferred alternative.

We recognize that there is no perfect alternative and that with growth comes risks, burdens, and unintended consequences. At the same time, there is great potential for benefit through growth and investment and it is possible to share these benefits equitably. Selecting a targeted growth strategy balanced with mitigation efforts and the right goals and policies will ultimately help the city achieve equity and sustainability goals while ensuring a better quality of life for Seattle residents and employees.

Thank you for your consideration. We look forward to continuing to work with city staff and the public to integrate health and equity into Seattle2035.

Sincerely,

Spencer A. Williams, AICP, Assoc. AIA
Urban Designer and Planner

Growth Alterative Impacts on Health & Equity Priorities

	Alternative 2	Alternative 3	Alternative 4	Additional Analysis Needed or Other Considerations.
A Prevent displacement and increases access to opportunity	Alternative 2 concentrates growth into the urban center which takes away commercial and business from these areas as business is replace. Reliance on mid-rise and high-rise development increases demand for older units in cheaper development types will go up as the market prices out the urban centers. Benefit to transportation costs does not outweigh increased housing costs.	Focus on station areas, light rail disproportionately burdens areas at risk of displacement, especially the areas with lower densities that are currently more affordable and have family-friendly housing.	Focus on station areas, light rail disproportionately burdens areas at risk of displacement. Increases the potential for additional development in areas outside of existing station area. Alternatives 3 and 4 can be mitigated for these risks and present strong opportunities to provide stability in areas well served by amenities.	Develop an economic/job displacement risk and attempt to quantify its role in community stability and needed mitigation. Homeownership is dismissed – one of the areas with the highest disparities. Must be dealt with, have increased equity and wealth and benefits. More jobs should be concentrated in a variety of village typologies to maximize household-job colocation. Short trips have benefits in health, VMT, and mode choice.
B Maximize opportunities for equitable development throughout the city	Alternative 2 does not take full advantage of transit infrastructure. Ignores single family high opportunity areas from growth. The market trend has not seen a great diversity of unit sizes and number of bedrooms in these construction types. As a result, housing diversity may be limited.	Takes full advantage of station areas for growth, but leaves out some areas that are well served.	Takes full advantage of station areas and expands target areas for growth along frequent transit. This leads to greater choices throughout city, provides greater diversity of housing types, and increases supply of land for development which can lower cost and increase access.	Areas with high access to opportunity but limited housing capacity should be considered for additional villages. Need housing types that the market is not producing. Identifying assets in high risk areas. Dismissive of concentrated pockets of poverty and communities or color – Have not fully assessed the value that exist in areas – childcare, reasons to cultivate or celebrate these areas.
C. Take proactive action to achieve climate and	Focus on core limits vehicle trips, smaller units, new construction is more energy efficient. Reduces impacts on tree canopy in other city areas.	Positive influence on mode-split. Creates more walking trips by locating housing by transit and neighborhood commercial development.	Takes from benefit Alternative 3 and applies them to more areas.	The relationship between air quality, natural system function, and noise with the growth and changes to the built environment should be more predictive to assess degree of mitigation anticipated on infrastructure and human health. Transportation modeling should include most up to date travel behavior information. Does not predict increase in mode split in spite of recent trends.
D. Integrate planning, design, investment, and implementation to deliver holistic placemaking	In order to deliver growth there, have to be a substantial level of planning coordination and investment – focuses planning and investment in smaller, more heterogeneous areas. Drains resources from other areas.	Focused on and tailored to station areas. A more focused geographic scope likely assists in the delivery of high-quality, high-functioning station areas that foster complete communities.	A broader geographic scope could mean greater distribution of planning and investment resources. The strength of market forces may assist the city in focusing planning and investment in underperforming areas to stabilize against the risk of displacement and increase baseline level of service in areas that have been historically underinvested in.	Future Land Use Map (FLUM) designation should reflect the different placemaking typologies; however, careful considerations must be given to recognize different geographic needs including displacement risk to respond to community character and market forces. Growth estimates should be replaced with full capacity reporting for all villages and areas outside villages. Actively monitor village and city-wide growth in terms of permits, demolitions rents and sales will help guide citywide investment and guide policies for changes to market forces.
E. Balance community benefits and burdens through growth, goals, policies, and investments	Focus on urban centers are well located to service communities across Seattle, are ultimately restrict effectiveness. Do not have proximity to priority populations to influence health and equity through housing development, transit development etc. While city wide indicators may increase, other places will not benefit and disparities will likely increase.	Capitalizing on existing transit investment and leveraging to increase access to opportunity & amenities expands performance throughout the city.	Capitalizing on existing transit investment, leveraging to increase access to opportunity & amenities expands choices throughout the city. Distributes growth in a way that puts more people in more types of communities – greater diversity in lifestyle choice, density, and distributes benefits in close proximity which gives more choice for goods and services.	Consider planning resources in the same way you consider fire, schools, police, and other services. Many neighborhoods have reached out for planning attention to respond to outdated plans, growth and new opportunities though the city has limited resources. View elements of the DEIS through a health an equity lens. One example is crime. While there may be a loose correlation between growth and increases in crime, there is a disparity in how the criminal system impacts communities of color. This disparity should be addressed.

Dear City of Seattle,

1 Thank you very much for inviting our comments for your Draft EIS. The residents of Haller Lake Community appreciate the forward-thinking leadership that this city exhibits. Please consider the following concerns that our community has concerning the Seattle 2035 plan.

Questions and Concerns:

Bitter Lake Urban Village is the existing commerical/mixed use zoning space. This area also has been associated with a number of violent crimes (shooting and stabbing) in the recent years, and is very close to our neighborhood. The Haller Lake Community is concerned that this type of criminal activity is attracted by the commercial/mixed use activity, and that the future plan will exacerbate the problem of violence. We would like to see the EIS include a plan to handle criminal activity within this commercial/mixed use zone.

2 Haller Lake is a community not mentioned at all in the DEIS. What does it mean for those communities not mentioned in the plan? Many existing residents of Haller Lake are very concerned that the City of Seattle will rezone the neighborhood to a higher density development capacity smaller than the current zoning of Single Family 7200. The residents of Haller Lake are extremely against the idea of building denser housing in our neighborhood.

3 How will street use be changed as a result of this plan? Our neighborhood is already combatting unsafe uses of residential streets. If changes are made, we need the plan to include safer street use. Again, residents worry that growth in hubs/villages will negatively impact street use in the residential spaces not mentioned in this plan. We request that the EIS include language addressing street use and traffic safety in zones neighboring the targeted locations of change.

4 The residents of Haller Lake recommend that the "Potential New Village" at I-5 exit NE 130th St. under Alternative 3 should only be considered if a Light Rail station is built at 130th. In other words, the "Potential New Village" at 130th should be a consideration for Alternative 2, NOT Alternative 3.

5 On page 2-28, it says: "Alternative 3 would also generalize land use designations in the urban centers and urban villages to provide greater flexibility, consistent with the intent and function of the specific urban center and village, in place of the more specifically defined Future Land Use Map designations." What does that mean,specifically? How does that impact us?

Comments on Alternatives 1-4:

6 Alternative 1: Bad idea. That will contribute to uncontrolled sprawl and Seattle will become one of the worst cities to live in America. Please don't do it.

7 Alternative 2 & 3: Great idea-- reducing traffic problems and placing heavy use of foot traffic and existing light rail infrastructure (more would need to be said about bike infrastructure). Having lived a number of years in major European and Asian cities, I value the opportunity to expand commercial use of the urban village space, because that means people can have access to basic needs in urban villages (hair cuts, groceries, dry cleaning, etc). To make Seattle a world-class livable city, I recommend that the 2035 EIS include a plan to increase land-use for outdoor public spaces near commercial areas (as part of the commercial zoning requirement), such as wider sidewalks for benches, outdoor coffee shop seating,

7 cont. sculptures and other artworks, etc. There has been a lot of research done relating the open public spaces and mental health and social cohesion. (Please see additional resources below.) Furthermore, many European cities-- large and small-- have eliminated the option of driving personal vehicles into the center of the city (core of downtown) to reduce traffic risks and enhance the public space for people to mingle (community building). This has been successfully done by building a number of public parking structures on the outskirts of the city center so people can park their car and walk the rest of the way within city center. I would like to see Seattle become a healthier city, where people can walk to their destinations and enhance the social cohesion between individuals, rather than fighting against each other while merging lanes or for a parking spot.

8 Alternative 3: Bad idea by itself, but might be a good idea if there is a mixed option of Alternative 2+3. Growing the periphery without growing the centers will further isolate communities from one another and further exacerbate the traffic and/or public transit shortage problem we currently have.

9 Alternative 4: I personally have a lot of concern for this one, because the transit system as it exists currently is highly dysfunctional and fails to meet current demands. Its trajectory for the future doesn't look promising either. Building housing infrastructure based on a dicey transit infrastructure is very risky.

Additional resources:
Human Dimensions of Urban Greening | www.naturewithin.info/
Green Cities :: Good Health | www.greenhealth.washington.edu
Green Cities Research Alliance | www.fs.fed.us/pnw/research/gcra/

Thank you for taking the time to hear our concerns.

Sincerely,
Joanne Ho, PhD
Board Member and Traffic Safety Liaison
Haller Lake Community Club

Note: comment submitted via email on 06/18/2015

HISTORIC SEATTLE
Educate Advocate Preserve

June 18, 2015

Gordon Clowers, Senior Planner
City of Seattle Department of Planning and Development
700 Fifth Avenue, Suite 1900
P.O. Box 34019
Seattle, WA 98124-4019

Re: Seattle 2035 Draft Environmental Impact Statement

Dear Mr. Clowers:

Thank you for the opportunity to review and provide comments on the City of Seattle's Comprehensive Plan Update, Draft Environmental Impact Statement (DEIS). *Seattle 2035: Toward a Sustainable Future* provides a vision and roadmap for accommodating Seattle's growth over the next 20 years, *while preserving and improving our neighborhoods*.

As a Preservation Development Authority and the only citywide nonprofit dedicated to protecting Seattle's architectural heritage, Historic Seattle has significant interest in the future development of the city and the role that historic places play in fostering a more livable environment.

We offer the following comments:

1

Historic preservation tackles many of the objectives (**Section 1.2**) laid out in the DEIS, among them:

- Leveraging growth to create housing choices and to promote healthy, complete communities
- Creating jobs and economic opportunity for all Seattle residents
- Becoming a more climate-friendly city
- Distributing the benefits of growth more equitably

Preservation and creative adaptive reuse of our existing building stock cuts across all four core values of the Comp Plan including *Community, Environmental Stewardship, Economic Opportunity, and Social Equity*. Historic places are important to our societal memory, community diversity and character, economic vitality, and environmental stewardship:

Preservation enhances community vibrancy and cultural identity. Historic buildings in older neighborhoods help define the sense of place or personality of cities. These buildings lend vibrancy to communities and play a vital role in contributing to the livability of cities and health of local economies. Additionally, older neighborhoods with a mix of buildings have much higher Walk Score and Transit Score ratings, and contain hidden density.

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1 cont.

Preservation is an economic driver. Investing in historic buildings sparks economic revitalization and acts as a linchpin in neighborhood development. A study by the National Trust's Preservation Green Lab, *Older, Smaller, Better: Measuring how the character of buildings and blocks influences urban vitality*, provides clear and powerful data that older buildings draw a higher percentage of non-chain shops, restaurants, and retailers than new neighborhoods.

Preservation conserves resources. Rehab of existing structures reduces waste and saves energy. Approximately **25%** of the material in landfills is demolition and construction waste. Building reuse almost always offers environmental savings over demolition and new construction. Life spans for new buildings are often **30-40 years** vs. more than **100 years** for most historic structures.

Preservation contributes to social equity. Rehab investment is often made in culturally and economically diverse communities. The Preservation Green Lab's research shows that neighborhoods with a smaller-scaled mix of old and new buildings host a significantly higher proportion of women and minority-owned businesses. Reusing our historic building stock – whether it's an old warehouse, school, or former church – provides much-needed, creative spaces for housing, arts, offices, and community centers.

2

The DEIS summary (**Section 1.1, Proposal**) states that "All Comprehensive Plan elements will be reviewed and updated as part of the proposal." The DEIS analyzes the Comp Plan elements of *land use; relationship to plans and policies; transportation; population, housing and employment; public services; utilities; earth/water quality; air quality and climate change; and noise*.

However, the DEIS does not provide any assessment of potential impacts related to the following Comp Plan elements: *Economic Development, Neighborhood Planning, Cultural Resource, and Urban Design.* Nowhere in the DEIS is historic preservation mentioned. Will these other elements be addressed as part of the Comp Plan update?

3

The **Environmental element** addresses environmental stewardship, one of the core values of the Comp Plan and Washington's Growth Management Act (GMA). Environmental stewardship is primarily defined within the context of the natural environment and not built environment. **SEPA defines the elements of the environment (WAC 197-11-444) to include both the natural and the built environment.**

4

The DEIS examines *Construction-related Greenhouse Gas Emissions* (**3.2-19**) as it relates to demolition and construction equipment, such as trucks used to haul construction materials to and from sites, and from vehicle emissions generated during worker travel to and from construction sites. The environmental impact is estimated to contribute 22 million metric tons of carbon dioxide emissions from construction activities over the 20-year period. It mentions the City's Climate Action Plan (**3.2-8**), which focuses on city actions that reduce greenhouse gas emissions. Building energy and waste, along with transportation, comprise the majority of local emissions.

The greenhouse gas emissions analysis does not take into consideration the environmental impact of preservation vs. demolition of existing building stock. Recent research on the life-cycle environmental impacts of new construction (in terms of energy, carbon, water, materials, toxicity, etc.) shows that it takes decades for the greenest new building to pay back these up-front costs.

Historic buildings contain significant embodied energy – the amount of energy associated with extracting, processing, manufacturing, transporting, and assembling building materials. Reusing a 5,000 square-foot building saves a level of carbon equal to the amount consumed by 85 homes in one year (Athena Institute).

4 cont. Climate-related goals and policies are incorporated within the existing Comp Plan's Environmental Element (**Appendix A-1**) and includes a policy for establishing energy efficient standards for both new and existing buildings (**Policy E15.6**).

5 **The overwhelming emphasis is on creating high-performance new buildings, with little emphasis on encouraging high-performing existing buildings. Shouldn't the City develop policies that leverage the value of existing buildings toward achieving sustainability goals?**

Section 3.4 of the DEIS addresses physical land use (patterns, height, bulk, scale, and compatibility.) All alternatives would focus the majority of future residential and job growth in urban centers and urban villages, and would result in "generalized increase in building height and bulk and development intensity over time, as well as the gradual conversion of low-intensity uses to higher-intensity development patterns." The DEIS states that no mitigation strategies need to be defined and that the City's development regulations, zoning requirements, and design guidelines sufficiently mitigate these impacts.

We believe the City's existing land use and zoning regulations and guidelines do not adequately mitigate impacts in our neighborhoods. The issue of neighborhood character was raised as an important concern in the EIS Scope Comments Log (Appendix B). The *omission of this concern needs to be addressed in the Final EIS.*

One size does not fit all. The Preservation Green Lab's *Older, Smaller, Better* report documents how the character of buildings and blocks influences the urban vitality of a neighborhood, and examines block-scapes and the elements that coexist within a block. Shouldn't this inform land use policies and provide solutions for balancing new development with the existing built environment?

This analysis needs to take into consideration the distinctive and valued characteristics of a community, patterns of development, and types of buildings to encourage sensitive modern infill that preserves and complements historic building fabric.

6 **The issue of housing affordability was identified as a probable significant impact under all four alternatives.**

It is critical that Seattle takes the lead on social sustainability, along with environmental stewardship. Preserving historic and cultural properties should be an essential link in any equity agenda. The most economically and socially successful neighborhoods are the ones with a stock of older buildings, including multi-family structures that have historically provided affordable housing for decades or that can be renovated for affordable housing.

The Comp Plan should focus on supporting the benefits of walkable, compact urban areas rather than destroying and replacing older structures in neighborhoods that have always contributed to a livable Seattle.

7 The current Comp Plan includes preservation under the Cultural Resource element (**CRG6--CRG7, CR11-CR16**). The updated plan replaces Cultural Resource with an Arts & Culture element to "align with current priorities such as public art, cultural space, arts education, creative economy, creative placemaking." **The Arts & Culture element is focused on art and eliminates historic preservation and protection of cultural resources.**

Will historic preservation be included under this element? How will the City's existing preservation policies and regulations be accommodated in the updated Comp Plan?

8 Over the next 20 years Seattle will face design and development challenges, as well as opportunities. Seattle 2035 should lay out a development path that respects context and preserves historic and cultural resources in achieving healthy and complete communities.

Sincerely,

Kji Kelly
Executive Director
Historic Seattle

Cc: Mayor Ed Murray
Seattle City Councilmembers
Diane Sugimura, Director, Department of Planning and Development
Kathy Nyland, Director, Department of Neighborhoods
Karen Gordon, City Historic Preservation Officer
Nathan Torgelson, Deputy Director, Department of Planning and Development
Susan McLain, Deputy Planning Director, Department of Planning and Development
Tom Hauger, Department of Planning and Development
Lish Whitson, City Council Central Staff
Historic Seattle PDA Council

Letter No. 16

HOUSING
DEVELOPMENT
consortium

HDC's Affordable Housing Members:
- Low-income Housing Organizations
- Community Development Corporations
- Special Needs Housing Organizations
- Public Housing Authorities
- Community Action Agencies
- Workforce Housing Organizations
- Public Development Authorities
- Government Agencies and Commissions
- Architects and Designers
- Development Specialists
- Certified Public Accountants
- Regional Funders and Lenders
- National Funders and Lenders
- Community Investment Specialists
- Property Managers
- Law Firms
- Contractors

June 18, 2015

City of Seattle
Department of Planning and Development
Attn: Gordon Clowers
700 Fifth Avenue, Suite 1900
P.O. Box 34019
Seattle, WA 98124-4019

RE: Comments on the Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Clowers:

On behalf of the Housing Development Consortium of Seattle-King County (HDC), thank you for this opportunity to comment on the City of Seattle's Draft Environmental Impact Statement (DEIS) concerning the update of its Seattle 2035 Comprehensive Plan.

HDC is a nonprofit membership organization which represents more than 100 private businesses, nonprofit organizations, and public partners who are working to develop affordable housing and provide housing-related services in King County, with many of our members serving the City of Seattle. *HDC's members are dedicated to the vision that all people should be able to live in a safe, healthy, and affordable home in a community of opportunity.* In other words, we believe all people, regardless of income, deserve the opportunity to thrive in a safe neighborhood with affordable housing, good jobs, quality schools, and strong access to transit.

1 We appreciate Seattle's efforts to plan for growth while simultaneously working to advance equity, promote affordability, and mitigate displacement. **We support the proposed Comprehensive Plan amendment to consider adding affordable housing as an appropriate use of City surplus land. We also support the work of the Housing Affordability and Livability Agenda and believe many of those recommendations will need to be incorporated into the Comprehensive Plan (2-3).** Furthermore, HDC applauds the DEIS's equitable

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1 cont. objectives that aim to create jobs and economic opportunities for all city residents while leveraging growth to develop housing choices and promote healthy, complete communities (2-6). The DEIS and Comprehensive Plan draft provide you an ideal opportunity to explore what other strategies are necessary to create an inclusive and affordable community for all of Seattle's residents.

2 While the DEIS has set commendable objectives for the Comprehensive Plan, the plan must include specific, timely, and wide-reaching mitigation strategies to address the city's deep affordable housing needs, increasing rents, and the displacement that will accompany growth. Our comments below—on the issues of home ownership, housing affordability, and displacement—reflect concerns for low and moderate-income residents and communities of color who must benefit from the intense growth that Seattle continues to experience if we are to have a truly equitable city.

3 ❖ Home Ownership

Home ownership is still a dream for many Seattle residents, but rapidly rising property values make it challenging to turn that dream into a reality. Equity helps home owners build their own financial stability for years to come, providing a safety net for families should an emergency arise. However, without purposeful City policies, these benefits will go mostly to wealthier communities, thereby preventing many lower-income and communities of color from experiencing the positive gains of homeownership.

One of the stated objectives for the Comprehensive Plan is to "distribute the benefits of growth more equitably" (2-6). We believe that working towards increasing home ownership for low and moderate-income populations helps achieve that objective. In light of the City's proposal to eliminate the Comprehensive Plan goal of increasing homeownership over time (2-3), **we urge the City to clarify its support of homeownership for certain populations in the Final EIS and incorporate policies into its Comprehensive Plan that strive to increase homeownership over time for low and moderate populations and immigrant communities.**

4 ❖ Housing Affordability

Seattle's DEIS provides four alternatives to accommodate projected economic and population growth over the next twenty years. On page 3.6-17, the DEIS states, "Housing affordability will be an issue of concern under all four alternatives, including Alternative 1 [status quo]." The DEIS later goes on to consider housing affordability challenges to be a significant unavoidable adverse impact. The City must institute mitigation strategies to retain affordability, particularly in light of Mayor Ed Murray's goal to improve housing affordability through the construction and preservation of 20,000 income-restricted homes over the next ten years.

What specific mitigation strategies will Seattle's Comprehensive Plan include to address concerns of housing affordability as growth occurs? This especially applies to areas of opportunity that are close to public transit, education, civic infrastructure, health, jobs, and services. For instance, although Alternative 2 suggests the least risk of displacement for vulnerable populations because it focuses most growth into urban centers, the Seattle 2035 Equity Analysis notes that it also provides the least expansion of access to opportunity for marginalized populations (28). Additionally, if most new housing stock is built primarily in

4 cont. urban centers, it will be unaffordable to the majority of moderate- and low-income households (28). **Due to the tradeoffs of each alternative, the Seattle 2035 Comprehensive Plan and Final Environmental Impact Statement (FEIS) must have specific strategies to mitigate the concerns of housing affordability in the City. As Seattle expects its affordability challenges to worsen as growth occurs, these mitigation strategies must go beyond current policy and must be implemented rapidly.**

5 ❖ Displacement

Displacement is a serious concern regarding how Seattle plans to accommodate growth over the next twenty years. The accompanying Seattle 2035 Equity Analysis notes, "All of the alternatives are likely to cause displacement, which would have disproportionate impacts on marginalized populations" (28). The urban villages and centers with the highest risk of displacement happen to also be majority nonwhite, thereby exacerbating not only socioeconomic but also racial inequity.

Each of the alternatives have different risks of displacement. As discussed above, under Alternative 2, displacement will be minimized in highly vulnerable places, but will also further segregate the city by income level, creating neighborhoods of wealth and neighborhoods with residents who struggle to afford basic necessities. Alternatives 3 and 4, which focus growth to urban villages near light rail and transit, respectively, are acknowledged to require the greatest level of public investment to mitigate displacement. **The City's 2035 Equity Analysis should be used when looking at the equity and displacement impacts of the growth alternatives. The Seattle 2035 Comprehensive Plan and FEIS should explicitly address the how and when the City will mitigate displacement under any alternative through the development of tools that can address the needs of vulnerable populations that are affected by growth.** The Equity Analysis states that under Alternative 1, the City of Seattle should provide "incentives for private market housing that serves a range of incomes and household sizes or creates education and job opportunities for low-skilled workers" (29). While we agree, **we also believe that mitigation strategies under all alternatives will require mandatory development-driven strategies in addition to incentives.** New tools and strong equitable development measures will be needed to mitigate displacement and housing affordability issues as growth occurs.

6 We urge you to consider our comments above and develop well-defined mitigation strategies to help keep Seattle a place residents of all income levels can call home. We will be following along as Seattle publishes its draft Comprehensive Plan and would be happy to work with the city on ways to incorporate affordability tools. We can be reached by phone at (206) 682-9541 or by email at hdc@housingconsortium.org. We hope you will contact us with any questions.

Sincerely,

Kayla Schott-Bresler
Policy Manager

Marty Kooistra
Executive Director

1 Thank you for conducting the Equity Analysis in conjunction with the Draft Environmental Impact Statement for Seattle 2035, our Comprehensive Plan Update. This document validated neighborhood and community concerns concretely. It is with a sense of resignation that we saw that the C/ID was the community with the Highest Displacement Risk and Highest Access to Opportunity. As stated, the C/ID is a high demand area with available amenities and opportunities, and that new development could cause displacement if not coupled with public sector investment to stabilize existing communities.

2 Please find below comments from SCIDpda and Interim CDA on the Draft EIS and Equity Analysis. These are distinct from the community comments that resulted from the Chinatown International District Open House on June 4 and were transmitted by SCIDpda's Cara Bertron in a memo dated June 10. The Equity Analysis must be included as a part of the Final Environmental Impact Statement; the recommendations and analyses should be used by the City just as other elements of the DEIS is utilized. It adds a human dimension that is critical for equitable, just long-range decision-making.

3 The Equity Analysis must be used to create the best, most equitable growth alternative for the City. The City should proactively and immediately leverage real resources to prevent the displacement that almost inevitably comes with growth. This is a top concern for the Chinatown International District and a major threat across the city, particularly in areas with the most vulnerable populations.

4 An additional alternative needs to be generated that focuses higher growth in high opportunity/low displacement areas, and the City must commit public investment in high displacement risk areas to create more opportunities for people living in these areas. Otherwise, the City could trigger actions that run against equitable development.

5 We urge you to use an expanded definition of "displacement" in the EIS. The DEIS discusses the potential of businesses and residents forced to move due to redevelopment, but many residents and businesses are displaced due to the inability to afford rising rents. The definition used in the Equity Analysis, which is "the involuntary relocation of marginalized communities from their current neighborhood" is a preferable and more complete definition, and reflects the realities in our neighborhood.

6 Include small businesses in the definition of" marginalized communities". Oftentimes, small businesses are not considered members of a marginalized community. In our neighborhood, they play a major part of our community.

7 Displacement has environmental impacts. For example, low-income households use transit more frequently and have lower car ownership rates. This is especially true in dense mixed-use areas such as the Chinatown ID. If these households are displaced to lower-cost suburbs, they will be forced to commute by car, thus increasing vehicle miles traveled (VMT) and greenhouse gas emissions. The Draft EIS should consider these environmental impacts

8 As organizations that steward one of Seattle's most historic neighborhoods, we would like to see historic preservation included in the Final EIS as a part of the (built) environment. We hope the Comprehensive Plan will consider meaningful, substantive incentives to promote historic preservation as a tool for affordable housing, commercial entrepreneurship, environmental sustainability/resource conservation, and cultural preservation. We are particularly interested in incentives that assist current property owners with rehabilitating their historic buildings, as well as a strong public commitment of incentiving

8 cont. the sustainability aspects of renovating existing buildings. Without these commitments, the City could trigger development that is inequitable.

9 The importance of preventing displacement of our residents, businesses and institutions to preserve cultural identity is important for our neighborhood; this is important for other communities as well. The City needs to plan along with us for the neighborhood's growth, with stabilizing investments in order to preserve our community and help it grow in an equitable manner.

Thank you for the opportunity to comment -

Maiko Winkler-Chin
Executive Director, SCIDpda

Andrea Akita
Executive Director, Interim CDA

Note: comment submitted via email on 06/18/2015

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June 18, 2015

Dear Mr. Clowers:

This letter is in response to the City of Seattle's (City) call for public comments on the draft environmental impact statement (DEIS) of *Seattle 2035*. International Community Health Services (ICHS) has reviewed the DEIS and the accompanying *Growth and Equity* report, and appreciate the opportunity to share our comments.

ICHS, founded in 1973, is a non-profit community health center offering affordable primary medical and dental care, acupuncture, laboratory, pharmacy, behavioral health, WIC, and health education services. As an important part of the health and human services safety net, ICHS is committed to improving the health and wellness of underserved communities. ICHS advocates for and provides affordable and in-language health care, in addition to advocating for and emphasizing the importance of addressing the social determinants of health, which include access to jobs, housing and economic opportunity. ICHS' four full-service medical and dental clinics—located in Seattle's International District and Holly Park neighborhoods; and in the cities of Bellevue and Shoreline—serve over 21,000 patients in nearly 50 languages and dialects annually. ICHS' International District Medical and Dental Clinic alone served approximately half of all ICHS patients seen last year (nearly 11,000 unduplicated patients).

1 ICHS commends the City for developing the *Growth and Equity* report, which provides a race and social justice lens from which to assess the four growth alternatives outlined in the DEIS. As a safety net provider, ICHS is acutely aware of how a person's access to opportunity can significantly impact the environment where someone lives, where they work, the kind of work they are able to secure, where they spend their leisure time, and the types recreational activities in which they participate. The Access to Opportunity index's impact on the social determinants of health can and do impact a person's health outcomes and well-being.

2 The findings of the *Growth and Equity* report categorized the Chinatown/International District (C/ID) neighborhood—the location of ICHS' flagship clinic and administrative headquarters—as a High Displacement Risk/High Access to Opportunity area. This categorization indicates that new development focused within urban core areas like the C/ID could cause displacement of the existing community if not coupled with public sector investment to stabilize existing communities. The C/ID's proximity to Downtown—coupled with the increased availability of amenities and opportunities in the area—make it an attractive area for future development, which will inevitably subject the neighborhood to the impacts generated by growth guided by any of the four growth alternatives outlined in the DEIS. The categorization of the C/ID as one that has a High Displacement Risk and High Access to Opportunity finally recognizes and validates the experience of this neighborhood's community of residents, small business owners and service providers, and their customers, clients, and patients. The C/ID has been adversely impacted by various private development projects (*e.g.* the demolition and construction of stadiums for professional sports) and public infrastructure, transit, and development projects over the past several years (*e.g.* Seattle Streetcar), and will likely continue to be subjected to the adverse impacts of such projects over the next several years (*e.g.* Denny Substation Project's transmission line).

3 ICHS urges the City to prioritize the review and update of the C/ID neighborhood plan, which should include the Little Saigon area. The C/ID serves as a unique cultural and historical hub for the local A/PI community. The last neighborhood plan completed by the City for the C/ID was in 1998—nearly 20 years ago. The updated plan needs to reflect the changes the neighborhood has experienced over the past 17 years and incorporate current and planned private development and public infrastructure, transit, and development projects in the neighborhood. The incorporation of these projects should also include the current and planned projects that will take place in the SODO and stadium areas, which border the C/ID and would likely have inevitable impacts on the C/ID. A comprehensive update of the 1998 neighborhood plan is necessary for two reasons: (1) to inform the development of public sector investment strategies to help stabilize the community that live in, work in, or visit the C/ID; and (2) to ensure our city's future growth and development is guided in an equitable manner that can reasonably benefit all residents, including those that are considered the most vulnerable and marginalized of our city.

Thank you for the opportunity to comment on the *Seattle 2035* DEIS. ICHS hopes that the finalization of the *Seattle 2035* environmental impact statement provides an opportunity for us to collaborate with the City to review and update the C/ID's neighborhood plan.

Sincerely,

Teresita Batayola
Chief Executive Officer
International Community Health Services

City Neighborhood Alliance

http://lcna-seattle.org/

June 18, 2015

Tom Hauger
Kristian Kofoed
Department of Planning and Development

Dear Mr. Hauger and Mr. Kofoed,

1 I am writing on behalf of Lake City Neighborhood Alliance (LCNA), an alliance of organizations with the mission to protect and enhance the quality of life in the greater Lake City area. LCNA is comprised of 27 member groups representing neighborhood, business, faith, school, special-issue, and service-provider groups throughout Lake City. Katie Sheehy, DPD Senior Planner, provided an excellent but brief overview of the Seattle 2035 EIS, Growth Alternatives, and Equity Analysis at our June 11 meeting. LCNA had hoped to make a decision about which alternative was the best fit for Lake City to minimize displacement and maximize opportunities. We were unable to select from the Growth Alternatives listed. Is Lake City considered part of Alternative 4: Guide growth to Urban Villages near Transit? Are hybrid alternatives being proposed?

What LCNA did agree on was that our perspectives on Lake City are very different from those in the EIS where the LC HUV is described as having both a high displacement risk, with which we agree, and high access to opportunity, which we dispute.

ACCESS TO OPPORTUNITY INDEX

2 Specifically, we take issue with the evaluation of Lake City as having High Access to Opportunity. Many metrics of opportunity used in the EIS don't fit our neighborhood now nor even in 2010, the year from which data used in this report were taken. There has been tremendous growth in Lake City since 2010, with many new residents who are non-English speaking, low-income, and people of color, including many single mothers. Up-to-date data should be used. It is unclear how DPD is defining **Access to Frequent Bus Service**, so it is not possible to determine whether Lake City meets that criterion.

Lake City does not meet at least five key criteria:

- **High-Performing Elementary and Middle Schools**: A definition of "high performing" is not provided; however, numerous studies have shown that a school's performance is inversely proportional to the percentage of its students who qualify for Free or Reduced-Price Lunch. Recently, Lake City has experienced an astounding growth in the number of families with school-aged children, including those living in poverty. Since the 2011-2012 school year, the number of K-5 students enrolled in schools serving the greater Lake City area has grown by over 400 students. Enrollment in local middle and high schools has also increased significantly. Currently, population growth demands exceed school capacity. Importantly, future projections show a continued increase in population growth in Lake City and North Seattle. Seattle Public Schools has failed to anticipate these capacity issues; their future building plans seem to indicate that meeting Lake City's capacity needs

2 cont.

will remain a struggle, particularly for grades K-5 and grades 9-12. In addition, school buildings serving the Lake City area, notably those housing John Rogers and Sacajawea elementary schools, are in poor condition, and were not included for building replacements or substantial repairs as part of the recent BEXIV levy.

Lack of school capacity and lack of up-to-date facilities must certainly negatively influence school performance. Of particular concern, the reactivated Cedar Park School building is reopening without appropriate library or computer lab spaces, and without additional cafeteria space or bathrooms to support the addition of eight portables to the site. Portables will account for at least 40% of the classrooms at Cedar Park Elementary School, and unless improvements are made, these portables will lack typical elementary school classroom amenities, such as sinks and drinking fountains. Further, the assignment of multiple, high-poverty neighborhoods to Cedar Park Elementary School could result in the highest-poverty elementary school in North Seattle, if not District wide. Overcrowded schools (including high schools) not meeting current educational specifications, and filled with high-poverty students without requisite resources, cannot possibly fit DPD's High Access to Opportunity model. Further, these issues do not bode well for another Opportunity criterion—**Above Average High School Graduation Rate.** In the 2008-2009 school year, Lake City's Nathan Hale High School on-time graduation rate of 89% was well above the City-wide average graduation rate of 68%. As the current and future elementary and middle school students who have experienced these many adverse conditions in their schools move into high school, they may well have a more difficult time than their predecessors achieving above average graduation rates.

- **Number of Jobs within 2-mile Radius:** There is no industry in Lake City; there are a few large businesses and many small businesses; there are few jobs for residents;
- **Access to Light Rail:** Northgate Station will be some distance from the LC HUV; accessing NE 145th Street Station will require a very difficult east-west access on NE 145th Street—currently the topic of Shoreline's NE 145th Street Corridor Study; NE 130th Street light station is only proposed at this point;
- **Proximity to a Community Center:** The Lake City Community Center is not operated by the City and is not a full-service community center; it was built in 1944 and has been remodeled twice, yet remains ADA non-compliant. It has no gymnasium. For our underserved residents, especially those families living in Little Brook, the Northgate and Meadowbrook Community Centers simply are too far to walk to and too expensive to access via bus;
- **Proximity to a Park:** Lake City is below the City's Gap Analysis for parks and open space. We have no sports fields and no gymnasium. Lake City recently lost two parks: Cedar Park *the Park* due to reactivation of Cedar Park School, and NE 130th Street-End shoreline access by a recent court ruling. Our newest "Park" is land banked and has an office building on it. Our Mini Park is the closest park for many people living in the HUV as it is in the heart of Lake City, but it has become a troublesome gathering place for people suffering from mental illness and/or substance addiction. Little Brook Park is in the middle of that de-facto HUV neighborhood, but it is too small (1.1 acres) to meet the needs of the 2,000 people who live there.

3

Further, we argue that these "amenities" should be considered as metrics in the Opportunity Index:

- **Sidewalks and Drainage Infrastructure**: All Seattle neighborhoods north of 85th Street—the 1954 annexation line—are missing large numbers of sidewalks. Lake City Way, our Main Street and SR 522, is missing long areas of sidewalks. Virtually all of our neighborhood streets and arterials are without sidewalks. Lack of sidewalks and wet, muddy, and eroded street shoulders are safety, livability, and equity issues.
- **Senior Centers:** There are only three senior centers north of the Ship Canal: Wallingford, Ballard, and Greenwood—none remotely close to Lake City. Lake City is poised to receive some funding for senior services this year, but there is no funding for a senior service *facility*. Currently Lake

3 cont. City has over 6,000 residents aged 50+ and nearly 2,100 residents aged 65+. By 2025 it is projected that 25% of all King County residents will turn 60+.

4 **DISPLACEMENT INDEX**

We are very concerned about both residential and small-business displacement, which is linked to housing affordability and livability. A major strength of our community is diversity. Our most diverse residents and businesses are most apt to be displaced. Residential and small business displacement is a major City-wide topic that must be addressed in the Housing Affordability and Livability Agenda recommendations.

5 **PUBLIC OUTREACH ABOUT SEATTLE 2035**

We are also concerned with the lack of public outreach on this critical document. At the very least, meetings should have been held with all the Neighborhood Councils. Having only one public meeting and then assuming other people could self-educate and respond within 45 days falls short, particularly for a process that may well have dramatic consequences for our city and communities.

SPECIFIC COMMENTS FROM INDIVIDUAL LCNA REPRESENTATIVES

6 • It is not clear from reading the description of alternative 4 whether the Lake City Hub Urban Village (referred to as Lake City) meets the definition for this alternative since it is not close to a light rail station (Northgate) and may not be included as a priority bus transit route.

7 • The EIS makes no mention of potential impacts to fire service for Lake City. A recent investigation of level of service (response time) and capacity for Engine 39 (the only equipment assigned to Fire Station 39) indicated that the total number of responses is increasing. Further, response times are increased when other fire stations provide coverage for Lake City when Engine 39 is not available. The current zoning in Lake City and along the Lake City corridor both north and south is allowing the construction of 4-to-8 story apartment buildings. Continued growth, more high-rise buildings, and a rapidly changing demographic will require an aid/medic unit and a ladder truck in order to provide adequate fire service in the near future and certainly well before 2035.

8 • The reactivation of the Cedar Park School, which is scheduled to open in the fall of this year, will not meet current school development standards even after extensive renovations and may not be able to be expanded on the site due to Landmark Designation limitations. The area around the school has insufficient sidewalks or safe walkways to serve the immediate enrollment area, which includes the Olympic Hills and Little Brook neighborhoods on the west side of Lake City Way.

9 • The Lake City community is grossly underserved by Parks. Lake City has no sports fields; there is no gymnasium in the City-owned but not City-operated Lake City Community Center. The two existing developed Lake City parks (Virgil Flaim and Albert Davis Parks) are both located on the west side of Lake City Way. Growth is happening on the east side of Lake City Way. Immediately adjacent to our land-banked "park" is a DPD-permitted, 6-story, 150-unit congregate housing project to be built on the south property line. It was not required to have design review, and as a result, will significantly shade this park site. The Lake City community has lost our only public Lake Washington shoreline access at NE 130th Street due to a recent court ruling. The reactivation of the Cedar Park School, with no re-negotiated lease between the Parks Department and the School District as well as discontinuance of park (now school-yard) maintenance by Parks in September 2017 will mean that Lake City will lose a 2.2 acre park (based upon Park Gap Analysis' definition of open space). The Little Brook Neighborhood, which is part of Olympic Hills, has a 1.1 acre park site serving one of the densest areas in the City (2,000 people in a 10-block area, bordered by Lake City Way NE and 30th Ave NE, and by NE 135th St and NE 145th St). Little Brook is experiencing new growth with a newly completed

9 cont. apartment complex and another large housing complex under construction. The new Park District Levy budget is inadequate to address the types of growth needs that Lake City is experiencing both now and into the future. A new, full-service community center is needed, which will cost in excess of $10 million. The 6-year budget for the Park District has less than $5 million per year for all 27 existing Parks-operated community centers. That $5 million will only buy $3 million dollars in construction.

10 • Section 3.5 of the EIS relating to Plans, Policies, and Regulations does not appear to make reference to a policy and proof that the City, as part of its budget process, should or will commit funds to deal with the types of impacts associated with the proposed growth projected to happen over the next 20 years.

11 • The analysis of impacts due to displacement and restricted access to opportunity appears to be based upon demographic trends between 1990 and 2010 and does not acknowledge that there have been drastic changes in the north-end demographics, which will have major implications for the implementation of this policy.

12 • The Access to Opportunity map for Lake City and the Lake City community is confusing since it could be interpreted in different ways. A better legend would help.

13 • Alternatives 3 and 4 would result in a new growth center at the proposed NE 130th Street light rail station. This new growth center would compete for limited City resources to meet the growth needs of both the Lake City and Bitter Lake HUVs.

14 • The listing of the resources known to deal with implementing the Growth and Equity policy as well as the general growth policy for the City seem inadequate without a total commitment by the Mayor and the City Council to pledge all available City resources to support the Equitable Development measures as well as fund the impacts created by the projected growth at certain desired locations in the City.

15 LCNA encourages DPD to find the resources for more public outreach at community meetings. We hope you will seriously consider our comments, and we look forward to participating in the continued development and completion of the Comprehensive Plan.

Very sincerely,

Sandra Adams Motzer

Sandra Adams Motzer
Chair
sandymotzer@aol.com
206.819.8056

cc: Councilmember Mike O'Brien, Chair, Planning, Land Use, and Sustainability Committee; Councilmember Tom Rasmussen, Chair, Transportation Committee; Katie Sheehy, DPD Senior Planner; Irene Wall and Cindi Barker, Co-Chairs, City Neighborhood Council Land-Use Committee

June 15, 2015

City of Seattle Department of Planning and Development
Attn: Gordon Clowers
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Seattle, WA 98124

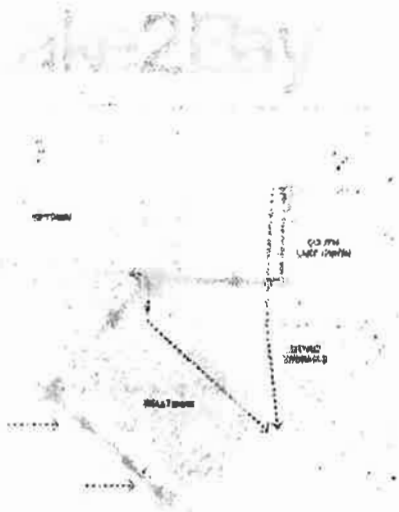
Re: Comment Letter for the Seattle Comp Plan DEIS and Lake2Bay

Dear Mr. Clowers:

1 *On behalf of the Lake2Bay Coalition, we are pleased to submit the following comments on the Seattle2035 DEIS. The Lake2Bay Coalition includes over a hundred committed civic leaders representing a wide-variety of non-profit organizations, private enterprises and government departments who have been working for several years to plan and implement a world-class, city-defining vision of Lake2Bay as the healthiest urban space in the world.*

Connecting Lake Union to Elliott Bay has been a dream for decades. In recent years, that vision has been expanded to include a city-defining urban corridor through a web of diverse, thriving places that embody and reflect the area's leadership and innovations in business, culture, science, philanthropy and education. This ambitious vision is consistent with the opportunities and needs in Seattle's most dynamic neighborhoods.

The Lake2Bay Corridor project when complete will connect four of Seattle's fastest growing neighborhoods and many of our most iconic public spaces. Located in South Lake Union, Uptown, Denny Triangle and Belltown, the Lake2Bay area is an exploding business and employment hub, a cultural and recreational asset for the region, an international tourist destination, and a critical crossroads for Seattle's transportation network, utility infrastructure and ecological systems.



Through the Seattle2035 process, Seattle is planning for growth and change for the next 20 years – not only where growth will go, but how we can leverage our existing assets and invest our resources in ways which promote a strong economy, a sustainable environment and equitable and connected neighborhoods. Implementation of the Lake2Bay vision provides the City with an opportunity to achieve these goals and more.

The Lake2Bay Corridor project is a comprehensive vision incorporating world-class pedestrian, bike and transit infrastructure, open spaces and parks, public art and innovative district-wide approaches for hydrology and utilities while leveraging new private investment to achieve City goals. ***We urge the City to recognize the opportunity that the Lake2Bay represents both in achieving the City's growth targets and as a tool to support improved health, economic opportunity, mobility and livability in Seattle.***

2

From 2005 to 2015, the Lake2Bay area has increased by 11,689 residential units, representing 25% of the City's growth and over half of the residential growth in Urban Centers. The area has achieved 70% of its growth target for the 20-year period in ten years. Including permitted units, the area is at 95% of its target for residential growth.

	Growth 2005-2015	Target 2005-2024	% of Target Met	Permits Issues	% of Target with Permitted
South Lake Union	3,250	8,000	41%	1,678	62%
Belltown	3,167	4,700	67%	1,724	104%
Uptown	2,266	1,000	227%	332	260%
Denny Triangle	3,006	3,000	100%	360	112%
Lake2Bay Total	**11,689**	**16,700**	**70%**	**4,094**	**95%**
Urban Centers Total	20,917	27,450	76%	8,339	107%
Seattle Total	44,846	47,000	95%	15,629	129%
Lake2Bay as % of Urban Centers	56%	61%		49%	
Lake2Bay as % of Seattle Total	26%	36%		26%	

Source: Seattle DPD Urban Center / Village Residential Growth Report, 04.06.15

From 2004 to 2013, the Lake2Bay area increased employment by 12,839 jobs, reaching 42% of its 20 year target. This represents 50% of job growth in Urban Centers and almost one-third of job growth in the City as a whole, most of which was concentrated in South Lake Union which represented 33% of the City's job growth over the period.

	Growth 2004-2013	Target 2005-2024	% of Target Met
South Lake Union	14,954	16,000	93%
Belltown	-1,668	4,000	-42%
Uptown	332	1,150	29%
Denny Triangle	-779	9,515	-8%
Lake2Bay Total	**12,839**	**30,665**	**42%**
Urban Centers Total	25,694	61,125	42%
Seattle Total	44,362	84,000	53%
Lake2Bay as % of Urban Centers	50%	50%	
Lake2Bay as % of Seattle Total	29%	37%	

Source: Seattle DPD Urban Center / Village Employment Growth Report 08.11.14

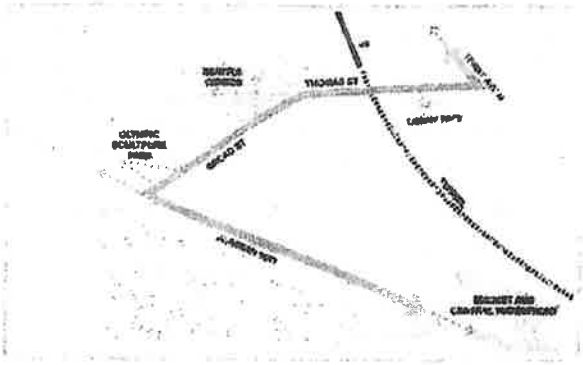
All Seattle2035 growth alternatives will continue to target residential and employment growth in Urban Centers and Villages. The Lake2Bay area growth targets range from between 26% and 42% of Seattle's total residential growth and 37% to 49% of employment growth. ***Prioritizing policies and investments that address livability, transportation, education, and environment in the district will be necessary to ensure that the area can continue to attract housing and jobs to accommodate a high proportion of the City's growth and to mitigate the impacts of rapid growth in the area.***

	Alt 1	Alt2	Alt3	Alt4
South Lake Union	4,700	12,000	8,000	7,500
Downtown	10,000	15,000	12,000	12,000
Uptown	3,500	2,500	2,000	2,000
Lake2Bay Total	**18,200**	**29,500**	**22,000**	**21,500**
Seattle Total	70,000	70,000	70000	70,000
Lake2Bay as % of Seattle Total	26%	42%	31%	31%
South Lake Union	20,000	20,000	15,000	12,000
Downtown	30,000	33,000	25,000	30,000
Uptown	3,500	3,500	2,000	2,000
Lake2Bay Total	**53,500**	**56,500**	**42,000**	**44,000**
Seattle Total	115,000	115,000	115,000	115,000
Lake2Bay as % of Seattle Total	47%	49%	37%	38%

Seattle Comprehensive Plan Updated Draft EIS, 05.04.15
**Note: The DEIS includes Belltown and Uptown as part of Downtown*

3

As noted in the DEIS, the City would need to add 1,400 acres of parks and open space city-wide to meet their stated parks and open space goals. Particularly in downtown, which is currently deficient, significant new green space will be required and new and creative strategies to meet this need will be necessary. ***By focusing on improving connections to existing parks such as Olympic Sculpture Park, Seattle Center, Denny Park and Lake Union Park, Lake2Bay will increase the number of residents, workers and visitors who can easily utilize these existing City assets.***



Additionally, by incorporating more public space into the street right-of-ways as well as private development, Lake2Bay will support the addition of enhanced public space without large investments in acquisition from the City.

Usable public space in Broad Street NOW

4

As shown above, Lake2Bay is experiencing exceptional growth through private investment in new residential and commercial development. Existing zoning, development guidelines and incentive programs leverage this investment to create affordable housing, public space and improved streetscapes. ***By incorporating the Lake2Bay vision into these City policies and development regulations, Seattle can use the Lake2Bay Corridor project to leverage private investment to address deficiencies in pedestrian and bike infrastructure, affordable housing, parks, open space and public art.***

5

Lake2Bay will improve multi-modal connectivity in Belltown, Denny Triangle, South Lake Union, and Uptown as well as Eastlake, Queen Anne, Downtown and Capitol Hill. While much of Seattle's existing transit infrastructure has been focused on commuters going to or through downtown, there is increasing need for improved inter-neighborhood connectivity, particularly in transit, pedestrian and bike networks. This is a critical component to supporting car-free living and allowing people not only to use transit to commute to and from work, but also to visit friends, go to a large park, concert or grocery store. The Lake2Bay Corridor plan to achieve multi-modal street placemaking will address this need through public and private investments. ***To best serve the significant growth this community is taking, the City should focus on improving inter-neighborhood connectivity in Lake2Bay in the way of transit, bike and pedestrian investments.*** *Today, in the Lake2Bay area, 36% of households do not own a car compared to 16% citywide.[1] Lake2Bay investments will support and expand this trend improving health, air quality and mitigating the adverse impacts to on-street parking demand discussed in the DEIS.*

Lake2Bay also has the potential for increased transit investment through the expansion of regional light rail. As Sound Transit studies corridors for light rail expansion through ST3, the Lake2Bay coalition strongly supports the addition of a light rail station in the Lake2Bay corridor as part of the potential Downtown to Ballard corridor. This potential for additional high-capacity transit in the neighborhood further demonstrates the need to prioritize Lake2Bay for projects which will leverage existing and future transit infrastructure and expand neighborhood interconnectivity.

6

Successfully capturing City growth in our most central neighborhoods closest to job centers and key transit infrastructure and improving multi-modal connectivity in Lake2Bay will enable the City to encourage more multi-modal trips, reduce residents' reliance on cars and reduce greenhouse gas emissions -- an essential component of meeting the City's climate change mitigation goals. *The estimated average annual carbon footprint of a household in the Lake2Bay area ranges from 25.4 to 35.0, lower than most Seattle neighborhoods, such as Bitter Lake (50.6), Admiral (43.5) or Rainier Valley (45.1) and significantly lower than households in suburban locations, such as Redmond (72.0) or Renton (56.8).* [2]

[1] *Source: American Community Survey, 2013 5 Year Estimates, B08201*
[2] *Source: Cool Climate Network, UC Berkeley*

7 *Additionally, the vision for the Lake2Bay Corridor incorporates innovative water management strategies to increase the health of the water network in Lake2Bay and Seattle as a whole. Divided by a ridge which sends water either to Lake Union or to Elliot Bay, the green infrastructure and innovative storm water management strategies planned for Lake2Bay would positively impact these two critical natural resources and the wildlife dependent on them. The plan for two Eco districts would allow for district-wide approaches to water management to protect the environment and leverage new investment to contribute to an innovative water management system.*

8 *Lake2Bay is a remarkable opportunity for Seattle. With a team of individuals and organizations committed to its success and with the tremendous growth and private investment already occurring in the area, Lake2Bay represents an important strategy in achieving the City's growth targets by fostering residential and economic growth while mitigating the adverse impacts of growth on our transportation system, parks and open space and environmental sustainability.*

We look forward to working with the City in the coming months to determine what policies, regulations and investments can best advance Lake2Bay and support the City's Urban Village Strategy and core values in the Seattle 2035 plan.

Sincerely,

Thatcher Bailey

Co-Chair Lake2Bay

Norma Miller

Co-Chair Lake2Bay

July 15, 2015

Gordon Clowers, City of Seattle

Department of Planning and Development

PO Box 34019, Seattle, WA 98124

RE: City of Seattle Comprehensive Plan Draft Environmental Impact Statement (DEIS)

Dear Gordon,

The Othello Station Community Action Team (OSCAT) is a group of neighbors, business owners, and others with interest in the Othello neighborhood of southeast Seattle. OSCAT works with prospective developers to create a community that fulfills our neighborhood plan. We are excited to contribute to Seattle's growth strategy for the next 20 years. Many of our comments on the DEIS are applicable to all four growth strategies (see the later part of point (2) below):

1 (1) Historically, projections of future growth have been very uncertain, with unpredictable growth spurts and contractions being common. Therefore we recommend not one growth scenario but two or three. The purpose would be to emphasize adaptability and resilience, not one scenario which some may interpret as a target, or as a minimum, or as a maximum. A significant economic downturn over the next generation is a high risk due to global limits to growth, especially environmental limits like climate change and resource limits like the depletion of affordable fossil fuels, and the resulting disruption and conflict.

2 (2) Among the four growth strategy alternatives we prefer number 4 (a growth emphasis toward transit corridors and hubs). However, the four growth strategies in the DEIS were developed without benefit of some of the options discussed by the mayor's Housing Affordability and Livability Agenda (HALA) committee. We cite the possibility, discussed by HALA, of doubling the density in many single family areas, and dramatically increasing affordability options, via a variety of strategies used in other cities, while maintaining the single family character. These strategies include remodeling homes into apartments or shared living space, infill homes or backyard cottages designed for the same purpose, carefully designed duplexes or triplexes or row housing, courtyard or cooperative designs, etc. Such strategies would support a much denser network of transit service and should be designed with that in mind to reduce parking and car travel. In addition more support is needed for ownership options for this variety of living arrangements, including partial or shared ownership, and permanently affordable ownership, not just renting.

3 (3) The Equity Analysis in the DEIS is very appropriate, except that the concern about displacement should not be used to try to stop development, but rather to guide development in ways that support housing opportunities and services for people of limited means. These would include additional housing options within easy walkability of good transit, but also a variety of subsides or regulations that enable people to stay in existing housing, as well as support for the kind of options cited in section (2), above. Neighborhood planning should anticipate increasing transit dependence and transit choice, given the likely increases in the price of oil over the next generation. We commend the City on the Equity Analysis and ask that it be used in the Final EIS.

4 (4) The affordable housing levy, multifamily property tax exemption, and other programs should be designed to provide incentives that target more affordable housing throughout Seattle in areas with a higher "access to opportunity index", not just in lower income areas like southeast Seattle. Given the findings of the Equity Analysis, better geographic balance in affordable housing would help overcome concentrations of poverty perpetuated by past practices such as redlining. Meanwhile, we hope that the City will make investments in education, health, recreation, arts, transportation in the Othello neighborhood to help improve our access to opportunity here. Affordable housing tools in lower opportunity places, like Othello, need to help the community to continue to grow in a socio-economically diverse way, in light of the trend toward gentrification.

5 (5) In addition to housing, equity applies to small businesses and the need for a greater variety of work opportunities within our neighborhoods. In southeast Seattle there are many ethnic businesses which could be displaced. At the same time there is increasing opportunity for a variety of office and other low impact business types within growing town centers in the vicinity of light rail stops.

6 There is growth already occurring in high displacement risk areas like Othello (some residents recently protested at city hall about displacement at 42nd and Othello). Significant monitoring and investments are needed immediately to offset these risks of displacement. However the maps showing relative residential growth under each alternative (page 2 in the summary of Equity Analysis) over-simplify who the winners and losers will be in the growth alternatives, with inequities persisting in each alternative. Policies and strategies to counteract these inequities should be included as part of this update.

7 OSCAT was involved in the re-zoning of the area surrounding the Othello light rail station and supports additional density near transit investments. For example, the Only in Seattle grant has enabled a coalition of community groups to work with developers to ensure that their projects enhance our community. We support the growth strategy #4 from the DEIS because this transit oriented development

7 cont. | strategy does the most to promote growth in areas where it makes sense from environmental, social, and economic perspectives.

On behalf of OSCAT,

Tim Parham
Tparham9@gmail.com
206-854-1309

Puget Sound Sage
Growing communities where all families thrive.

June 18, 2015

Seattle Department of Planning and Development
Attn: Gordon Clowers, Senior Planner
700 Fifth Ave, Suite 1900
P.O. Box 34019
Seattle, WA 98124-4019

RE: Puget Sound Sage Comments on the Comprehensive Plan DEIS

Dear M. Clowers,

We respectfully submit our comments on the Seattle Comprehensive Plan Update, Draft Environmental Impact Statement (DEIS). We appreciate the tremendous work done by DPD and City staff to analyze the data and write the report. In particular, we deeply appreciate that the DEIS and its companion study, *Seattle 2035 Equity Analysis,* incorporate a discussion of race and social justice implications of the Comprehensive Plan.

Puget Sound Sage improves the lives of all families by creating shared prosperity in our regional economy. We bring together community, labor, faith, and environmental leaders to advance a common agenda for racial and social equity, a stronger democracy, better jobs, a clean environment, and thriving communities.

We strongly believe that the Seattle Comprehensive Plan should prioritize growth of an inclusive and equitable city over the next 20 years. Our comments are organized, below, under headings that reflect an overarching comment. They are sequenced, to some degree, to build on prior comments.

1 **The determination of significant and unavoidable adverse impacts for housing and population is inadequate.**

Under Population, Employment and Housing, the DEIS finds that displacement will be a major outcome under all four alternatives: "Given the factors identified in this analysis, the risk of displacement of vulnerable resident populations and existing businesses is concluded to generate probable significant adverse impacts."[1] Our own research on gentrification and displacement in Southeast Seattle affirms with these conclusions.[2]

However, the DEIS fails to estimate in any way the scope of displacement. Without any estimate of scope of displacement, the proposed mitigations have no baseline for comparison of effectiveness. Key questions remain unanswered, such as:

- What is the scale of the displacement problem that the mitigations need to address?

[1] DEIS, Page 3.6-20.
[2] Puget Sound Sage, *Transit Oriented Development that's Healthy, Green & Just: Ensuring Transit Investment in Seattle's Rainier Valley Builds Communities Where All Families Thrive,* May 2012.

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1 cont.

- How much displacement has occurred under existing growth plans?
- What are the historic factors that have led to specific groups being vulnerable to displacement and how will mitigation strategies address those challenges?
- Will the proposed mitigations make a small, medium or large difference in reducing the impacts?

2 Furthermore, the mitigations section under Population, Housing and Employment represent a list of either 1) existing policies and programs or 2) ideas that may or may not ever be enacted.[3] Recent analysis by the Office of Housing for the Housing and Livability Agenda (HALA) shows that existing programs are failing to create or preserve adequate affordable housing that keeps pace with market rate housing.[4] To the first point, more of the same will not provide significant mitigation. To the second point, implying that the combination of the HALA, the City's Equity Analysis and the Race and Social Justice Initiative will somehow ensure that "a robust housing agenda that includes low-income housing preservation and tenant protection strategies" will emerge over the next few years belies historic experience. Finally, the DEIS does not contemplate the timing of mitigations – if they are not put in place early in the 20 year time span, they will be simply too late.

Following discussion of mitigations, the Population, Employment and Housing section concludes that the only unavoidable impacts will be "housing affordability challenges." This conclusion implies (rather than directly states) that the displacement discussed at length in the analysis will be avoidable after mitigations have been put in place. Affordability challenges, which could be limited to housing costs burdens, are not the same as displacement impacts, which represent real harm to people, communities and the environment. Given that the DEIS is not clear on the scope of the displacement impact, nor clear on the scale of mitigation needed, this conclusion is unsubstantiated and must be revised. Either the mitigations section must show how much displacement will be averted or the conclusion must be that displacement is a significant unavoidable adverse impact.

Displacement impacts can and should be modeled.

3 The DEIS discusses the combined impacts of affordable units lost to redevelopment and units lost to rising rents. We affirm that a total displacement effect on vulnerable communities is required to understand displacement impacts. However, as discussed above, the DEIS lacks adequate analysis or modeling of displacement impacts. We believe that such analysis is both necessary and feasible.

Failure to study at least the impacts of direct displacement contradicts City policy. City code clearly states a concern with units lost to redevelopment: "Demolition or rehabilitation of low-rent housing units or conversion of housing for other uses can cause both displacement of low-income persons and reduction in the supply of housing."[5] Further, the City's requires that "Proponents of projects shall disclose the on-site and off-site impacts of the proposed projects upon housing, with particular attention to low-income housing."[6]

[3] DEIS, 3.6.3.
[4] http://murray.seattle.gov/housing/#sthash.4I7h9KsK.dpbs.
[5] SMC 25.05.675: I-1.
[6] SMC 25.05.675: I-2b.

3 cont.

It has been the practice by the City to require developers and non-project plans to disclose estimates of low-income housing units that will be demolished. For example, the 2004 *Downtown Height and Density Changes Draft Environmental Impact Statement* estimated that 300 units of low-income housing were likely to be lost to redevelopment as a result of the proposed rezone and projected growth.[7]

Moreover, the City possesses already highly accurate data of units lost to demolition or redevelopment over the last two decades with which to make projections over the next two.

While analysis of how many households have been displaced from indirect development is more methodologically difficult, again, historic data and evidence exists to provide some scale of the problem. For example, we know the timeline and scale of historic displacement of African Americans from the Central District. The City also possesses American Community Survey data that can show, block by block, demographic changes throughout the city which could also be used as a baseline trend.

4

Displacement outcomes have an environmental impact that must also be analyzed .

The DEIS identifies that displacement of lower-income households will be an inevitable impact under all four alternatives. However, the DEIS does not, in turn, assess the environmental impact of displacement affects. We can only assume that DPD concluded this was unnecessary, because they find that only "housing affordability challenges" will have a significant, unavoidable adverse impact.

However, as discussed above, the DEIS fails to substantiate this conclusion. At this time, nothing in the DEIS or proposed alternatives warrants a conclusion that displacement will be insignificant or avoidable.

5

As such, several sections of the DEIS should be revised to reflect displacement effects on residential patterns.

Displacement of low-income households is occurring as better-off households move into Seattle. In our 2012 report on transit oriented development, we showed that higher-income households that live in exactly the same neighborhoods as low-income households are more likely to own and use vehicles – despite proximity to the same, transit-rich service.[8] Low-income residents are also more likely to be entirely without vehicles and transit reliant. When a transit reliant household is pushed further away from jobs and opportunities into transit-poor suburbs, they are more likely to purchase and use a vehicle. The net result is that displacement (and income inequality in Seattle) will result in an off-set of environmental gains made by concentrating growth and density in the city.

Table 1 shows census data that breaks out vehicle ownership by commute mode, from 2005-2013. Overall, ownership of vehicle by working people (age 16+) fell from 92% to 91%. Unsurprisingly, workers who drove alone had high ownership rates, which remained about the same over the 8 years. However, workers who did not drive alone (walk, bike, transit, etc.) increased vehicle

[7] Page 4-29.

[8] Puget Sound Sage, *Transit Oriented Development that's Healthy, Green & Just: Ensuring Transit Investment in Seattle's Rainier Valley Builds Communities Where All Families Thrive*, May 2012.

5 cont. ownership, from 39% to 45%. More telling, workers who took public transit increased household vehicle ownership from 77% to 81%.

Table 1: Vehicle Ownership by Commute Mode, All Workers in Households

Commute Mode	2005		2013	
Total All Modes	276,933	92%	338,055	91%
Drove Alone	169,552	98%	186,304	99%
Carpool	29,804	95%	28,996	97%
Public Transit	39,489	77%	62,238	81%
Walk	14,398	69%	23,230	69%
Bike	9,141	89%	15,907	90%
Home	14,549	94%	21,380	94%
Non-SOV	107,381	39%	151,751	45%

Source: Author's Analysis, 2005 and 2006 American Community Survey, Table B08141.

And, in fact, vehicle ownership is increasing in unexpected places. A 2014 Seattle Times article showed that walkable, transit friendly neighborhoods in Seattle that have experienced dramatic growth (such as South Lake Union, East Lake and Capitol Hill) have seen their car to people ratio go up more than anywhere else in the City.[9] Simultaneously, several south suburban cities (such as Tukwila, SeaTac and Kent), where displaced Seattleites have relocated, also have seen increases in their car to people ratios.

We must stress here that two of the alternatives (3 & 4) concentrate growth disproportionately in transit-rich neighborhoods that have high displacement risk– environmental gains made by growth in these transit-rich areas may be offset partially or entirely by displacement effects.

What would be the environmental impact of swapping of reliant households for vehicle-owning households? First of all, it could be significant enough to affect the transportation modeling that underlies estimates of vehicle miles traveled (VMT), greenhouse gas emissions (GHG), and traffic. On traffic, for example, it is probable that the households moving into walkable, transit-rich neighborhoods are using their vehicles not for work, but for errands. Errands are numerous, chained and occur at peak and non-peak periods – have these trips been adequately modeled for level of service impacts? The modeling presented in the DEIS appears to be primarily focused on commute trips.

6 For greenhouse gas emissions, incorporation of displacement affects are even more important, as they have a cumulative impact across the region. If displacing a low-wage, working household to Tukwila results in a higher VMT than the City is projecting, the DEIS may be underestimating

[9] Balk, Gene, "The surprising places where car ownership is up in Seattle," *The Seattle Times*, July 11, 2014.

6 cont. greenhouse gasses and air pollution resulting from proposed growth. Currently, displacement is not an assumption built into the City's VPT model (referring here to assumptions enumerated on page A.4-24).

7 **The proposed alternatives do not include adequate growth in high opportunity areas.**

The City's *Seattle 2035 Equity Analysis* identifies areas of the city that are characterized by "access to opportunity" and "displacement risk" through a numeric index. The two indexes show which areas of the city are most vulnerable to displacement, and, at the same time, which areas of the city offer or lack opportunities to those who need them most.

Many areas of the city present high displacement risk to existing residents, such as 23rd and Jackson, Bitter Lake, North Beacon Hill, Northgate, Othello and Rainier Beach. The *Equity Analysis* suggests that large-scale public investment is needed to help these communities take advantage of increasing opportunity – we agree with this finding.

Other areas of the city have high opportunity combined with low risk of displacing existing residents. These are mostly higher-income, stable communities with expensive housing. Creating better access for low-income households to these communities should be a major strategy in the Comprehensive Plan.

Yet, many of the high opportunity areas of the city are either not in the urban hub/village framework or not proposed for expansion – this will result in under-capacity to accommodate meaningful amounts of affordable housing. In this regard, several new urban hubs or villages should be added to the alternatives. The *Equity Analysis* should be used to determine new urban villages or expansions of existing ones that prioritize equity outcomes.

For example, a recent article in the online journal, *The Urbanist*, uses the *Equity Analysis* to proposed four new urban villages in North and Central Seattle, including Wedgewood, Magnuson Park, Magnolia and Madison Park.[10] Building affordable housing in these areas, under an urban village designation, would reduce inequality in Seattle and take advantage of high opportunity areas to reduce displacement. Moreover, this would balance the expected and disproportionate growth in high displacement areas, especially in transit corridors in South and Southeast Seattle.

Incorporating new urban villages in the DEIS amount to either an fifth alternative or expansion of existing alternatives – neither have been adequately studied to understand their environmental impacts.

8 **Lack of transparency in growth target modelling requires clarification.**

The DEIS assumes growth targets of 70,000 households and 115,000 jobs. According to the "Updating Seattle's Comprehensive Plan Background Report: February 2014," these targets are slightly scaled down growth estimates created by the King County Growth Management Council in

[10] Brennan, Alex, "Seattle 2035: Toward A More Equitable Growth Plan Alternative," *The Urbanist*, June 15, 2015. http://www.theurbanist.org/2015/06/15/seattle-2035-toward-a-more-equitable-growth-plan-alternative/

8 cont.

2010.[11] On page 1-18 of the DEIS Summary, the City states that the employment growth targets come from the *King County Countywide Planning Policies*, last adopted in 2012.[12]

Yet, we could find no clear statement in the DEIS of how these estimates were calculated and what assumptions were made. We understand that the growth targets are merely estimates, by nature educated guesses and intended to be directional rather than precise. However, there is a ripple effect of the size of the growth targets (i.e., number of households) on the concentration of growth in specific areas of the city. Even moderate changes in assumptions could affect the alternatives such that projects impacts may be greater or lesser.

For example, we presume that the growth targets are based on a set of assumptions about the ratio of jobs to working adults, people per household and family size. If the Comprehensive Plan established objectives that vary from these assumptions, it could change assumptions behind other modeling, such as transportation, greenhouse gasses and need for schools. Below, we describe one strategy that would result in an equity strategy that would result in a higher number of people per household.

9

Family-sized housing strategies that could affect other assumptions are absent from the DEIS.

A lack of new family-sized affordable housing and replacement of existing homes with smaller units are factors creating displacement pressures. The Seattle Planning Commission found that only 1% of the city's entire housing stock comprises affordable units with three or more bedrooms.[13] Communities of color, immigrants and refugees are more likely to need larger homes,[14] but are increasingly finding them too expensive and in short supply.

The Planning Commission recently released an action agenda that calls for multiple policies and strategies to encourage preservation of existing and construction of new family-sized housing. The action agenda states: "Seattle needs to develop a concerted, multipronged action plan now to increase the supply and availability of family-sized housing for families with children at a wide spectrum of income levels."[15]

The DEIS is silent on land use, housing and transportation strategies that could increase the number of families in Seattle. Although the section on public services describes Seattle Public School's projections of growth in school age children, this is a reactive policy to existing trends. The Comprehensive Plan should set growth targets specifically for larger households and larger units of housing. In addition to the strategies proposed by the Planning Commission, the City could establish

[11] Page 31.

[12] This document clarifies that the growth targets were adopted from the most recent 20-year population projection from the state Office of Financial Management and the most recent 20-year regional employment forecast from the Puget Sound Regional Council. But the document contains no further discussion of estimate modeling.

[13] Seattle Planning Commission, *Housing Seattle*, Winter 2011.

[14] Puget Sound Sage, *Transit Oriented Development that's Healthy, Green & Just: Ensuring Transit Investment in Seattle's Rainier Valley Builds Communities Where All Families Thrive*, May 2012.

[15] Seattle Planning Commission, *Family-Sized Housing: An Essential Ingredient to Attract and Retain Families with Children in Seattle*, January 2014.

9 cont.

a higher persons per household goal than the current 2.06 city-wide ratio. Specific ratios could even be established for different areas of the city.

As such, the DEIS should mention the possibility of these strategies and analyze the environmental impacts of increasing household size – especially on housing, transportation, and public services.

10

Jobs quality and growth strategies that could affect other assumptions are not studied.

As with population and housing estimates, the DEIS assume that job growth by sector and types of new businesses will mirror existing trends. The DEIS is concerned primarily with how jobs will be distributed across urban centers and villages, not what kind of jobs will be created.

Seattle is experiencing strong growth in both high-wage, technology jobs and low-wage service jobs. While the new $15/hour minimum wage will mitigate the disparity between the inadequacy of the State minimum wage, it is widely acknowledged that $15/hour is not a housing wage in Seattle. Continuation of these job trends will sustain new opportunities for people with higher-incomes but exacerbate income inequality that underlies displacement risk.

Two types of job strategies could affect the Comprehensive Plan's impacts. First is change in sectoral growth patterns. For example, a strong investment in Seattle's tourism industry combined with policies that support high-quality hotel jobs could 1) greatly increase the share of hospitality employment and 2) mitigate displacement impacts for the current hospitality workforce, which is disproportionately people of color, immigrants and refugees.[16] Other examples of sectoral strategies could include emphasis on maritime-related jobs, health-sector employment and light manufacturing.

Second are strategies for place-based job development. The DEIS assumes similar patterns of job dispersion by area: "The anticipated future employment growth of 115,000 new jobs over twenty years will occur predominantly in Seattle's urban centers, hub urban villages and manufacturing/industrial centers."[17] In turn, the City's modeling of commuting and transportation impacts are based on where these jobs are currently located and where respective workers live. But the Comprehensive Plan could set out to change this.

For example, the City recently adopted a Priority Hire ordinance, which creates new access to construction jobs created by city capital investment for people with barriers to employment. The goal is to increase the share of workers from economically distressed areas in the city working on City projects. While the City's public works program is a relatively small employment generator, the idea could be taken to scale with other industries, such as maritime, hospitality and health care – and connected to neighborhoods experiencing high displacement risk. At scale this type of policy could change commute patterns and serve as a mitigation for displacement.

Another example of a place-based strategy is job creation in low-opportunity areas. The Rainier Beach community has envisioned a Food Innovation District located in and around the new light

[16] Puget Sound Sage, *Our Pain, Their Gain: The Hidden Costs of Profitability in Seattle Hotels*, April 2012.
[17] DEIS, page 3.6-19.

10 cont. rail station. This district would create living-wage, food-related jobs that are co-located with the workforce. Creation of the district will require a Comprehensive Plan provision, zoning change and significant public investment. The proposal could be transformative to the community and the local environment.

Again, this type of policy could change commute patterns and serve as a mitigation for displacement. More importantly, it calls into question this statement about projected impacts: "Although Alternative 3 spreads employment growth throughout the City, it concentrates it in fewer centers than in other alternatives due to the particular focus on light rail transit connections. As a result, these transit station villages are more likely to experience displacement along the light rail corridor in the nodes around the transit stops."

The exacerbation of economic inequality by current employment trends, as well as the possibility of economic strategies that could alter existing job patterns, requires the City to include some rudimentary analysis of job quality and access to those jobs by areas at risk of displacement.

11 **Disproportionate impacts of air pollution in the Duwamish Valley needs analysis.**

In Section 3.2, the DIES concludes that under all proposed alternatives, "No significant unavoidable adverse impacts to air quality and greenhouse gas emissions are anticipated."[18] This statement is based on an incomplete analysis of air pollution in the Duwamish Valley.

The communities of Georgetown, South Park and the International District are located in close proximity to Port of Seattle maritime operations, bus yards, rail yards, the City's waste transfer facility and many goods movement businesses. As a result, communities in Duwamish Valley have the highest concentration of mobile and point source pollution in the City and the region.

On the one hand, the DEIS discusses the situation of the Duwamish Valley in some detail (Page 3.2-10). On the other hand, the DEIS pivots away from the Duwamish Valley in the impacts section (3.2.2) to discuss the general cancer risk of air pollution along all Seattle roadways, emphasizing the distance that health risks from harmful emissions falls. The DEIS then states on page 3-2-17 that: "Given this, it would be prudent to consider risk-reducing mitigation strategies such as setbacks for residential and other sensitive land uses from major traffic corridors, rail lines, port terminals and similar point sources of particulates from diesel fuel and/or to identify measures for sensitive populations proposed to be in areas near such sources."

The DEIS points to a study by the Washington State Department of Health that modeled the risk of cancer from vehicle traffic along major roadways in South Seattle. However, this study had several flaws. First, the study only models cancer risk based on assumptions of traffic at one point in time. It does not account for potential increases in traffic. Second, the study did not model port trucks that move containers on and off the docks – port trucks are a major source of diesel in local communities where the trucks drive and park.

The DEIS fails to acknowledge a subsequent study by the University of Washington's Department of Environmental & Occupational Health Sciences on amounts of diesel exposure to residents of

[18] DEIS, Page 3.2-29.

11 cont. Georgetown and South Park.[19] Unlike an exercise in computer modeling, the study team set up diesel monitors throughout the two communities to determine how much diesel was in the air. The study concluded that areas in which monitors were placed experienced disproportionately high levels of harmful chemicals present in diesel particulate matter, compared to other parts of Seattle.

Since the publication of the State's analysis, scientists have determined that no level of diesel pollution is safe to humans. Even with improvements in truck fuel standards, the pollution coming from diesel trucks is unacceptably harmful to sensitive receptors. As a matter of environmental justice, the DEIS must acknowledge disproportionate impacts of diesel pollution in the Duwamish Valley, assess future diesel truck traffic and propose mitigations.

12 **The DEIS needs to include a Graham Street light rail station and potential urban village around it.**

Communities in Southeast Seattle have proposed to Sound Transit and the City of Seattle that a Graham Street station be added to the light rail line as a model to achieve equitable transit oriented development. The station is not proposed or even mentioned in the DEIS. A Graham Street station will allow for leveraging transportation investment to promote healthy, safe and inclusive community.

Conclusion

13 Sage believes that the updated Comprehensive Plan can be a real tool for economic prosperity for all current and future Seattle residents. We believe that growth is possible without displacement and that increasing density can go hand in hand with race and social justice. But the Comprehensive Plan and the DEIS must prioritize analysis, specificity and scale of strategies to accomplish these double bottom lines. We hope that you accept these comments in this spirit and look forward to an improved Final Environmental Impact Statement.

Sincerely,

Howard Greenwich

Howard Greenwich
Deputy Director

[19] Schulte, J.K., Magzamen, S., Oron, A.P., Beaudet, N., Kaufman, J.D., Larson, T.V., & Fox, J.R., *Diesel Exhaust Exposure in the Duwamish Study: Technical Report*. Seattle, WA: University of Washington School of Public Health, Department of Environmental Health Sciences, 2013. http://www.duwamishdiesel.org/home/technical-report

SCID

Seattle Chinatown International District

DATE: June 10, 2015

TO: Patrice Carroll, Gordon Clowers, and Susan McLain
Department of Planning and Development
City of Seattle
Via email

FROM: Cara Bertron
SCIDpda

RE: CID community comments on Draft EIS and Equity Analysis

Dear Patrice, Gordon, and Susan:

I am writing to share the results of the Chinatown International District Open House at IDEA Space on June 4. Twenty people attended, including residents, business owners, property owners, local media, representatives of cultural organizations, and SCIDpda staff.

We gave a brief presentation on the comprehensive plan process, the Draft EIS, and the Equity Analysis, with Chinese interpretation. Community members asked several questions at the end. Attendees then walked around the room looking at posters about the Equity Analysis, responding to questions about each in writing. Three UW Landscape Architecture students administered surveys about the Draft EIS and took photos of people with the photojournal board.

1 People offered diverse feedback. The following comments were mentioned more than once:

- The importance of preventing residential, commercial, and cultural displacement to preserve neighborhood identity.
- Affordable housing is a priority
- Public transportation is also important
- Jobs should be spread across the city, so people don't have to travel far to work
- Supporting and retaining community centers is important
- Outreach and communication, development, etc. should be culturally appropriate
- Reducing business and property taxes could benefit businesses and residents

The full list of questions and responses is attached. Arisa Nakamura indicated that the UW students would return the completed surveys about the Draft EIS to DPD under separate cover.

Patrice and Susan—thanks for your help in talking through the open house and providing guidance on the type of questions and feedback that would be helpful to DPD. Please let me know if you have any questions.

P 206.623.5124
F 206.623.6216
www.SCIDpda.org

CID Community Comments on Draft EIS and Growth and Equity Analysis

Provided at open house on June 4, 2015
IDEA Space/SCIDpda

The bulleted comments were written on posters in response to the questions in italics, which accompanied five posters showing information on the Equity Analysis and equitable development goals.

Which of these goals [below] is most important to you? Why?

1. *Create economic opportunity*
2. *Prevent residential, commercial, and cultural displacement*
3. *Build on local cultural assets*
4. *Promote transportation mobility and connectivity*
5. *Develop health and safe neighborhoods*
6. *Equitable access for all neighborhoods*
    - #2 – Displacement would change the CID in a HUGE (not good) way!
    - #2 – Especially in CID
    - #2 – Residents and businesses are assets of the neighborhood. If these go away, we might as well be Ballard... or SLU... or Belltown... or Bellevue... ☹
    - #2, but #6 is very close. We need to create opportunity for the residents we are preventing from being displaced.
    - #2 and #3 – Protecting residents' housing and culture are essential
    - #1 – Chinatown is currently underdeveloped. Reduce restrictions for development.

What strategies are most important to reduce or eliminate displacement of residents, businesses, and cultural assets?

- ID/Chinatown is rich in diversity. Maximizing and maintaining the Chinatown culture requires developing in a culturally sensitive manner. Affordable housing is very important.
- Help small/culturally based businesses to stay put (along with community centers)
- Lower housing and rent prices
- Reduce and eliminate property taxes to lower housing costs
- 30 minutes free street parking

How can the City of Seattle support diversity in all neighborhoods?

- Create access (funding, etc.) and opportunity for communities of color and other underrepresented and marginalized communities
- Support community centers and parks
- Provide culturally relevant outreach and communication
- We should treat others like we want to be treated

What do you think will make Seattle a better place for all people to live, regardless of their race, age, and income?

- Mixed-income buildings
- Access to healthcare
- Affordable food (groceries) and essentials
- Reduce/eliminate business taxes to make Seattle friendly to draw in businesses and increase jobs
- Walking trail and bike lanes for all (like the Burke Gilman Trail) will change the areas where people can go easily. Bikeable/walkable city!
- Affordable housing and transportation to and from the suburbs
- Better, faster, more expansive public transit
- End homelessness

Where do you think new jobs should be located in Seattle?

- Ideally scattered throughout the city—closer to residential areas—minimizing travel. For example, affordable housing in the ID/Chinatown, close to downtown commercial areas.
- Diversity of type of jobs is as important as location.
- Everywhere!
- Evened out across the city

Comments of Seattle Green Spaces Coalition to Draft EIS

June 17, 2015

Seattle Green Spaces Coalition is a grassroots organization representing hundreds of neighbors throughout Seattle who are concerned about maintaining and acquiring open space to balance growing density in our communities. We seek to re-purpose "surplus" city-owned property for public benefit, consistent with Seattle's environmental goals and the needs of neighboring communities.

We submit the following comments and questions in response to the Draft EIS of the Department of Planning and Development:

1 A chief concern is that the Draft EIS does not put forward meaningful mitigation strategies, but instead defers to other departments to create and implement mitigation strategies. Without articulating specific mitigation strategies, including identifying funding for the strategies, the Draft EIS is inadequate.

For example, instead of describing actual mitigation strategies with respect to Earth and Water Quality, the Draft EIS points to unspecified City policies:

> "The continued application of the City's existing policies, review practice and regulations, including the operational practices of Seattle Public Utilities, would help to avoid and minimize the potential for significant adverse impacts to critical areas discussed in this section." (Draft EIS, 1-11)

Vaguely pointing in the direction of other unidentified policies is not a true analysis. It sounds like Dorothy in the Wizard of Oz. The Wizard has no inclination or power to do anything. Really, we deserve more than a hand-wave in the direction of the Man behind the Curtain. The proposed "strategy" gives no assurances that effective mitigation strategies exist or will meet the demands of future growth.

The Draft EIS Fails to Offer Meaningful Mitigation Strategies to Address the Need for Open Space

2 The Draft EIS says that under all Alternatives, adding more households would widen the existing gaps between the aspirational goal of 1 acre of open space per 100 residents. (Draft EIS, 1-24) Further, the Draft EIS gives "as an illustration" that the City would need to add 1,400 acres of "breathing room" open space to the current park inventory of 6,200 acres. This illustration is inadequate because a robust analysis would include more than an "illustration."

We are currently not meeting our open space goals. Eleven out of 32 urban villages do not meet open space goals. (Draft EIS, 3.8-16) Many other deficiencies are identified in the Draft EIS (see Draft EIS, 3.8-16) With projected population growth, there will be more demand for parks, recreational facilities and open space. (Draft EIS, 3.8-25)

2 cont. Significant gaps in open space in certain single-family areas are likely to continue under all alterative scenarios. (Draft EIS, 3.8-28) Moreover, the Department of Finance and Administrative Services has identified approximately 414 acres of property including open space which are "surplus" and which may be sold by the City, further reducing our open space.

3 Despite these recognized deficiencies, the Draft EIS fails to address the health and environmental effects of the lack of adequate open space.

4 The Draft EIS does not address how the deficiencies will be remedied. It points out that the Seattle Parks District will provide funding for park maintenance, operation of community centers and developing new parks on previously acquired sites. (Draft EIS, 3.8-17). However it omits mention of acquisition of any other land for new park sites, except for the central waterfront project.

The Draft EIS notes that Parks' ability to acquire sizeable open space is currently very difficult given the cost of land, the need to pay fair market value and the lack of available space for purchase. (Draft EIS, 3.8-28) Despite this acknowledgement, the Draft EIS does not contain proposed mitigation strategies for open space except that the Parks Department should "strive" to leverage funds to match state funding grants. (Draft EIS, 1-25) This is not a proper mitigation strategy. "Striving" to address shortfalls by looking for outside money is not a reliable and dependable mitigation strategy.

Despite acknowledging that it will be "very difficult" for the Parks Department to meet the open space goals, the Draft EIS concludes that there are no unavailable impacts to public services! The Draft EIS concludes with boilerplate language that "No significant unavoidable adverse impacts to public services are anticipated." It is specious to make this statement while acknowledging existing and widening gaps and shortfalls, yet without proposing any reliable mitigation plan.

5 The Draft EIS lists a number of "possible" mitigation strategies including: updating the Comprehensive Plan goals and policies related to the acquisition of new park lands and development of usable open space within existing parks, creative accounting of private open space in certain areas to meet city goals, creative accounting of green streets as meeting open space goals, encouraging and enforcing developers to set aside publicly accessible usable open space, and partnering with other government agencies or private property owners to provide and maintain public open space.

It is the position of Seattle Green Spaces Coalition that the Department of Planning and Development must amend its Draft EIS to include proposals for meaningful mitigation strategies for acquiring additional open space, as well as methods to ensure that these strategies are successfully implemented. The Draft EIS must be amended to endorse mitigation methods such as the use of Transfer of Development Rights or mitigation within the city limits, using surplus publicly owned land, and the establishment of a public development authority for the acquisition and maintenance of

5 cont. open space is another possibility. (See below EcoSpaces Public Development Authority description.)

Use of surplus city-owned land must be proposed as a mitigation strategy to compensate for our loss of open space and to balance our growing density. Although there have been numerous studies and plans referring to using surplus city-owned land for open space, the Draft EIS fails to mention this and fails to address using surplus property as a mitigation strategy. Currently the City of Seattle owns approximately 414 acres of open space deemed "surplus" to the needs of the various departments of the City. Seattle Green Spaces Coalition takes the position that it would be imprudent for the City to sell this land for private development while the open space goals of the City are not being met and are at serious risk of not being met under all the Alternatives.

6 **Numerous Environmental Impacts are Not Addressed**

The Draft EIS pays little attention to adverse effects on storm water run-off and how the loss of tree canopy and open space will affect storm water run-off.

Increased development and increased vehicles on the road will put pressure on storm water run-off. The Draft EIS does not address this environmental impact which is significant to the health of the Duwamish River and Puget Sound. The Draft EIS does not put forward any mitigation strategies, instead simply pointing to Seattle Public utilities to come up with mitigation strategies for storm water run-off: "SPU currently employs and will continue to employ management strategies (…) to meet customer needs." (Draft EIS, I-26)

7 Similarly, there is no discussion of how loss of tree canopy and green space will affect greenhouse gas emissions. The mitigation strategies of separating homes and other sensitive uses from freeways, railways and port facilities by a buffer zone, or using filtration systems, is inadequate. (Draft EIS, 11-13)

8 With respect to Earth & Water Quality, the Draft EIS recognizes that certain neighborhoods have streams or wetlands in close proximity to urban villages. (Draft EIS, 3.1-7) The Draft EIS identifies a potential adverse impact to these areas (Draft EIS, 3.1-8). However, without identifying mitigation strategies, the Draft EIS concludes that no significant unavoidable adverse impacts to earth and water quality are anticipated (Draft EIS 3.1-9), claiming that the City has existing policies and practices which can avoid significant adverse impacts. This circular reasoning is illogical. We deserve a real examination of the potential damage to our streams and wetlands and how this will be mitigated.

9 The Shoreline Management Act requires that there be no net loss of ecological function and that the existing condition of shoreline ecological functions should not deteriorate. This includes wetland and flood plains associated with the waters of the state, including Puget Sound, Lake Washington, The Duwamish River, Lake Union, the Ship Canal and Green Lake and associated wetlands. The Draft EIS indicates that growth outside the

9 cont. urban villages and urban centers is planned for a range of 6% to 23% and that there are accommodations in the alternatives' growth distribution, which would not likely generate significant adverse impacts to the Shoreline District. (Draft EIS, 3.5-9) However, the reasoning behind this conclusion is not shown, the accommodations are not described, nor is there any mitigation for the what-if scenario in there event that there are significant adverse impacts.

10 By examining "likely" outcomes and events, the Draft EIS seems to ignore other occurrences which are possible and can have significant consequences. Why does the Draft EIS focus only on "likely" significant outcomes, without considering harmful outcomes that may occur? A proper risk assessment would examine the degree of harm of the less likely but still significant outcomes which can have serious deleterious effects on communities and our ecosystem.

Land Use Patterns, Compatibility, Height Bulk and Scale

11 The Draft EIS notes that future growth is likely to create localized land use compatibility issues. Under "significant unavoidable adverse impacts, the Draft EIS points to unspecified policies as a panacea: "[T]he City's adopted development regulations, zoning requirements and design guidelines are anticipated to suffiently mitigate these impacts. Therefore, no significant unavailable adverse impacts to land use are anticipated." (Draft EIS, 1-17)

The Draft EIS points obliquely to existing city policies. This is inadequate. In order to protect our natural resources and the environment upon which we depend, we need a robust analysis of the human health impact of increased density and a robust analysis of mitigation methods.

12 **The Loss of Tree Canopy is A Significant Adverse Impact.**

The Draft EIS refers to reducing the Comprehensive Plan's goal to increase the overall tree canopy cover from 40% to 30%.

There is no explanation of why this reduction of 10% is to be made. The claim that the reduction is to be consistent with the Urban Forestry Stewardship Plan is implausible because there is no analysis of how this reduction in our tree canopy will affect the environment. There is no discussion of how reducing our tree canopy goals will affect our air quality and water quality, health and quality of life. Wildlife habitat and heat island effects and other environmental impacts are also ignored.

Further Questions

Two portions of the Draft EIS appear to have implications for open space, without sufficient discussion. Please explain that these mean.

13 First, Draft EIS page 3.8-34, as a possible mitigation strategy to remedy the need for more open space, DPD suggests: "Update Comprehensive Plan goals and policies related to the acquisition of new park lands and development of usable open space within existing parks." The meaning of this is unclear. How does DPD propose developing space within space? Does this mean that Parks Department would convert natural areas or forested areas into "usable open space"?

14 Second, in Chapter 3.4, DPD includes a proposal to incorporate parklands as "expansion areas" for residential urban villages. What does this mean? One of these "expansion areas" in West Seattle, in the green space along the east side of 35th close to the golf course. Does this mean that greater open space will be available, or does this mean that development will take place in existing public open space?

Conclusion

15 While one of the stated objectives of the proposal to amend the Comprehensive Plan is "to become a more climate-friendly city" (Draft EIS, 1-2) there is no analysis of what this means or how it is to be achieved. We ask for real, meaningful analysis for the environmental impacts and real, viable mitigation strategies.

Contact information:

www.seattlegreenspacescoalition.org

Mary Fleck, Co-Chair, Seattle Green Spaces Coalition, maryfleckws@gmail.com, 206-937-3321

Elaine Ike, Co-Chair, Seattle Green Spaces Coalition, elaineike@hotmail.com, 206-933-0163

ECOSpaces: Engaging Community Open Spaces

What is ECOSpaces? A private/public partnership in the form of a public development authority.

What is ECOSpaces' mission? To engage community in stewarding and re-purposing public land to benefit the community in ways that are consistent with Seattle's environmental goals.

Why ECOSpaces? Urban open space is critical to a healthy city, its residents and our ecosystem. Our growing built environment requires open space to balance the growing density. Open space provides vital ecosystem services.

ECOSpaces provides an opportunity for using surplus city-owned property and open space that does not exist under the current Parks Dept., Department of Neighborhoods or Financial and Administrative Services' policies. ECOSpaces will allow community groups to obtain funding for projects on public land where the public would not otherwise be able to do so because of constraints where the community groups do not own the land.

How does ECOSpaces work? ECOSpaces owns public land throughout Seattle. It partners with neighborhood and community groups to develop plans for re-purposing the public land in different ways that suit the needs of the community. It supports the groups in securing funding. It partners with government entities and the private sector to secure funding.

Where does the public land come from? ECOSpaces' public land belongs to the City of Seattle. As a public development authority, it acquires land from the City of Seattle. It identifies and acquires "surplus" city property.

Where did the money come from for the land? Some of the land is provided to ECOSpaces at no cost from the City of Seattle. Some of the land is acquired over time by ECOSpaces as it secures funding. Some of the land is provided to ECOSpaces as mitigation or in exchange for transfer of development rights.

How does ECOSpaces sustain itself? ECOSpaces receives private and public funding. It leases land, which it owns. It sells snippets of property to neighboring property owners and others, but first attaching conservation restrictions to the property.

Community members apply for private and public funding for projects on the sites. ECOSpaces sustains itself through vital connections with community groups. It is the motivation of the community groups which supports each site, both from the start by initially identifying potential sites, development outreach from communities and neighbors near the sites, working with them to

develop plans for the site, and long-term commitment and stewarding of the sites.

What are some of the community purposes? This is as varied as the creativity and imagination of the public. Some ideas are: art installations, green spaces, botanical gardens, electric vehicle charging stations, solar demonstration projects, tree banks, community gardens, emergency hubs, dog runs, public pavilion meeting places, outdoor environmental learning labs, and rain gardens.

Comments to the Draft EIS - Seattle 2035
Submitted by Seattle Nature Alliance
June 17, 2015

Seattle Nature Alliance offers our comments on the Draft EIS. The Alliance represents Seattle citizens interested in preserving and protecting Seattle natural areas and greenspaces for wildlife habitat, low-impact passive recreation, and scenic beauty. We are concerned that pressures from population growth and development will subject our natural areas to overuse and will ultimately degrade nature for wildlife, and the nature-experience for people.

1 We have reviewed the plan, and also the comments from several other groups, including the Urban Forestry Commission, Seattle Greenspaces Coalition, and TreePac/Plant Amnesty. We would like to express our full support for the comments submitted by those groups.

2 In addition, we would like to emphasize that the Plan should include much more specific goals with regard to protecting existing trees, and for increasing overall tree canopy. The stated reduction in tree canopy goals from 40% to 30% coverage is unacceptable. We should be increasing the goal, not decreasing it. City dwellers as well as urban wildlife depend on the urban forest for health and well-being, and this need will be much more dire in the future, with more people and fewer natural areas to serve them.

3 The Plan should have more specific goals for increasing open space, and allowances for using surplus city-owned land as protected and preserved open space specifically designated and reserved for wildlife habitat and passive/low-impact recreation or scenic beauty. Instead of selling off this surplus acreage for development, the City should be improving and restoring this land for our open space needs. In the future, people will desperately need more natural areas close to where they live, as transportation to outlying natural areas will be much more difficult, and for many lower-income people, virtually impossible. They will need nature close to home.

4 Chapter 3.4 includes some very odd references to "Proposed Expansion Areas", with maps showing Residential Urban Villages with dot-hatched areas overlapping onto existing parkland. See attached screenshot for an example. This makes it look like the Urban Village—and residential development—will be extended into part of Ravenna Park, and other parks as well. We assume this is a mistake, or that there is some explanation that makes sense. It cannot be that the Plan is truly proposing to *build in existing parklands*, because that would be far outside the bounds of wise planning. Please clarify this in the next Plan document. **Please state clearly that parklands, greenspaces,**

4 cont. **open spaces and natural areas are expressly and forever exempt from urban village development.**

5 In conclusion, we feel the Plan should be much more nature-friendly, and should increase, protect, and preserve natural areas and tree canopy.

Signed,

Seattle Nature Alliance
www.seattlenaturealliance.com

Co-directors:
Mark Ahlness
Rebecca Watson
Denise Dahn

Contact:
seattlenaturealliance@gmail.com

Attachments:
Map of the "Proposed Expansion Areas"

Figure 3.4–16 Height limits—Roosevelt expansion area

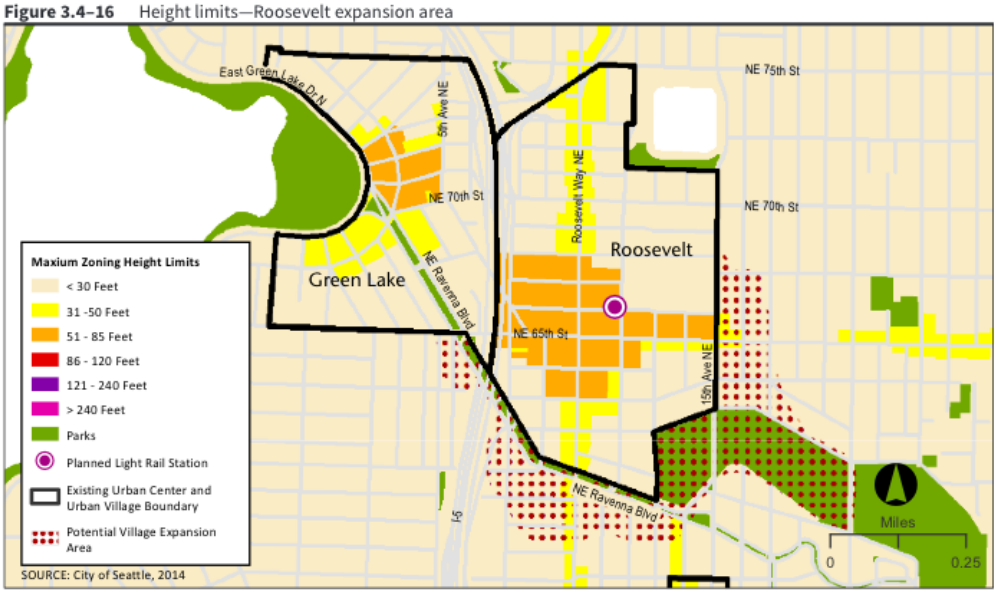
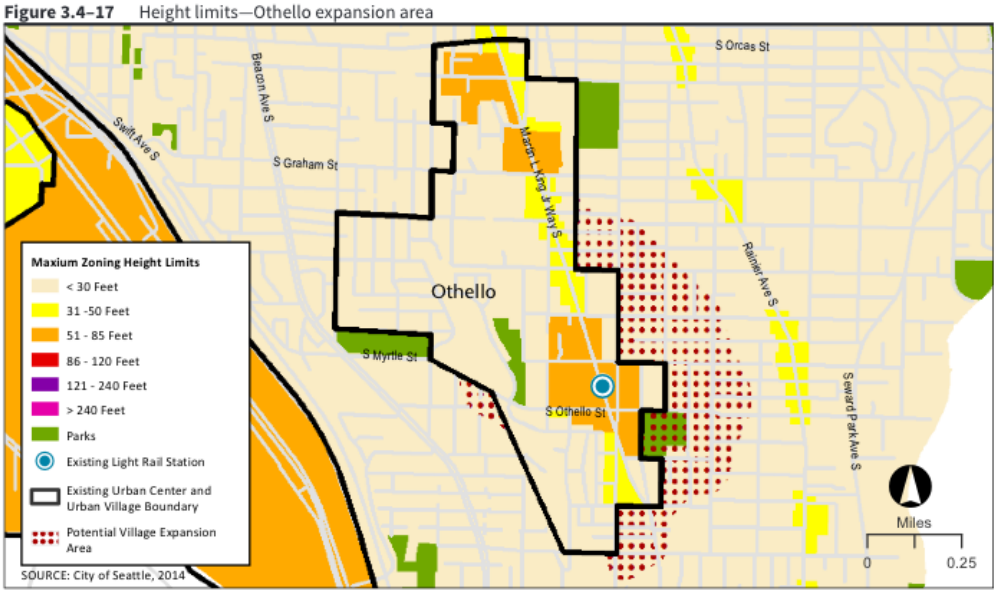


Figure 3.4–17 Height limits—Othello expansion area



1 In chapter 3.4, Alternatives 3 and 4 show "expansion areas" that show potential "residential village expansion" incorporating existing parklands and greenspaces. See attached screenshot.

What does this mean? From the document, it appears that these areas would be developable as residential, which would be preposterous and unacceptable.

In the final document, please clarify what is meant by this, and emphasize that parklands, greenspaces, and open space are to be protected and preserved.

Sincerely,

Denise Dahn
co-director, Seattle Nature Alliance
www.seattlenaturealliance.org

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denise@dahndesign.com
www.dahndesign.com

Figure 3.4–16 Height limits—Roosevelt expansion area

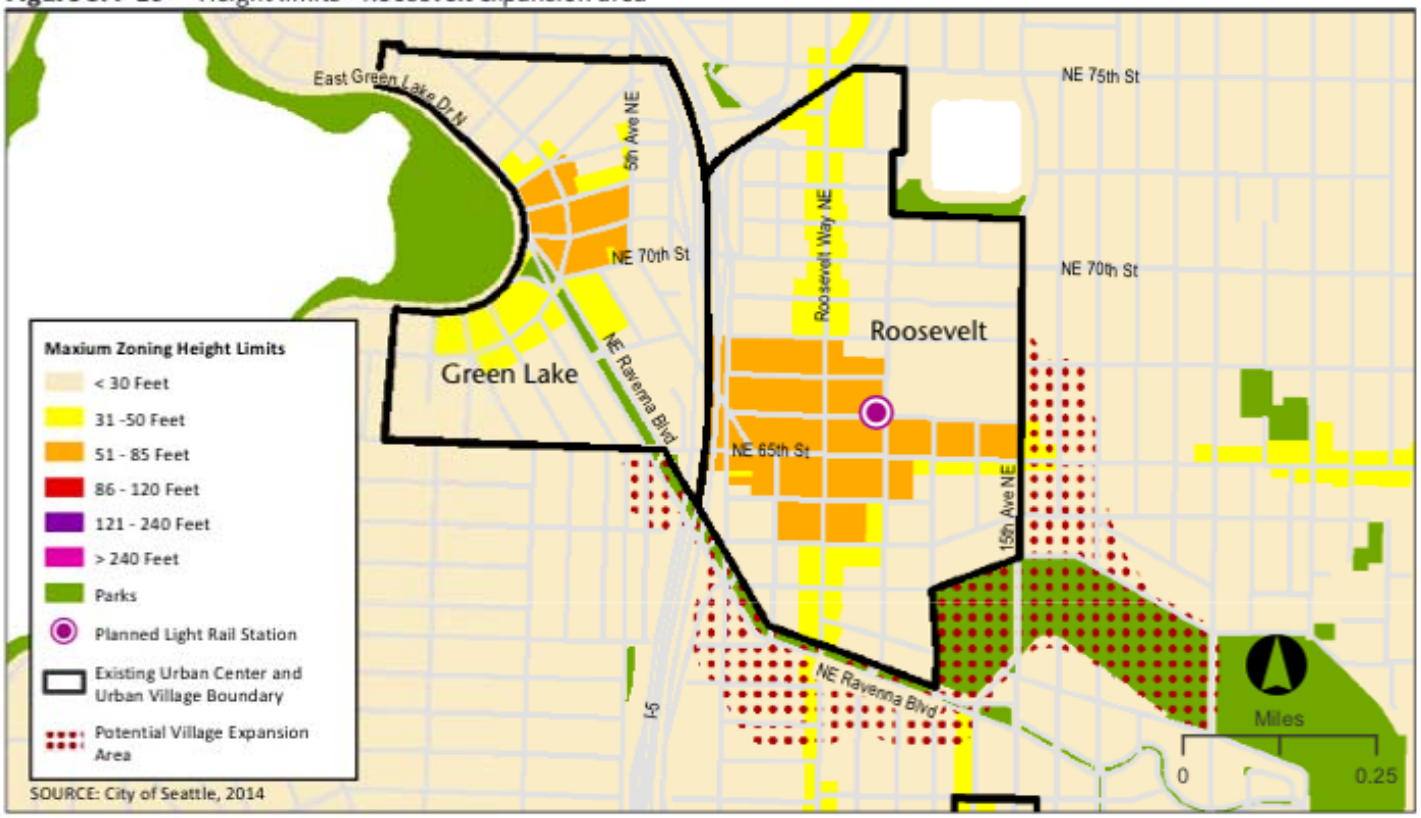
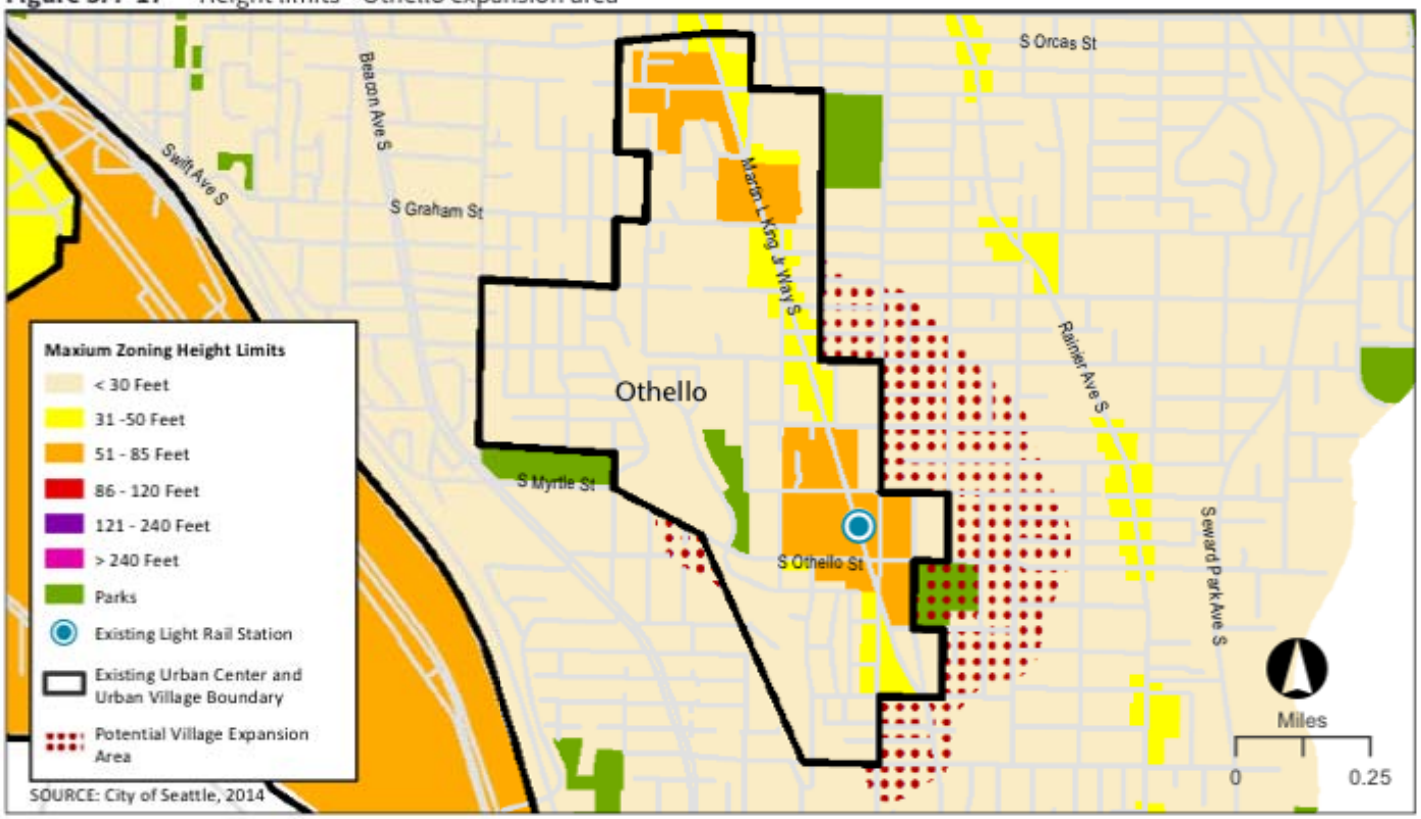


Figure 3.4–17 Height limits—Othello expansion area



www.SeattleGreenways.org
Seattle Neighborhood Greenways *safe healthy streets for all*
200 2nd Ave South #100 Seattle WA 98104 (206)713-5869

June 18, 2015

Dear City of Seattle Planners:

I am writing on behalf of our safe streets advocacy coalition, Seattle Neighborhood Greenways. The following is a summary of our comments on the Transportation Element and Transportation Appendix of the Draft Environmental Impact Statement for *Seattle 2035*, Seattle's Comprehensive Plan for growth over the next 20 years.

We appreciate the opportunity to comment on this draft plan. We want a city where living without a car is an easy, affordable, and realistic choice.

We came up with four recommendations:

1. Use a multi-modal, person-trip level of service standard rather than a vehicle level of service.
2. Count trips, not just commute trips to work.
3. Make sure *Seattle 2035* is in alignment with existing Seattle plans.
4. Build transportation models that push the envelope rather than following business as usual.

1 **Multimodal Level of Service** Rather than measure and base our transportation network on roadway capacity for vehicle-only level of service, measure the through-put of people – walking, riding buses and trains, in delivery vehicles, riding bikes, driving cars. The metrics we set for "person-trips" will help us fund and build the complete networks we want in the future. Nearby Bellingham and Bellevue have great models for us to study.

2 **Commute trips** We are changing how we work and we often work from home. Our trip to work represents only a fraction of where we travel. We go to schools, parks, bars, and out to visit friends. The Puget Sound Regional Council has collected fine-grained analysis of different trips we make during the day. We want to make sure our 20-year transportation planning models reflect the variety of places and ways we travel as well.

3 **Align with existing plans** We are especially happy that the Climate Action Plan expects just 25% of us to drive to work alone by 2035 and expects transit boardings to increase by 37% by 2040. We'd like to see *Seattle 2035* be clear about which plan alternatives greatly increase the possibility we'll reach our goals for Vision Zero, the Climate Action Plan, transit, and active transportation modal plans. The current DEIS for the Comprehensive Plan assumes Seattle's walk/bike/transit plans will not reach their goals, yet according to our mode plans we ***will*** be walking, biking, and riding transit a whole lot more in 2035 — and our Comprehensive Plan needs to reflect this welcome reality.

4 **Great models that push the envelope** What kinds of land use plans would inspire developers to be motivated to build properties that minimize auto trips? How can levels of service be used to fund multi-modal street improvements? What would a car-free downtown look like? What would happen if the city no longer subsidized free parking?

5 We encourage your planners to make one "visionary" alternative of *Seattle 2035* that reflects new assumptions for the trips we make and that dramatically reduces our greenhouse gas emissions.

We feel a deep sense of responsibility to our future city, and a desire to support Seattle government as it plans for our common future. We look forward to living in a great city in 2035!

Sincerely,
Cathy Tuttle, Executive Director Seattle Neighborhood Greenways

South Communities
Organizing for Racial/Regional Equity
Community controlled & inspired development.

June 17th, 2015
Gordon Clowers,
City of Seattle Department of Planning and Development
PO Box 34019
Seattle WA, 98124
RE: Comprehensive Plan Draft Environmental Impact Statement (DEIS)

Dear Mr. Clowers,

1 South Communities Organizing for Racial/Regional Equity formed in 2013 to be an organized voice for community controlled and inspired development. We have a vision of sustainable multi-racial neighborhoods in the Rainier Valley where all community members are socially included, economically self-sufficient, politically engaged, and are at the forefront of shaping the future of our city, county, and region, but what we were seeing is more of our members, clients, and neighbors being pushed out rather than benefiting from growth. We are pleased to provide our comments and feedback for the Draft Environmental Impact statement (DEIS) on the update to the Comprehensive Plan. We are tracking this update very closely and will be weighing in throughout the process.

Context: Unique Features of Southeast Seattle
In South East Seattle, community, cultural, and faith based institutions are centrally located in the city and act as first-stop and one-stop shops providing a broad range of vital services to diverse constituents from a variety of backgrounds, cultures, languages, and faiths. They also help connect clients to additional neighboring services in Seattle. As pillars of their various communities, these institutions also provide a sense of place and belonging to individuals relocating from around the world and across the United States. A major concern in Southeast Seattle is the very real potential that these institutions will soon disappear, forced out by rising rents. Investing in community ownership of cultural, communal, and faith based institutions will provide stability and predictability for the constituents who depend on them. We urge the city to look at creative ways to create ownership opportunities for these institutions to prevent communities from being displaced.

2 **Equity Analysis in the DEIS**
Fundamental to our concern with the DEIS is that the DPD's Equity Analysis appears to be supplemental to the proposed Comprehensive Plan alternatives rather than integral. The Equity Analysis should be part of the environmental analysis to inform the shape of the growth alternatives, not just future mitigation policies.

As such, we strongly urge the City to use the Equity Analysis to adjust one or more of the proposed growth alternatives. The proposed four alternatives in the DEIS fail to distribute growth throughout the city in a way that maximizes opportunity for vulnerable communities and minimizes displacement risk. We strongly believe that public debate on the Comprehensive Plan will be centered on displacement, but the EIS will have failed to study growth potential that provides solutions.

2 cont. For example, several potential urban villages such as Rainier Beach, Othello, and North Beacon Hill, have not been included in any alternatives. High opportunity areas, like Magnolia and Madison Park, could be designated urban villages, allowing for integration of affordable housing at a much larger scale than possible now. This would allow potentially displaced households an opportunity to move to a high opportunity areas within the city and instead of low-opportunity suburbs.

Also, in Southeast Seattle, South CORE is advocating for a Graham Street station on the light rail line as a model to achieve equitable transit oriented development. The station is not proposed or even mentioned in the DEIS. Graham station will allow for leveraging transportation investment to promote healthy, safe and inclusive community by linking community benefits like affordability of housing close to transit and overall accessibility of our city, focusing on equity issues of transportation planning and policy.

To adequately provide analysis to make these changes, the Equity Analysis should be incorporated into the body of the DEIS, either in the Housing and Employment section or as an Appendix.

3 **Timing of Mitigations**

The Equity Analysis shows which communities in Seattle are most vulnerable to displacement. Several of those areas 1) comprise largely low-income households, communities of color, immigrants and refugees and 2) are disproportionately receiving growth under alternatives three and four. Displacement of communities of color has already occurred and continues to occur in these areas now. Although the DEIS proposes mitigations to the displacement effects of the four alternatives, it does not speak to timing or urgency. We know displacement is happening now and action by the city is needed now if Seattle is to remain a city for all communities. It is simply not acceptable to offer an alternative that could make displacement worse without an analysis of timing.

As such, the DEIS must incorporate timing of public investment strategies to prevent displacement. The investment and mitigation strategies must be put in place immediately before private sector investment reaches a tipping point in these areas. This means not 10 or 15 years from now, but within 5 years. This may substantively change analyses in the DEIS.

4 **Integration of Impacts and Mitigations**

Transportation choices, what gets built, where it gets built, and how it is operated and maintained have major impacts on our economy, climate, and health. It is important that we identify ways to align public investments with outcomes such as reduced displacement and improved air quality. The DEIS needs to tell a better narrative on how to bring together affordable housing, better transit, quality jobs, and investment in ways that allow us to grow without displacement. Beyond the land-use map of the growth alternatives, impacts and mitigations need more integration in the analysis so that we see how they can all work together to build a better city. For example, including a proposed Graham Street station brings together mitigations in the transportation, housing, employment, and air quality sections. Another example is clean air – South Park is vulnerable to displacement, but it is also one of the most polluted areas of the city and needs public intervention to reduce health disparities.

5 **Failure to Study Displacement Impacts**

While displacement emerges in the DEIS as a major effect of all growth alternatives, the DEIS is surprisingly silent on what that could look like. Displacement is alluded to, but no numerical estimates made – unlike other sections, such as air quality and transportation which use sophisticated modeling. This is important, because unless we know the scope of the impact on people, it is impossible to measure proposed mitigations against those impacts.

Furthermore, the DEIS does not take into account the historic inequities that led to some populations being more vulnerable to displacement and more likely to be excluded from high opportunity areas. The

5 cont. DEIS claims that race and social justice are a priority for the Comprehensive Plan, but without specific analysis of how communities of color have historically been made vulnerable - and how they can be central to solutions - the DEIS fails to fully address potential displacement impacts.

6 **Failure to Study the Environmental Impacts of Displacement**
The DEIS fails to identify in any way the environmental impacts that result from displacement. Low-income households and communities of color use transit more frequently and have lower car ownership rates. If displaced to the suburbs, these households will be forced to commute more by single occupancy vehicles, offsetting GHG emissions and total VMT gains in the city be location of better-off households near transit. The cumulative impacts of increased vehicle miles traveled and economic displacement on low-income communities must be taken into consideration when selecting and developing the chosen alternative.

7 **Failure to Study Alternative Job Growth Strategies**
The DEIS lacks important details about what kinds of job growth are being projected over the next 20 years. Will they be mostly high tech jobs that require advanced degrees? Will they be manufacturing jobs that are accessible to more people? Or will they see even more service sector jobs with low wages? This lack of detail makes it very difficult to assess outcomes for communities and whether we think the DEIS has really studied all alternatives. The Comprehensive Plan needs to establish clear and bold goals for economic prosperity and improve upward mobility of low wage workers through skills improvements, raising of wage floors and improved transit mobility. The DEIS does not appear to assess this possibility.

In conclusion, we appreciate the hard work underway by DPD staff on the four alternatives. The plan for how we grow in the next 20 years is clearly being stewarded by a committed group of staff at DPD. We are hopeful that our suggested modification to DEIS is seen as a positive and you will consider using the equity analysis to inform the creation of a growth alternative that addresses the current risk of displacement in high risk areas by coupling whatever level of growth chosen with significant near term stabilizing investments.

Sincerely,
South CORE Members

African Diaspora of Washington State

Asian Counseling & Referral Services

East African Community Services

El Centro de la Raza

Eritrean Association of Greater Seattle

Ethiopian Community of Seattle

Filipino Community of Seattle

Friends of Little Saigon

Got Green

GABRIELA Seattle

Homesight

InterIm

One America

Puget Sound Sage

Rainier Beach Community Empowerment Coalition

Rainier Beach Moving Forward

Somali Community of Seattle

Urban Impact

UNITE-HERE Local 8

United Food & Commercial Workers Local 21

Vietnamese Friendship Association

The Urbanist

Examining Urban Policy to Improve Cities and Quality of Life
theurbanist.org | info@theurbanist.org | 424.234.6936

Letter No. 29

June 18, 2015

Diane Sugimura, Director
Department of Planning and Development
City of Seattle
700 5th Avenue, Suite 2000
Seattle, Washington

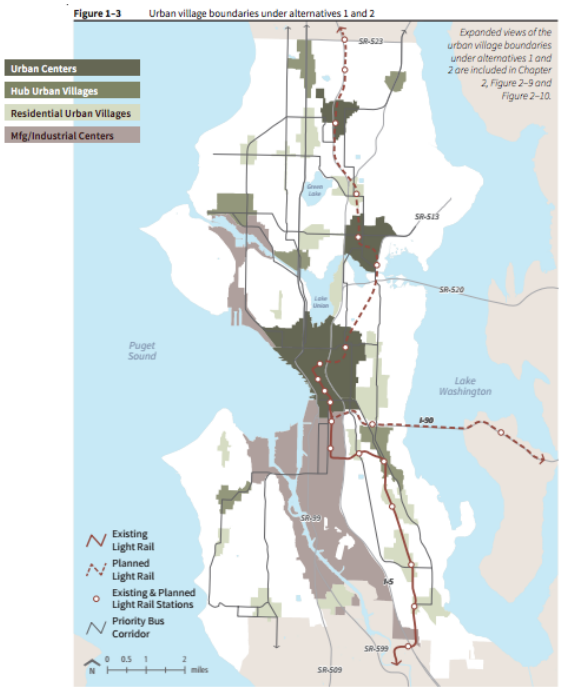
Director Sugimura,

1 We wish to present our comments on the Seattle 2035 Draft Environmental Impact Statement. But before we do that, we would like to recognize city staff for their excellent work in reaching out to communities and putting together a high-quality set of plans for a growing city. It's been encouraging to watch DPD staff in particular make strides to communicate at every step of the process. Early on, we had a number of chances to sit down with multiple staff members to share our thoughts on a range of planning and public involvement issues. We commend your department for those collaborative opportunities and hope to continue in the future.

2 Recently, we published a series of articles highlighting Seattle 2035. The most recent piece was our endorsement article. In it, we explained our concerns with the four existing alternative proposals on the table and how we would improve upon city growth strategies. Our overarching themes are diversity, equity, opportunity, and accessibility for all. The following is a summary of the arguments that we presented in the article; first with our concerns of the alternatives, then with our preferred approach for a new alternative:

Alternative 1: Business As Usual

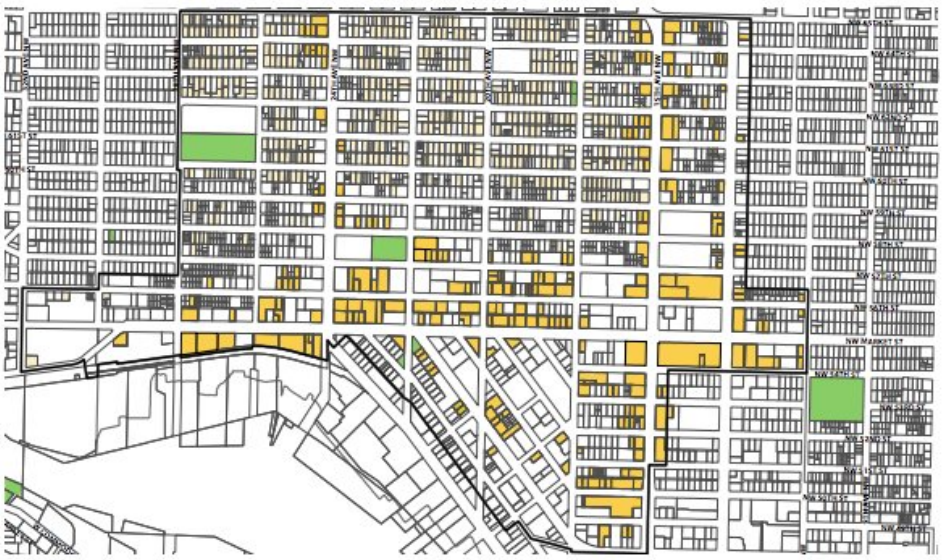
The least surprising option is Alternative 1, which simply continues the city's existing growth patterns. Under this alternative, 42% of household growth would be focused in urban centers, 35% in urban villages, and 23% in single-family neighborhoods. There would be no changes to urban center/village boundaries. Instead, growth would be sustained by infilling parcels of remaining developable or redevelopable land.



The city could implement strategies to increase building capacity within these areas through upzones or modifications to development regulations. Indeed, some urban villages still have excess land supply that is zoned for urban low-density residential. Those familiar with the city's zoning maps would notice, for instance, that the Roosevelt Residential Urban Village is one such place with single-family-to-urban-zoning potential. These areas could be rezoned to support more growth, though this would likely involve lengthy planning processes.

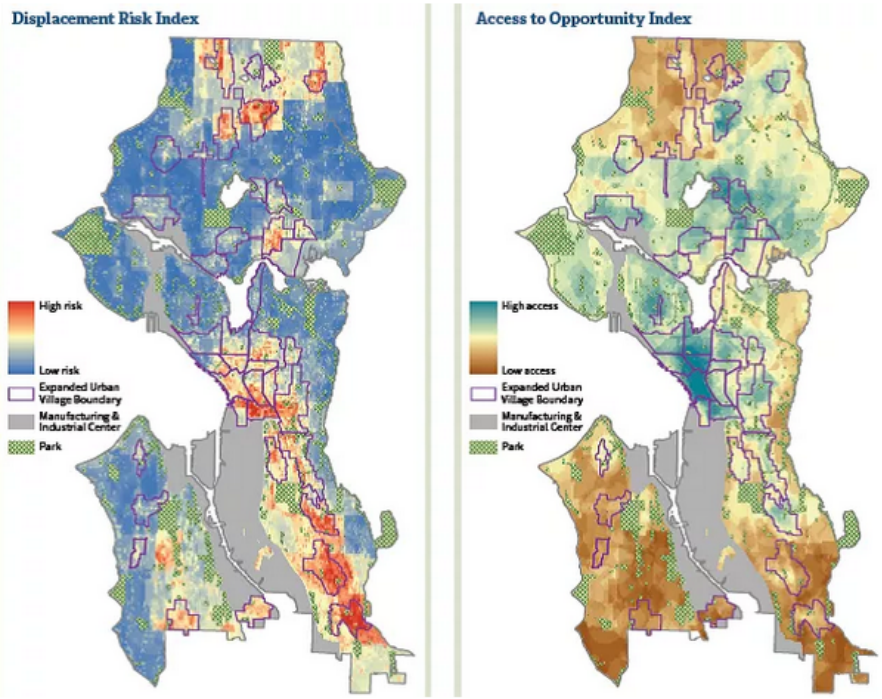
Meanwhile, some urban villages, like Ballard, are approaching their total development capacity under today's land use regulations. It's likely that there isn't enough remaining development potential in Ballard to meet the legal requirement to provide 20 years of capacity. Over the past 20 years, 3,516 new dwelling units have been built in Ballard, of which 2,836 net new dwelling units were built in the past 10 years alone.

2 cont. And development isn't slowing down; dozens of new projects are currently being planned or constructed. If this level of growth continues, it won't be long before there aren't any parcels in Ballard left to develop.



Urban Village Parcels with Capacity for Development

To its credit, the city is engaging in a process to determine how the central area of Ballard can be designed to absorb more growth through the Ballard Urban Design Framework. But Ballard is just one of many urban villages that have seen rapid growth, and like Roosevelt, Ballard's urban design framework will likely need to be revisited sooner rather than later if growth continues at its current pace.



Alternative 2: Double Or Nothing

3 Alternative 2 similarly offers no changes to the city's urban center or urban village boundaries. Where it differs from Alternative 1 is its emphasis on urban centers, to the exclusion of urban villages and single-family residential areas. Alternative 2 would focus a staggering 66% of households in urban centers, while only 21% would be allocated to urban villages and 13% to single-family areas. Under this alternative, urban villages would absorb 10,000 *fewer* households than under Alternative 1, while urban centers would absorb 17,000 more.

3 cont.

On the face of it, Alternative 2 might seem like a great vision for the city. Urban centers have excellent access to jobs, high quality transit, city services, and shopping opportunities. Alternative 2 would concentrate growth in these well-connected areas, while relieving pressure on areas of the city at high risk for displacement, like Southeast and Northeast Seattle.

But there's a catch. This level of concentrated growth would amplify the rate of change in the urban centers. As cheap, older buildings are cleared out to make way for new, expensive ones, it will become that much harder for anyone but the rich to afford to live in those areas. Lower-income households would be effectively shut out of the most vibrant and thriving parts of the city.

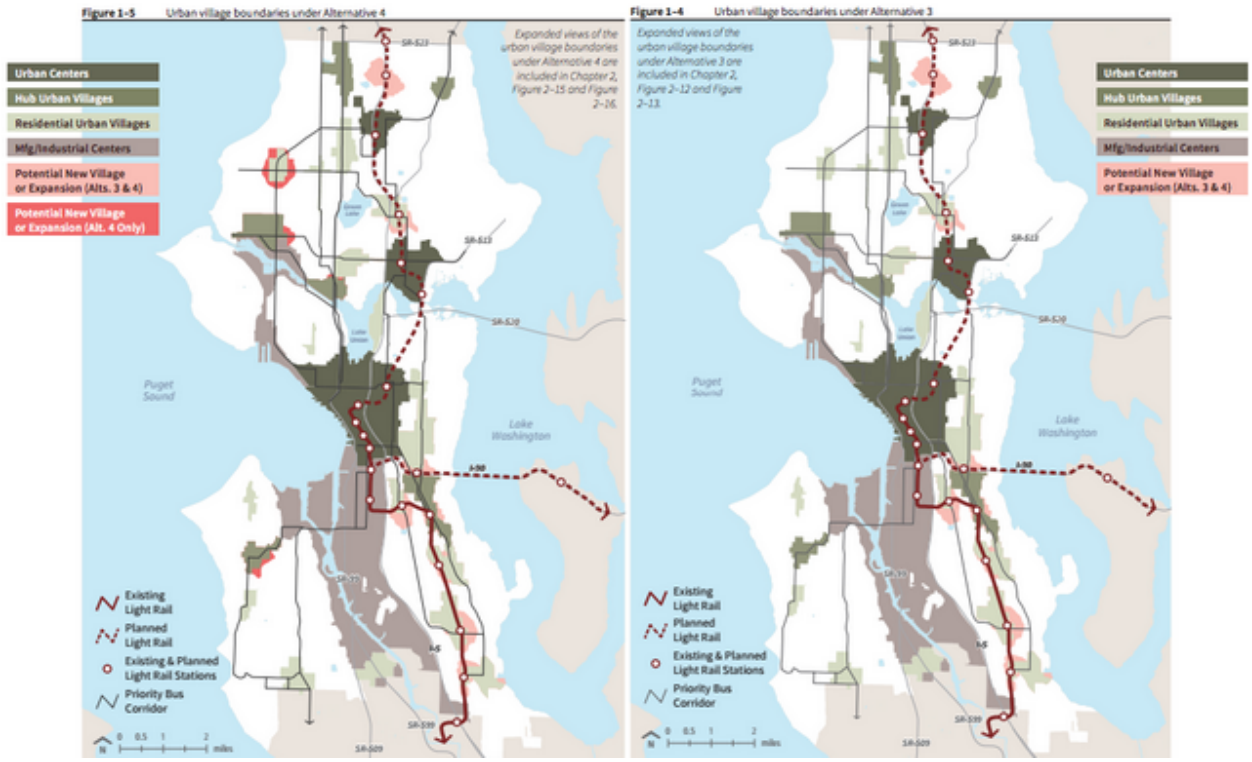
Additionally, despite fairly generous zoning in urban centers, there's no guarantee that projects would come anywhere near the allowed limits. They certainly don't today. It's entirely possible that changes in the market could push developers to seek other types of development than high-rises. If this happens, development would essentially be unplanned.

South Lake Union is a clear demonstration of both of these problems. The neighborhood changed so quickly that it lost its low cost building, and yet many of the new projects didn't maximize the neighborhood's zoning capacity.

Alternatives 3 and 4: Transit-Oriented Displacement

4

Alternatives 3 and 4 are more ambitious in their approaches to growth in the city. Underlying both alternatives is the thesis that high-quality transit, like light rail and/or bus rapid transit, are key to expanding access to urban benefits. Both alternatives would expand the boundaries of urban villages near light rail stations at Rainier Beach, Othello, Mount Baker, Beacon Hill, and Roosevelt, and would establish new urban villages centered on the future Judkins Park and N 130th St stations. Alternative 4 would additionally expand urban village boundaries in Crown Hill, Ballard, Fremont, and Alaska Junction. Under both alternatives, the city would take steps to implement zoning and regulatory changes to facilitate urban development.



Transit-oriented development is a fantastic way to extend the reach of urban benefits, but it is not a panacea. Both alternatives run the risk of severe displacement in Rainier Beach, Othello, Mount Baker, and Beacon Hill, as well as dozens of other locations in the city's urban villages slated for future development and regulatory changes under these two alternatives. In fact, the city's own analysis suggests that the

4 cont. potential for displacement is higher under the latter two alternatives. It would be unfair and inequitable to ask lower-income residents to bear the brunt of the city's growth--and yet both alternatives essentially gloss over new and effective potential mitigations for this problem.

Our Alternative Approach: Alternative 5

5 The Urbanist's editorial staff believe that all four of the provided alternatives would lead to an unacceptably high level of displacement and inequity. We cannot, in good conscience, endorse any of them. Instead, we are endorsing a fifth option, which we have creatively dubbed **Alternative 5**.

Growth can be a wonderful thing. Seattle is growing, and it behooves us to direct that growth in a way that will most benefit our residents, our city, and our planet. Yet growth also has costs, and we must not allow those costs to fall disproportionately on those who are least able to pay them. If we want to accommodate the next 20 years' worth of growth without large-scale displacement or turning Northgate into a gated community, we must find a way to spread that growth--and the benefits of urbanism--to a wide swath of the city. High-density growth must be paired with high-quality transit, such that walkability and car-free living are no longer the sole privilege of those who live downtown.

Concretely, Alternative 5 makes four proposals:

1. **All areas of the city have an obligation to support growth, and the right to access the urban benefits that come with it**. Regardless of wealth, race, class, or zoning, each portion of the city must support its share of the city's growth. As an example, single-family residential zones are appropriate for many of the common Missing Middle housing types, such as cottage housing, detached accessory dwelling units, duplexes, triplexes, townhouses, and even rowhouses. These housing options should be broadly allowed with minimal interference from neighbors. These building types are equitable, desirable, and compatible with the character of residential neighborhoods. While this type of growth may seem painful to some, it presents a wide range of opportunities and benefits: proximity to jobs, access to high-quality transit, grocery stores and restaurants, parks, schools, and more. All these benefits come from growth and density, not the other way around. All residents, whether new or old, deserve to partake in these urban benefits, regardless of where they live.

2. **Expand the number and size of urban villages to accommodate growth throughout the city**. There are ample commercial and medium-density residential areas in the city that have no urban center or urban village designation, such as Aurora Avenue (north of N 36th St to N 85th St), Upper Fremont, "Frelard", Westlake, Nickerson, Madison Park, Wedgwood, South Magnolia, Interbay, Graham, and many more. Each of these areas presents an opportunity to absorb growth while providing tremendous urban benefits. The city should also consider extending boundaries in these areas beyond just the immediate medium-density residential and commercial core properties. Transit walksheds extend beyond the core, and bikesheds extend even farther. Connecting bike rides with transit, something that will become even easier with Pronto!'s expansion, shows that the urban villages can be much larger. Overconcentration of growth leads to targeted displacement and disruption. Only by spreading growth throughout the city can we ensure that no single area experiences an unreasonable share.

3. **Expand urban zoning in urban villages and urban centers**. Designating areas as urban villages isn't enough. The city needs to go further and expand the areas of urban development in urban villages and high-intensity zoning in urban centers, especially where there is extraordinary demand for housing (e.g. Ballard, Wallingford, South Lake Union, and the University District). This will reduce the number of people that are displaced due to demolitions.

4. **Actively mitigate the impacts of growth in areas where displacement risk is high.** We support adopting policies that will alleviate or prevent actual displacement. This might include mandatory participation in the multifamily tax exemption (or a similar program), mandatory inclusionary zoning or linkage fees, one-to-one replacement of affordable units in perpetuity, focusing housing levy dollars in these areas, using the city's bonding authority for sustainable affordable housing options, and other socially progressive housing strategies through the land use code or city actions in the form of programs and partnerships.

5 cont. Seattle deserves an equitable approach to growth, and we believe that Alternative 5 is that approach.

Cordially yours,

The Urbanist Editorial Board

Carbon Copy: Office of the Mayor and Seattle City Council

Transportation Choices transit for all

feet first promoting walkable communities

To: Gordon Clowers, City of Seattle Department of Planning and Development
From: Transportation Choices Coalition and Feet First
Re: Seattle 2035 Draft Environmental Impact Statement
Date: June 18, 2015

Dear Mr. Clowers,

Thank you for the opportunity to comment on the 2035 Draft Environmental Impact Statement. The City of Seattle's Comprehensive Plan will shape how and where our City grows over the next 20 years. Transportation Choices Coalition (TCC) is a nonprofit that advocates for more and better transportation options in Washington State. Feet First is a nonprofit organization that advocates for more walkable places to allow more people to safely walk. With the tremendous ongoing and planned investments in transportation over the next decade, we believe the City should direct growth in a way that connects the people who live in Seattle to these transportation options, increases economic opportunity, and limits negative environmental impacts. Using these guiding principles, our organizations offer the following comments:

1 **Some estimates and projections in the DEIS analysis do not appear consistent with current trends**. **We recommend providing an addendum to the DEIS that includes analysis using updated data. Models used for future analysis should be updated accordingly.**

2
- **Population growth might be underestimated.** The DEIS uses growth estimates of 120,000 people and 115,000 jobs in Seattle through 2035. 120,000 constitutes a nearly 20% increase over DPD's 2015 population estimate of 662,400. While this appears consistent with prior population trends of about 10% each decade between the 1990s and 2010 (although it doesn't account for compound growth), Seattle's population grew about 10% between 2010 and 2015, nearly double the rate of these previous decades.[1] At this rate, we would expect an increase in people closer to 300,000. Seattle's thriving economy made it the fastest growing city in the nation in 2014. Additionally, the growing impacts of climate change will likely increase the number of climate refugees that will move to the city.

3
- **Non-SOV mode split may be underestimated**. Mode split analysis throughout the DEIS relies on PSRC household travel survey data from 2006. Early analysis of more recent 2014 household travel survey data shows significant shifts away from SOV travel, especially in designated Regional Growth Centers. For example, in 2006, 26% of all trips to Downtown Seattle were by SOV. However, 2014 data shows that number dropping to 16%.[2] Capitol Hill also showed a 10 percentage point decrease in SOV over this 8-year time period.

4 **Some estimates and projections in the DEIS analysis are not consistent with other City modal plans and targets.**

- **Mode split estimates in the DEIS are not consistent with PSRC guiding principles for Regional Growth Centers.** A PSRC Guidance Paper published in 2014 recommends that "Mode split goals

[1] http://www.seattle.gov/dpd/cityplanning/populationdemographics/aboutseattle/population/
[2] http://www.psrc.org/assets/833/trend-t8.pdf

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4 cont.

for centers should represent a significant decrease in SOV travel [...] over the course of the 20-year planning period.[...] Mode split goals for centers should achieve reductions in single-occupancy vehicle trip share that are at least consistent with and *should exceed* recent trends in mode share."[3] The DEIS shows, at most, a decrease in SOV travel of 10 percentage points in Downtown Seattle, 5 percentage points in Capitol Hill, with other sectors showing between only 1 and 5 percentage points decrease in SOV, and a citywide decrease in SOV mode share of only 3 to 4 percentage points. Based on changes in only the past eight years in the PSRC household travel survey data cited above, Seattle should both anticipate and strive for more rigorous declines in SOV travel.

5

- **VMT reduction estimates are not consistent with Seattle's Climate Action Plan (CAP) targets**. According to the DEIS, the PM peak period VMT per capita citywide is expected to decrease from 3.3 miles in 2015 to 2.9 miles by 2035 under all four alternatives. However, the CAP assumes a 20% reduction in VMT by 2030. The CAP is implemented through plans such as the Comprehensive Plan and Seattle Department of Transportation modal plans. Although the DEIS assumes full implementation of all modal plans by 2035, VMT is estimated to decrease by only 12%. Seattle should include mitigation measures in the Comprehensive Plan that help the City meet VMT reduction targets, or consider land use alternatives that can further lower VMT. Some neighborhoods with higher density, land use mix and connectivity have 25% less per capita VMT than comparable nearby neighborhoods.[4] We will not be able to achieve the VMT goals outlined in the CAP without close coordination with the comprehensive plan.

6

The City should consider using a multimodal approach for Level of Service (LOS) standards.

- **Using auto-centric LOS is inconsistent with the City's GHG emissions reduction targets**. The DEIS' primary metric for evaluating the transportation impacts of different alternatives is LOS, which measures the number of vehicles crossing a number of screenlines across the city compared to the designated capacity of the roadways crossing the screenline. However, LOS has been shown to make it more challenging to approve environmentally-friendly projects (such as adding bike facilities or widening sidewalks) that reduce road capacity or to encourage dense development in urban areas.[5] Multimodal LOS standards should instead be set to prioritize the movement of people and goods instead of only the movement of vehicles, and should encourage development that can be supported by walking, bicycling, and transit use.[6]

- **Seattle has the flexibility to set multimodal LOS standards**. While the Growth Management Act requires level-of-service standards for arterials and transit routes, it does not prescribe what these standards should be. According to PSRC, local governments have "virtually limitless

[3] http://www.psrc.org/assets/11659/Guidance-Centers-Target-Mode-Split.pdf
[4] http://www.vtpi.org/tdm/tdm20.htm#_Toc119886799
[5] http://la.streetsblog.org/2014/08/07/california-has-officially-ditched-car-centric-level-of-service/; http://www.planetizen.com/node/46112
[6] http://www.psrc.org/assets/11694/MMLOS.pdf

discretion" when setting LOS standards.[7]

6 cont.

- **Other cities and jurisdictions have moved toward alternatives for measuring LOS**. In 2014, the State of California published draft guidelines proposing to substitute Vehicle Miles Traveled (VMT) for LOS.[8] Jacksonville, Florida has developed a Multi-Modal Transportation Plan, which uses pedestrian and cycling LOS ratings to prioritize walking and cycling improvements.[9] Bellevue, WA, has also explored incorporating multimodal levels of service into local and regional long-range planning efforts. A recent report includes proposed methodology and suggested metrics.[10]

Additional Considerations

7

- **Consider adding bikeshed and transitshed graphics to analysis.** Land use patterns that make it easier for people to walk, bike, and use transit would help achieve goals for improved access and opportunity for citizens. Showing graphics for the anticipated bikeshed and transitshed - in addition to a walkshed - for each alternative would provide an easier way to compare access across alternatives.

8

- **Include number of public services accessible within each walk, bike, or transitshed**. Along with households and jobs, living within walking distance or with transit access to services is an important part of Access to Opportunity, as defined in the 2035 Equity Analysis.[11] Providing the information to select an alternative that maximizes such access should be consistent with the City's equity goals.

9

- **Provide additional traffic safety data in the analysis.** Safety for people biking, walking, and driving is an important part of environmental health, and therefore warrants further analysis in the transportation element of the DEIS. A map showing the location of the 11,600 police reported collisions in Seattle in 2012 could help guide land use decisions. The DEIS says that "the City['s] goal of zero traffic fatalities and serious injuries by 2030 [...] will be pursued regardless of the land use alternative selected." However, land use can be an important determinant of safety outcomes, and therefore land use plans should be selected in order to maximize safety. In particular, alternatives should be proposed and evaluated based on their projected safety impacts. Traffic density increases crash frequency but reduces severity, and tends to reduce per capita traffic fatalities,[12] and land use patterns that encourage bicycling can lead to decreased cyclist collisions per cyclist.[13]

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[7] http://www.psrc.org/assets/11694/MMLOS.pdf
[8] http://la.streetsblog.org/2014/08/07/california-has-officially-ditched-car-centric-level-of-service/
[9] http://www.planetizen.com/node/46112
[10] http://www.psrc.org/assets/1822/MMconcurrency.pdf
[11] http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2273984.pdf
[12] http://www.vtpi.org/landtravel.pdf
[13] http://www.sciencedirect.com/science/article/pii/S0001457513005137

10 - **Add the Pedestrian Master Plan in addition to the other plans listed in the displays**. While this is understood how we will achieve many of the outlined goals, it should be explicitly shared in presentations to bring relevance to this important plan.

11 - **Coordinating Planning.** The City and schools should coordinate planning to support the increase in students. This should include accommodations for K-12, private and public as well as community college. The impact of students' arrival and departure and safe, accessible choices to get to these destinations should be considered in planning.

12 - **Increase youth engagement to support the updates to the Comprehensive Plan**. Youth should have meaningful opportunities to share their vision for what Seattle should be like in 20 years when they are leading the city.

13 - **Consider some changes to presentation format.** The time travel "clocks" are difficult to read and difficult to compare across alternatives; consider using bar charts instead. Using a similar color palette to compare both across sectors and across alternatives is confusing; consider using two distinct color palettes.

14 **Of the four alternatives presented, Alternative 4 best aligns with our guiding principles, as well as PSRC's Growing Transit Communities Strategy. However, we believe it doesn't go far enough.**

Our evaluation suggests that none of the existing four alternatives goes far enough in meeting VMT reduction goals. As our population grows increasingly rapidly, we also believe that more alternatives should expand the number and size of urban villages to accommodate growth throughout the city, including residential areas. The Climate Action Plan itself suggests that the City "allow a greater diversity of housing types (e.g. duplex, triplex, cottages etc) in selected single and multi-family areas."[14] Promoting density and employment opportunities in more areas can help achieve environmental and safety targets, and help improve access to opportunity for more Seattle citizens. Because growth in some areas carries a high risk of displacement, we also believe that any alternative should automatically include equity mitigation strategies that are embedded in the land use regulations and incentives that accompany the alternative.

Sincerely,

Rob Johnson
Executive Director,
Transportation Choices Coalition

Lisa Quinn
Executive Director,
Feet First

[14] http://www.seattle.gov/Documents/Departments/OSE/2013_CAP_20130612.pdf

219 1st Ave S., Suite 420 | Seattle, WA 98104
p : 206.329.2336 | transportationchoices.org

Westwood-Highland Park Residential Urban Village

Committee of the Westwood/Roxhill/Arbor Heights Community Council
wwrhah.org

June 17, 2015

City of Seattle Department of Planning and Development
Attn: Gordon Clowers
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124

Re: Seattle 2035 Draft Environmental Impact Statement & Equity Analysis Response

Dear Mr. Clowers,

The residents living inside the *Westwood-Highland Park Residential Urban Village*, (WWHPRUV) with the assistance of Futurewise, and along with members of the Westwood-Roxhill-Arbor Heights Community Council, respectfully submit for your review and response our formal comment to the Seattle 2035 Draft Environmental Impact Statement of 2015.

1 The DEIS, as written, does not address the issues and needs of our community, now or in the future. As an area with a history of underinvestment, we urge the City to specifically address our neighborhood in the Final Environmental Impact Statement and in the forthcoming Comprehensive Plan Policies. This can be done in two ways:

(1) by designating our neighborhood as a "bus transit hub" and prioritized for growth and investment under Alternative 4,and,

(2) by better reflecting the Equity Analysis finding that reducing inequity will require investment and strategies even in areas not designated for substantial growth.

1. Westwood-Highland Park Residential Urban Village Growth Designation

2 Alternative 4: Guide Growth to Urban Villages Near Transit designates four urban villages with substantial bus service as destinations for growth and investment (Ballard, Fremont, West Seattle Junction and Crown Hill). **We believe Westwood-Highland Park should be included in this designation, which will result in the City providing the neighborhood with a more equitable share of public investment and city-wide development.** The WWHPRUV has been designated as a *High Displacement Risk and Low Access to Opportunity* area within the *Equity Analysis,* and we are afraid that without this designation, our area will continue to be excluded from the public investments that would foster redevelopment and growth in our neighborhood.

--continued on next page--

2 cont.

2. **Identifying and expanding public investment strategies in low-opportunity/high-displacement risk neighborhoods.**

Even without designation as a "growth" area under Alternatives 3 or 4, our neighborhood will still require significant investments to rectify the results of decades of underinvestment. The City has underserved the area with investment and the private market has failed to capitalize on development opportunities within the WWHPRUV for more than 20 years. The Equity Analysis accurately reflects the conditions in our neighborhood - an at-risk community that has had zero capital improvement dollars spent, has had only a 40% completion rate on our neighborhood plan, and experienced a significant increase in the immigrant population over the same period. DPD is currently studying the Delridge corridor up to the edge of the WWHPRUV while SDOT is studying the Delridge Multi-Modal Corridor. Without a direct plan to connect the entire corridor, including WWHPRUV and White Center to the rest of Delridge, long lasting impacts, either from the continued level of disinvestment or the sudden impact of growth and market forces will displace long time residents.

Following this Comprehensive Plan Update statement, we will commence with an update of the Westwood-Highland Park Residential Urban Village Plan. We regard our City's border with White Center as fluid, with this region providing essential components of livability to southwest Seattle and King County.

Our fear is that as the 2035 Comprehensive Plan moves forward, the City will once again ignore the WWHPRUV community. We ask that the City implement the Equitable Development Strategies identified as sorely needed for the area and take into consideration a number of development opportunities that it can and should take advantage of, and that we touch on at the end of this response to best implement a growth strategy that advances equity, expands opportunity and protects our community from the risks of displacement.

3

Snapshot of the Westwood-Highland Park Residential Urban Village
Here is a high level description of our area:

- A diverse mix of immigrants and second/third generation Seattleites, who all value maintaining cultural diversity and housing affordability, elevating local economic opportunity, improving our schools and transportation options, and building a safe and sustainable living environment.

- Many people choose to live in the WWHPRUV area as it is one of the last truly affordable areas in the City, with many spending time in creative careers such as music, photography, and the fine arts.

--continued on next page--

3 cont.

- According to the SSNAP Report released in September 2014, it was found that WWHPRUV:
    - has the *lowest investment* in the arts for the entire City, despite the density of creative people that live here.
    - has *zero Capital Investment* dollars spent.
    - has a significantly disproportionate increase in the number of people of color from 39.7% in 1990 to 60.8% in 2012. Conversely, homeownership has only increased just over 2% in the past ten years.

- WWHPRUV area residents walk, eat, shop and bank in the White Center area. We value our neighbors and view the southern border between Seattle and White Center as a natural, fluid corridor for services and amenities.

- The eastern side of the WWHPRUV has a number of large, abandoned or disused commercial buildings. There are also abandoned homes with squatters and unsafe living conditions including drug activity. Increased economic activity would assist in solving these crime problems.

4

Seattle 2035 DEIS – WWHPRUV Comments to Key Topics

Land Use/Housing/Employment

- We have a marginalized immigrant population who voice fears of displacement.

- We have many single family units with large lots that could accommodate increased density using DADU zoning.

- WWHPRUV residents need walk-able, green community open spaces located on the east and south sides of the WWHPRUV zone.

- We have a significant portion of underutilized commercial space.

- WWHPRUV has an untapped capacity to build a local, thriving economy, based on a vision of a culturally diverse, small business owner operator food and arts oriented community.

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4 cont.

- We believe that the Race and Social Justice Initiative has not been adequately applied to the WWHPRUV area. A large proportion of youth of color are falling through the cracks; they work very hard and cannot seem to get ahead. The lack of Capital Investment in the area by the City directly correlates to a long history of racial discrimination practices, such as "red lining" in the area. This has had a spiral effect of systemic poverty, lack of opportunity and lack of private investment.

5

Services and Utilities

- The residents between Westcrest Park and Roxhill Park do not have a family friendly, walk-able green space within the WWHPRUV.

- The eastern portion of the WWHPRUV is densely populated with older, low-income apartments and newer townhomes without yards. The area that has no community center, no open green space and no shared areas to grow food. As the area continues to add more dense housing types, maintaining and expanding parks and open space is a priority.

- Roxhill Elementary School is in desperate need of infrastructure redevelopment, with Highland Park Elementary School the lowest performing elementary school in all of Seattle.

6

Transportation:

- In 2012, the Rapid Ride and Metro brought a Transit Hub to Westwood Village / Roxhill Park. However, a lack of support for pedestrian and safety improvements has been an ongoing concern. Additionally, there is no direct bus from the Westwood Village/Roxhill Park Transit Hub to services in White Center

- There are no bicycle facilities making bicycling difficult and unsafe. A push to prioritize implementation of the Bike Master Plan in our area with neighborhood greenways would be welcome.

- East/West bus connections are limited.

7

EIS Topics:

- WWHPURV is part of the Longfellow Creek watershed. Roxhill Park's fen holds the headwaters of the Longfellow Creek. We have determined that significant transpiration by the trees, and deliberate installation of drains has removed water from the fen, possibly forever damaging the ecosystem. This dense dry brush area has created a dangerous situation within Roxhill Park as it is used for transient camping, drug use and alcohol abuse.

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7 cont.

- The city has invested in rain-gardens with success in other parts of the city; however, though our area could benefit from this improvement we have not been prioritized for these investments. 17th Ave SW between Barton and Henderson streets has three large standing pools of water in the streets throughout the rainy season. This has not been remedied, and, in fact, this block alone was dropped from the entire Delridge Drainage Project plan.

8 **Our Vision of the Westwood-Highland Park Residential Urban Village**

- An increase to the rate of homeownership and locally-owned business ownership.
- Develop "brand" identity, neighborhood character, and marketing to promote the WWHPRUV area as a growing retail arts and ethnic food centered destination.
- Maintain cultural diversity.
- Enable capacity for smart, sustainable growth.
- Maintain-a mix of affordable housing and live/work spaces for craftspeople, artisans and small business owners.

We would like to the 2035 Comprehensive Plan to reflect:

9 1. *That WWHPURV is included in the overall 2035 Comprehensive Plan.* We view the City's blatant disregard for our area in the lack of attention, lack of capital investment, continued serious crime and continued blight as a travesty, and can no longer continue for another 20 years as the City grows. The current DEIS focuses only on the Urban Centers and Villages designated for significant growth– areas like WWHPRUV are not included at all.

10 2. *As noted in the Equity Analysis, areas like WWHPRUV are suffering from a historic lack of investment and even without a "growth" designation, the City will still need to prioritize investment in our neighborhood to rectify this historic trend. We request the City work with us to elevate the community as a whole, by creating a solid plan to implement the Racial and Social Justice Initiative* to invest in the children of WWHPRUV, increase access to opportunity for the marginalized populations, and thereby providing local economic opportunity resulting in improved living conditions for the entire community.

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11 **Overview of Opportunities for the City of Seattle:**

- Consider the purchase of abandoned buildings and lots and keep them as land holdings for development in the future.
- Work with WWHPRUV to redevelop some of the zoning policies that are conducive to creating, smart, sustainable, and affordable and vibrant model communities.
- Persuade the residents of White Center to annex to Seattle with a comprehensive updated WWHPRUV plan that includes their area.
- Expand our Urban Village as part of creating a branded Food and Arts District that builds on a foundation of reliable transit service.

We look forward to working with you.

Respectfully,

Kim Barnes
WWHPRUV Plan Steward and Westwood/South Delridge Resident

Amanda Kay Helmick
Co-Chair, Westwood/Roxhill/Arbor Heights Community Council

Mary Schlichter and Mike Reidel
WWHPRUV and South Delridge Triangle Resident Representatives

Cc: Amy Gore & Spencer Williams, Futurewise

RESPONSE TO BE ADDRESSED TO:

Kim Barnes
WWHPRUV Plan Steward / Committee of WWRHAH.org
9057 21st Ave SW
Seattle WA 98106
e: kim.barnes.la@gmail.com

Citizen Comments Received on the Seattle Comprehensive Plan EIS

Note: Citizen comments submitted via social media are included in a separate section.

#	Comment	
32	Our neighborhoods keep us a liveable city. We are fortunate to have involved citizens at the grass roots level. Do not destroy our single family zones, nor allow dense over building in these areas, ie alternatives 3 and 4. We don't need to walk in between tall buildings which create cold wind tunnels. You fell for the argument that the developers made when you changed the required parking for new residences. At this hearing, which I attended, they talked about how expensive each parking place was to put into new construction and that to keep rents affordable to eliminate this requirement. Well we now know, rents are not affordable and cars are parked all over blocks away, impacting us all.	**1**
	We get the statistic from the department of motor vehicles of how many newcomers are coming. I believe it was 1900 per month last year. Notice that this is from the vehicle department.	**2**
	Obviously, the city and their planners are not listening to the people who live here. The special interests have organization and know how to reach the council. The Cascade bike club along with Greenways have over ridden the ordinary residents.	**3**

ADVOCATES
law group, pllc

TALIS M. ABOLINS
attorney

June 18, 2015

Sent via e-mail only to: 2035@Seattle.gov

City of Seattle
Department of Planning and Development
Attn: Gordon Clowers
700 5th Avenue, Suite 2000
Seattle WA 98124.

Re: Seattle 2035 – Comprehensive Plan Comments

Dear Mr. Clowers:

1 At a general level, I believe the Comprehensive Plan must select the alternative that avoids urban sprawl, and which encourages higher, concentrated density. I am not sure which of the alternatives best reflects this principle, but in essence we do not want dispersed growth that forecloses opportunities for more orderly growth in the future. The creation of dense neighborhoods with concentrations of services, transit, housing, business and employment should be the goal. High rise construction is more costly, but it serves an important purpose, preparing the way for a sustainable future. If growth is not focused, are City will be plagued with an urban version of sprawl, with valuable space utilized inefficiently and more disruptively. Perhaps alternative 2 and 3 are the most sensible in this respect. Regardless of the alternative chosen, I believe the following principles need to be better incorporated into the Comprehensive Plan.

2 **Schools.** Our schools generate a significant number of vehicle trips twice each day, not including extracurricular trips. We seek to improve Safe Routes to School, yet the irony is that increased traffic around schools during these busy times increases danger and congestion for all. The City should guide growth and housing to facilitate improved opportunities for families to live adjacent to schools, thereby reducing trips, easing congestion and parking, improving safety and contributing to a healthy community and a healthy environment. An example of poor growth management is the location of a 60 unit microhousing project adjacent to Franklin High School, off Mt Baker Boulevard next to the fire station. Zoning within school walksheds should encourage growth that is compatible with family friendly access to schools. Microhousing makes no sense at this location. In addition to housing to support school age families, the City must more intentionally collaborate with Seattle Public Schools on preservation of adjacent properties for school expansion. Again, the 60 unit microhousing project may have made sense for the developer (who even avoided a local design review), but in 2035 is there any reason to doubt that Franklin High School will be requiring additional space for expansion on its perimeter? This project is a case study in zoning failure for several

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2 cont. reasons, and hopefully the lessons of this failure can lead to improvements through the Comprehensive Plan process.

3 In a recent review of public records, I could find no indication of any deliberative engagement between Franklin High School and/or Seattle Public School decision makers on how best to coordinate, preserve and enhance school operations within the new zoning framework of the new Hub Urban Village and Town Center identified in the Comprehensive Plan and rezone. Perhaps that was a failing of the school district to respond to outreach. In any event, some sort of master planning with these essential public school facilities must occur if we are to truly prepare for a functional community in 2035.

4 **Social Equity and Mobility.** Without opportunities for upward mobility, our society loses legitimacy. The polarization of our society with the shrinking middle class threatens our ability to preserve community and equity. Our affordable housing crisis speaks to this problem. This problem cannot be solved by local government alone. However, Seattle should use the Comprehensive Plan process to support opportunities for upward mobility that will increase the ability of its less advantaged residents to afford life in the City. Targeted subsidies and incentives for affordable housing may mitigate some symptoms of our polarizing society, but a more sustainable solution focuses on expanded educational and vocational opportunities. For too many years State leaders have lamented the failure of our educational system to supply skilled labor and employees with the technical, scientific and/or engineering skills that are so high in demand by local successful businesses. Our region's growth is fueled by industries that bring skilled workers from distant regions. We need to stop importing employees, and work more aggressively to educate and employ our own residents, so they can truly afford to live in a more vibrant and vital community.

For example, consider the North Rainier Hub Urban Village. The City recognized the major opportunities for a campus like setting, adjacent to transit, connected to Rainier Valley schools, and a short ride from the University of Washington. Yet, as the recent Berk North Rainier Hub Assessment (April, 2015) confirmed, the City officials neglected an opportunity for coordinated interdisciplinary focus in the North Rainier station area, based in part on fears of accelerated gentrification and displacement. The end result is that a critical hub of our regional transportation and growth management system remains dysfunctional and unattractive to both economic and residential development. In this case, the City got what it paid for – no displacement, no investment, no development, no positive change for a needy area that in 2035 should be vibrant and self-supporting like other areas in our City.

If there is a gap in vocational and technical training opportunities for our workforce, what can our City leaders and planners due to incentivize the location of such opportunities at the doorstep to Rainier Valley where social equity needs cry out for upward mobility? Our Comprehensive Plan should play a role to help bridge these gaps by incentivizing intelligent siting / expansion / collaboration of our high demand educational opportunities.

5 I appreciate the City's emphasis on "access to opportunity". Displacement risk is an important factor for social justice and equity. But a City policy that overemphasizes displacement avoidance runs the risk of preserving poverty and holding back progress. "Prevention of displacement" is unrealistic. Some level of displacement is an unfortunate but necessary side effect of increased access to opportunity. Displacement must be managed, while proactive policies foster intelligent and sustainable growth in opportunity for struggling areas adjacent to transit. Many factors must guide our investments in the public realm, and opportunity creation. Displacement risk may be one of those factors. But the City must not blindly rely on maps of displacement risk as a political excuse for "spreading the money". This "spread the money" approach is an abdication of leadership at a time when the livability of our future generations requires a nuanced and multi-faceted analysis focused on expanded opportunities, rather than preservation of status quo.

6 In addition to educational opportunity, upward mobility requires a City that is not based on demographic enclaves or balkanized ethnic regions. For instance, South Lake Union is booming to the point that private developers must pay major subsidies to achieve "affordable restaurant housing" to serve the growing workforce. Yet, at the same time, the City has done little to require a range of housing options within and adjacent to South Lake Union. A rich and relatively homogenous neighborhood is escaping the diversity that builds community with developers who want restaurants, but avoid making room for housing that can be afforded by all but the rich – including the new restaurant workers, many of whom must drive in order to reach their South Lake Union workplaces. Our Comprehensive Plan (and neighborhood plans) discuss the importance of providing a range of housing options within our neighborhoods, but to my knowledge there is nothing to enforce this vision. To the contrary, it appears that the City is allowing developers to go sky high without any significant offsetting local provision for affordable or even middle class family housing. These are missed opportunities.

Meanwhile, down in North Rainier, the ArtSpace Mount Baker Lofts project stands alone as the only positive development around the station area (unless you count the King County wastewater overflow facility that replaced a local church). Mount Baker Lofts continues to provide affordable housing in the center of a rezone environment that is so unwalkable that a visually impaired resident and gallery owner was declared ineligible for a seeing-eye dog, because it was too dangerous for the dog! In addition, despite the City's documentation of an open space gap in this same Town Center, children in the Mount Baker Lofts still have no walkable usable open space, let alone a plan for preserving such a space. See attached rezone analysis and GMA decision. This is not equity. Payment in lieu is not the answer – instead it is a vehicle that perpetuates the polarizing forces that are dividing our City. Areas with high concentrations of affordable housing need help to bridge documented gaps in public amenity and infrastructure, while areas experiencing the greatest growth must address and incorporate a meaningful range of housing opportunity in order to avoid divisive and elitist enclaves.

7 **Demographics of Growth.** The Comprehensive Plan seeks to manage growth for 70,000 more households. Managing that growth requires a careful analysis of where the growth is coming from. If we don't know who is coming, we cannot effectively

7 cont.

prepare for their arrival. What are the demographics of these new residents? What types of housing and services will they need? What type of industry will they work in? What social services will they require? The Comprehensive Plan must include provisions to rationally assess the type of growth it purports to manage. To ignore this central question would be irrational, arbitrary and a disservice to expanding communities.

8

Essential Elements of Livability / Concurrency. A fundamental requirement of growth management is that we preserve the essential elements of livability for our future generations. See Seattle Planning Commission report on transit oriented communities, cited in rezone analysis. Whichever option is chosen, the updated Comprehensive Plan must be modified to better achieve livability. "Livability" should not be a quality preserved only for our wealthier more walkable communities. If social equity and justice means anything, it means that livability must be preserved and fostered in all areas, including Rainier Valley and especially within the Urban Villages and Town Centers where most of our growth and density will be focused.

The Comprehensive Plan must more effectively preserve livability. In this letter I incorporate by reference the following analyses that must be considered. First, I attach my Town Center Rezone Review, which describes all too painfully how existing planning processes have failed in the North Rainier Hub Urban Village. Second, I incorporate the closely related North Rainier Hub Urban Village Assessment (Berk / Seattle Economic Development Commission (April 2014). Third, I incorporate the decision of the Central Puget Sound Growth Management Hearings Board in *Abolins vs. Seattle*, CPSGMHB 14-3-0009 (including briefs and record on file with City). All of these analyses focus on the North Rainier Hub Urban Village, and identify the need for specific improvements to facilitated coordinated growth management planning in areas slated for density -- regardless of which alternative is chosen in the DEIS process.

In its decision, the Central Puget Sound Growth Management Hearings Board ultimately refrained from invalidating the City's development regulations. But the Board's discussion of the City's approach to growth management is very instructive, and must be considered carefully as the Comprehensive Plan is updated. The Board stressed an expectation that the City would take action to update its Comprehensive Plan to address critical problems and deficits. During the hearing itself, the City attempted to rely on an outdated Comprehensive Plan provision which suggested that the City did not need any additional open space for its citizens. This position flew in the face of other provisions and requirements which mandate essential elements of livability to be preserved for all. To manage growth, the Comprehensive Plan must contain provisions that are meaningful and enforceable – not generic and meaningless. A Comprehensive Plan cannot establish standards of livability and then defeat that vision with watered down provisions that do not even require the capital planning needed to preserve that same livability.

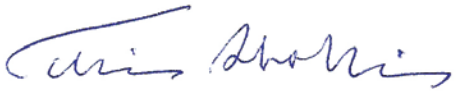
In the Comprehensive Plan amendments I hope that the City will provide the tools for managing its growth more effectively and concurrently. Capital planning processes must be linked to growth. Development should not be penalized or discouraged. But in the current environment the City has given away too much to developers,

8 cont.

abandoning fundamental reasonable tools (such as impact fees and master planning) that more equitably require development to address a fair share of its own impacts. Whatever growth does occur, the City must provide the infrastructure and public amenity needed to preserve opportunity, amenity and quality of life for its residents. These qualities explain our phenomenal growth. If we don't preserve these qualities, our booming industries will see no reason to remain here. Businesses based on technology can easily leave once their high priced lease terms expire.

Thank you for your efforts to sustain and expand our mutual success, and keep Seattle great. Here's to a brighter future in 2035.

Sincerely,



Talis M. Abolins
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Encl.s

See Appendix B.6 for the attachments to Letter No. 33.

#	Comment	
34	As someone who has been active in promoting affordable housing in downtown since 2006 when I spoke in favor of Peter Steinbruick's incentive zoning fee first at the Gethsamane Church then, a couple weeks later in front of the city council, let me assert that I am in full agreement that we need to grow our city. But for growth not for growths sake and the handsome profits of developers and corporations. Rather I want to see intelligent growth that encompasses diverse housing for the workforce that will work downtown so that people of ALL wage scales can afford to live close to where they work. That means making available plenty of "affordable" housing of that even the lowest paid workers can afford rather than forcing them to live outside, not just Seattle, but outside King County in order to find affordable housing. Seattle will implode upon itself if downtown becomes, basically, a gated community where only the ultra rich and ultra poor can live. A rising tide should lift ALL boats. PLEASE!! PLEASE!! MAKE SURE YOU BUILD INTELLIGENTLY! NOT JUST WITH DEVELOPER'S AND CORPORATION'S INTERESTS IN MIND. Thank you.	**1**
35	A new alternative that adds urban villages to more parts of the city should be considered. We shouldn't force the poor out of the Rainier Valley and we shouldn't direct density into a few high-rise zones causing rents to skyrocket. Areas with more wealth like Magnolia and Madison Park should accept more density.	1
36	Here is one citizen's vote for option 4. While it may lead to the most dislocation (which I hope the city can mitigate in significant and meaningful ways) it is also the most fair. Over the long run it also seems like it might diffuse neighborhood income disparities, which should ultimately help the least well off. I think it makes most sense.	**1**
37	Please no more apodments...especially when they are zero-lot line with no trees, greenery and no sense of charm or style!	**1**
38	Seattle City leaders are doing nothing to curb displacement in the last diverse neighborhoods in South Seattle. People of color need to be able to have a community that looks like us. We are such a small percentage of the Seattle population as it is and the City policies are only helping to dismantle it. This is not about pitting one race against each other but preserving a history, community and a way of life that is comfortable for residents who are already there. The only "improvements" being made are serving those who are moving to South Seattle NOT the people who have always lived there. All we keep hearing from the City and the new residents is how ugly it is, how it needs to change but yet we live here and love it and appreciate the fact that it doesn't look like Ballard or Magnolia. We see ourselves in the community even if the City doesn't like the way that looks. The City talk about equity and social justice be it feels like lip service as more and more Blacks, Latinos, Asians and other people of color and their businesses are displaced in favor of coffee shops and expensive retail stores.	**1**
39	None of the growth alternative reflect my preferences. The urban village strategy has generally worked, but growth has been focused outside of southeast. Invest in southeast neighborhoods AND provide affordable housing there. There is no need to expand village boundaries around rail. They're in the locations they are for a variety of reasons - but using the location and the central factor for determining growth (creating communities) is silly. As Licata notes, you can also add affordable family housing in neighborhoods with high access to opportunity, but why	**1**

#	Comment	
	should people have leave their community to access opportunity? Reinforce existing communities, the people and the institutions the support them. Make RB schools the best; invest in permanent affordable housing create numerous pathways to jobs at amazon, expedia, starbucks, boeing, etc.; create better transit connection to rail (#7). Option 5 should be to maintain existing villages and center - investing heavily in areas of low opportunity to increase access to those who live their and those who move their in the future.	**1 cont.** **2**
40	Going forward, displacement should be avoided at all costs. Seattle has allowed gentrification to run amuck. Developers seem to own our leaders and profits seem to be more important than people. Current South Seattle residents cannot afford to keep up with the skyrocketing housing prices and costs of living. The American dream is quickly becoming impossible to obtain. The only people who can own a home anymore are those who are the wealthy. Seattle needs to do more to make all housing affordable and help keep what little diversity this city has intact.	**1**
41	The uncertainty you create with your awful plans is detrimental to my desire to remain a Seattleite. I don't know if my neighborhood will be rezoned causing multifamily development next door. I do know I will be subject to an ever higher level of taxation to fund idiotic greenways and other street takeovers that foul up my automobile commute. Rather than drive me onto a bus or a bike, you will drive me and my income and assets out of the city to be spent and invested someplace that has greater respect for what it takes to create that wealth. If I didn't have deep family ties to Seattle I would move out of here today. I'm disgusted by the constant drumbeat of complaint against people with high incomes or significant assets. We're constantly told how horrible we are while simultaneously being burdened with ever higher taxes and fees and regulations. I refuse to invest anything in the city or hire anybody here. Any new business ventures will be taking place outside the city's borders.	**1**
42	We should be far more aggressive in upzoning around light rail stations to put far more people and jobs within close walking distance to the stations. We should also abolish parking minimums throughout the city and enact parking maximums in the vicinity of frequent transit areas. Furthermore, even if we're not going to open up the single-family-zoned areas to more diverse usages (though we should), we should at least make it much, much easier to build DADUs and the like. I'd also like to see the city putting a far higher priority on the movement of transit and safer walking/biking infrastructure. The city has been making strides, but many of SDOT's projects still seem to put cars first, leaving everyone else picking at the scraps.	**1** **2** **3**
43	Greetings: My wish for Seattle government is LESS progressive politics and LESS expensive programs. PLEASE have a concern for those on a fixed income who live in this city. We ARE not all wealthy technocrats. Mayor Murray, are you listening????	**1**

#	Comment	
44	I'm confident that Woodland Park Zoo will be closed down by 2035, if not before. This anachronism is long overdue to close. There is no place in the 21st century for locking up innocent animals for the "entertainment" of humans. Zoos do NOT contribute to saving wildlife. WPZ's annual budget for keeping elephants in misery for years could have funded game wardens in Africa to stop the slaughter of elephants for their ivory and funded local in situ programs to protect elephants.	1
45	Can you tear down all of the old houses and apartments building (I am looking at you Pioneer Square, Capitol Hill, Queen Anne), and force a MINIMUM height of five stories. I don't want some shitty craftsman house. I want to live in a tall building with a view, where I have space. The only way to lower the price of housing is to BUILD MORE. We should embrace Amazon, but all those news apartment in S Lake Union are expensive and crap. Build real homes (i.e. minimum 2 bedroom, more 3 and 4 bedroom homes). I have kids. I want to live in a walkable neighborhood. I would give up my car (or one of them). but I need a place for the kids. A $3,000 a month for a 1.5 bedroom downtown isn't enough. And I down want some shithole on Lake City Way or Capitol Hill. BUILD MORE. Imagine if I could live in belltown, or S lake union, walk my kids to school (a good school) and then to work downtown, and we live in a new, clean 3 bedroom with 1500 square feet, which costs lest than $2,500 a month. OMG, civilization. Get you S* together Seattle. BUILD MORE. Tear down old crap. No more single family houses. Tear them down. Yes, the townhouse are ugly. So stop allowing it. Make the buildings 5 stories. You know, like Paris. Not an ugly city. Pioneer square needs to have most of the buildings removed. Ditto half of capital, beacon, and queen anne hills. Please please please just build more. And not small 1 bedroom units. I have a family. We have a dog. We need to live in an apartment which may not be quite as big as the house I grew up in, in Bellevue, but still, decent in size. This isn't hard. BUILD MORE. Don't pay more money for low income housing. That doesn't lower the price. BUILD MORE. Shift the supply curve (that econ professor up at UW will show you what happens, but basically you get cheaper housing). BUILD MORE. Then, with decent homes, with more tax payers, with less money wasted trying to beat capital markets in the price of houses, you have all the money in the world to build a decent train. Oh, yeah. build a decent train. Really. 2035, lets pretend like we care about being part of the future. BUILD MORE.	1
46	Quit killing Seattle. Your 4 DEIS options are terrible. How about an option wherein you don't try to kill the City - one where you're realistic that mass transit (10%?) and bike (3% in the summer only) doesn't get 100% of the attention. We need roads, parking, and a smarter brand of government. You people live in a bubble. Whether you like it or not, and so do you. We drive cars.... everywhere! Deal with it.	1
47	The highest priority for Seattle is to keep its trees. Any development that proposes to cut down trees needs to be very seriously reviewed with the aim to preserve as many trees as possible and	1

#	Comment	
	with replacement of any trees that need to be cut down. I am concerned that developers are cutting too many trees in order to make it easier for them to build new construction. Trees are more important than buildings. We need trees to clean our air, provide habitat for birds and other animals, hold the soil in place, and most importantly, to lift our human spirits and provide respite from the urban environment.	**1 cont.**
48	feedback: having encountered the department of planning employees who stomp their feet and are completely irrational, i have little doubt that the plan you create will actually come to fruition. i am unsure why any city plan would include this statement, especially in terms of increasing density: "There could be an increased risk for disturbance of environmentally critical areas." (why are our lakes, without this increased development, filled with toxic algae, unsafe to swim in, and smelly?) i've seen how you/the city/dpd have further marginalized the marginalized populations so that places that were filled with black (or asian) people are now all white (beacon hill, 23rd and jackson, rainier valley, etc). at this point, i hope to not be living in seattle in 2035 unless you bring back affirmative action, decrease police brutality, and have and abide by actual city rules that are not only equitable and just but also easy for all to understand with penalties to the city or its employees if they do not follow the rules as stated. all the levies and increases by SPU or other departments are pricing out people who have lived here so that some new (probably) white couple can come in and buy a place for $700k. at some point, it has to stop. if you're advertising transportation for all, then don't make me walk over a quarter mile to a bus stop and don't expect me to walk that far with groceries because you've penalized me for having a vehicle. if you are increasing infrastructure for people, then you have to actually uphold your laws so that a mom with a stroller, a visually impaired person, and an average college student can all walk down the street without encountering garbage cans or hedges/overgrowth on every block making it visually disgusting and hard to navigate. these same people should not be standing at a crosswalk forever because they did not push the walk button in time to cross with traffic. if you are making dense neighborhoods or whatever you call them, think about how things have changed at one of the locations (at pike/pine) that was formerly gay friendly and now according to recent news reports is a place of hate, a place for frat boys, and a place to terrorize people who are different (read: not frat boys). i have no confidence in your plan or your department. in fact, it would seem that this model will just increase road rage, narcissism, fear and anger toward people of color leading to even more racist people living here and people who are different, lack of diversity, increase in occupations that are high paying until the IT jobs all dry up again, ...	**1**
49	Beacon Hill near the VA Medical Center to the south is located near downtown and should all be rezoned from single-family to multifamily units. Currently only portions of Beacon Hill is zoned for multi-family buildings. I would like to help with growth and build on my lots some multi-family townhouses, however current zoning prohibits this.	**1**
50	Always late to the party, Seattle. This should have happened a decade ago when huge growth began, good luck trying to put the horse back in the barn. Transit is a perfect example, a majority of your questions focused on growth, look how bad transit is now, we needed it YESTERDAY. Even if you use this survey, how many years to implement suggestions? Also, the cost of all this is what? It's time to make the developers actually pay for the	**1** **2**

#	Comment	
	infrastructure they have built. Real costs such as utility lines, pipes, parking, transit for their developments, etc. Why are tax payers footing the bill and not those making the profit? Do you think we are stupid? Your survey is like saying "do you agree that clubbing baby seals is wrong?" Of course people are going to say they want parklets and equal opportunity, schools, etc. but you are saying nothing about the costs. If it's going to bankrupt what little is left of the middle class I say NO. It's someone else's turn to pick up the check, maybe the person at the table with the biggest pockets for example.	**2 cont.**
51	Please also look at distributing density and not doing away with what few single family homes we have. They help provide canopy and other open space - green space for birds and bees and other wildlife. Cutting down a tree takes away a resource and then strains resources to replant	**1**
52	Beyond the numbers in West Seattle & Worth - please make sure that school facilities allow children & families to walk to school as much as possible. This is especially important in relationship to the extreme gerrymandering that has happened in the Central District around TT Minor and the soon to come extremes when Meany opens again as a middle school. Washington is an 11 acre site that could be developed to serve all the nearby students.	**1**
53	There are no good alternatives here---the city I was born in and love dearly is being ripped to pieces---However, there are some strategies that will help the pain. The head of SDOT said at a meeting that I attended that "there will be a lot of pain until the transportation and infrastructure catches up to the [my insertion: runaway] growth." To minimize this unavoidable pain (though one could say that it is now unavoidable because the transportation and infrastructure promised to manage growth DID NOT HAPPEN IN A TIMELY FASHION), growth should be directed to the Urban Centers in Alternative 2. THOSE places have the trans/infra to accommodate growth. Shovel it all in there for the time being---once we have some sort of support system for this growth, ONLY THEN think of expanding the growth districts. 200 story towers, who cares, as long as they can walk to work....As far as I can see, this is the only way to deal in the next 5-10 years with the growth until trans/infra catches up. Think about it--how will we be able to move around if Ballard, Wedgwood, Roosevelt, etc. have the kind of growth that South Lake Union is handling fine?	**1**
54	As efforts are made to get folks out of their cars and using mass transit, bus system, riding bikes, walking, etc., you are increasing the number and concentrations of pedestrians at intersections all over the city. Vehicles and pedestrians/bikes do not mix well. I believe this EIS document should acknowledge there will be a significant increase in the need for upgraded traffic controls at street intersections and the costs to install/maintain them.	**1**
55	Your draft EIS statement maps all show the West Seattle area will remain the same no matter which alternative growth pattern is selected. The Admiral, Junction, Morgan street colored areas are exactly the same on all the maps. Perhaps you folks need to drive out here and take a look at what all is being constructed. I doubt you folks have accounted for the fact the City Council, a couple of years ago, raised the zoning limits in the Triangle area (Alaska, 35th SW, Fauntleroy area) so the develo0pers can construct 150-180 foot highrises. Now that they have created a Condo Canyon form Morgan Street to the view point they have started on the blocks	**1**

#	Comment	
	on either side of California Ave. Once they have torn every single family dwelling down in that area they will start on the triangle area. I thlnk this EIS statement has greatly understated the population density estimates for West Seattle over the next 20 years.	**1 cont.**
56	Keep density out of South Seattle. South Seattle is already seeing too much density and displacement. Gentrification is ruining the fabric of the community. The new neighbors are racist using their privilege and money to push life long residents out. I have never felt so much racism and discomfort in my 35 years living in South Seattle as I do now. Its horrible. The new whites do not want to live among people of color and be part of the existing community - they want to replace us and the City of Seattle is setting policies that are aiding them in doing so. In my lifetime, South Seattle has always been a mixed community with people of color and whites, rich and poor living close to each other and attending the same schools and shopping at the same grocery stores without problems. Now we are told our community is ugly and needs to be changed which is a slap in the face to the homeowners and business owners in the community. How can "progressive" Seattle set out on a course that eliminates its entire black and immigrant community? Seattle City officials are beginning to look like wolves in sheep's clothing. Stay out of South Seattle and find ways to curb gentrification.	**1**
57	About the sign the woman is showing..."the most diverse US City..." diverse in what way? Diversity is a desired outcome because, why? These things need to be articulated or they are just weasel words, meaningless.	**1**
58	The Survey Icon is not active and will not allow me to take it. With that, I am a 40 year old married, professional living in the North Beacon Hill neighborhood and I vote for the 3rd option (related to light rail line stations) for future growth with secondary investment going to the rest of the regional transit systems. Thank you.	**1**
59	Many aspects of these plans are highly objectionable. The concepts of guiding growth and defining Urban Centers and Villages is ludicrous. As a city, Seattle must remain flexible and adaptable enough to react to growth trends as they happen and respond to the needs of those mew communities. Urban planning is simply a combination of guesswork and Orwellian social manipulation, and as such has no place in our governmental system. In that respect, the first alternative i the only alternative. While it is not good, the other alternatives are so bad they should not have even been brought before the public.	**1**
60	The city should pay attention to opportunities to create ground-oriented infill housing with small gardens/yards, for a new generation of families, seniors and people in general. These should not be large-squre-foot homes, with adjoining driveways covering a lot, but rather modest townhomes or cottages with some green space for gardening. We should explore eliminating parking requirements for these types of homes, and allowing people to rely on on street parking permits. The alternative is a city increasingly stratified between owners of increasingly expensive single-family homes on the one hand, and those who can afford only apartments and condominiums,	**1**

#	Comment	
	or must leave the city for far suburbs, causing us to lose even more middle-class families.	1 cont.
61	If I understand the goals of Seattle 2035, then the ONLY option that makes sense is to make Downtown and maybe South Lake Union more dense because that is where the jobs are. If Seattle wants to get people out of their cars then people need to work closer to where they live and need to be close to resources. Resources and jobs are scarce to pretty much non existent in some parts of Seattle so it does not make sense to make those places more dense. All you would be doing is putting a strain on already strained resources which would be unfair to current residents of those communities. Additionally, if Seattle is serious about equity, then options that cause displacement should be removed from the list of alternatives. We are already seeing a decline of diversity and that includes race, socio-economic diversity, age etc. The Seattle area is loosing its character. Lastly, Seattle should be comfortable and affordable for those who currently live here and those who wish to come here. Seattle needs to stop or drastically slow infill development and high rise buildings in single family and low rise zones. There need to be options for all. Single family housing is disappearing at a rapid rate making it impossible for families to stay in the city.	1 2 3
62	You are ruining our neighborhoods thru poor planning and over development. The "noise" mitigation recommended on this site is LAME! Windows and insulation will not help unless the intention is to live in a temperature controlled house/building. That means air condition instead of opening the window which increases costs, isn't good for the environment and is a failure! My answers to this survey hopefully will steer you towards more parks, green spaces and for god's sake separated, safe, continuous bike and walking paths so that people like me will feel comfortable biking around town. The buses that you are insist need to cut through our neighborhoods do not seem well thought out and I'm skeptical that they will actually reduce traffic -- it looks more likely that they will add more congestion to overloaded streets. I'm more interested in the trolleys that Sound Transit is proposing for some neighborhoods. They are quiet and seem to make good links to transit hub/rail. The cost of housing and property taxes are another BIG problem. I am not expecting to be able to afford to retire here if housing and property taxes continue to rise like they have over the past few years. Finally, I hope everyone involved in the planning process is actually going to these neighborhoods and thinking about how it feels to live, sleep and work there. The decisions you make now will determine if Seattle is still a livable city in 20 years. To me it doesn't look very promising.	1
63	I think there are several issues that are not considered at all in these "plans": 1. There is no development in the Magnolia, Madison Valley, Mount Baker, Laurelhurst, and Wedgewood neighborhoods. The High-income neighborhoods are not affected at all by the runaway, unplanned growth in the other neighborhoods. I think these neighborhoods should also get the ugly, one-dimensional, six-story, cheaply-built mixed-use buildings as the rest of us. If we're going to ruin the city then we should ruin the entire city, not leave pockets for the rich to be insulated from the ruin. There are plenty of lots in Magnolia that could replace a single-family home with a 50 unit building. 2. Bicycles are not mass-transit. Have you been on 2nd Ave where they removed a lane of traffic to put in a bike lane? It is gridlock at rush hour. And at all other hours there are NO bikes to be	1 2

#	Comment	
	seen. It is silly.	2 cont.
	3. Buses and streetcars are stuck in the same traffic as everyone else. There is no incentive to use them as they end up being slower than a single-occupancy vehicle. Mass transit needs to be separated from cars. We voted for the monorail expansion twice because it's a good idea. You all figure out what it takes to pay for it but get mass transit off of the roads.	3
	4. Until you have actual mass transit options that are NOT stuck in the same traffic as everyone else then suspend allowing developers to buid housing that does not have at least one parking spot for each unit. It doesn't make sense to allow this when mass transit is stuck in the 1950s.	4
	5. Stop this nonsense of catering to bikes. It's just making things worse. There are much, much higher priorities.	5
	6. Build another West Seattle bridge. This one is full. So are the streets.	6
	7. My rent just went up 50%. I'm going to have to move out of Seattle.	7
	Create a Department of Planning. The Department of Development is going full steam but there is no planning at all.	8
64	Of GREAT concern to me is the result of a lot of taller building construction (commercial and residential). A mix of building heights should be limited per city block. Whether it be downtown or in single-family residential neighborhoods, permitting allows for exceedingly tall structures which steal light. Why have walkable neighborhoods when the construction of tall buildings prevents sunshine from permeating the path one walks? Why should a new, large home be permitted/constructed on a low-rise building site street and it forever cast its next-door neighbor's home (or even sites across the street) in shadow? Seattle already has less sunny days than other large metro areas. Continued growth patterns of such heights can only make the outside darker, cooler and drearier. No one wants to walk a dark canyon in urban areas. As example, when a lot is large and a developer wants to put three tall 3-story homes on it, don't allow it. Permit 2 stories only. Force developers to keep light and, where the 3rd tall home would be, permit it for off-street, on-lot surface parking. Or in the urban areas, mix up building heights on both sides of the streets so that light can shine.	1
	Some single family homes only get sunlight during one part of the day - no new home should be allowed to take what little light one can enjoy away. Part of the development process should include a review of the sun's path during most of a year in order to prevent such established older homes from being cast in darkness. I've walked my area for 20+ years and have begun to see the pattern of "light stealing" becoming so common it has forced a change in my path, again and again. Long-standing Seattle neighborhoods are losing not only their identity, they are quickly losing sun and light.	2
65	As much as our founders wanted Seattle to be New York, we shouldn't want to emulate New York. A Vancouver with a median housing price of 1.2 million would be disaster.	1

#	Comment	
66	There is no mention at all of integration with the wider region, which I think needs to be addressed. Alternative 2 seems to be the best option. If people can't afford to live in Seattle, they will live elsewhere; at the very least, if growth is concentrated in the Urban Centers, the existing frequent transit lines to the suburbs will allow workers to commute to an from Seattle easily.	**1**
67	Help bring an indoor climbing gym to one of the mixed-use buildings downtown!!! Great for tourists and locals alike!	**1**
68	Please continue the good work saving priceless big trees and planting additional trees in and around the city. Boulevards including trees are amazing and often trees in those places don't end up being shaped oddly around wires, as well. Could there be more boulevards in Seattle?	**1**
69	Living and working in Columbia City for the past 20 years, I am seeing and living gentrification. We watched light rail put small business owners on MLK Way out of business, while new owners reap profits after light rail came in and the land is now more valuable. In our schools, families leave every year to move further south to more affordable cities. I believe in mass transit and density and reworking our urban fabric to make it more livable, but feel very uncomfortable with the impact I am seeing on affordability for long term residents of lower income, and on southeast Seattle's traditional role of being a welcoming place for immigrants.	**1**
70	The city should not be encouraging families with children to live in the city. Parklets are terrible. Encourage more density in close in neighborhoods - even those with big houses - such as Captiol Hill and Montlake.	**1** **2** **3**
71	It is crucial to maximize TOD and loosen regulations on new construction. in order to maximize social equality and mobility the city should: 1. remove height limits around light rail stations/zones with good transit connectivity and investigate staggered height regulations similar to Vancouver, Canada which prioritize density while maintaining sight lines and direct light! Platforms 3-4 stories with high rise portion set back from street! 2. introduce variable rate congestion tolling to maximize throughput and increases transit speed/reliability - very successfully implemented in: Stockholm, Singapore and London 3. prioritize the development of pedestrian and bike friendly zones (parklets, widened sidewalks, protected bike lanes) 4. introduce tax on commercial parking to incentivize transit use and parking lot redevlopment 5. establish exchange for parking permits and limit their number to increase revenue and decrease car dependency. 6. impose parking maximums - buildings with parking v. no parking increase rent by 62% 7. allow residential buildings offer public parking	**1**

#	Comment	
	8. create transit dedicated lanes, signal prioritization, increase frequency and queue jumps. 9. do not institute linkage fees offer increased tax breaks and incentives to build taller (would increase section 8 housing and tax revenue. 10. change property tax to land use tax. the aforementioned list would maximize affordability and mobility while creating a more livable and socially equitable city. If the city does not embark on an aggressive housing building campaign which reduces car dependency the city will become unaffordable for the average Seattlite. It is important to note the fasting growing city in the country, Houston, has achieved remarkable growth while maintain affordability. Houston achieves this through massive housing growth. I am not advocating no zoning, just sensible zoning liberalization which aids affordability and social mobility while maintaining Seattle's commitment to the environment and sustainability. the following is a quote from The Economist's, May 14th issue: "Unlike most other big cities in America, Houston has no zoning code, so it is quick to respond to demand for housing and office space. Last year authorities in the Houston metropolitan area, with a population of 6.2m, issued permits to build 64,000 homes. The entire state of California, with a population of 39m, issued just 83,000. [...] for families on moderate incomes, it is a place to live well cheaply." thank you for you time. please refer to the following articles for more development, much of the supporting evidence for my prior posts can be found here. http://www.economist.com/blogs/economist-explains/2014/11/economist-explains-0 http://www.citylab.com/housing/2015/05/the-urban-housing-crunch-costs-the-us-economy-about-16-trillion-a-year/393515/ http://www.citylab.com/cityfixer/2015/05/how-parking-keeps-your-rent-too-damn-high-in-2-charts/392894/ http://www.citylab.com/housing/2015/05/the-deep-roots-of-americas-housing-affordability-crisis/393773/ http://www.economist.com/news/leaders/21647614-poor-land-use-worlds-greatest-cities-carries-huge-cost-space-and-city http://www.citylab.com/housing/2015/05/mapping-the-hourly-wage-needed-to-rent-a-2-bedroom-apartment-in-every-us-state/394142/ http://www.economist.com/news/briefing/21647622-land-centre-pre-industrial-economy-has-	1 2 3

#	Comment	
	returned-constraint-growth http://www.economist.com/news/united-states/21646221-americas-fastest-growing-metropolis-faces-up-cheaper-oil-life-sprawl	
72	I like option 2 best - concentrate growth where the jobs are, downtown, to minimize congestion. But in general, growth plans in Seattle do not take enough into account the impacts on the neighborhoods. These are what make people growth-adverse. The impacts are: 1) Parking. This is not Boston or NY, which have enough public transportation that a lot of residents don't own cars. New residential developments should provide one parking space for each bedroom, and at least one per unit, even apodments. This is major - løts of old houses in Seattle only have 1-car garages, and the neighborhoods are short parking already. Also roll the cost of the parking spaces into the apartment rents, to minimize use of street parking. 2) Keep the sidewalks, streets, and street parking open to the public during construction. If that means the developer can build on a little less of their land, so be it. Or they can figure out how to stage on a portion of the lot, then into the finished parking. 3) Charge development fees like Bellevue does. Some possible uses for the fees are: a) Synchronizing stoplights on arterial street or installing new ones that maximize throughput on the roadways. This would also reduce emissions from idled cars b) Increased public tranportation, preferably light rail instead of buses, and bike routes. c) Use the money for homeless housing - perhaps more apodments with parking and showers to also accomodate people living in their cars. 4) Make the developers responsible for refilling potholes caused by construction cuts into the streets until the street is next resurfaced. 5) Get rid of the share-road bike signs on arterials - those are NOT safe. Make bike lanes instead, maybe on secondary roads. Connect all the various bike trails. 6) Also, along the lines of trying to reduce the homeless population, why not put up a couple of billboards with counters and let people text $10 to help homeless? It could be phrased as 'instead of giving to panhandlers, help the get off the streets since the start date. Have the counters show the number of homeless people who have 2 years of housing paid for.	**1** **2** **3**
73	The Survey was very confusing and I was not clear on what I was actually in favor of or against. It seems like it was designed to be that way. If you really want to know what people think then ask real direct questions. This survey was a waste of time. Additionally, none of the alternatives seemed to be balanced or better than the other. Its a shame that our leaders in this City cannot come up with a plan where there is something for everyone. In every alternative there are clear winners and losers and the losers are the most vulnerable populations.	**1**
74	Mitigating displacement is of paramount importance. Investments to create a high quality of life in urban areas if only certain demographics are able to enjoy it is not a good use of city resources.	**1**
75	Growth should be encouraged where light rail transit can serve it, with bus service connected to rail stations as well. Better consideration should be given to the need for single occupancy	**1**

#	Comment	
	vehicles access/parking, paratransit and taxis for the elderly, disabled and parents/caregivers with small children and or others needing care. Existing single family residential neighborhoods must be protected as the foundation of neighborhood loyalty and investment (tax base!) with much more rigorous enforcement of building codes and elimination of nuisances that degrade the community. The "Sissely" (SP) outrage near Roosevelt High School that has gone on for almost 40 years was exacerbated by a lazy city bureaucracy that refused to protect a neighborhood from a vicious property owner whose mental state caused old fashioned "blight."	**1 cont.** **2**
76	I think it would have be more helpful to paint a picture for each of the four options. "This option would look like this with more of this and less of this." I might have understood them better that way. Your question on Seattle Schools shows a remarkable lack of nuance to the current situation of growth without very little capacity (a situation unlikely to change over the next decade). You seem to lay all the answers at the feet of the district instead of asking what the City could do to help the situation. Also, what does this mean (under solving race and social justice? How would this happen? - Provide better access to quality education for marginalized populations Also, there was a section on what is important for urban villages and there was something about "more programming" that I had no idea what it meant. I think this survey is geared to people who are more "in the know" and have a higher degree of education. It was not easy to read. Keep that in mind as you wonder who took the survey and why.	**1** **2** **3**
77	the question specific to public schools were difficult to answer without knowing what the costs would be. Reopenign an old school versus building a new one? Hard to know which would be best without more details. Regardless, increasing public education for all individuals is critical:)	**1**
78	Rather confusing survey so take my answers with a grain of salt. I sure don't want to be taxed to death so get the rich (we have plenty of them!) to help out. More economic opportunities - yes. But through small business. I'm sick of big corporations and mega chains everywhere. That will help our poverty problem. Open more hospitals for mentally ill. Keep neightborhoods neighborly with centralized interesting commercial areas defined. Not sure I understand "urban centers" vs. "urban villages" and I think I prefer rail to buses but not sure about that either. Really like bikes but too many hills! Would need dedicated roads (not lanes) for bikes. Many bike riders extremely unsafe on the roads and rude. Also, I often think that bike lanes should be inside lanes rather than outside where they conflict with drivers opening doors and the difficulty of seeing them. If bikes had inside lanes, they would be more careful and drivers could see them. If a bike wants to make a right turn, he/she would have to use a signal. Cars would be mandated to let them or they could merge for an upcoming right turn. Put 'em right there in the middle of the damn road. Everybody would be safer. Could try it anyway.	**1**

#	Comment	
	Also, All urban villages or urban centers should be corporation free - let small businesses rise out of the people who live in the village. Again would increase small businesses. People working where they live. Create gardens - large so local food per village. Too many big trucks in neighborhoods. We need parking because cars aren't going away. Dream on. Perhaps could mandate city-size cars only? Larger cars would have to be stored outside the neighborhood. Hard to do but we could get used to it. Any high building (which is good - I believe in density to save wilderness) should be bird-proofed. No more big windows without some bird awareness. NY - 300 dead birds a day? And that was a long time ago. We can do better. If somebody is really going to spend the amount of money all this takes, look at the big picture and do it right for a change. I voted against Bertha and wish Mike were still in office. Unbelievable waste of money.If corporate interests are going to run this, then I'm against it all. I love Kshama! Whatever she says is fine with me.	**2** **3** **4**
79	I was proud to see that environmental stewardship and race and social equity were two of the core values. These are crucial when thinking about our city and where we are headed. I can't support a plan that is likely to displace marginalized populations. I believe that increasing density downtown might very well be the best way to go, and (as I'm sure you're already doing) I think Seattle can take examples from other major metropolitan areas, such as Toronto and Vancouver.	**1**
80	how about the plan has no deadline! so if an amazing idea comes to mind later.. Let's empty, lonely houses or abandoned land into wonderful opportunities for those in need for a home of their own.	**1**
81	I strongly support an alternative five as Urbanist writes about.	**1**
82	There is so much truth in these statements on the Seattle Schools blog by a planning expert that I'm just going to pass them along. If only you'd listen. Comment 1 The City of Seattle is so disconnected from the state of public schools and capacity, that this question is pretty meaningless. Option 1 is very complex and options 2-4 have been largely executed or are underway. That list is a simple list of most expensive to least expensive options with zero context. 1) There are no real properties for building new schools 2) All but three closed buildings are either open or scheduled to be re-opened. 3) Portables buildings have been aggressively located, wherever possible.	**1**

#	Comment	
	4) While long term planning has been largely politically driven and not well targeted, the facilities folks who are actually accountable for the day to day stuff have done a remarkable job making existing facilities have more capacity. The work at Mercer was exceptionally well done. Comment 2 ..These questions make it clear that the City of Seattle is profoundly disconnected from what is happening in schools. Their belief that space can be made if someone just wanted to badly enough, misses the fundamental reality that ... every nook and cranny has already been examined for optimization.	**1 cont.**
83	I support Urbanist's Alternative 5, which will increase density and diversity in a more distributed way without exacerbating displacement in poorer, less white neighborhoods, especially in the south end: http://www.theurbanist.org/2015/06/16/support-alternative-5-for-seattle-2035/ I would encourage DPD to consider this alternative in its analysis.	**1**
84	I support Plan #4 that promotes increased development around light rail and public transit.	**1**
85	Please consider alternative 5 as sugested by The Urbanist. I support the tenant that all communities should have an urban core nearby to reduce reliance on cars for small errands and provide a hub of community.	**1**
86	I would like to see more commercial zoning in my neighborhood. I live in Highland Park and it would be great to see more business that people can walk to. I think if you want people to be amenable to density it has to come with perks. I would like to see these perks come in increased transit, sidewalks and additional commercial zoning. Our neighborhood which has been designated as at risk desperately needs all of these. The 131 bus didn't receive an increase in service due to it going outside of Seattle. 14th Ave SW which is a few blocks away from the elementary school lacks sidewalks. And we don't have a commercial area. Delridge, 16th and Holden would be great areas to increase commercial zoning in the Delridge neighborhood.	**1**
87	This city is hung up on "Race & Social Justice", but it is all lip service, because people who have gentrified the historical African-American Community (the Central Area) are listened and heard more than the people (African-Americans) they are displacing. As far as income is concerned the distinction of fixed income needs to be considered along with "low income".	**1**
88	City Hall must have public hearnings in every library, school, community center and senior center in order for people to understand how this lengthy document affect them persosnally and their economic growth or displacement. Expecting citizens to always come to you (City Hall)	**1**

#	Comment	
	shows that you are not concerned to hear community voices. Invite the Seattle Times , the Seattle Mediium the Stranger and the Seattle Channel to take each item and have a forum on each item. Too many citizens do not know what is going on until they see a graffetti filled board on an empty lot.	1 cont.
89	There's a lot of folk displaced in Seattle because of economic pressures. As such this population should be included in the DEIS, which currently only refers to direct displacement. I would suggest using the definition for "displacement" that is used in the Equity Analysis rather than what is used in the DEIS.	1
90	Please avoid MIC proposals to lock down industrial zoning permanently. Living near industry means living near multiple bad actors when it comes to air pollution and other environmental factors. Threat of zoning changes is often the only leverage we have to force these companies into compliance.	1
91	Rezone Beacon Hill by VA to Multi family.	1
92	Can SE Seattle grow Equitably and if so, how? We need livable wages -equitable pay - work is valued - not a race to the bottom. We are putting economic stress on people by asking them to take on service jobs but needing to live far away because they cannot afford to live near work (i.e. they work in the City but live in Federal Way and transit does not run late enough) Transit/transportation needs to work for people who need it. Workable tranist.	1
93	Can SE Seattle grow Equitably and if so, how? Yes. SE Seattle needs to have more jobs, higher wages, housing, transportation, cultural center, health care.	1
94	Can SE Seattle grow Equitably and if so, how? 1) TOD near transit hubs and transit corridors. Yes. 2) But also open up single family neighborhoods to more variety of housing: duplexes, row houses, backyard cottages, remodels into apartments, rooms, etc. Doubling density in SE would also enable a much finder transit network. 3) Focus on jobs near transit too, and job trailing, especially in Southeast Seattle.	1
95	Can SE Seattle grow Equitably and if so, how? For Seattle to become an equitable city it must address the devastating impact of the criminalization of people of color, especially people of color. The criminalization of young people for youthful offenses or drug use, low level dealing creates a pipeline from schools to prison. Discrimination of convicted felons that marginalizes them, in housing, education, employment, etc. needs to be ended and replaced with programs that reintegrate them into society. Thanks.	1
96	Can SE Seattle grow Equitably and if so, how? Better government support/conrol (ex hire local with private industry)	1
97	Can SE Seattle grow Equitably and if so, how? Affordable housing. Affordable housing. Affordable housing. Means diversity can stay in Seattle - ensure a healthy future!	1

#	Comment	
98	Can SE Seattle grow Equitably and if so, how? Give our schools more funding.	1
99	Can SE Seattle grow Equitably and if so, how? Opportunities for the people that live in South Seattle now to stay. Cooperation and empowerment amongst communities to support assett development. Introduce cultural hubs of communities to increase access to cultrual community, service, jobs and housing. Balance income and housing types. Have areas that are affordable empasis on 3-5 story, larger units, 2 stories in some single family areas to help transitions.	1
100	Can SE Seattle grow Equitably and if so, how? A healthier world without racism, sexism and capitalism is what we need for Seattle to grow equitably.	1
101	Retain the 40% tree canopy cover goal Do not replace it with the lesser Forest Steward goal. How can forest stewards want less tree canopy cover than the general public?	1
102	Speaking of displacement, driving homeless out of downtown tourist areas like Pioneer Square pushes them out to areas like Ballard that see exponential increases in crime. Local businesses bear the brunt of people living in cars, displacing 'free' space for employees and customers. Beligerent transients clustered near the retail core drives away business. Now the neighborhood wants Ballard businesses to pay an extra tax for cleaning streets and private security. The city made this problem, and small businesses have to pay. Maybe if Amazon or Paul Allen moved to Ballard, oh wait, they won't because the city won't give them a tax break and transit is awful. As for walking? The people that live in so called micro-housing don't have the disposible income to dine out or shop small retail. So let's see: transients, needles in parks, no parking and extra fees to pay for cleaning and private security. Urban hubs don't attract the 'tech-hipster class'. Seattle needs to solve its homeless problem, not just shove it into neighborhoods unprepared for it just to placate downtown big business.	1
103	None of the options address the severe shortage of both housing, and land. The city presently has enough land to house millions of People. However, this won't be feasible in any of the proposed schemes. At least, not without even higher rents, more displacement and luxe housing. Far too much land is devoted to detached housing - the least efficient form of urban housing. Berlin has less than 10% of its land area available to detached housing. Nearly 90% of all housing is in 5+ unit buildings. According to planner sonia hirt, Stuttgart has <1% of its land dedicated to detached housing. Why are we less progressive than these thousand year old cities? And by an insane margin?!?	1

#	Comment	
	The protectionism of single family zones, specifically with the urban village strategy, has been a massive failure. This whole experiment is an excellent case study for why local land use planning should be outlawed in this country. The affordability problem is further compounded by horrid transit and poorly planned transportation. Any scheme that doesn't look at massive rezone of the entire city should be left out. To fail to do so would be criminal and negligent. Seattle's zoning maps were based on a snapshot of how the city had built up and progressed through annexation and little has changes since then. The zoning map is still mostly fundamentally unchanged nearly a hundred years later - nee, it's actually more restrictive than it was when first conceived - a testament to the complete lack of planning, foresight on the city's behalf. it's long past time to start over. And this time, develop a geospatial plan that allows ample growth, encourages affordable housing, reduces displacement, and makes for a vibrant, connected city for all - instead of merely expanding the toxic, segregated neigborhoods it has become known for.	**1 cont.**
104	The Equity Analysis should be included as a part of the Final EIS. The Equity Analysis should be used to inform the creation of a growth alternative that addresses the current risk of displacement in high risk areas by coupling whatever level of growth chosen with significant near term stabilizing investments made BEFORE the market picks up. The DEIS only refers to direct displacement (eviction, demolition, etc…) not the more common displacement due to increased rents (economic displacement). Use the definition for "displacement" that is used in the Equity Analysis rather than what is used in the DEIS The DEIS does not take into account the historic inequities that led to some populations being more vulnerable to displacement and more likely to be excluded from high opportunity areas. The DEIS sections on environment and housing/employment should clearly identify the mitigation required to offset the environmental impacts of displacement. Namely that low-income households and communities of color use transit more frequently and have lower car ownership rates and thus if displaced to the suburbs then will be forced to commute more by car, increasing GHG emissions and total VMT. There is development interest and growth already occurring in high displacement risk areas such as Southeast Seattle. These places are already, and will continue to absorb the City's growth. Displacement of communities of color has already occurred and continues to occur in these areas. Significant mitigation investments are needed immediately to offset the resulting increased displacement risk.	**1** **2** **3** **4**
105	I'm very concerned about some ways in which the urban centers are affecting the character of neighborhoods. Many of us chose to live in places precisely because of the qualities those neighborhoods exemplify--walkability, small businesses, trees, parking. Now, we're getting huge buildings of low architectural interest that are still not affordable for low-wage earners and that do not provide sufficient parking for their occupants. Streets are being narrowed, traffic can back	**1**

#	Comment	
	up for blocks, and parking is scarce. This makes it hard to get to places we like to support. I have no objections to mass transit--I commute by bus each day--but sometimes a car is more practical and convenient when going out for a meal, shopping, etc. What I would like to see is shorter buildings and community parking garages that are open, attractive, and affordable. They have these in Portland, Fort Collins, Cheyenne, and other cities. Why not here? I understand not wanting to encourage people to drive downtown, but let us continue to be a part of our neighborhoods. Also, plan ahead for rail in places like West Seattle. The land is being developed rapidly and will be harder to acquire once we finally get something besides buses!	**1 cont.** **2**
106	I support the Urbanist Alternative 5. The communities that are already being displaced should not bear the entire burden of improving density. Places like Magnolia and Madison Park and even Seward Park should be considered.	**1**
107	I am a homeowner in a Lowrise 1 area in Ballard. I am constantly surprised at the low quality of buildings being constructed in place of older, functional residential buildings (houses, duplexes, triplexes, apartments). In addition, it has been my observation that the new construction of townhomes rarely has any significant impact on density in this zone. For example, a duplex that houses six people is replaced by three townhomes that house one to two people each. That is not a density improvement, it is a profit-generating machine for developers who have no vested interest in improving the area. In the meantime, some of my best neighbors (read: long-term renters) have been displaced by the sale and demolition of their residences and cannot afford to live in the city any more. In addition, the new construction rarely contributes to the improvement of the landscape and overshadows adjacent properties. Making developers plant a tree on a parking strip (which will later be neglected by new homeowners) is not as environmentally enhancing as a long-term resident's established yard and garden. The new construction is often occupied by people who have no interest in yards or gardens, and it changes the landscape to concrete where there once were trees, birds, and greenery. Given that there is no density motivation to the lowrise type of construction that is being built, PLEASE PLEASE PLEASE consider reducing the lot coverage and height limits of townhomes in lowrise 1 zones. At the very least, offer developer incentives for buildings that are higher quality, lower in height, and more sensitive with regards to their placement and design. There is a very strong market for smaller, high quality homes in this city. In contrast to Lowrise 1 zones, concentration of mixed-use buildings and apartments in the adjacent urban village have been obviously a much more effective means of creating density. This is particularly effective if there are existing bus lines and transportation. in general, our urban village has benefited greatly from this trend. With that in mind, please ensure that there are good resources available for low income and homeless individuals. We need housing for everyone, not just for people with money. If we want Ballard to be more live-able, we need to get help for people who need it, because desperate, homeless people will otherwise occupy parks and streets and that does not enhance the neighborhoods they occupy. Please allocate funds to build more centers for people who have problems with addiction, mental illness, and homelessness so that they can get the support they need. Build these facilities where they are needed (urban villages and light industrial areas). If	**1** **2**

#	Comment	
	people don't have to live on the streets, they will be less likely to commit property crime to survive. It will be better for everyone. Finally, I think that some focus could be made to improving our light industrial districts. Ballard is rife with under-utilized, single story warehouses. Just like South Lake Union was. There are some well-established businesses that should continue to thrive here. However, there are some rental buildings with high turnover that could be improved in a manner that increases density without significantly impacting light industrial business, most of whom have already fled to better facilities in cheaper metropolitan areas. Thanks.	**2 cont.** **3**
108	I support the Urbanist's Alternative 5 as the best vision for growth within Seattle.	**1**
109	I support the Urbanist Alternative 5	**1**
110	There are a lot of positives about Seattle, but since you asked for feedback, these are some critical comments. I'm a newcomer, and probably won't be staying much longer (about a year total). I have grandchildren here, and one thing I've noticed is HOW EXPENSIVE any activities for children are. Zoo admission high, museum admissions high (including such activities as the Science Center, which mainly caters to children), any cultural activities (drama, etc.) high. (The Nutcracker production at the local ballet company STARTED at over $100 per ticket, I noticed last Nov.-Dec. as I was considering taking my granddaughters - well, I can't fork out $300 for 3 hours of entertainment, so we didn't go. In contrast, Vancouver, where one of my daughters lives, had The Nutcracker for about $40 per ticket, in cheapie devalued Cdn dollars, as I recall. And Vancouver is no one's idea of a cheap city, but apparently they make an effort regarding cultural activities. Why can't Seattle? Seattle is becoming 'richer' - housing prices are going up, and the COL is generally high, favoring wealthy families. If you want to have a good place for kids of all backgrounds and income levels to grow up, you need much more affordable activities for kids. Full disclosure: I am originally from Washington DC , specifically the Maryland suburbs. More specifically: Greenbelt, a fantastic little town (maybe 40,000 by now) that offers scads of reasonable or no-cost activities for families; check out their website, http://greenbelt.com/ Trust me, for all Seattle's reputation as bike-friendly and green, you do not hold a candle to this little town! It was the first planned community in the US - originally a housing co-op, though owned by the federal government - and it was planned around children and families and a green, welcoming environment.	**1**

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	Well, enough of my Greenbelt patriotism! I was born and raised in Washington DC, and of course, the Smithsonian treasures in DC are entirely free ... except you pay for parking at the zoo, which encourages people to take public transit, which, BTW, is also pretty bad in Seattle. Oh, more about my experience with Seattle's public transit: I am in the NE corridor, and find it really inconvenient to take public transit. (I don't drive.) To go anywhere in my general region, I have to take a bus downtown and transfer multiple times. Once I took my grandson to an ultimate frisbee game held at a nearby school, and we spent more than 2 hours on 3 buses (waiting and riding - first downtown and then back) for a trip to a destination approx. 15 minutes by car from our home. The only convenient destination for me by bus from my home is UW, and even that has a not-great schedule for service, though it seems to be well-patronized by students and others (it's bus route 65). Better transit is a hugely important environmental investment - and it would help get children and youth used to using it. Right now it's impossible, though - way too inconvenient. Thanks for asking for input - hope this helps. Again, there are a lot of positives here. Seattle folk are a friendly, polite bunch, and the mix of residential/business where I live (View Ridge/Wedgwood/Bryant intersection of 35th-75th) is good. I hope you keep that mix as a goal, because it makes for a more liveable city for all. CONNIE ARNOLD 7064 35th Ave NE #2 Seattle 98115	**1 cont.** **2** **3**
111	Thank you for the opportunity to share online. As a Seattle homeowner and inner-city commuter, I believe it's imperative Seattle builds it's own municipal rail/streetcar system that provides access to all major neighborhoods. This can be done in addition to the Link Lightrail and would provide current drivers a true alternative to driving without being forced to ride a bike.	**1**
112	I have reviewed your alternatives and believe that they have potential, but I cannot support these options when light rail does not extend to West Seattle or into Ballard. It looks like all light rail is on the east side of the city, but does not take into account all west side neighborhoods or is even close to these areas. This continues to be a HUGE issue / mistake in planning of the city. ALL areas need as much access to modern transportation as we can make and yet the city continues to ignore this request. In West Seattle there is a state ferry that unloads every 1/2 hour creating a lot of additional traffic. Previous housing construction has gone into areas that are more affordable for contractors to build in and created a dense population, but transportation issues continue to be ignored. Also as the economy changes / changed people began moving to areas more affordable as was done in West Seattle and Ballard in the late 90's & 2000's. No new roads were added or roads seriously updated, this was not even considered when granting permits to build. Instead the city added a turn lane and took away 2 lanes of a roadway. Lastly, all new buildings for large	**1** **2**

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	businesses and for apts. /condos need to have parking spaces included in the building itself or as a separate lot. A permit to build should not even be considered if this option is not in the building plans. A good example of this happening is Capital Hill, a lot of great housing, but no where to park. Cars exist and will continue to be a part of a large city. We can make great leaps forward, which I think the city is trying to do, but we also must be realistic. We are not a village, we are a large west coast port city with new businesses coming on a regular basis. Thank you allowing comments.	**2 cont**
113	Hello, Can you please articulate what is specifically being considered to provide additional parking in Ballard? I own a home in Ballard and have lived here for the past 5 years. Over that time, I have watched and continued to watch countless condos go up in the area. While the growth is exciting there are undefinable challenges. Ballard store owners NEED to know that parking is so bad I often chose to go to other neighborhoods. A classic example...I can never find parking at the ballad Rudy's barbershop but I can at the phinney location so I now always elect to go there. I believe we could use one less massive condo building and instead should have a massive parking garage. Don't worry, people can and still bus and bike. However, for those folks that have children, vehicles are way more practical and we deserve to have parking options. Thank you, Eric Bachhuber 503-577-9451	**1**
114	Bus or light rail to work should be free. Simple to set up passes. Require businesses with xx+employees to pay per employee, smaller businesses (except franchises) paid by city. Example: I work for small company B in Pioneer square. I get a pass programmed to give me two rides per day free. One to work, one from work. Simple to program.	**1**
115	Officials of review team to review comments about the proposed update to Seattle's Comprehensive Plan: I fully support the three points that the Seattle Urban Forestry Commission has made in its letter about the proposed update. John Barber, 3421 East Superior Street, Seattle, WA 98122 (206) 324-1548	**1**
116	I have been involved in Georgetown real estate since 1997. I have seen and been involved in many changes in the neighborhood. Although my first real estate purchase was in 1997, I have	**1**

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	been aware of Georgetown since the mid 1970's, where I saw many older historic homes torn down to make room for industrial buildings , including the Design Center. Georgetown has changed drastically over the last few years, emerging as a unique dynamic neighborhood. At one point quite a few historic homes were being razed to build industrial warehouses. This has tapered off due to the low demand for small in city industrial and the high demand for residential housing. As cities grow and change so do the close in neighborhoods. Urban decay.....suburban sprawl.....urban renewal. At one time Georgetown was a good place to situate small industries, but as our city grows and prospers, needs have changed. Our homes that were rezoned to industrial are in danger. Seattle needs affordable commutable housing. A comprehensive plan to keep all of Georgetown industrial would be short sighted. Trying to legislate the growth and natural progression of our neighborhood is not a good idea. Thank you, John Bennett JOHN A. BENNETT BENNETT PROPERTIES LUNA PARK CAFE 2914-A SW. AVALON WAY SEATTLE, WA. 98126 206-227-1950	**1 cont.**
117	June 18, 2015 Gordon Clowers, Senior Planner City of Seattle Department of Planning and Development 700 Fifth Avenue, Suite 1900 P.O. Box 34019 Seattle, WA 98124-4019 Subject: Seattle 2035 DEIS Dear Mr. Clowers, Thank you for the opportunity to provide comments on the Seattle 2035 Comprehensive Plan update DEIS . I've been in the historic preservation and sustainability fields for the past 15 years and am very concerned about the direction of the City's future growth. The plan talks about promoting healthy, complete communities yet historic preservation and preserving our existing building stock is completely left out of the equation. Preservation encompasses all of the plan's core values: Community, Environmental Stewardship, Economic Opportunity, and Social Equity. Historic places are vital to creating livable, healthy neighborhoods. There's significant research demonstrating the powerful link between investing in historic buildings and economic revitalization. Preservation is sustainable! A substantial	**1**

#	Comment	
	amount of our landfill is made up of demolition and construction waste. Building reuse almost always offers environmental savings over demolition and new construction. Lastly, preservation contributes to social equity. The Draft EIS analyzes certain elements of the Comp Plan but does not address Economic Development, Neighborhood Planning, Cultural Resource, and Urban Design. Even more surprising, there's no mention of "historic preservation" in the Draft EIS. How will these other elements be addressed as part of the Comp Plan update? The "Environment" element deals with one of the core values of the plan and Washington's Growth Management Act (GMA): environmental stewardship. SEPA defines the elements of the environment to include both the natural and built environment. The DEIS is narrowly focused on the impacts of the natural environment and not built. The Final EIS needs to assess the potential negative impacts on our historic properties.	**1 cont.**
	The draft looks at construction-related GHG emissions (3.2-19) associated with demolition and construction equipment, but does not address the life-cycle environmental impact of preservation vs. demolition. Recent research shows that it takes decades for the greenest new building to pay back these up-front costs. Reusing a 5,000 square-foot building saves a level of carbon equal to the amount consumed by 85 homes in one year (Athena Institute). The City needs to own up to its reputation as a national leader in sustainability by encouraging and developing policies that leverage the value of existing buildings toward achieving its sustainability goals. New LEED-designed buildings are just one piece of the puzzle, not the magic bullet.	**2**
	The issue of "neighborhood character" is an important concern that was brought up as part of the public comments process. Its omission needs to be addressed in the Final EIS. The Preservation Green Lab's Older, Smaller, Better report documents how the character of buildings and blocks influence the urban vitality (or "urban grain") of a neighborhood. Has the City worked with the Preservation Green Lab to inform new land use policies? The Comp Plan needs to strike a balance between new development and historic places, i.e., encouraging sensitive modern infill that preserves and complements historic building fabric. It should not be an "either-or" solution.	**3**
	As important, the City should demonstrate its leadership on social sustainability. Again, preserving historic and cultural properties needs to be a critical component in any equity agenda. The PGL report indicates that the "most economically and socially successful neighborhoods" are the ones with a stock of older, three- to six-story buildings.	**4**
	Although not covered in the DEIS, I am very troubled by the new plan's proposal to replace the "Cultural Resource" element with an "Arts & Culture" element that is primarily focused on art (public art, cultural space, arts education, creative economy, creative placemaking) and eliminates historic preservation and cultural resources. Is this accurate? How will historic preservation and the city's existing preservation policies and regulations be accommodated in the new plan?	**5**
	Seattle 2035 provides a vision for the City's future growth, but I'm not convinced it's a future that achieves its goal of creating healthy, complete communities.	**6**

#	Comment	
	Sincerely, Brooke Best Architectural Historian/Concerned Citizen	
118	We need higher zoning near the stations AND more room for growth in the neighborhoods. We need more housing at all levels: Townhomes, condos, and apartments. Northgate near the station needs a major upzone. 160-200ft or more. The whole city needs more townhomes.	1
119	Thank you for the opportunity comment on the Draft EIS alternatives for the Seattle 2035 Comp Plan. Alternative 4 offers the most promising path towards the achievement of the plan's four values. Seattle must capitalize on our enormous investments in light rail and frequent bus service by building high density, walkable, and affordable housing and commercial space near these major transit connections within urban villages and urban centers.	1
	In conjunction, the City must consider imposing parking maximums within urban villages and centers. There are currently 30,000 excess parking spaces in the four Center City urban centers, driving up the costs of construction, commercial and residential rents, and traffic congestion. Parking should be capped within a 1/4 mile distance of light rail stations. At the same time, on-street parking must be reduced to make way for better sidewalks and protected bike lanes so that people can easily access light rail by foot, bike, and transit. For people who need to rely on their cars, the City should explore joint-use or permitting partnerships with property owners who have excess parking (King County Metro found apartment buildings have 30 percent extra capacity, on average). Loading zones for businesses should be moved to side streets and alleyways. Safe routes to school and road diets should also be included as transportation strategies to help fulfill the Vision Zero plan.	2
	With greater development and right-of-way enhancements land prices will inevitably rise around transit stations in urban villages, threatening the displacement of many people. I appreciate the City's map analysis of displacement potential and opportunity access. In conjunction with Seattle 2035, the City must act quickly to implement the linkage fee and other affordable housing strategies to capture the value of future upzones around transit. It is the ultimate irony that that new, high quality transit service could displace the low-income and vulnerable people that need it most, pushing them out to areas with lower bus service and higher car dependency. City-owned housing and mandatory inclusionary zoning must be included as housing strategies in the plan, primarily within urban villages.	3
	The City must also plan to help preserve local businesses and community anchors, like religious facilities and event centers. We too often focus on housing displacement, but businesses are also affecting by rising rents. The City must consider ways to help neighborhoods retain their core commercial and cultural identities.	4

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	With the effects of climate change already obvious, the City must also include plans to further reduce its carbon footprint and adapt to the inevitable effects. Sea level rise will necessitate protection of our coastal and port infrastructure. Decreasing snowpack may require new water sources and stronger conservation measures. Rising temperatures will require better building insulation and tree canopy coverage. I look forward to the next 20 years of growth as Seattle continues to evolve. Thank you again for the opportunity to comment, and excellent work on presenting these issues in a concise and visual manner.	**5** **6**
120	There is development interest and growth already occurring in high displacement risk areas such as Southeast Seattle. These places are already, and will continue to absorb the City's growth. Displacement of communities of color has already occurred and continues to occur in these areas. Significant mitigation investments are needed immediately to offset the resulting increased displacement risk.	**1**
121	I can not believe you have missed west seattle and ballard. Where do you think people live? This plan is not even close to reflecting how traffic moves and from where it goes and comes. I think all of these plans are negligent if they do not address West Seattle and Ballard.	**1**
122	Public transportation needs to change to discourage less cars Ballard has added far too many new apartments and condos but withdrawn busses to the areas a that feed Ballard No one will take two busses to get to work when they can drive in half the time Sunset Hill #17 Ballard use to have a bus during the day for individuals to use shopping in Ballard but now must drive or walk 10 plus blocks carrying their groceries---unrealistic Removing transportation in areas that are vital seems someone had bad judgement Traffic is bad in all areas of Seattle and needs attention	**1**
123	I am very disappointed in the way Seattle is zoning new projects! We have a seven unit project being built across the street. There is NO Parking included in this new development! The new tenants WILL have cars! Despite transit across the street. The street parking is completely filled after 7PM nightly already! How can you justify allowing 7-12 additional cars on our street. We are moving this summer to get out of this parking issue! Moving South to North Tacoma! Perhaps the zoning issue will be quickly resolved! We are out of here! Good bye West Seattle! Mike Boyle	**1**
124	Mr Clower, The following comments on the DEIS for the Seattle 21035 Comp Plan Update are based on my	

#	Comment	
	professional judgment, as a historic preservation architect. They also reflect my personal beliefs about what makes and will sustain Seattle as a unique, livable, and vibrant city. 1. Preservation of neighborhood character is critical to sustaining communities. In all neighborhoods. 2. The Comp Plan Update must consider preservation of historic buildings, structures, open space and landscapes. 3. The analysis of alternatives must address the potential impacts of development and building demolition in terms of sustainability and historic preservation. 4. Analysis of cumulative impacts of the plan alternatives on should be included. The analysis should consider specifically potential demolition of smaller b~ildings on increasingly valuable sites resulting from increased future development. 5. The analysis of alternatives should consider properties that are currently eligible for listing on the National Register of Historic Places and those that currently appear eligible for local landmark designation, and those that could become eligible during the duration of the plan. Thank you for your consideration. I look forward to your response to this and other public comments and to the revisions in the FEIS.	**1** **2** **3**
125	I'm a 20 year resident who moved here in my 20's and have seen a lot of growth - as anyone living in Seattle for that amount of time, at any period, has. Seattle's an amazing city but the primary thing I love about it is the wonderful quality of its neighborhoods. Walkable, full of parks, connected closely to each other cheek to cheek without dead zones in between. I love the commitment to density that keeps development and redevelopment happening. Here are some of my top priorities for our growth: Affordable Housing AND neighborhood character: I'd like to see publicly-owned (city-owned?) development companies so that the city, not just developers, can exert more control over how our neighborhoods get developed. I'm not an expert in the field of development so I don't know what the best models are, but there have got to be some we can look to and emulate, or create for ourselves. I don't want Seattle to rely on private profit-driven developers to shape our neighborhood landscapes. Some of them build beautiful things but some build unsightly boxes, and the rest of us have to live with it for decades to come. Plus, if we want affordability, lets build it ourselves. I'd love to see a city conversation about how to ramp up this kind of publicly-driven development and start making it happen. On the topic of development, too many new buildings are being created with empty storefronts at the bottom. They stay empty for years, creating "empty eyes on the street" and a sense of nothingness at the human pedestrian level. Sometimes a national chain store might go in (Subway, H&R Block) but I often see just a swath of empty windows. It makes our neighbhorhoods feel soulless. Can we incentivize developers to get those rented out to real local	**1** **2** **3**

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	businesses? It seems they would rather get $0 rent so I'm assuming there's something in the way the new buildings are financed and incentivized that is driving these empty street-level storefronts.	**3 cont.**
	Safer streets: the mayor said he wants to slow down traffic and make streets safer. Zero fatalities. I love it. So lets add more crosswalks at important places that neighborhood leaders ask for, repaint the ones that have practically vanished, and commit to new signage that will slow traffic and remind drivers about pedestrians and bikers. In my neighborhood a new crosswalk was added at 43rd and Stone and completely changed the way my family is able to access nearby Wallingford's main street area. It's great. I would love to see more of this kind of thing. There's also a crosswalk up the street, right next to a busy playground/park and practically adjacent to several local schools, and it's completely faded. I tried to tell the city about it and my request to repaint felt like it dropped into a void and left me with hte impression this was the lowest of low priorities in the city. Are we waiting for a 7 year old to get hit? We can do better than that. On the same line of thought, why can't we commit funds to adding neighborhood traffic circles and other calming devices? It adds to neighborhood safety but also, the more we invest in these calming structures, the more we build a" culture of calm" on Seattle neighborhood streets that will become the new norm as we add drivers over the years.	**4**
	The Obvious: we should be commiting to transit and light rail. I browsed through your website briefly and didn't quite get the various options you laid out. Without going back to study it in depth I'll just say I'd like to see as much transit as possible, so we don't have cars choking up our neighbhorhood streets and so that people can commute via bus in comfort and speed. Best, Jenny Brailey	**5**
126	Housing costs are the issue du jour, and it would seem like it will stay that way for the foreseeable future. The following appears to be a key statement from the draft EIS: "The alternatives that promote the most concentrated development patterns will result in construction of taller buildings to provide housing accommodating higher numbers of residents in a smaller geographic area. Taller buildings will generally be more expensive to construct than low-rise residential structures in areas not designated for growth." It is my belief that Seattle needs to shed the idea that it deserves a 'normal' mix of housing types. Were we isolated from the rest of the region, that strategy may be a sound and balanced one to pursue. The fact is, however, that our city is the dense hub of the region, and regional thinking requires us to remove the protections afforded to single-family zones in the city. I'm not advocating for a free-for-all in current single-family zones, but history has shown that concentrating growth in a handful of small areas simply raises prices. If 5-over-2s are the most cost-effective building type, the reins should be let loose to build this type of housing on a larger proportion of Seattle's land -- in a planned fashion with concurrent transit/bike/ped investments. There are already plenty of places well-served by transit in the city where growth is not being directed.	**1**

#	Comment	
	The solution to housing affordability is on the supply side. Concentrating growth into high-cost, high-amenity areas (and what we really mean by that is limiting growth to those areas) is not the solution. Given the regional context, the majority of Seattle should be considered a growth area and opened up to allow the market to function. We need not be terribly concerned about displacement (except for poor and minority households), because people are already being displaced by the high cost of housing caused, in part, by the protection of single-family zones. Thanks for your great work so far.	**2**
127	There is development interest and growth already occurring in high displacement risk areas such as Southeast Seattle and the Central District. These places are already, and will continue to absorb the City's growth. Displacement of communities of color has already occurred and continues to occur in these areas. Significant mitigation investments are needed immediately to offset the resulting increased displacement risk. I am not seeing enough focus on the Central District aka "AfricaTown" when you talk about mitigation of displacement. This analysis does not take into account the historic inequities that led to some communities, namely the black community, being more vulnerable to displacement and more likely to be excluded from high opportunity areas. I don't see incorporation or emphasis on the Black community (those who have a history of enslavement in this country) and the efforts around the Firestation on 23rd and Yesler, the re-appropriation of Horace Mann Schoolhouse as Africatown Center for Education and Innovation, the Black Seattle 2035 plan, Elizabeth Thomas Homes (a black led affordable housing development), Pastor Jeffery's economic development campus, or the development on 23rd and Yesler. Where are your intentional RACIAL Equity goals for the black community?!? Please use the Equity Analysis to create the best growth alternative for the City -- one that couples a real investment of resources to create race and social equity to mitigate the increased risk of displacement caused by growth.	**1**
128	I really like the development of Urban Villages and want to encourage that. I like to visit Urban Villages that have their own unique character and having lightrail go through those places would be best for me to visit and for the people who live there to get to other places. I am not wanting a taller and fatter downtown Seattle that will become uniformly the same thing eventually. Much better to spread the development and hopefully have Urban Villages that represent something diffrent- Like a tour through europe used to be where just a quick train ride and you would be in a completely different place. The most important thing to me is that everyplace should not be the same, and all places should have some money and transportation to grow. And, I want to live without a car forever so please make it possible that I can do that.	**1**
129	First, I think it is essential that Seattle densify to ensure that we're taking our fare share of the nation's population growth. It's important that the City is doing this work and I'm glad to see that	**1**

#	Comment	
	serious thought is being put into not only how to grow, but how to grow while minimizing displacement. That said, we also need to ensure that the growth is done in a humane way that promotes the unique qualities that our City strives to embody - access to light/air, ethnic & cultural diversity, and community-based neighborhoods. If we are to achieve all of those things while still accommodating the extra growth, we need to find ways to incentivize communities to accept the growth AND developers to build quality housing/office buildings. Regarding incentivizing growth for communities, I think this means helping residents to understand what tangible benefits they gain by accepting higher density within their neighborhood. For instance, does the City priorities more bus service if they accept more growth? Perhaps developments of a certain density are required to set aside a certain amount of ground-level open space that is accessible to the public? These are all examples of tangible ways that communities "get" something in exchange for accepting more growth. As for incentivizing quality development amongst developers, I think the City needs to take a hard look at the Design Review program as well as the Design Guidelines. Other cities, such as Portland and Vancouver B.C., are receiving considerably higher quality construction and with many more public benefits than Seattle is. We need to find ways to encourage developers to break-up bulky "bread-loaf" developments which do nothing to promote vitality at the street level. I would rather allow small portions of a building to pop-up within a block than to have the continued proliferation of the ubiquitous 5-over-1 projects. In short, I'm all for more density in Seattle but lets do it right!	**1 cont.** **2** **3**
130	I'd like to simply comment on the reliance on transit for moving people. I think urban planning should take into account the fact that transit is only a useful / viable transportation method for a few select groups of people. There a large groups of people for whom mass transit is an impossible option – parents who need to take their children to and from school (and possibly continue on to work), people for whom transporting equipment with them is important (carpenters, house cleaners, painters), people for whom the time spent on the bus negates the money they could earn otherwise (low-income hourly workers commuting from far away). When these factors are taken into consideration any plan that sacrifices moving about the city rapidly by car for increased bus routes puts large portions of the population under undue hardship. I hope that moving cars, buses, bikes and pedestrians safely and speedily around the city can be a goal of future planning. Simple solutions like better signal timing, eliminating unnecessary stop lights, increasing speed limits where it is safe to do so, etc. can go a long way toward decreasing driver frustration (and actually increasing safe driving as a result) and moving goods and services in Seattle in a timely manner. Thank you for your consideration of these comments. Jasmine Bryant	**1**
131	The City Council has really missed the boat on affordable housing. Instead of these stick-built crackerboxes, let them consider something REALLY affordable. Let the Council gratify their hatred of motor vehicles, and their romantic visions of far-flung vacations simultaneously, by	**1**

#	Comment	
	erecting steel frameworks on city lots which would support four-level stacks of vacation campers minus running gear. Each such camper is essentially a full-service home already, and could easily be hooked up to all the existing utilities, thus providing absolutely the most low-cost housing conceivable. And with the ultimate triumph of motor vehicle haters, such housing units will be available even more cheaply once cars are banished from the roadways. To screen these communities from the urban snobs who hate any such concession to the real world of supply, demand, and basic logistics and other such metropolitan inconveniences, let graceful walls surround each such development, on which could be projected, both inside and outside, prize-winning environmental photographs of choice sylvan locations selected from wilderness preservation areas, with speakers demurely placed throughout to grace the air with sounds of waterfalls, coyotes and urban lovers frolicking in the bushes.	**1 cont.**
132	The developer who presented this at City Hall had a project in Ballard where apartments were built over a Q.F.C. on 24th and 57th. In order to get the permit to build, he was supposed to have a percentage of that project devoted to low income. He agreed to it, and then reneged on the agreement. This guy touted this plan as his. If he cannot play by the rules on a small project like the Ballard Q.F.C what makes you think that he will won't just take the whole city to the cleaners? This is why I am against this idea.	**1**
133	1) The City needs to support the School District in building new schools! Lack of impact fees and some poor planning has created a capacity crisis- we do not have enough seats for all the kids, and the problem is getting worse by the day. The City needs to step up and help solve this problem. Schools are a fundamental part of democracy and our society. 2) Other large international cities (Barcelona, Paris) have small to medium grocery stores every block or two. Zoning and encouraging these type of stores makes cars much less necessary, and quality food available to all. Zone to support this!	**1** **2**
134	I have a few short comments to make for your consideration: 1. I believe that the Equity Analysis should be used to inform the creation of a growth alternative that addresses the current risk of displacement in high risk areas by coupling whatever level of growth chosen with significant near term stabilizing investments - and that this should be done before the market picks up. 2. The DEIS only refers to direct displacement (issues like eviction or demolition) not the more common displacement due to increased rents (economic displacement). I believe the latter issues should also be considered. 3. I think it is important to use the definition for “displacement” that is used in the Equity Analysis rather than what is used in the DEIS. Thank you for the opportunity to comment on this important process.	**1**

Downtown Residents
c/o Albert C.S. Chang
1920 4th Ave Unit 407
Seattle, WA 98101
6/16/2015

Diane M. Sugimura, Director
Seattle Department of Planning & Development
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124

Re: Public Comment on the Draft Environmental Impact Statement for the Seattle Comprehensive Plan Update

Dear Director Sugimura:

1 We are downtown residents writing to comment on the Seattle 2035 Draft Environmental Impact Statement (EIS) for the Seattle Comprehensive Plan Update published on May 4, 2015. With respect to Downtown/South Lake Union sector, we strongly disagree with the finding of "no significant unavoidable adverse impacts" (3.4-36) under all alternatives in Section 3.4: "Land Use: Patterns, Compatibility, Height, Bulk and Scale."

Section 3.4.4 of the EIS acknowledges that the anticipated additional growth in Seattle will create "adverse impacts" that include an unavoidable "increase in building height and bulk and development intensity," as well as "land use compatibility issues." Nevertheless, the EIS dismisses these concerns by claiming that the City's adopted design guidelines and development regulations such as setbacks, height limits, tower floorplate limits, and minimum tower separation will mitigate these impacts.

2 That claim simply does not comport with the realities of the downtown Seattle residential community because the mitigation measures identified do not apply to many areas of downtown Seattle. The EIS notes on page 3.4-10 that "building height and FAR limits are two of the most important code elements that directly influence how intense a development feels" but then immediately concedes on 3.4-12 that "allowed heights in Downtown… is unlimited in the commercial core, and… portions of Pioneer Square… actually have no limit on [Floor Area Ratio (FAR)]." In fact, in most areas of downtown the mitigation measures referenced do not apply to residential use. For example, residential development is entirely exempt from FAR limits in most areas of downtown. The result is that residential towers can be built with few of

2 cont. the restrictions intended to mitigate the adverse impacts identified. Furthermore, the design review process lacks the power to impose necessary mitigating reductions (such as smaller floor plates and tower separation) over prescriptive zoning and development allowances.

As current examples, the enclosed photographs of the Cosmopolitan Condominium and the Olive 8 Condominiums clearly demonstrate the lack of tower separation requirements in most areas of downtown Seattle. The community at the Escala Condominiums will suffer the same fate should current proposed developments along 5th Avenue between Virginia and Stewart streets come to pass. Other developable sites in the immediate area and beyond could produce similar adverse impacts under current zoning regulations.

3 Figure 3.4-11 shows that under all alternatives, downtown Seattle is expected to experience the highest or second highest increase in housing density. In fact, of the 33,512 future residential units possible in downtown (Development Capacity Report, pg. 11), nearly 2/3rds of that growth can occur in areas that lack meaningful mitigating regulations (as opposed to the DMR and SMR zones, which have some protection). Therefore, it is disingenuous for the EIS to claim that "the City's adopted development regulations, zoning requirements and design guidelines are anticipated to sufficiently mitigate these impacts" when, in fact, all alternatives presented intend to drive residential growth to areas that do not benefit from such mitigating measures.

The analysis in this EIS identifies a range of adverse land use related impacts and recognizes that all the alternatives will drive intense residential growth in areas without the benefit of the mitigating policies identified. The EIS should identify these as probable significant adverse impacts and define detailed strategies to mitigate these impacts. Specifically, the EIS should recognize the need for zoning regulation amendments in the downtown core (DOC 1, DOC 2, DMC DHF, and DRC zones) to address the "land use compatibility issues" that will arise.

4 Lastly, please note that we are not opposed to increases in downtown residential density. As downtown residents, we all chose to live here because we value living in the city center. The livability of downtown and the health of our community is at risk if future development and its adverse environmental impacts are not adequately mitigated. As Brent Toderian, former Chief Planner in Vancouver would put it, we want "density done well." To achieve that, the City must recognize that there are significant impacts associated with all of the alternatives considered and commit to mitigating these impacts with the mitigation strategies identified.

Thank you for your consideration of this issue. We look forward to your response.

Sincerely,

Albert C S. Chang

JOHN SOSNOWY

LaGayle Sosnowy

CHARLES ANDERSON

Nancy STUDZINSKI

DONNA MURPHY

JULIE DIAMOND

MIKE McCOY

CATHY LOSCHEN

Myra McCoy

Lisa Lippert

Marine Spicer

Amy Laycock

R. LYNN Laycock

Annette Michael

ROSLAN Stern

Rob Dill

JARROD WITELAN

APRIL WHELAN

CARNIVAL HALLACK

Victoria Loyko
Andrea L. Pierantozzi
CRAIG PIERANTOZZI
FRANK J LOYKO
Leo G. Studzinski
RONALD D. NAGLE
ASHUIL & ANNETTE MICHAEL
Elliot Mansing
AUSTIN G. WATSON, P.E
J. C. Mejia
Prashant Tatineni
Lauren AKlinski
OFFICE OCCUPANT
Tony Hewlett
Beth Bennett
JEFF BENNETT
JUNE JAFFEE
CARLA REICH
Rebecca McAdams
RACHEL OTTEN
SARAH RAFFELT

Figure 1: Olive8 Condominiums

Figure 2: Cosmopolitan Condominiums and the neighboring office tower.

#	Comment	
136	Mr. Murray & Co., We are increasingly a city of rich people, and thus we need to import poor workers to support the service industries. Biff and Muffy need their morning lattes. They need drivers for the cab rides to their techie yuppie jobs, poor people to make and serve their lunches, maid services to clean their multi-million dollar houses, bartenders, cooks, and busboys to allow them to enjoy happy hour and dinner at their trendy hipster foodie South Lake Union eateries. Long story long, your city will have to (increasingly) import people to do all the real work. Invest in efficient and affordable infrastructure to do so, or Biff and Muffy Moneybags will suffer. Middle and lower-class people will be marginalized and increasingly unable to contribute to your taxpayer base, so tax the hell out of these tech kids to pay for it. They probably won't notice. Keep in mind this will put pressure on the dwindling industrial areas, like Sodo, Georgetown, and Interbay. I would consider making some tax incentives available to green industries, and prioritizing infrastructure that supports workers that service them, so as not to lose your industrial base. This will come in handy when the tech rush is over and people realize they need to make stuff to sell again. Encourage homeless people to join organized communities and discourage them from occupying public green spaces. Give them access to the tools and services they need to escape their circumstance, like mental health access, substance abuse counseling, a real address, a verifiable phone number, SSN, ID and green card access. In short, give them what everyone else takes for granted, and lift them up. Biff and Muffy will complain less about those annoying, smelly panhandlers, and will never suspect that the guy that begged them for change last week is now serving them a burger at the local yuppie fern bar or sweeping the floors in their ultra-modern work space. If you want an interesting city, make it possible for artists to afford to live here. If not, you'll have to import them, too, and no one wants to pay for that. You still have a ton of musicians and visual artists hanging around- make it easier for them to perform and display their works. That's the "easy button". If you don't care, fine- you're already half-way to being a Californian suburb anyway. Own it. Thanks for reading, if you actually did, Brian Cito Georgetown Resident Sent from my iPhone	**1** **2** **3** **4**
137	Alternatives 3 and 4 are the most realistic paths to optimizing Seattle's unique landscape and economy. Put simply, distributed density and growth will enable development of mid-size, human scale buildings that evoke Paris and Washington DC -- and allow greater selection and	**1**

#	Comment	
	diversity, while enabling greater environmental performance at both building and district scales. Change is not easy -- reducing the proportion of SF zoning will lead to different looks and feels for many neighborhoods. This is an opportunity, not a threat. Build diversity into the Comprehensive Plan through distributed growth.	**1 cont.**
138	-Sidewalks that are handicap accessible -More parks -upgrades to schools and ease overcrowding -do something about the dangerous eyesores at 65th near the high school Sent from my iPhone	**1**

Understanding this is a non-project EIS, I still think that it is important for the public and decision makers to have a good understanding of the change that is being proposed and I believe that the DEIS falls short on a couple of levels.

1 My focus is on Alternative 4 which would expand the boundaries of several Urban Villages. My specific interest is the Crown Hill/Ballard Urban Village, though I expect that my comments/concerns are applicable to other Urban Villages as well.

Alternative 4 proposes to expand the Urban Village boundaries to include properties within a 10-minute walking distance from a nearby bus stop. There is a lack of detail about the changes that boundary shifts would entail.

Detailed concerns

2 Specifically, I am interested in:

a) The increase in housing unit capacity that would occur after the boundary change and follow-up rezone,

b) The visual impact that would result from development that would be allowed by the change, and

c) The impact on infrastructure, especially the bus service, in the area affected by the change and the extent of the downstream effects of the new riders.

My major concerns are addressed below:

3 1) What is change in capacity if the boundaries are expanded, both in new housing units and jobs? The DEIS suggests that that the boundary change could be accompanied by rezones in the newly expanded portion of the urban village. In order to reasonably comment on the impacts of the proposed change, it is important to have an idea of the magnitude of the contemplated change. In terms of area, what is the proposed increase? In the Ballard Urban Village, it looks like the proposed increase is very small, but in the Crown Hill area, it looks to significantly increase the acreage of the urban village. How would this translate as increased capacity?

4 2) What is the likely visual impact of the new development that will be allowed as a result of rezones that will occur to implement the boundary change? In Crown Hill for example, are the new units likely to be 3-story townhouses or 5 to 6 story apartments/condos with retail or office on the ground floor? Specifically, on pages 3.4-32-33, the proposed expansion areas in Ballard and Crown Hill are zoned for single-family development. Would the boundary area change result in new zoning designations and/or height and density limits?

5 3) What would be the impact of new residents on the infrastructure of the area? For example, in Crown Hill, for example, the assumed Household growth difference between Alt 1 and Alt. 4 is 1100 units.

How would this impact bus service? Assuming each unit has 1.5 working adults and 20% of them take the bus, this would result in 330 new trips during morning and evening commute times or

5 cont.

about 165 new riders per hour. Assuming 40 riders per bus, this would require 4 new busses during each hour of the morning and evening commute.

There would undoubtedly be impacts on other infrastructure as well.

Proposed Mitigation in terms of additional policy in the Plan

6

I suggest that if alternative 4 is reflected in the final proposal, that a policy be added to the Plan that would tie the increased capacity allowed by the Urban Village expansion to city funding of the affected infrastructure. For example, if the boundary change will add 20% additional housing capacity to an area, the city would commit to funding (as part of the general fund) some additional bus hours to serve the area. Additional funding for neighborhood parks would also be appropriate, since they would be directly tied to population increase.

I hope to see a policy like this in the proposed Comprehensive Plan update to make it more likely that neighborhoods needs are met. While the actions of one Council cannot bind another Council, such a commitment would help the Council be more accountable to the residents of the city who vote for them.

Thank you for the opportunity to comment on the DEIS.

Steven Cohn
Seaview Pacific Consulting
seaviewpacific@gmail.com

#	Comment	
140	Please note the following (bulleted) comments which I agree with, and which Historic Seattle kindly sent to me. I have added additional comments regarding my specific concerns as they relate to the Historic Seattle comments and the comprehensive planning process. The Draft EIS proposal states that "All Comprehensive Plan elements will be reviewed and updated as part of the proposal." The draft does not address Economic Development, Neighborhood Planning, Cultural Resource, and Urban Design. This is a very serious concern. The decisions associated with this process will impact the next 20 years, yet the timeframe for the plan update review is the minimum allowed in the EIS process. And it is happening when people are involved in end-of school-year and summer activities. This timeframe is in sharp contrast to the first comprehensive planning process. Many elements of that plan have been changed without public input or process. A review of how we are doing now in comparison to what that plan promised is in order. Then proceed with a review that will accommodate a community discussion. An online survey hardly compensates for the lack of a fulsome community discussion. The current plan includes preservation under the "Cultural Resource" element (CR11-CR16). The new Comp Plan replaces "Cultural Resource" with an "Arts and Culture" element. This new element focuses on art (public art, cultural space, arts education, creative economy, creative placemaking) and seems to eliminate historic preservation and protection of cultural resources. How will preservation be included in the future Comp Plan? How are the city's existing preservation policies and regulations being addressed? I fully support this comment. There are other areas of the plan as well, including affordable housing and transportation, that warrant community review and the time needed to perform that review. The "Environment" element addresses environmental stewardship, one of the plan's core values. Environmental stewardship is primarily defined within the context of the natural environment (air, land, and water resources) and not built environment. The analysis should address the role of preservation vs demolition in terms of environmental stewardship. I fully support this comment. Too many new buildings are intruding onto the street scape and are reminiscent of eastern block countries. Rather than continuing on this path, the plan update should bring design review to the forefront for a comprehensive community discussion. Preservation Matters! Preservation and creative adaptive reuse of our existing building stock cuts across all four core values of the Comp Plan. Preserving historic places enhances community vibrancy and cultural identity; serves as an economic driver; conserves precious resources; and contributes to social equity. I fully support this comment. It is concerning to see our city taking a direction towards excessive development without the opportunity to shape the growth that will be coming our way. Thank you for the opportunity to comment.	**1** **2** **3** **4**

#	Comment	
	Mary Coltrane 13332 23rd PL NE Seattle, 98125	
141	Thanks for this draft! One quick note I wanted to make: under the 'Transportation' section, we really need to improve transit frequency, not so much speed. Our trains and buss's go plenty fast, the issue is keeping frequency and capacity up to meet demand. MPH aren't going to make a huge difference, but adding vehicles to routes will.	1
142	Dear Seattle Department of Planning and Development, Green space, trees and flaura are what makes the Northwest...the Northwest. Without it the city will lose it's character, not to mention incure negative climate impacts. We do not need to choose between density and green. We can do both. I read the Seattle Urban Forestry Commission Letter in reference to the 2035 COMPLAN/EIS and I agree on all points. Please refer to the SUFC letter and make note of my agreement with their analysis. Here is the SUFC letter: http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/ADOPTEDCompPlandraftEISLetter.pdf Briefly, I am concerned about: 1. Impacts on the Urban Forest due to Increased Density 2. Inadequate Tree Protection in Current Code. 3. Removal of the Current 40% Canopy Cover Long-Term, Aspirational Goal Thank You, Anne and Tim Connell 2321 16th Ave South	1
143	Your options seem to neglect current trends to disrupt history and heritage in our city. If areas such as Rainier Valley have been historically immigrant, then rather than putting in more upper income housing as in multiple plans, develop that more fully as it is. Put resources into the neighborhood WHILE preserving it's economic reality and current pattern. Those same folks are STILL working in Seattle and it is better to keep these neighborhoods intact than to change them into something completely different and "move out our problem (poor)". Historical buildings or even historically characteristic buildings should not be sacrificed in our eagerness to grow. Perhaps condemning more property from the wealthy, such as Diamond's empty parking lots, rather than the low-cost housing in South Lake Union would have been more	1

#	Comment	
	compassionate????? Let's plan growth with a heart!!	1 cont.
144	New development can be put in along the light rail stations but it should be spread out along all of that distance, not just crammed into a small space like Capitol Hill. The new development needs to be in scale with the surrounding environment, not excessive. LR zones and Single Family zones need to be respected in terms of character of architecture and quality of life for the people who have invested in living there.	1
145	1) Conducting such an enormous change to the City as a whole with one public meeting is ludicrous an unconscionable. 2) The disproportionate impact on lower income/blue collar workers in Alternatives 3 and 4 is completely unacceptable. 3) Please consider the proposed Alternative 5 as specified in TheUrbanist.org: http://www.theurbanist.org/2015/06/16/support-alternative-5-for-seattle-2035/ Connie Cox Hillman City Resident	1 2 3
146	I feel that the current urban village strategy would have worked if seattle was less appealing for development, but as it stands it is restricting growth too narrowly. This is leading to some neighborhoods with construction on every block, and vast swaths of sfh suspended in amber. I think it would help prevent diplacement if zoning was relaxed throughout the city, putting less rent pressure into certain areas. Also, theurbanist.org had some very interesting ideas they called "option 5". I'd recommend a read, you might find something useful.	1
147	Your density and transportation planning is too timid.	1

Dear Seattle 2035 Team,

1 You have probably noticed that the NONE of the four alternatives studied in the DEIS meet the carbon reductions targets for year 2030 adopted by Seattle City Council in Resolution 31312. These targets form the basis for the 2013 Climate Action Plan (CAP), and city policymakers and stakeholders from the Executive to citizen Boards and Commissions, from the Council to neighborhood non-profits have made clear that meeting them is an inextricable component of achieving equitable and responsible urban policies and outcomes. Climate change is likely to affect our city's most vulnerable and historically disadvantaged populations disproportionally. If our Comprehensive Plan alternatives cannot trace a path to carbon neutrality – which will help to improve economic stability, minimize disruptions to utilities and water supplies, reduce displacement, and ensure long term access to opportunity and growth for all – then the Plan may be in danger of undermining the very foundation of equity on which it is being built.

2 Of particular concern is the fact that the DEIS Alternatives do not propose mitigation measures or course corrections that could move us closer to achieving the important emission reductions goals adopted by the CAP. Following SEPA review protocol, the DEIS shows no significant transportation-related impacts attributable to the expected housing and jobs growth - emissions for passenger and freight vehicles, for example, are projected to decrease from 2015 levels, despite the steady increase in population. Likewise, even though building energy and waste emissions are shown to go up with the growth, city-wide emissions are estimated to go down slightly from where they are today. If we as city believe that year 2015 is working out just fine for our many underserved communities, or that a "no-action" alternative is prudent long-range policy, then this approach might make some sense. It might even be laudable. It certainly is appropriate from a strict SEPA point of view. But, from a policy-making perspective with a 20-year climate-aware planning horizon geared towards equity and social justice, this logic is nothing short of baffling. The CAP and 31312 establish a data-driven, outcome-oriented, and very ambitious goal of reducing city-wide emissions in 2030 to 58% below 2008 levels. Science tells us steep reductions such as this are necessary to help stave off the worst climate disruption scenarios. But, the best of the DEIS alternatives achieve only a 4% reduction below 2008 emissions by 2035 – that's a 54 point shortfall a full five years after the adopted CAP goal will have passed. (see attached spreadsheet analysis) How are we to reconcile such clearly inconsistent planning policies? How can the Comprehensive Plan provide meaningful guidance to functional plans such as the CAP given this dismal GHG emissions scorecard?

3 We can do better, and we should. Seattle has an established record as a leader in climate justice and environmental action planning, and we have demonstrated measurable progress towards our goals. Let's not step backwards; let's step up the pace. For each Seattle 2035 DEIS alternative and the selected FEIS preferred alternative, DPD, OSE, and collaborating departments should identify specific mitigation strategies that have the capacity to achieve the emissions reductions targets already adopted by our City's established plans and policies, including the CAP and Resolution 31312.

The Comprehensive Plan should help provide a road map for growth that can align our shared and often interdependent goals in ways that enable, not inhibit. Even the first-of-its-kind Growth and Equity report does not once mention the word "climate," or discuss mitigating the potential environmental and emissions-related challenges that may increase inequities, displacement, and dislocation from essential services. What the DEIS reveals today is that, despite the rigorous and admirable focus on social justice, our current planning framework has entirely lost sight of the corollary need to work towards carbon

3 cont. neutrality. This is incredibly unfortunate and unfair for those most vulnerable to climate change – both existing and future generations.

Sincerely,

David Cutler
2103 East Crescent Drive
Seattle, WA 98112
310-963-7740

This letter reflects opinions entirely my own and in no way infers the positions of the Seattle 2030 District Board of Directors, the Seattle Planning Commission, or my employer GGLO.

Resolution 31312

Target Year			
2020	2030	2050	**Metric**
14%	20%		reduction in passenger vehicle miles traveled
35%	75%		reduction in GHG emissions per mile of Seattle passenger vehicles
7%	15%		reduction in freight vehicle miles traveled
25%	50%		reduction in GHG emissions per mile of Seattle freight vehicles
5%	10%		reduction in commercial building energy use
8%	20%		reduction in residential building energy use
15%	25%		reduction in combined commercial and residential building energy use
69%	70%		waste diversion rate
50%	50%		reduction in methane emissions commitment per ton of waste disposed
30%	**58%**	**87%**	**total GHG reductions**

			Transportation			Building Energy Use					
			Passenger	Freight							
Scenario	**Year**		GHG from VMTs	GHG from VMTs	Combined	Commercial	Residential	Combined	**Waste**	**Total GHG** (added from left)	**Total GHG** (Incl. "marine & rail" + "air" + "industry & other." Excl. Offsets.)	
Baseline	**2008**	**mtCO2e**	**1,578,000**	**677,000**	**2,255,000**	**767,000**	**608,000**	**1,375,000**	**115,000**	**3,745,000**	**6,689,000**	from 2012 GHG Emissions Inventory. This inventory recalculate
	2020	% Reduction	14%	7%		5%	8%	15%		30%	30%	from resolution 31312
		mtCO2e	1,357,080	629,610	1,986,690	728,650	559,360	1,168,750		2,621,500	4,682,300	caclulated value
Target	2030	% Reduction	20%	15%		10%	20%	25%		58%	58%	from resolution 31312
		mtCO2e	1,262,400	575,450	1,837,850	690,300	486,400	1,031,250		1,572,900	2,809,380	caclulated value
Target	2050	% Reduction								87%	87%	from resolution 31312
		mtCO2e								486,850	869,570	caclulated value

Seattle 2035: DEIS Alternatives

			Transportation			Building Energy Use					
			Passenger	Freight							
Scenario	**Year**		GHG from VMTs	GHG from VMTs	Combined	Commercial	Residential	Combined	**Waste**	**Total GHG** (added from left)	**Total GHG** (Incl. "marine & rail" + "air" + "industry & other" + "offsets")	
	2015	mtCO2e	1,669,000	720,000	2,389,000	705,000	538,000	1,243,000	95,000	3,727,000		from Seattle 2035 DEIS and 2012 GHG Emissions Inverntory
		% Reduction from 2008 Baseline	-6%	-6%	-6%	8%	12%	10%		0%		caclulated value
		Meets 2030 CAP Target?	**NO**	**NO**		**YES**	**YES**	**NO**		**NO**		
		Delta from 2030 Target	-20%	-13%		3%	4%	-5%		-30%		caclulated value
Alt. 1	2035	mtCO2e	1,277,000	892,000	2,169,000	722,767	583,793	1,306,560	131,958	3,607,518		Add data from Seattle 2035 DEIS to 2015 baseline
No Action		% Reduction from 2008 Baseline	19%	-32%	4%	6%	4%	5%		4%		caclulated value
		Meets 2030 CAP Target?	**NO**	**NO**		**NO**	**NO**	**NO**		**NO**		
		Delta from 2030 Target	-1%	-47%		-4%	-16%	-20%		-54%		caclulated value
		Reduction from 2015 Conditions	23%	-24%	9%	-3%	-9%	-5%		3%		caclulated value
Alt. 2	2035	mtCO2e	1,268,000	892,000	2,160,000	723,396	579,949	1,303,345	131,958	3,595,303		Add data from Seattle 2035 DEIS to 2015 baseline
Guide Growth to UCs		% Reduction from 2008 Baseline	20%	-32%		6%	5%	5%		4%		caclulated value
		Meets 2030 CAP Target?	**NO**	**NO**		**NO**	**NO**	**NO**		**NO**		
		Delta from 2030 Target	0%	-47%		-4%	-15%	-20%		-54%		caclulated value
		Reduction from 2015 Conditions	24%	-24%	10%	-3%	-8%	-5%		4%		caclulated value
Alt. 3	2035	mtCO2e	1,273,000	892,000	2,165,000	723,640	579,670	1,303,310	131,958	3,600,268		Add data from Seattle 2035 DEIS to 2015 baseline
Alt. 2 + UVs near LINK		% Reduction from 2008 Baseline	19%	-32%		6%	5%	5%		4%		caclulated value
		Meets 2030 CAP Target?	**NO**	**NO**		**NO**	**NO**	**NO**		**NO**		
		Delta from 2030 Target	-1%	-47%		-4%	-15%	-20%		-54%		caclulated value
		Reduction from 2015 Conditions	24%	-24%	9%	-3%	-8%	-5%		3%		caclulated value
Alt. 4	2035	mtCO2e	1,277,000	891,000	2,168,000	723,238	577,023	1,300,261	131,958	3,600,219		Add data from Seattle 2035 DEIS to 2015 baseline
Alt. 3 + Transit Commun		% Reduction from 2008 Baseline	19%	-32%		6%	5%	5%		4%		caclulated value
		Meets 2030 CAP Target?	**NO**	**NO**		**NO**	**NO**	**NO**		**NO**		
		Delta from 2030 Target	-1%	-47%		-4%	-15%	-20%		-54%		caclulated value
		Reduction from 2015 Conditions	23%	-24%	9%	-3%	-7%	-5%		3%		caclulated value

#	Comment	
149	I'd like to see some bolder plans for integrating pedestrian and bicycle traffic with transit. i.e. designated "intermodal" connection points, shared vehicle models (Car2Go), greenways and greenway route connectors, family-biking routes for schools, and in general, a far greater focus on measuring mobility for all use-cases. This may imply things like: a) better pedestrian routes that have separate right of ways; b) setbacks on commercial buildings that allow for more "sidewalk life" in urban areas; as well as, c) grade separated cycle-tracks and separate lights. I'd like to see more thinking about how to prioritize affordable housing for teachers, police, fire, nurses, and other similar professions in city via developer credits and other market mechanisms. I'd like to see this integrated with the Vision 2020 for Seattle in energy use and built infrastructure.	**1** **2** **3**
150	Comments are provided below on the DEIS. 1. The DEIS is vague without sufficient detail on specific actions for the public to provide meaningful comments. In short, the DEIS falls short and has little value with respect to decision making about Seattle's future. 2. The four DEIS alternatives considered were developed without sufficient public engagement during the processes. 3. The DEIS lacks a "gaps" analysis and generally fails to address current problems that should be addressed through comprehensive planning. 4. Potential actions hinted at, but not explicitly described, include "increased zoning flexibility" and "development incentives". The impact of such vague action statements cannot be reasonably evaluated by the City or the public. 5. There appears little rational basis for selected amongst the "alternatives". 6. Alt 1 assumption of current trends is bogus and ignores important trends that are occuring including a planned new school near Aurora-Licton Springs Urban Village. 7. Alt 1 it is not reasonable to think that areas of high growth will continue to grow at historic pace. Undeveloped areas will feel more pressure not less as development capacity is depleted or too costly in developed areas. 8. The potential for increased transportation impact on east-west travel through Greenwood-Phinney for Alt 4 due to Crown Hill urban village expansion is not recognized. Regards, Joel Darnell	**1** **2** **3** **4** **5** **6** **7**
151	Alternatives 2 and 3 feel the best for me. Seattle's best bet is to become as Manhattan-esque as	**1**

#	Comment	
	possible. These two alternatives provide the best chance of providing the population density required to make transit really work, and thus justify a real subway. Like Manhattan.	1 cont.
152	I am writing to express serious concerns about this far reaching plan which includes many aspects which either have been already written without sufficient public involvement, but would have huge impact on the public; or include language which would decrease public involvement in the future. I am particularly concerned about language like "increased zoning flexibility" and "development incentives". These kinds of statements, without the hard details put the public, and the city in a position of not being able to evaluate the outcome adequately before making decisions. I feel this Comprehensive Plan should NOT be adopted in it's current state. I feel like there are forces pushing our city to maximize profits, without allowing the public to influence the development in a way that makes Seattle a truly livable city. Please do NOT accept this Comprehensive plan. Thank you, Janet Dockery 306 NW 87th St. Seattle, WA 98117 (206) 784-4498	1 2 3
153	The single best move Seattle could make to increasing walkability, decrease car reliance, and legalize affordable housing would be to abolish Euclidean zoning and adopt Japanese-style "inclusionary" zoning (not be confused with the inclusionary zoning that requires affordable housing). The city should loosen zoning restrictions across the board and allow a more laissez faire attitude toward the building market. Does it make more market sense to tear down this single family home and build a 15-unit low-rise apartment building here? Good, do it. Is there a critical mass of people here to support neighborhood shops dispersed throughout the neighborhood? Good, do it. Small office here? Do it. Small shop? Do it. Corner store? Do it. If you let the whole city absorb the population in that would make the whole city more walkable. The main reason people drive so much is legally-required separation of land uses. The city needs to legalize affordable housing and legalize environmental stewardship. Right now we're just trying to patch a terribly broken system. It's time to scrap the whole thing and start over.	1
154	If you want the 1%, the homeless, Amazon brogrammers and nobody else living downtown and surrounding areas, keep doing exactly what you're doing. Neighborhood diversity is all but gone in Capitol Hill, as many legacy long-loved business are forced to close by significant rent increases brought on by developer speculation. Numerous long-term renters who have made this area great for years if not decades are forced out, replaced by high-end Amazon employees or well-capitalized people buying their way into America from overseas.	1

#	Comment	
	Stewardship by the city has been pretty much absent. Over-accelerated growth has been the only priority. It's not possible to walk a block in Capitol Hill any more without hitting torn up sidewalks and cratered property due to construction, life within construction zones, and shiny shitty new mall stores to replace long loved local establishments. The city has utterly failed to care about anyone but developers. Congratulations. If you want Socialists, this is exactly how you get Socialists.	**1 cont.**
155	4 comments- 1) Consideration should be given to satisfying anti-light pollution advocate's demands that all new and rebuilt/replaced old outdoor lighting within the city by mandating the International Dark Sky Association Model Outdoor Lighting Ordinance and adopting it with few or no amendments. The main points to consider are Full Cut Off (FCO) Cowling to eliminate glare and light trespass, restricting the new LED's light spectrum to yellow narrow band like current sodium lights, and not falling prey to first cost cheapness of full spectrum white/ blue heavy spectrum like old mercury vapor lights and eliminate the biorythmic disruption to plants and animals-including humans that blue or full spectrum will cause...go to www.darksky.org for more information.	**1**
	2) capital expenses should be directed to finally finishing the curb, gutter, sidewalk and updated storm sewers NOT built as promised by the annexation of 1950 to ALL streets north of 85th and the neighborhoods of Rainier Beach and adjacent to White Center in the south. End the broken promise and fix things!	**2**
	3) To accommodate increased population, action should be taken to allow via ordinance, variance and other land use codes to give developers the option to build "one building" cities inside Seattle, which follow principles of design as outlined in the 1970 work by Paulo Soleri; Arcology: The City in the Image of Man, 1970, MIT Press. The Japanese are already designing these for adding to old cities and creating new ones. It would allow for suburban single family density in a high rise via cutting the typical suburb into pieces and verticalizing them into stacked floors of a single new building. Including the new design of urban multi story farms and be self contained with schools , parks and offices as well as homes for a variety of family sizes. These structures would be large enough to need to sink their foundations to bedrock and thereby be better for surviving any future earthquakes. Create this special permit category.	**3**
	4) Buses inside the city should be west to east and vice versa Bay to Lake routes which feed into Link light rail stations in the middle of their routes and end the north-south bus routes except where they are changed to local shuttles for neighborhood errand and shopping runs.	**4**
156	I listened with interest to the press announcements today (may 28 2015) and immediately looked-up the website for Seattle 2035. I was disappointed to find that the open house and public hearing had occurred the day before (may 27); especially so as my review of the website materials left uncertainty about a number of issues which might have been clarified in an open house format. Suggest a second open house be arranged to benefit those who were not aware	**1**

#	Comment	
	prior to the press announcement.	**1 cont.**
157	I would like to know more about what Seattle is doing to address the large and growing homeless population here. Providing long-term services for the homeless aimed at helping them re-integrate into society not only helps them but can save the city money from reduced healthcare and policing costs. A large number of homeless and mentally ill people currently ride the transit system in Seattle, which makes it feel less safe and less appealing to ride, especially during off-peak hours and late at night. To be clear, I don't think that we should make it more difficult for the needy to make use of the transit system, which is often their only means of mobility. Instead, I would hope to see the underlying problem of homelessness and mental illness addressed more effectively.	**1**
158	I am very concerned about the poor quality of the new construction in Seattle. I don't feel there is enough oversight and I fear many dangerous buildings are being built. The McGuire apartments had to be torn down after 9 years because they were so poorly constructed. I see new buildings and housing going up in my neighborhood by sloppy construction crews that clog the drains with mud and paint run off. I've watched trees coming down illegally. There is not enough construction oversight, nor redress for homeowners who buy places that have construction flaws that show up later. I also think the city is not doing enough to make sure that new buildings and housing, "fit the character of the neighborhood," as they are supposed to. Our once beautiful city is turning ugly with the cheap construction.	**1**
159	Growth may be inevitable, but it doesn't all have to happen at the same time and in the same places. The rate of new building and the destruction of Seattle historic buildings and neighborhoods is a great lose. Steps should be taken to slow the rate of new growth. Decisions made now will come back to haunt the younger generation later when they can't find or afford housing to raise their families. Rent control and additional tax subsidies should be considered to support current residents especially low income workers and artists. This is our home. It's cruel to not mitigate changes that make it too expensive to live here. We all lose when our history and diversity are destroyed.	**1**
160	I live in the Rainier Beach community, which is seeing home values increase, risking further displacement of communities of color. This particularly affects the Black community, which is continuing to move out of the Central District as well. Significant mitigation investments are needed immediately to offset the resulting increased displacement risk. Thank you for considering.	**1**

#	Comment	
161	Options 1 & 2 call for way too much concentration in just a few areas. These also happen to be rather expensive areas. As such, any housing built in those areas is bound to be out of reach for the average wage earner in Seattle. Also, it is incredibly naive to think that more people will give up their cars. This is Seattle - people like to go camping, hiking and skiing at weekends - are they supposed to catch a bus there and back? So concentrating most of the development in the few areas will just lead to more crowded streets and moaning about the lack of parking. Options 3 and 4 are better in that it spreads development out a lot more, including traffic. With the advent of light rail (eventually getting to Lynnwood), there is no reason NOT to spread out development much more around the Urban Villages. This also means that with more spread out development in the less expensive areas, the average wage earner is much more likely to be able to afford somewhere to rent. Naturally processes should be put into place for these areas so that developers cannot charge the same outrageous rents as Capitol Hill and the like.	**1**
162	I would love to see more infill in existing single family neighborhoods. Many of these neighborhoods are within close proximity to transit and neighborhood commercial centers. I understand that the city gets a lot of push back from existing single family home residents, but the character of these neighborhoods can be maintained while still adding density- with duplexes, rowhouses, MILs, backyard cottages, small cottage developments, etc. Parking is always an issue, but can be managed via shared garages, caps on residential permits, car and bikeshare programs, and lease agreements that restrict owning a vehicle in certain developments. While it is good to add density in the Urban Villages, I don't want Seattle to become a city where there are pockets of super crazy density, surrounded by an island of SFR. It just doesn't make a lot of sense. Thank you!	**1**
163	More dense development in more concentrated areas allows for the most efficient use of city services in my opinion. None of these plans works without an elementary school and a high school downtown Seattle so families can actually live in dense areas with their kids, not just single tech workers as we see now in areas like Belltown and the densest areas of Capital Hill.	**1**
164	Seattle is at a critical point in creating policies that will affect growth and development over the next 8 years directly and in many ways the next 20 as well. DPD has put together sensitive and reasonable growth alternatives in the Seattle 2035 DEIS. But it's my belief that Seattle will dramatically blow past its growth targets in large because the Puget Sound Regional Council's Vision 2040 is entirely flawed in its analysis of regional growth. Seattle will continue to be the preferred place for people to take up residence, play, and work. We as a city and people have an obligation to ensure that we accommodate growth reasonably and in a well planned manner. It's my belief that an all-approach must be sought: one that expands urban villages and their benefits, complements existing and planned facilities services, gives access to residents from all portions of the city, gives wide variety of development options regardless of growth designation, and considers those who are vulnerable to the pressures	**1**

#	Comment	
	brought on by rapid urbanization. The Urbanist wrote a very compelling set of priorities that the City should pursue in a final and complete growth plan called "Alternative 5". I hope that the City will adopt these approaches advocated by The Urbanist. I'll quote them as follows and put my support behind them: "1. All areas of the city have an obligation to support growth, and the right to access the urban benefits that come with it. Regardless of wealth, race, class, or zoning, each portion of the city must support its share of the city's growth. As an example, single-family residential zones are appropriate for many of the common Missing Middle housing types, such as cottage housing, detached accessory dwelling units, duplexes, triplexes, townhouses, and even rowhouses. These housing options should be broadly allowed with minimal interference from neighbors. These building types are equitable, desirable, and compatible with the character of residential neighborhoods. While this type of growth may seem painful to some, it presents a wide range of opportunities and benefits: proximity to jobs, access to high-quality transit, grocery stores and restaurants, parks, schools, and more. All these benefits come from growth and density, not the other way around. All residents, whether new or old, deserve to partake in these urban benefits, regardless of where they live." "2. Expand the number and size of urban villages to accommodate growth throughout the city. There are ample commercial and medium-density residential areas in the city that have no urban center or urban village designation, such as Aurora Avenue (north of N 36th St to N 85th St), Upper Fremont, "Frelard", Westlake, Nickerson, Madison Park, Wedgwood, South Magnolia, Interbay, Graham, and many more. Each of these areas presents an opportunity to absorb growth while providing tremendous urban benefits. The city should also consider extending boundaries in these areas beyond just the immediate medium-density residential and commercial core properties. Transit walksheds extend beyond the core, and bikesheds extend even farther. Connecting bike rides with transit, something that will become even easier with Pronto!'s expansion, shows that the urban villages can be much larger. Overconcentration of growth leads to targeted displacement and disruption. Only by spreading growth throughout the city can we ensure that no single area experiences an unreasonable share." "3. Expand urban zoning in urban villages and urban centers. Designating areas as urban villages isn't enough. The city needs to go further and expand the areas of urban development in urban villages and high-intensity zoning in urban centers, especially where there is extraordinary demand for housing (e.g. Ballard, Wallingford, South Lake Union, and the University District). This will reduce the number of people that are displaced due to demolitions." "4. Actively mitigate the impacts of growth in areas where displacement risk is high. We support adopting policies that will alleviate or prevent actual displacement. This might include mandatory participation in the multifamily tax exemption (or a similar program), mandatory inclusionary zoning or linkage fees, one-to-one replacement of affordable units in perpetuity, focusing housing levy dollars in these areas, using the city's bonding authority for sustainable affordable housing options, and other socially progressive housing strategies through the land use code or city actions in the form of programs and partnerships."	**1 cont.** **2**

#	Comment	
	For more on the proposal, see the article here: http://www.theurbanist.org/2015/06/16/support-alternative-5-for-seattle-2035/ Thank you for the important work on planning the city's future.	**2 cont.**
165	It's okay to encourage bike riding and mass transit, but it's not going to work for everyone. I drive a 33 foot long bus for Horizon House Retirement Community and it can be more than challenging to find safe places to drop them off at different venues around town. I would like to be able to drop off and pick up our residents in front of Safeco Field and Benaroya, to name a few,but that isn't possible. Parking is being taken away right and left, whole blocks in Bell Town have been turned into demi parks. Please consider the disabled and elderly in your plans. They deserve it. Thank you. Jenny Fillius Sent from my iPad	**1**
166	More low income housing in the city. We need space in front of venues, such as sport stadiums, for dropping off bus loads of seniors and children. We also need wait areas for those buses. Stop turning parking into parks , like in Belltown. Not everyone is going to be using a bike. Baby boomers are aging fast and need these considerations. Thank you. Jenny Fillius Horizon House Retirement Community Lead Driver Sent from my iPad	**1**
167	I moved to Seattle from Illinois in 1982. I had first visited Seattle as a tourist in about 1965 and fell in love with the area. It took a long time, and several more visits before moving here was possible. Yes, I loved the small town atmosphere of Seattle in 1982. A city-town. When I was eventually able to buy my home in 1986, I ended up in West Seattle. Again, feeling that I was living in a mostly self-contained suburb, but with all the amenities offered by a small city. Until recently. When all this Urban Village stuff really started happening a few years ago, I began to see what the future was going to hold for West Seattle. I didn't like it, and now that it is happening in a	**1**

#	Comment	
	very over-whelming way all around me, I very much don't like it. I once wrote a letter to former mayor Rice asking him why the city was trying to turn Seattle into another Chicago….rezoning single family neighborhoods and tearing down those houses and replacing them with….what were then….modest apartment buildings. With limited or no off-street parking. He did reply to my letter and said that the city had an obligation to provide more rental apartments, since that seemed to be what was most in demand. Well, I don't know about that, but that's what continues to happen. On a MUCH larger scale. The city population is growing by leaps and bounds. My question is….what would happen if there wasn't enough housing for those people who want to move here? They wouldn't be able to move here. Are we obligated to provide this housing just so more and more people can move here? Why must a city grow? Wouldn't it be possible for a city to stay smaller and be the city that most of the residents like and are satisfied with? I do not hear any of my neighbors talking about how thrilling they are finding the changes that have been thrust upon us, especially here in the Alaska Junction area. We are already experiencing traffic and parking problems, and it seems that the city is doing all it can to make those situations worse. Yes, I am aware the city wants us all to give up our cars and use public transportation. They are going out of their way to make us suffer if we have to drive in this area….or anywhere in Seattle. I don't understand it and I think Seattle is doomed to strangle itself. Fortunately, I'm 78 and my not see the full extent of that strangulation. I may not have given you comments about any of the other things you're interested in…..but this is what I wanted to share. Thanks. Art Flatt Sent from Windows Mail	**1 cont.** **2**
168	I think serious consideration and study should be given to construction of a monorail instead of light rail in the West Seattle - Downtown - Ballard/Crown Hill corridor. Monorail would cost less, could be built in less time, and would require much less land acquisition. It would also go a long ways toward solving the problem of conflicts between traffic and industrial and port operations in SODO regarding the sports stadiums, including the proposed basketball/hockey arena. Parking could be provided in other areas with fans using monorail to reach the stadiums (and Key Arena too!). With this plan parking around Safeco and CenturyLink Fields could be reduced. It could also provide modern service to the cruise ship terminal in Interbay. There are more arguments in favor and more details, but I don't have room for it all here. I will try to update my website at www.seattlemonorail.org (not .com, that's the Seattle Center Monorail).	**1**
169	I haven't had a chance to study in detail the draft EIS, and haven't really prepared my comment, but this is the last chance so I proceed with the gist of it.	**1**

#	Comment	
	If the draft EIS includes plans for a high-speed transit corridor from downtown Seattle to Ballard, and also downtown to West Seattle, then I strongly urge consideration of a monorail, similar to the failed Green Line project. The advantages are faster construction, probably lower cost, less space on the ground, less disruptive to the neighborhoods, more pleasant for riders, safer (no conflicts with surface traffic), and in Sodo, would provide transportation to expanded sports venues without increasing surface traffic that interferes with industrial and port operations. Underground light rail would also have many of the same benefits, but at a much higher monetary cost. The Green Line project did not fail due to design or engineering factors, but rather to mismanagement and poorly planned, inadequate, and inflexible means of taxation for funding the project. More on my website, http://www.monorail.org (but I need to find time to improve my website). Bob Fleming Seattle --- This email has been checked for viruses by Avast antivirus software. https://www.avast.com/antivirus	**1 cont.**
170	What has the City Development and Planning Department (DPD) done to plan for a reduced growth? many of the people who move here do so for economic reasons,, think jobs. What happens if these companies decide to move elsewhere or just lay off thousands of people and the growth turns into a reduction of population. Do not thinks growth is inevetable.	**1**
171	The only sane way to accomodate Seattle's future growth is transit-oriented development. However we must use our investments in transit to lift up marginalized communities instead of displacing them. Seattle must adopt New York's 80/20 rule (or even something more aggressive) to minimize displacement. http://www.nyshcr.org/Topics/Developers/MultifamilyDevelopment/8020HousingProgram.htm	**1**
172	I am concerned about access to open space as the city grows in population and density increases. While I am most interested in this in my neighborhood (Ballard), I think it is vital that all Seattle residents have access to open space near where they live and work. I encourage the plan to more specifically address the need for additional open space, as well as preservation and	**1**

#	Comment	
	enhancement of existing open space. One opportunity for addressing open space needs exists in making sure existing public lands remain in the public hands, rather than being sold on the open market to the highest bidder. One such example is surplus substations. Currently, Seattle City Light is planning to sell the sites, rather than look at opportunities to keep them as a tree bank, park, or other open space. This plan would take public land out of public hands, rather than looking at creative ways to keep them as open space. David Folweiler	**1 cont.**
173	Focus should be only on existing urban village plans. Since the last plan update the tax structure has been unable to create an environment where shared infrastructure costs (affordable housing, enforcement, natural environment, parks, schools, transportation modes, utilities) is consistently generated. The alternative approaches create more opportunities for investors to get a better rate of return as opposed to residents participating in their communities. The focus should be enabling neighbors to create resources and tools for diverse property development. Tony Fragada 1625 Harbor Ave SW 98126 Sent from Yahoo Mail on Android	**1**
174	My husband and I have lived in our Green Lake house for 34 years. Our 1100 block of N76th Street is a very cohesive neighborhood, and we all know each other. We and many of our neighbors have attended several public meetings and have submitted written comments over the years to voice our concerns over developments (e.g. PCC store, left turn traffic signal at 77th & Aurora, apartment building planned for 77th Aurora) adjacent to our single family neighborhood. We feel that our input has been totally ignored and that our time was wasted. The developers and the City changed absolutely nothing from their originally submitted plans. Hopefully this time our input will be considered.	**1**
175	I support The Urbanist Alternative 5 as the best approach to growth over the next 20 years. I believe it attempts to address the most issues out of any option, and does so while limiting how much current residents get pushed out of the city. The city is great because of who currently lives here and the cultural and business diversity that they provide, and that is most likely what is on the line if growth is not managed with an effort to retain them.	**1**
176	I'm commenting to support the creation of as many new residential urban villages as possible. Expanding a few existing ones is good, but that's not going to get us to the growth capacity we need to handle. Additionally, there are too many neighborhoods in Seattle with no residential urban villages in walking range, creating commercial "deserts" with low walk scores and low access to groceries, restaurants and other things that make a neighborhood work. I support the plan to drive growth to existing urban villages with high capacity transit, it's definitely a part of	**1**

#	Comment	
	the mix. But we should not exclude areas because there isn't yet high quality transit to the area. It's a chicken and egg problem, you need density to make transit viable, but you also need transit to make density viable. Maybe that means new urban villages don't have good transit at first, but as they grow, bus lines can be upgraded. There are many good candidates for residential urban village designation that already have mixed use commercial development: Magnolia, Alki Point, Ravenna, Madison Beach, Wedgwood, etc etc. What's holding us back from spreading the benefits of walkable neighborhoods with concentrations of local business to areas of the city where they are few and far between?	**1 cont.**
177	I've been renting my 1 bedroom Capitol Hill apartment since 2009. In August of 2014 my landlord raised the rent by $250/month. That as well as personal issues (divorce and unexpected brain surgery) have resulted in me going into debt more and more each month. Since Amazon has moved into South Lake Union, I've seen the rents in my neighborhood skyrocket, and so many of my neighbors have been priced out of the nighborhood and (many out of the city). I'm a city employee (I work for the library), and I'm worried that soon, I too will be forced to leave my neighborhood. I'm all for growth and prosperity, as long as integrity isn't sacrificed. Unfortunately, not enough is being done to maintain the integrity of Capitol Hill. Everything that makes Capitol Hill unique is being quickly pushed out or destroyed. I think a lot of steps need to be taken to ensure affordable housing in the city for marginalized communities (people of color, LGBTQ populations, immigrants, artists, low-income populations, etc.) as well as those of us that make a decent yet modest living. Thank you,	**1**
178	Seattle should follow the lead of France and some other countries/ cities and require 'green rooftops' on all new commercial/ industrial/ and larger multi family buildings. Thinking in the 25-50% coverage range depending on the size of the rooftop. I'm also in favor of alternatives 3 and 4 as we MUST take advantage of the billions we are spending on light rail at a minimum. I'm also a strong supporter of Seattle Subway's west tunnel idea for ST3. http://www.theguardian.com/world/2015/mar/20/france-decrees-new-rooftops-must-be-covered-in-plants-or-solar-panels Thanks, Gary	**1** **2** **3**
179	Being a new resident of Seattle (2 years), i'm coming to the Growth Plan without any history.	**1**

#	Comment	
	Questions: 1. What is the dark blue area near Boeing Field? That color is not in the legend. 2. Is there any difference between the maps for Alternatives 1 and 2? All for maps were super similar. http://seattle2035.publicmeeting.info/Media/Default/PDF/2015_0514_UrbanVillage_Alt1_v4c.pdf http://seattle2035.publicmeeting.info/Media/Default/PDF/2015_0514_UrbanVillage_Alt2_v4c.pdf 3. Is the focus on in-fill and density different from the 1994 plan? I cant imagine focusing on anything else, except more aggressively. Comments - Thanks for defining terms! It made it much easier to understand. - The overview should include an explanation of the tools used to execute each plan (zoning, permitting, more?). I found myself looking at the Alternatives and wondering what will be different to achieve the outcomes listed. - Question 5 about Open Space did not include dogparks, which does have a small, but real, influence on our choice of where to live.	**1 cont.** **2**
180	Can SE Seattle grow Equitably and if so, how? This is a very impressive accomplishment. So comprehensive in terms of physical environmental issues. Two comments: 1) We need to think about methods for taking this awareness to the grassroots level and make it a subject of their discussion and desire for change. 2) We need to also think about the sustainability of social, cultural, economic and political environment and their role in shaping holistically community life and governance.	**1**
181	It seems to me that option 4 not only supports but also bolsters existing urban villages. The implementation of option 4 could spread the density of future Seattle throughout the city instead of concentrating the density to a few locations along the light rail line. The spreading of density could help mitigate an LA like feel, with a few strips of high rises surrounded by single family homes, and instead create robust centers throughout the city, providing greater options for residents in terms of places to live, work and spend their free time. Option 4 also seems to be the plan which is best suited for the development of future light rail lines.	**1**
182	Please add this to the formal comments on the Seattle 2035 EIS. The city is rushing to judgement with the four EIS alternatives. What's missing is a cumulative impact study of the existing policies on urban villages. The EIS, for example, is silent on how many more bars Capitol Hill can support before the neighborhood becomes unhabitable on weekends, and starts forcing middle class residents, families, and the elderly to abandon the neighborhood. The EIS is silent on the cumulative impact of 20,000+ people descending on the neighborhood	**1** **2**

#	Comment	
	every weekend, a large percentage of them getting drunk and wandering through residential neighborhoods at 2 a.m. How many bars is the tipping point for Capitol Hill to become an even higher-crime neighborhood than it is? The EIS is silent on the impact on residents of the steady decline in the number of pay-lot spaces and street parking for visitors, vendors, delivery trucks, and workers. The EIS silent on the impact of additional parklets, pocket parks, and other park-like planner fads in encouraging their use by scary people, vandals, junkies, and drunks, especially given the city's inability to maintain parks such as Bobby Morris Playfield and First Hill Park—and even to enforce its own regulations of no overnight sleepers. The EIS is silent on the impact of existing urban-village policies to make the population more homogenous (20's-something folks) and less diverse (fewer families, the elderly, middle-class families, and blue-collar workers who need cars to get to their job). The EIS is silent on the impacts on blue-collar jobs of bikes sharing the røad with trucks along the industrial Duwamish and waterfront. It is silent on the impact that anti-car policies are having on blue-collar workers who need cars to go to their jobs, which invariably are in less-accessible areas than, say, South Lake Union. The EIS is silent on the demographics of the homeless population, and whether existing Seattle practices and regulations are attracting large numbers of transients from outside the state. In short, it's impossible for city planners to ethically determine the appropriate alternative unless they have the data about the cumulative impacts that existing urban-village policies are having. You would be making an entirely ideological decision, based soley on planner fads. That being said, because the impacts on existing urban villages have been terrible, I support Alternative 4, which shares the pain of unintended consequences across a wider section of the city. Don Glickstein 1300 University St Seattle 98101	**2 cont..** **3**
183	Before determining alternatives for 2035, the City needs to conduct a cumulative impact study on crime and the environment based on the existing anti-car, pro-drunk, pro-bike, pro-nightclub, anti-elderly policies. Adding more density, for example, to First Hill and Capitol Hill is reckless without understanding the impact of the changes that already have taken place. First Hill Park is virtually unmaintained, and often filled with scary people. Garbage left by weekend drunks is increasing the rat population. The proposed First Hill Realm Action Plan hasn't been studied for its impact on crime, petty vandalism like graffiti, trash, needles of junkies. Residents can no longer invite guests because the war on cars has eliminate parking, and pay lots are being converted to pods.	**1**

#	Comment	
	In short, without understanding the cumulative impacts of existing policies, you're smoking dope if you think you can determine what the policies leading to 2035 should be. City planners and politicians are negligent by failing to have a comprehensive cumulative impact study prior to making future decisions. That being said, because the impacts on existing urban villages have been terrible, I support Alternative 4, to share the pain of unintended consequences across the city.	**1 cont.** **2**
184	Dear Comp Plan Team: Please add these comments to the record. In reviewing the DEIS, I see that there are several elements missing from the DEIS for the 2035 Comp Plan. 1. There was no analysis of the impact of the alternatives on the City's Manufacturing Industrial Centers. Without that analysis there is no way to tell whether this update contradicts and violates existing comprehensive plan goals with regard to the MICs. That includes an analysis of its compatibility with the Container Port Element. 2. As part of the process, an equity analysis was conducted. But that analysis does not include an evaluation of the impacts of the proposed changes on existing family-wage, blue-collar jobs in the MICs. The City must understand the plan's impact on, and protect, existing family-wage jobs. 3. The traffic-impact analysis is so rudimentary as to be nonexistent. The DEIS' emphasis on screen lines is flabby, unprofessional analysis. How will the City ensure that the level of transit service necessary to support all that development will actually be there when it is needed? Simply referring to existing transit corridors is insufficient. Also, the DEIS shows volume-to-capacity rations of 1.2 in select corridors—in other words, traffic is 120% of capacity—yet the DEIS says there will no significant "unavoidable" impacts. That level of cynicism has no place in an EIS prepared by a public agency. 4. The traffic analysis fails to determine how existing comp-plan goals related to freight mobility would be affected. 5. The DEIS' focus on existing urban villages and hubs will eliminate everything that makes living and working in those areas desirable, and Alt 2 is the worst offender. A comp plan shouldn't encourage greedy developers to cram in cookie-cutter buildings that don't fit in with the existing neighborhoods while demolishing the very same buildings that give these areas their identity. The plan encourages 1-plus-4 development under the guise of affordability. Yet few of these units, unless they are apodments or "efficiency units" (which are often the worst offenders with regard to their neglect of their surroundings) are affordable. The question of what happens when all those cheaply constructed buildings fall apart at the same time in 20-25 years would seem a fit subject for the comp plan as well.	**1** **2** **3** **4** **5**

#	Comment
	6. Focusing on cramming in more housing units does not help the city grow in a healthy, sustainable way. Density for density's sake is going to make the city less, not more, livable. The plan fails to address the need for supporting infrastructure to accompany the thousands of new anticipated units. In Capitol Hill, for example, the only new businesses seem to be bars, restaurants, and fitness centers. The plan fails to address the need for the schools, libraries, parks, and firestations, and the accompanying staff that will need to scale up. Where will the residents of the thousands of studios, efficiencies, and pods move to when they start families? The plan fails to address the need for a diversity of population: homes for the middle class, transportation for blue-collar workers who can't rely on mass transit, etc. The plan encourages single people to move to the suburbs—with the accompanying commuting challenges—as soon as they decide to have a family or move in with a partner who does also work in a $100,000 a year tech job. 7. The plan ghettoizes and overloads the existing urban hubs and centers while leaving enclaves of the wealthy alone. The plan fails to address the needs for more rigorous design guidelines for new buildings, thereby encouraging developers to build only to maximize profit, without regards to the context of the neighborhoods they are building in. With some adjustments, I support a fifth alternative already proposed in Grist.com, with the following modifications: 7.1. All areas of the city have an obligation to support growth, and the right to access the urban benefits that come with it. Regardless of wealth, race, or class, each residential or commercial portion of the city must support its share of the city's growth. 7.2. Expand the number and size of urban villages to accommodate growth throughout the city while protecting the two MICs from incompatible land uses. There are many commercial and medium-density residential areas in the city that have no urban center or urban village designation. Each of these areas presents an opportunity to absorb growth while providing tremendous urban benefits. The city should also consider extending boundaries in these areas beyond just the immediate medium-density residential and commercial core properties. Overconcentration of growth leads to targeted displacement and disruption. Only by spreading growth throughout the city can we ensure that no single area experiences an unreasonable share. 7.3. Expand urban zoning from just the existing urban villages and urban centers to other parts of the city, especially wealthy single-family neighborhoods—but in a way that does not ruin their character. This will reduce the number of people that are displaced due to demolitions and make it easier for the neighbors to accept more density. 7.4. Actively mitigate the impacts of growth in areas where displacement risk is high. Adopt policies that will alleviate or prevent actual displacement. This might include mandatory participation in the multifamily tax exemption (or a similar program), mandatory inclusionary zoning or linkage fees, one-to-one replacement of affordable units in perpetuity, focusing housing levy dollars in these areas, using the city's bonding authority for sustainable affordable housing options, and other socially progressive housing strategies through the land use code or city actions in the form of programs and partnerships.

5 cont.

6

#	Comment	
	7.5. Protect the MICs and the jobs they support. That means providing for adequate freight mobility. 8. Beyond the inadequate traffic analysis, the DEIS fails to fully understand the cumulative impact of existing city policies (urban villages, building design rules, pods and studios, bike enhancements, etc.) on crime, neighborhood integrity, emergency response, city demographics, impact on the elderly, parks maintenance, the homeless who can't afford pods, and a host of other issues that current policies seem to be exacerbating. Comp Plan 2035 shouldn't go forward until a cumulative impact study by a neutral third party (as opposed to city planners who have a conflict of interest in the policies) is concluded. Don Glickstein 1300 University St. Seattle WA 98101	**6 cont**
185	Please consider The Urbanist's Option 5! They've made the arguments for it better than I could; I consider it a significant improvement over the four options presented to us here.	**1**
186	The reason Aurora-Licton Springs is in an urban village is that the meaning of urban village has changed. Urban villages were never supposed to direct density -- that's what the zoning map is for, which determines where there's capacity for growth. Urban villages were intended to direct city investment to the places that were most likely to accept growth, so new services and amenities would accompany it and make them high quality places. That never occurred, but recently the city has reinterpreted urban villages as places where development standards should be reduced ostensibly because we need to convince developers to develop there, which I think is ridiculous. That was never the intent when urban village boundaries were created, so that's why there's a mismatch today. It is the job of developers to push for profitable buildings, and it is up to to the elected officials at the DPD to restrain them for the good of the citizens of this city.	**1**
	This letter will outline some of the concerns that the nearby residents have with the proposed project at 714 N. 95th St, near the corner of Aurora Ave N and 95th St. The current plans include some 41 “SEDU” or “apodment” units, and ZERO parking spaces. We are concerned about the effect such a structure will have on our neighborhood of primarily single-family homes. We understand that this city needs more housing. We are now at 140% of the national average for rental housing costs. But there are valid concerns around what could turn into tenement housing if not regulated properly. These buildings are exempt from design review, and mostly from SEPA, and they will have no (or comically few) parking spaces provided. We can see how this could benefit the right area—a true urban village with supermarkets, restaurants, and other shops right around the corner—but we can also easily see how they could be a problem. One question to ask is: what would Seattle be like if everyone built like this? The city would become unmanageable in short order. The builders argue that 714 N. 95th St. are close to businesses, so their residents won't need cars, and we are asked to accept this answer on faith, while numerous studies conducted by Seattle's own DPD indicate that up to 2/3's of the residents of such buildings DO in fact have	**2**

#	Comment	
	cars. This has not worked out well for many of the neighborhoods where large numbers of SEDU buildings have been built. In our neighborhood specifically, this type of building seems unlikely to work: on paper there is business, but in practice most residents will need a vehicle to accomplish their errands or to get to work. The nearest businesses to the proposed development are a doggy daycare, a self-storage facility, a muffler shop, and a tool and truck rental place. The nearest grocery store, HT Oaktree Market (an international supermarket), is half a mile away—which seems close until you try carrying more than one bag of groceries that distance. The property's walk, transit, and bike scores, respectively, are 77, 54, and 62 (www.walkscore.com). Not terrible, but not high enough that residents should be expected to make do entirely without a car. If residents of 714 N. 95th St. do have vehicles, this will cause a problem for people in the immediate vicinity. 95th is narrow, as is Fremont Ave; there is no room for street parking; and parking is not allowed along Aurora. This means the residents of and visitors to this building will park all over the neighborhood, increasing traffic and activity in a happily quiet neighborhood. We are expected to accept the builder's word that all 41+ of those new tenants will be riding the bus or bicycles. Though we are near a major bike path and two bus routes(one of which Metro threatens to cut on a semi-annual basis), it is difficult to rely entirely on those for transportation. This is to say nothing of the citizens who will visit residents of these units. Usually when permitting a building, the city considers the ratio of residents/users per parking space. However, a change was made to development regulations about three years ago that allows developers to build multi-family housing with no parking on-site in an area designated as an "urban village," and now high-density builders arrange kitchen layouts of these apodments such that it exempts them from many of the building requirements constrainingconventional buildings and homes.	**2 cont.**
	The urban village strategy was intended to recognize that new growth would have to occur in already dense locations—truly walkable areas (Ballard, for example, has a walkscore of 97; the University District, 98; Belltown, 98). However, we now have "urban villages" where there are no suitable businesses, or sidewalks, or even public transportation. The new approach, to use urban village boundaries to exempt builders from development requirements, was not part of that strategy. Simply put, these builders, specifically Daniel Stoner of Parkstone Investments are exploiting the urban village concept.	**3**
	We think the hardest clash is between visions and realities. We'd all like a great transit system and neighborhoods where we can access what we need by foot. But the reality is that we have basically the same transit system we had in the 1950s, albeit with nicer buses. Maybe there's a better path to getting to that less car-centric future than by pretending it is already here, and hoping it arrives someday. Around Aurora, the vision of a thriving pedestrian-friendly business district may be decades away. Without stellar public transportation in place, Seattle will never be a city that can get by without cars. If we think we can grow like New York or San Francisco, we should sort out our pubic transportation issues before growing to the point of allowing housing without parking. The citizens of this area don't want to live in San Francisco, LA, NYC, Vancouver, and many other	**4**

#	Comment	
	places due to the overcrowding and the cost of living; they chose to live in Seattle in communities of moderate density. Respect the neighborhoods and the people that make Seattle a desirable place to live. Believe me, we consider it a privilege to live here, and have been fighting dearly to maintain Seattle's cozy feel by trying not to overbuild. It would be a lot easier to accept buildings like 714 N. 95th St. and 1008 N. 109th St. both of which are Daniel Stoner's of Parkstone investments, if there was also a funded commitment to provide the infrastructure needed to make that future happen. Even a planning study for the Aurora-Licton Springs area to envision what the urban village model might look like here would be a step in the right direction.	**4 cont.**
	King County has published some guidelines on "right-sizing" parking to provide the number of spaces that will actually be needed. These can be found at: metro.kingcounty.gov/up/projects/... There's a big distance between right-sizing parking and excusing developers from providing parking at all. It's the classic definition of an externality—lowering the developer's cost by making parking scarcer or more expensive to others. If the developers building these things were passing on their cost savings then I might be more sympathetic, but they are charging pretty high prices regardless, and pocketing the difference.	**5**
	Please review the proposed building with a critical eye. We believe it's designed primarily to cut costs, to maximize ROI more than to fulfill a need. Residents who share the neighborhood with these dwellings would like to see developers and the city recognize their concerns, and stop trying to convince us that their occupants have no automobiles and never will. That strains credibility, and if that's the argument, we don't think there's much left to discuss.	**6**
	The notion that builders should be required to provide parking is just common sense. It's not hard to imagine how unmanageable this city will become if builders are allowed to build with no regard for the surrounding area. This is to say nothing of the long-term ramifications: every urban planning and development study ever done has concluded that increased occupancy without proper infrastructural support will result in increased crime and reduced property values. This is obviously not desirable, so we think it is in everyone's best interests to make sure this building is done well. Aside from ideological objections, we see no pragmatic objections to providing parking other then increased construction costs for the builder, which frankly border on irrelevant. Building micro-housing is enormously profitable. These builders can afford to provideadequate parking. However, since parking does add some cost, they will not do so unless they are required to by the city. We don't think this requirement will send them packing; there is simply too much money to be made for them to turn their backs on a project over a parking request.	**7**
	The residents of this neighborhood are not opposed to development. We would be ecstatic to see a building with the right mix of useful commercial space, residences, and parking—something that would add value to the neighborhood. We see the question to be: do we want to	**8**

#	Comment	
	manage development in a way that helps or harms our neighborhoods? We hope you agree to oversee this project such that it falls into the former category. Looking forward to hearing from you. Jeremy Goodman 902 N. 109th St. Seattle, Wa 98133-8808 (562) 618-8116 SomeHumanBeing@Aol.com	**8 cont.**
187	As a lifelong Seattle resident, it is really important to me to prevent communities of color and lower income residents from being displaced from the city. I've seen friends who have lived in Seattle since childhood forced to relocate because they can no longer afford to live here. Most have necessary jobs in fields like health care, education and community development, but cannot afford a home for their families within the Seattle city limits. I worry that I might also be unable to afford to live here someday, with current city growth patterns. I've already watched once-vibrant communities of color be displaced by recent Seattle transplants working for the tech industry. If I could choose one priority for the Seattle 2035 Comprehensive Plan, it would be to promote affordable housing and preserve existing cultural "hubs" in order to prevent further displacement. I would love to see Seattle become a thriving city with opportunities for ALL of its residents, not just Amazon, Google, Facebook and Microsoft employees.	**1**
188	The DEIS sections on environment and housing/employment should clearly identify the mitigation required to offset the environmental impacts of displacement. Namely that low-income households and communities of color use transit more frequently and have lower car ownership rates and thus if displaced to the suburbs then will be forced to commute more by car, increasing GHG emissions and total VMT. Deric Gruen 1605 E Madison Seattle 98122	**1**
189	The Seattle 2035 documents glaringly omits consideration of technological change and its impact on the city. Technological advances will have a massive impact of the city – far greater in my opinion than the zoning issues that the document entirely focuses on. For example, please consider: - Transit: What is the impact of driverless cars and the sharing economy on car use, road utilization, traffic systems, and street parking? Light rail may be obsolete. - Energy: What effect might residential solar energy production have on the energy grid? - Employment: What is the nature of employment and its impact on the city as low-wage jobs are taken over by automated software and robotics? As telecommuting grows? Why are these considerations not recognized in the plan? I have provided this feedback previously online and in person, and have not received a response or seen this consideration	**1**

#	Comment
	reflected in the plan. It seems like its simply a traditional long-term zoning plan – not the comprehensive collaborative vision for our future it is billed as. If that's what it is, it should be described as such. Let's paint an inspiring vision for our city's future. I'd like to help. Cheers, Keith

1 cont.

6/16/15

COMMENTS ON SEATTLE 2035
From A Life-Long City Resident

1 The Seattle 2035 Plan is missing the key factors that are new since the old plan was written 20 years ago. I find myself thinking about automobile use and its relationship to the plan. I admit I am, and will continue to be, a car driver. I hope to be able to dine, shop, and use medical facilities in the downtown city core in the future. However we are encountering more gridlock, as the City restricts its driving lanes.

While residential developers can buy land all over the City, SEATTLE 2035 will affect how much development will occur on each site. Decisions to build will depend the developer's belief that buyers and renters will come, and make the project profitable. Buyers and renters make decisions based on cost, access or distance to employment, desirability of the area, quality of schools, cost of parking, etc. These are individual decisions made by each private citizen.

Cost of rental housing is certainly a subject to be considered. The older rental housing stock is about 40% cheaper that the newer construction (Dupre+Scott uses 1999 as the division between new and old). Certain areas of the City are more desirable to renters, and command higher rents. High rise apartments, with their underground parking, are more expensive and attract hi-tech renters that can afford higher rents. More on parking cost: sloping lots allow less excavation and less expensive parking stalls. Further from the City core on low-rise zoning, parking usually goes on the 1st floor to avoid the costly excavation. Further out yet, parking is in the open on the grounds around the building. And, of course, the no-cost parking option is street parking, where it is available. If a person has a car or plans to buy one soon, his rent decision will provide for that car. A renter usually does not have to pay for the parking if he/she doesn't need or want it.

In the previous and the new proposed 20 Year Plans, neighborhoods have been sorted and identified for development purposes. However, areas within the same designation are not identical. One example that has recently come to mind is Eastlake. Eastlake is a "Residential Urban Village", and yet it is quite different from the other Residential Villages. Eastlake Ave E runs thru the middle. At the widest area, it is 2 blocks wide to the East and 3 blocks wide to the West of the Ave. But, note these are block "ends" and not block "lengths". A block end consists of a lot on each street that is usually 100 ft deep and (mostly) with a 20 ft alley (total of 220 ft). The next fact is that Eastlake is surrounded by an impassable "moat" on 3 sides – Lk Union to the West, the ship canal to the North, and the I-5 freeway wall to the East. It is not possible to walk 6 blocks to find car parking in an adjacent neighborhood. Eastlake is very small, and it has issues that are not the same as other Residential Villages. Much of the development was built 50 to 100 years ago when there weren't as many cars. The neighborhood has relied on street parking for all of these years. Does it have a "right" to that street parking, or should the City take that away by allowing apartments without any parking stalls? Even service vehicles and Car-To-Go vehicles need street parking.

Comments to follow will reflect on differences between the old "defined areas" within the same category, as listed in SEATTLE 2035.

2

The urban planning ideal would be to place housing, employment, shopping, and entertainment within walking distance of each other. Seattle has that in the Downtown and South Lake Union (SLU) "Urban Centers". The "core" new employees are in hi-tech or medical fields. The renters/buyers are highly educated, have higher incomes, and can afford to rent in the new hi-rise apartments. They are new to the City, younger, and can save money by not having a car for a while. On the other hand, new service employees in this area have to commute to less expensive housing. Rent is cheaper as you go farther from the City core and it is cheaper in older housing stock. It is cheaper yet, outside of the City to the north and to the south.

So, how do we move lower income employees into and out of the City core? Streetcar on rail was a novel idea that was supported by businesses in SLU. The next section on Broadway was a trade coming out of siting Light-rail stations. Beyond this point, a very expensive system that gets stuck in traffic and can't be easily modified for future changes, is being recognized as a dumb idea for additional expansion.

Light-rail would seem to be ideal – it is in place or will be; it is underground (mostly); one train can carry a lot of passengers; it is non-polluting. But, you have to give people access that suits their lives. Otherwise they can choose the bus, private car, or to take a job in Tacoma or Bellevue.

What about the other "Urban Centers"? – First/Capitol Hill, University, Northgate, and Uptown. We don't see the new office buildings full of highly paid employees! While the University District has an enormous employment base, it seems to be established and stabilized. What about the "Hub Urban Villages" and all the "Residential Urban Villages"? Again, employment is stabilized and distributed. I won't try to identify types of employment, except to mention our historic maritime industry. If the City doesn't drive it out of town, it will continue to provide employment long into the future. I found it interesting that Amgen eliminated its jobs in Seattle, and then Expedia took the opportunity to move in with room for its future expansion (note the 2 parking garages, in place for employees).

Seattle doesn't have to worry about Boeing manufacturing jobs, since the City received Boeing's promise to never increase employment in the City, after a disagreement over who was to pay for infrastructure improvements.

Back to DOWNTOWN, this area has an employment base that dwarfs anything else (even without counting hi-tech). Homes of employees are scattered thru the City, and indeed far beyond Seattle. These employees choose bus or car (a few now use bicycle, train, or Light-rail.

Employment outside the core Downtown is distributed in a pretty random fashion.

What good fortune Seattle had to draw a hand with "5 aces", and have Jeff Bezos start his business here (some time after Bill Gates and Paul Allen did the same). One could wonder what their combined wisdom would contribute to this discussion. Now the large pool of hi-tech employees is constantly drawing new employers to the City, and the beat goes on.

I think we should consider the hi-tech and medical (which is also hi-tech) employment as a separate category. What are the characteristics that are different? They

2 cont. are highly educated (with many recent grads). They are highly paid (relatively). Being young, they are highly motivated to do well and advance their careers. Cars are less important at this stage. This employment is highly concentrated**. Should they be separately considered for SEATTLE 2035?** If they decide to live near work, they have the least impact on the environment (meaning cars, bus service, grid-lock, air pollution, etc.). They are the ones that actually walk to work. It is not that they won't use transit services, it is just that they will not use them during "rush hour". Transit will be for education, dating, entertainment, sightseeing, church, and visiting family & friends.

NOW TO THE SEATTLE 2035 ALTERNATES, IN RANDOM ORDER

3 **New Alternative 5: Downtown & South Lake Union (SLU)**

The City should encourage more high-rise construction for office buildings and for residential towers. Consult with and support the hi-tech and medical industries, and supporting service employers. Developers will decide when the time is right to build the new stuff.

4 **Other Urban Centers (Part of Old Alternative 2)**

In general, they should fit in the category of "all else".

Alternative 3: Development along the Light-rail

This is the other logical opportunity for lower-impact growth. In contrast, if you don't do this one, the enormously expensive Light-rail will be a financial failure. And, government will be criticized for low ridership, like early results from the south leg. There should be substantial re-zoning within the defined walking distance to the stations. Mid-rise, or possibly even high-rise, residential should house residents for employment all along the light-rail route. These renters/owners will also have the option to go carless in Seattle, if they wish. Local bus routes should also feed passengers into the stations. A case could be made for large parking garages for cars from farther away (just like suburban transit stations). Everyone would have reliable (out-of-traffic and on-time) service. Parking needs to be a little cheaper than downtown, but the time savings & reliability will sell the system. Residents near these stations should expect change. The lucky ones will be well compensated for selling their land. An RPZ system will prevent overloading the on-street parking. You **must** retain on-street parking for prior residents and for local businesses. A couple of zoning changes in the station areas might facilitate a lower cost structure than downtown. Setbacks could allow construction without adversely effecting traffic, causing delays for everyone including the contractor (or line up adjacent "temporary" private land to facilitate construction). Mandatory commercial space on the bottom floor should not be required, so that parking could be above ground, where it is less expensive. Parking should be required, at probably a one-to-one ratio, as it was for so many years. Somebody will pay rent for that parking. If renters don't want to pay the price for the parking, or don't have a car for a few years, the building owner can offer parking to Light-rail users. It could be like Joe Diamond renting out stalls on vacant lots downtown, for so many years.

4 cont.

Note that parts of some "Urban Centers" (Capitol Hill, University District and Northgate) fit here as a light-rail station, as well as the other locations north and south of Downtown.

Alternative 1: More of the same

These areas have already taken more growth than the previous 20 year plan called for. Many of these communities are very unhappy with the City over spot rezones and elimination of parking requirements for apartments. Their critical businesses are squeezed for customer parking. Homeowners have no place for service trucks or guests to park. Where homeowners and Low-rise apartments have relied on street parking for almost a century, is it really fair (or legal) for the City to "take" that away, by allowing new apartment buildings with no parking stalls? Please require a one-to-one ratio of parking stalls to residential units. If the renters won't pay for that parking, someone outside that building will. The owner might need to sharpen his pencil to compete with other buildings, but is "lower cost to consumers" a bad thing? Reject this Alternative and let these areas be stable. Growth will still occur, as developers see a need.

Alternate 4: Incentivize all the bus corridors

Alternate 2: The Urban Centers other than Downtown, SLU, or at Light-rail Stations

Alternate 1: Residential Urban Villages

Hub Urban Villages

Leave the zoning as is. Do not allow spot rezones. Require one-to-one parking for all new apartment/condo buildings. Give the neighborhoods a much-needed break. Fast Action is badly needed, so that more long-term damage is not inflicted.

Other than Downtown & SLU, employment is widely disbursed. Homes are widely disbursed. The transit system is in place to serve. The private development sector will decide what, and where, new buildings are needed. With a steady and predictable regulatory system from the City, everyone can see what to expect.

For lower cost housing, more product is useful, but retention of existing housing (that is less expensive) is worthwhile. In individual locations, that will depend on location, condition, and demand. Another cost issue: is the City's Dept of Planning and Development as efficient and cost effective as it might be, compared to surrounding cities?

Choose well, City Officials, and you will get a vote of confidence from the people.

Sincerely,

Don Gulden 2624 W Viewmont Way W, 98199

#	Comment	
191	I am deeply disappointed that there are no options that wouldn't put nearly all growth in urban villages. We have way too much single-family zoned housing in Seattle. I don't think every neighborhood needs high-rises but the "preservation of single-family neighborhood character" is currently at the expense of the neighborhoods that are already bursting at the seams. Loosening the zoning in what are now single-family neighborhoods to allow townhouses or detached units or tasteful low-rise apartment buildings and condos would relieve the pressure on neighborhoods that are struggling to maintain their character and have lost the battle for affordability (I'm looking at Capitol Hill here, and I know many folks in Ballard who would sing the same tune). We *can* find a way to distribute the growth a little more evenly without destroying what people love about their neighborhoods. The urban villages can continue to grow - but if you look at the rate that Capitol Hill and Ballard, in particular, have been adding housing units compared with the rest of the city, it's ridiculous. And if some of those single-family neighborhoods grew just a tad more dense, they might find they enjoy the amenities that come with density -- more restaurants and theaters and retail -- the things they now *drive* to my neighborhood to enjoy. I know it would take tremendous political will to shake free the zoning stranglehold, but at this rate, there are way more of us in the hyper-dense areas than there are those in the low-density areas, so pretty soon, we'll be able to override them anyway. Might as well do it now, and do it carefully and well.	**1**
192	I was glad to see mention of the Bike Master Plan in the survey, along with transit, but thought it was odd that a point about benefiing peds didn't mention the Pedestrian Master Plan. I know that's in the process of being updated this year, but it should provide an important roadmap, if you will, for ped safety measures. Let's not forget it!	**1**
193	I am concerned that the focus on elimination of cars will leave the elderly and others who really need to use cars left behind. Not everyone is capable of walking or riding a bicycle for each and every outing. So please remember that we have legitimately diverse transportation needs and thus will still need a place to park our cars while rambling about on foot.	**1**
194	Here are a few observations: ·Neighborhoods are getting too dense with multi-family housing to handle traffic. Example Queen Anne. Need to be mindful of development and how it impacts a neighborhood. ·Anyone who uses the roads should have to pay for their maintenance. Example bikers should have to license their bikes and pay a portion for road maintenance and improvement. Bikers who ride on roads (vs. trails) should be required to have adequate reflective gear on. I often see riders in all black with one tiny reflector on the back of their bike commuting on a raining grey day – they blend right in with the road. Even if you are a careful driver, it is often hard to see them. ·Extend Proto bike stations to more neighborhoods. ·Seattle needs better public transportation – this has to be made a priority and not buses, we need a subway or light rail throughout the region. ·Develop the waterfront to be pedestrian friendly.	**1**

#	Comment	
	·Guard and protect our natural assets – our environment. andra hall	2
195	As a member of the Belltown community, I believe that our community can grow without the loss of our community character and identity. Development is already greatly changing the eastern portion of Belltown, where we are seeing a new type of community composed of glass and aluminum and generic-looking public gathering places. Our concern is that this type of development will expand west and eliminate the center of Belltown existing character. With the news of Mamma's Restaurant building being sold and proposed for demolition and development, we are all bracing for the loss of this and other key community businesses. Specifically, I am concerned that development of the eastern side of 2nd Avenue, between Bell and Blanchard. I believe this block to be central to Belltown's traditional character. Therefore, I request that the City acknowledge in its final EIS the community character and significance of this area and include in the final Comprehensive Plan specific measures for its protection, including both architectural and community features, such as locally-focused bars and restaurants that fit within the existing community character. As identified in the DEIS, community is one of the city's four core values guiding its current planning effort. Thank you for working with our community to ensure that Seattle's future includes protection of this significant component of the Belltown community.	1
196	I tried to take the online survey, but response time to go from page to page was so slow I gave up. One comment: It seems the city is allowing more and more business to build downtown, and I heard one group has added 3,000 parking spaces, I suppose to accommodate their employees. Just where will these 3,000 cars fit on our current streets? 2nd: Why, when we have the opportunity, will we not develop land into park/greenspace while we have the opportunity? (I am thinking of the Roosevelt/65th project). Are we going to build Seattle out of its current attractive position? Eileen Hallstrom	1 2 3
197	Thank you for encouraging public comment and providing such in depth materials online. Past 20 years of growth have not been well managed. Infrastructure has NOT kept up with growth, causing current and new residents of Urban Centers & Villages to suffer. I would vote for Alternative 2 which would have a lower potential to displace marginalized populations and concentrate growth in urban centers, which are better suited to increased density.	1

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	I oppose Alt. 3 & 4 that would potentially rezone single family areas near frequent transit service. Controlling growth of oversized projects would be problematic. At this time, multiplexes and McMansions are coming to our Whittier Heights neighborhood, in a haphazard manner. Zoning follows, but has not led development. Loopholes are used and after the fact attempts to rein in development have not been successful. Latest example is Lowrise zoning changes and current council deliberations. Thank you for the chance to comment on this important 2035 plan for Seattle.	**2**
198	It would be exceptionally foolish to restrict any kind of growth. I consider myself to be fairly socially and economically liberal, and would like to protect all of our populations in Seattle. I'm also a new homeowner who is concerned about the value of my property given I've just committed to an exceptionally expensive 30-year loan on a house that most people in Seattle can't afford. HOWEVER, what's good for me, isn't necessarily good for the city. Preserving little neighborhoods as sanctuaries means we have the exact same housing issues every other major city has. It's a terrible idea. Allow the people of the city to dictate where growth is based on their movement patterns and where they open new business. Restrict new developments only to prevent them from making harmful choices for the city. For example, don't allow developers to create a condo building with 60 residential units as well as retail space, but provide only 40 parking spaces... Require at least 3x the residency for parking spaces & make sure that a good chunk of that is available for public parking at an affordable price. Make sure initiatives to fund lower income housing that are 'billed' to the developers don't just get passed off to the renters. We need more housing, denser housing, and we need more mini commercial areas that neighborhoods can be proud of and rally behind. For me, that means my house value will probably drop. But it means that my generation who aren't as lucky might actually be able to stay in the city and give the city flavor.	**1** **2** **3**
199	I support option 4 because growth needs to be distributed across the city. People need to live close to transit and we need enough density to make transit work. One easy and fast way to increase affordable housing would be to loosen the restrictions on accessory dwelling units in single family neighborhoods. Vancouver, BC has done this with great success. Single-family neighborhoods need to be part of the solution. Seattle gives too much deference to demands for free on-street parking. As density is allowed to increase in urban villages on street parking shouldn't always be free. We need to create more incentives for people to give up their privately-owned vehicle.	**1** **2** **3**
200	After all the public input you've come out with four options that are very similar. As Boss Tweed is reputed to have said "I don't care who does the voting as long as I do the nominating." I can only conclude that the process was rigged from the start and there was never meant to be a serious consideration of doing anything other than more of the same. I'm sorry I wasted my	**1**

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	time going to your events. If you do ever decide to include a plan for land use that supports a sustainability throughout the city, let me know.	1 cont.
201	As related to the comprehensive plan, the Seattle public school district's current planning embedded within the comp plan is OUTDATED AND INADEQUATE. The comp plan MUST go back into this aspect with the school district and revise, otherwise the comp plan itself will miss the mark and the comprehensive planning will be a failure because it is based on stale-dated information that already has been proven to be false. The comp plan should put forward impact fees in order to offset costs for additional school facilities that will be needed to keep pace with growth.	1
	The planning for facilities for public schools is wholly inadequate. The CURRENT growth curve puts Seattle Public Schools (SPS) enrollment at 65,000. SPS currently can only house 53,000, and, that is pushing the SPS facilities to the absolute maximum (this is WITH the BEX IV additional capacity pushed into the system). This is enrollment growth is driven by SPS policy, which guarantees neighborhood schools, and that means unlike previously, parents now control where their kid(s) go to school. (The growth trend coincides with the new school assignment policy to guarantee enrollment that was implemented 4 years ago). So, instead of families moving to a suburb to procure a desirable school, parents are staying put. That is a fantastic thing for our city! Having the city populated by all demographics, young and old, singles and families, workers and retirees, makes a city vibrant and ensures a healthy cityscape for all.	2
	However, when the school capacity crisis for high schools hits in 2 years, and, it will hit incredibly HARD, high schools will have to go in shifts, and, that will send families out of the city in a hurry. There will be an exodus for stable, high quality schools by families with resources. Those who lack mobility and resources will have to stay here. It will change the overall demographic of who comes to public schools in Seattle. And, that will trigger a second wave of exiting. Simply put, no body wants to catch a falling knife. The fact the current Superintendent is not going to be staying beyond a couple of years, right when the depth of the issue is affecting all parts of the public school system, is not good. The school capacity crisis will have profound impacts on the city, and, even childless households. It will harm all stakeholders, all residents of the city because it will erode property values (thereby eroding the property tax base), harm civic revenue collection, possibly result in failed levies because angry voters cannot stomach the poor planning, and, affect employment and the service economy.	3
	BEX IV WAS NOT ENOUGH. It was acknowledge by SPS as NOT providing enough classrooms. Portables cannot even make up the difference. The only solutions left are non-construction solutions, like, schools in shifts (from 6am to noon, and, noon to 6pm) or year round school.	4

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	These will make Seattle's public school unattractive to families, so, families will simple leave Seattle. It has happened before. Seattle use to have 100,000 school children enrolled in SPS. Then, policy changes resulted in family flight out of Seattle. With 53,000 students enrolled for this September, with the lower grades having each about 5,000 students, that means the schools are 'regreening' with families, and, this is a great thing for the city! It is a great thing for supporting the anti-urban sprawl policies that protect the environment. But, to ensure success, SPS needs land to build on from the City and impact fees from the City and emergency capital money from the Legislature to build with.	**4 cont.** **5**
202	Dear Mr. Clowers, One of the things that has made Seattle a most livable city is the ability to own a house on a small lot within the city. For most homeowners, there home represents their single largest investment. Single family home owners are disproportionate participants in all manner of public activities that benefit the city. Section 3.4 and 3.5 advocate removing policies LU 59 and LU 60 from the Comprehensive Plan. Because these policies preserve the Single Family zoning in Seattle, removing them will have far reaching effects. While Section 3.4 enumerates Alternatives 2, 3 & 4, that actively require the removal of single family zoning in specific areas, Section 3.5 suggests thinly fabricated reasons why the policies have no place in the Comprehensive Plan. First, I disagree with the notion that removing the policies would have no effect. The Mayor would not bother to advocate their removal if he did not have specific plans in the place to go further to eliminate the single family zones, for which the removal was not a critical element. The Comp Plan is full of policies that have virtually no enforceable related action other than to satisfy Seattle's urge to feel good about itself, and those policies are not planned for elimination. Please address the unidentified plan, for which removal of these policies is essential for the unidentified plan to be carries out. Second, I believe the reference to LU 59 and LU 60 in Section 3.5 is a Trojan horse to ease the rezoning of large areas of SF zoning. Please address how the removal of these policies will hasten the rezone of areas not identifies in Alts 2, 3 & 4. Third, I believe the Mayor has in mind removing multiple areas of SF zoning to facilitate the ability of so called "non-profit" developers to have access to a greater range of land parcels for development. Please address how removal of SF zoning will affect the following: 1. The supply of Family Housing. 2. The price of single family homes.	**1** **2** **3**

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	3. The affordability of housing for large families based on the value of property, and therefore the amount of proporty tax paid, for property in SF zones in single family use, when the underlying zoning is changed to multifamily. 4. The likely change to family size, based on the loss of single family homes. 5. The likely change to the population of children living in the city. 6. The likely changes to the participation of citizens in public affairs as the population of home owners declines. 7. The likely change to the income profile of city residents as the number of single family homes declines. 8. The likely change to the number of trees and other plants in the city as the number of lots in single family use declines. Specifically identify the likely tree lose. Fourth, for the record, I favor Alt 1. When the urban village boundaries were drawn, many citizens objected to including areas of SF zoning within the villages. The city planners attached to each neighborhood planning group announced that the there was no plan to change zoning and that the present SF zoning criteria (LU59 and LUGO) would prevent any change to the zoning. They further noted that the only reason the SF areas were included within the planning area was to make easier to draw simple lines identifying the zoning. Please clarify if there will be a process to redraw the boundaries of the villages. Please address how removal of SF zoning policies LU 59 and LU 60 are tied to the ability to rezone SF zoned areas going forward. Sincerely, Gregory Hill	**3 cont.** **4** **5** **6**
203	1. For increased use of light rail, with a lack of parking at station sites, develop a system of shuttle buses from a 2-5 mile radius from each station. 2. Mentioned is working with the Seattle Public Schools for developing a downtown school. This is very short sighted. The City/Land Use Dept. should req	**1** **2**
204	Thank you to the many individuals and organizations who support this work. I am deeply appreciative of the work. My name is Aric Ho, and I'm going to wear multiple hats in this comment. Thank you again for taking the time to read these comments. -As an ex-government worker, having served in Emergency Services and 911 for about 6 years, I understand the depth of work that goes into these types of projects. -As a resident, I've seen the city evolve in many ways over the past 10 years. This city is home to my wife, and our future family. This city is home to our greater family and community. I love Seattle. -As a board member of Homestead Community Land Trust, which partners with the City of	**1**

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	Seattle to create and preserve affordable homeownership opportunities in the area, I am personally passionate about housing and displacement, and building equity (both social and financial...). -As a business leader, working with anchor institutions like Seattle Children's Hospital, and Nordstrom, I fully support fostering healthy economic opportunities. I also am keenly aware of the financial impacts of job creation. -As faculty of Pinchot University, which prepares learners from diverse backgrounds to design, lead, and evolve enterprises that contribute to the common good, I understand multi-faceted approaches to solving multiple challenges. Given multiple hats, I'd like to endorse Alternatives 3 & 4. I believe that diversifying where we create our economic opportunities to the Hub & Residential Urban Villages is the best strategy for the future. As a strong advocate for Race and Social Justice, I understand the research methodology taken to evaluate each of the alternatives potential impact. I personally would argue that they are the options MOST well suited to combating displacement and creating economic opportunity, particularly for communities of color. I'll cite the work of the Cleveland Foundation and the Democracy Collaborative, which has proven that with the combination of housing and job creation, communities that were once forgotten, and now generating wealth. The 'significant investment' required to mitigate displacement in Alternatives 3 & 4 would be a solid one, that would generate not only financial revenue for the city, it would generate social and environmental capital. To be a city that embraces healthy growth, and model for other cities how Race and Social Equity as a foundation allowed everything else to follow. Let's not be the city that has the best band-aids for structural racism, health outcomes, and global warming, let's create a Seattle that's a model for healthy and thriving communities. Warmly, Aric Ho P.S. I'm only just learning about this public engagement space, and have not been able to attend any of the Forums. If I can be in service in any way, I would be happy to be considered.	**1 cont.** **2** **3**
205	Seattle Department of Planning and Development, I read the Seattle Urban Forestry Commission Letter in reference to the 2035 COMPLAN/EIS and I agree on all points. Please refer to the SUFC letter and make note of my agreement with their analysis. Here is the SUFC letter: http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/ADOPTEDCompPlandraftEISLetter.pdf Briefly, I am concerned about:	**1**

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	1. Impacts on the Urban Forest due to Increased Density 2. Inadequate Tree Protection in Current Code. 3. Removal of the Current 40% Canopy Cover Long-Term, Aspirational Goal Thank You, Mark Holland 2218 14th ave. S. Seattle, WA. 98144	**1 cont.**
206	June 17, 2015 City of Seattle, Department of Planning and Development, Attn: Gordon Clowers, 700 5th Avenue, Suite 2000, PO Box 34019, Seattle, WA 98124 Dear Mr. Clowers: Thank you for the opportunity to comment on the Seattle's Comprehensive Plan: Toward a Sustainable Seattle - Draft Environmental Impact Statement (DEIS). “Urban Village Strategy: Locating more residents, jobs, stores and services in close proximity can reduce the reliance on cars for shopping and other daily trips. . . Residential urban villages provide a focus of goods and services for residents and surrounding communities. . . Seattle’s Comprehensive Plan January 2005 (2013) The intent of Seattle’s Comprehensive Plan is clear: to get residents out of their cars by providing amenities such as shops, markets, restaurants, parks and open space and enhanced street designs. A lofty goal for sure, but make no mistake: the Aurora-Licton Springs Urban Village remains only an idea on paper. According to Peter Steinbrueck’s Seattle Sustainable Neighborhoods Assessment Project submitted to the city in January 2015, the Capital Improvement Program appropriations per capita (2005-2014) in Aurora-Licton Springs is $872 – a paltry amount compared to other urban villages such as Downtown ($12,330) and Rainer Beach ($11,907). The point? Aurora-Licton Springs is an urban village in name only. We do not have the amenities that make it so, nor do we have the financial support of the city or developers to encourage and provide them. Our neighborhood doesn’t not have contiguous sidewalks. The newly designated arterial/bike lane along Fremont has sections with no sidewalks, and most of the existing sidewalks have no handicap curb access for walkers, wheelchairs or strollers to easefully and safely pass across a street. (Mayor Murray’s proposal of completing sidewalks on the cheap in North Seattle is	**1**

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	unacceptable. We deserve our full due – a bona fide and well-constructed sidewalk like many urban villages in Seattle.) Our neighborhood does not have shops and markets in easy walking distance. HT, an Asian Market, is .6 miles away, which is the main west-east access to our "urban center" but has no sidewalk. (There is a newly proposed storage facility with 19 parking places at 93rd and Aurora – is this where folks can meander and enjoy their urban village?) There is one bus stop on the Aurora E line within ¼ of a mile of our home. Greenwood, to the west, is well over a quarter of a mile walk at over 1800 feet, and 85th Street, the nearest west-east transit line is even farther – again with inconsistent sidewalks and little handicap access. Aurora-Licton Springs is an urban village with few services and amenities. Little has been done to enhance this neighborhood since Seattle's Comprehensive Plan (2005). The unique qualities of our neighborhood, unlike other urban villages such as Green Lake or Phinney Ridge which are alive, mixed-use neighborhoods, need to be taken into account: we are car dependent; we have few stores and services that we can access by foot. We would love to have shops and restaurants in easy walking distance. But this is just not the case. The Aurora Licton Springs Urban Village is an urban village in name only. The balance between residential development and supporting commercial services has not occurred. Therefore, the city needs to: • Update the Aurora-Licton Springs Neighborhood Plan, including reviewing the urban village boundaries. In reviewing these boundaries, it is conceivable that the west side of Aurora Avenue is removed from the urban village altogether. • Conduct a market study to determine the feasibility for mixed use development along Aurora Avenue to determine if the vision set forth in the Neighborhood Plan can even be achieved. • Adopt neighborhood design standards for Aurora-Licton Springs. • Place a moratorium on future microhousing development in the Aurora-Licton Springs urban village until the above steps have occurred. I fully support living in a diverse, urban neighborhood. But lofty goals do not make reality. Diversify our neighborhood: give us mixed use services that draw our interest and business, and then Aurora-Licton Springs has a chance to become a vibrant and alive urban village that supports the lives of its residents. But until that time, the development (super structures such as micro-housing) needs to freeze until these issues are clearly addressed. Thank you for your attention in this matter. Sincerely, Sharon Holt N 95th Street resident	**1 cont.** **2** **3**
207	I am shocked that the most populous neighborhood in the city (West Seattle) has no mention of being linked to light rail. How can you possibly have a comprehensive city plan up to 2035 that does NOT include that?	**1**

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208	Growth alternatives 3 & 4 seem to do a good job at accommodating growth near transit, and represent an improvement over current growth patterns. However, they are incomplete. All areas of the city have an obligation to support growth--including single family neighborhoods. I support an alternative that encourages increased density throughout the city by encouraging DADUs and other housing options--through streamlined regulations and incentives. Any alternative should also include a comprehensive package of policies that help mitigate displacement in low-income neighborhoods and among marginalized populations--such as: increased funding for affordable housing development from the city's housing levy; and incentivizing private developers to enter into community benefits agreements (for affordable housing, construction hiring, and commercial business recruitment).	**1**
209	I am a teacher in Seattle, a single mom with 100% timesharing, and a low-income wage earner. I have taught anti-bias curriculum for years and am a dedicated member of the community. The city needs to seriously improve its position on economic equality and systemic bias. I outweigh the environmental effects over economic, but we need to recognize that as we do not assist low income marginalized populations, we are undoing our environmental stewardship by forcing urban sprawl. Density is the best way to mitigate our environmental impact and preserve our area resources in a responsible way. With the high influx of very high wage earners we could do three things, require employers within the city to do COLA increases by the Seattle amounts, not regional percentages, and require business that employ large numbers of high wage earners (like Amazon) to dedicate funds towards the offsetting the gentrification their business is having on our community. We need to have more plans like the MFTE program, but do away stop the process of requiring people to meet both income requires of 2.5 times rent that complexes require in addition to staying below income limits, because our poorest populations do not get to benefit from MFTE when those requirements are in place. Instead we should all for income limits on the top end, but not the bottom end and designate that for some units, larger units like 2 an 3 bedrooms be locked at 60-70% instead of 80%. Single parent families are seriously disadvantaged when attempting to find housing with children when they must be at the 85% level for a unit large enough to accommodate their family size. But these accommodations should only be made to families with children. It is sad that my role as an early childhood teacher makes it difficult to live in the city. Currently, my small center did not need to raise my wages to $15/hr. I've seen 30% of our teaching staff leave for barista and bartending positions because those employers have to pay higher due to larger staffs. We are loosing our community builders to income inequality.	1
210	I'd like to simply draw your attention to the proposed "Alternative 5," put forth by theurbanist.org. It's a very sensible option, and one that includes key elements I've long sought for Seattle. While it's seen as politically dangerous to open up zoning in single family areas, we really need to develop a more broadly distributed growth strategy, and cottage housing, ADUs, and the like can play a key role in adding a large number of units in a manner that is quite consistent with the four goals of the plan -- particularly the first one, concerning equity. I also strongly support elements from Alternative 4, namely investing growth into areas served by frequent transit.	**1** **2**

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	Thanks for all your hard work, and consideration of my input!	2 cont.
211	I don't understand the plans. Esther John	1
212	I like what you guys tend to be up too. Such clever work and coverage! Keep up the very good works guys I've incorporated you guys to my personal blogroll. Ggdgkkgefkba	1
213	Its like you read my mind! You seem to know a lot about this, like you wrote the book in it or something. I think that you can do with a few pics to drive the message home a bit, but instead of that, this is fantastic blog. A fantastic read. I will definitely be back. Bfagdfadgdce	1
214	Seattle's Future It is incomplete to look at the future of Seattle proper without considering those areas outside Seattle that function as one economic unit. All of King County and several neighboring counties should be considered, and transportation for people and freight included. While we are at it, Regional transportation is also critical for Seattle as is contingency planning and emergency preparation. Lets look at all of it now. Local business leaders, the Governor and the President say we need to invest in infrastructure for transportation and utilities. I say the time is ripe for a breakthrough that will allow this investment to pay back better than you can imagine. This is a meeting of the perfect place, the right moment, and the right people and organizations all ready to make a difference. Combine this together with a leap in technology that will efficiently speed us ahead at over 750 mph using renewable energy, and we have a breakthrough that will shape our future in the best possible way. Our culture and economy has been transformed by the internet. The old model was to corner a market and charge the highest price the market can bear. Many sections of or economy are still run this way. The new economy puts the customer first and charges the minimum the company can sustain. Craig's List took billions of dollars away from newspapers and into the pockets of customers. They run a small and efficient organization and charge only for a couple premium services. This is part of the model for the next transportation system. In this essay I will share the extraordinary details of a plan that will make this happen. It is called Twelve Ways Transport. I encourage you to open your mind and look for your favorite parts and what you are excited about. Set aside cynicism and note that if we agree and work together, we can get anything done. First, you must give this a chance, and take it all in. Your favorite part might come at the end. This is a new kind of organization that combines the public interest of a cooperative and the cutting edge innovation of a high tech start-up. It is designed to deliver transportation and utilities without interruption and with huge upgrades in efficiency and nearly complete elimination of air and noise pollution. Twelve Ways Transport will get you there fast by both	1 2

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	getting the traffic and sometimes the air, out of the way. This project promises to deliver the following breakthroughs: #1 Fix Seattle Traffic, Really. (and other cities next) #2 Fix Regional Transportation with a 700mph tube train and #3 150 mph electric autobahn with a good view #4 New Regional Electrical Power Grid protected against all disasters #5 Downtown Transport hub connecting Twelve Modes across the entire region #6 With safe and dry glass 2nd deck for bikes and walkers #7 with Tethered Underwater Tube Trains connecting to all Regional Port Cities #8 with adjacent Stadium Market Square #9 Fix College Sports and connect the PAC 12 and all the universities and colleges #10 Solve the Coal train/oil train safety, traffic and capacity issues and eliminate all new pipelines #11 Schedule Twelve new Holidays, starting with sweet sixteen on July 16th, 2016 #12 Host a profitable Olympics, World Cup, Worlds Fair and Super bowl in Seattle This impressive list of accomplishments are all tied together, and it will actually be easier and less expensive to complete these tasks in one big, integrated project. The plan is to work together with select corporations and existing organizations and resources to efficiently connect us all and provide better transportation.	**2 cont.**
	Seattle and the West are the place for this to start. We have the need and the forward thinking people that will be willing to agree and work together to make this happen. It will make all of our lives better and start the switch over to renewable energy and a sustainable future. It will connect the distant cities of the West and improve the preparation and recovery from any disaster. It will keep the power on and help drive the digital revolution into a safe future. The Seattle traffic fix will rely on multiple integrated solutions, with the most important being a glass second deck for bikes and pedestrians. Not only do we get the bikes and walkers out of the way, we give them a much safer and dryer covered second deck made from glass. Combined with the tube trains, we will have excellent choices that integrate into existing transportation systems and make huge improvements in both the slow and simple human powered transport and add the 700 mph renewable energy tube train and electric autobahn with a good view. It will be better, and either fast or slow, as you wish. Rather than seek money and partners, and proceed with the standard route, I invite all of you to be co-creators. This will be a new type of Co-Operative, like REI, a credit union or PUD, but with much bigger plans. It will be a different type of Co-op because there will be three equal partners in the organization. The people will make up one third, the public sector the second third, and Corporate Partners the rest. I will lay out the conceptual design with a plan to fund it. We need 8 out of 12 people to agree it is a good idea. We will carry on with an unprecedented two thirds majority working together to deliver the future ahead of schedule and under budget. To secure that majority there will be something for everybody. Again, look for what you like and set aside any disagreement for now.	**3**

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	Many of us usually listen carefully for what is wrong. Just do the opposite, for now. It starts with Seattle and the twelves, extends to the PAC-12, includes twelve major cities and twelve forms of transport, including some utilities. It is a new kind of Cooperative Corporation, with twelve leaders on the short board that follow a better way to win. It is a transparent corporation with a heart, and it will bring more time, liberty and freedom to the people who use it. It will tie the region together with a quiet and efficient connection that will not be interrupted. We can break free of the polarity of left and right, as we each align our efforts by looking at what we agree on. We agree on almost everything. Often it is the details specifically with the path to get there and not the destination that we disagree on. We all want to solve transportation and several other huge issues we face together. Let's just get it done right. Twelve Ways transport will be led by Engineers, with the help of athletes and rock stars. Together, they will lead the twelves, the city of Seattle and the entire West into a transportation revolution that will connect us all and provide the resilient infrastructure our region needs to thrive and a sustainable future of which we can be proud. It will be powered by renewable energy and will operate nearly free of air pollution and noise pollution. Twelve Ways Transport will solve the traffic and transportation issues in Seattle, the hourglass shaped Emerald City. She is squeezed down in the middle and packed with a stadium, a ballpark, a Port, productive industrial area and high density core all served by the same few lanes of North and South freeways we had in the 70s and with little hope for an increase. It is only going to get worse. If we act now and invest in the future, we can enjoy the benefits faster than you believe. We need to think outside the box and harvest the combined efficiency of bundling multiple infrastructure projects into one mega project; one mega project brought to you by a company designed for that specific job. An organization designed to have the highest customer satisfaction rating. A Public Utility Cooperative that operates on a 12% profit. A Cooperative designed to transcend polarity with a structure based on the number Twelve and a two thirds majority. Twelve Ways Transport will fix Regional transportation as well as Interstate transport. We will do this by taking advantage of a whole new technology whose benefits run to the dozens. So let's start with the West and the PAC-12 and a few other cities near the route and connect them with a 700 mph evacuated tube train similar to the Hyperloop train proposed to connect San Francisco and LA. This concept is a super-efficient electric train that can comfortably reach over 700mph on straight and level runs. It will improve on the travel time and erases most of the disadvantages of regional air travel. This will automatically free up capacity for Airports to handle expected increases in Intercontinental and long range air travel and save billions for air capacity upgrades. The system will eventually connect with all major airports and utilize existing facilities when practical, rather than build all new hubs with hotels and services.

3 cont.

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	So we can avoid expenditures for capacity upgrades to airport infrastructure and shift the investment into a new type of system that saves trillions of dollars in the long run on fuel and with a massive reduction in environmental impacts. It also allows us to invest in improvements in several other regional issues. But first, here is a little more on how the Tube train will improve on regional air travel routes of around 1,000 miles. An airplane must take off, creating huge noise impacts, while carrying more than enough fuel for the scheduled route (about 40% of the total weight), carrying the additional weight of engines, wings, tails and landing gear. It must climb to high altitude where the air is thinner so it can go fast and burn less fuel. At around 30,000 feet the Jet fuel, derived from non-renewable oil, is burned and exhausted directly into the upper atmosphere. The improved version of the Hyper Loop train will be similar to a plane without landing gear, engine or pilot, and will carry up to 50 people in quiet comfort with no turbulence, wings, hair raising landings, or life jackets. It will accelerate like a pick-up truck, but only for about ten times longer, using linear induction motors mounted outside the tube. It will carry no fuel, using batteries to power on board utilities. It is really simple technology and utilizes an “air hockey” flotation system that first collects the thin air building up in front of the train and then injects it under the train for a simple, nearly friction free ride. It is kind of a cross between a train and a 737, with almost all the advantages of both and few of the disadvantages. This system gets the air out of the way. This is the key. The tube train operates at one thousandth the standard air pressure. If you stick your hand out of the car at 70mph you will feel it. Imagine that resistance is nearly gone, and traveling at ten times that speed. One disadvantage is there are no real window seats. Video screen windows or "virtual reality glasses" will allow you to see out. When we add any more transportation breakthroughs we will make sure they have a good view. Also, the original Hyper Loop design only connected two points. The improved version will provide more direct travel with multiple non-stop destination. So, rather than driving from The University of Washington to SeaTac, flying to Denver and then using ground travel to get to Boulder and the University, Twelve Ways Transport will have stops at both Universities. This will reduce the travel time by around half, and give the students more time to study or have fun. It will also reduce the travel fatigue for all the team sports. By getting the air out of the way, the efficiency soars. It is like coasting down a hill, with your foot off the gas, but without the wind noise or skimming like an air hockey puck, but moving a bus load without having to fill the tank and without blowing that exhaust. It is the way we should move most shipments, especially the ones we want to get there fast. Even when we are in no hurry, the extra speed of the system gives it extra capacity. One tube at 700mph is like 10 at 70mph. I have taken several other monumental projects and combined them into the hyper loop design, making improvements on each and reducing the overall combined costs by many times. First is a new power grid. Here is an impossibly expensive and unfunded project that we need to keep the

3 cont.

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	power on and add renewable generation. It replaces a cobbled together system of interconnected electric grids that has demonstrated itself to be fragile and vulnerable. The grid is also humanity's lifeline to our technology, water, food, transportation, communications and security. It is presently out of date, under capacity, and in need of replacement. A solar flare no larger than one that hit our planet in 1859 could take out the electric grid. By that, I mean it could vaporize the power lines and destroy the transformers. A similar flare in 2012 just missed. The new system can be built to prevent damage with special shielding, isolation and automatic shutdown prior to impact by large solar flares. Our existing system might fail completely and need to be rebuilt from the ground up while the people get by without electric power. So, while this scenario might be remote in both time and possibility, it is dire enough to require action to prevent it. Upgrades will not do it. We need a new and improved system with significant changes. I propose we build a new system that is more efficient and reliable and can handle nearly any catastrophe including hurricanes, tornadoes, solar flares or earthquakes. We will build it within the Twelve Ways Transport structure in such a way to protect the power. Picture a 50 foot high composite triple H beam suspended above the ground. The top of the H beam will carry the electric autobahn. It will be an 185 mph smart highway with a great view and a solar cell roof to keep the rain and sun at comfortable levels. It will be faster than a helicopter and safer than today's freeways. Just outside the clear jersey barriers, on the far outside of the top deck, will travel the wide and long load carriers. This tall arched system will carry wide and long loads one way only above the traffic on the electric autobahn. It will look like the Safeco field rolling roof, only smaller and moving at freeway speeds, and carry loads as large as the Twelve Ways Transport structure during construction. The new transportation and utility system will deliver and build itself. It will start at the manufacturing plant and build itself with no construction delays to existing traffic. I am calling it the Straddle Oneway, and will allow most oversized loads to stay off the freeways, and increase the size of loads that can be moved by double or triple. The manufacturing plant may be local, until the system is complete. Then it will sail away, as the entire plant could be built on multiple barges. Once the local system is complete, and we have built out the regional portions best supplied from Seattle, the plant will move to the next port. Portland, Oakland, and LA could handle their regions, and build out west to Arizona and Denver and then from Chicago and from New York City. Also possible is one big site with delivery everywhere from there or multiple sites to speed the project. Below the top deck will be the tubes and utilities, including water, data and power filling the odd shaped spaces created by the tubes. The middle flange will be the bicycle, skater and scooter deck with a 30 mph top speed. Below that, on the lowest flange, will be pedestrians, runners and Segways with a 12 mph top speed. Here again we have a monumental project that has no funding and huge public benefit. By combining it into Twelve Ways Transport it becomes possible. By making the total project more beneficial, we get the majority on board and excited. The cumulative benefit is too great to ignore. We can all agree to get this done.

3 cont.

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	To make the system strong we need the H beam and flanges, and here we use them to add more transportation that is safe, covered and out of the way. It will pull people out of cars and out of traffic and give them some exercise if they wish. Smaller versions of this system can forgo the tube train and penetrate deep into our neighborhoods and to every High school, giving us a safe route from home to school and back. The electric autobahn will accommodate buses as well as cargo vehicles. Deep in neighborhoods, where we have no tube train, people and cargo can travel on the Autobahn until it reaches the intersection with the tube train. There the standardized modules can be loaded from Autobahn flat beds to tube train flat beds and the trip can be continued at four or five times the speed. Shorter trips will stay on the Electric Autobahn for start to finish. The tube train modules will be sized to fit inside existing shipping containers. Modules designed to carry liquid will displace the need for any new pipelines for oil, natural gas, drinking water and even irrigation water with the cargo taking the night train and passenger travel having the priority during the day. Coal can travel this way as well. It will be funded by multiple sources, with the first being selling tokens for travel on the train. These will be numbered and will mark your jumping on to the Twelve Ways Transport bandwagon and set precedent for some future benefits. Each token will also act as a ticket to a party where we will all celebrate the launch of our future on July 16th, 2016. It will be the sweet sixteen party for the century and millennium. It is a new holiday that celebrates people and the power we have when we work together. I think we can all agree that we need to do something to fix our infrastructure. By combining multiple systems into one project we take advantage of the combined efficiency and get everybody's efforts moving in the same direction. By thinking outside the box and taking advantage of cutting edge technology we can speed into the lead and give the people what they want. We can build an organization that can succeed and enjoy the benefits of being the first region with Twelve Ways Transport. This is one of those issues that is much less expensive to handle before there is a big mess to clean up. Lets get rid of the traffic and all the time we are wasting sitting in our cars. Lets bring clean, renewable energy transport that is quiet and fast before there is an emergency. Lets imagine we are fifty years in the future and looking back on this moment. What would we do then? Lets do it right and have everybody win. Lets get the air out of the way, move smart, and deliver the future ahead of schedule and under budgets. Together, we will create Twelve Ways Transport, starting now. Where do you want to go tomorrow? Twelve Ways Transport and the Port of Seattle The Port of Seattle will not meet its long term goals of doubling container traffic. Numbers are going the other way. There are more efficient routes and, even when we subsidize our inefficient route, we cannot compete with faster and easier, and at terminal 46 with the inefficient truck

3 cont.

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	transfer to train, the customers will use other routes. It is unsustainable and takes up some big space at the narrow waist of the Emerald City. So we do what we do in Seattle, and we innovate. The Port of Seattle has recently joined forces with the Port of Tacoma, and this should help, but relying on global shipments passing through our Port means we are just vulnerable to the challenges like we face today, when the shippers use another route or maybe ship no more. So we start with terminal 46 and create a Port for our regional business. It will be dedicated to bringing goods from the Puget Sound and nearby communities, to our friends to the North, and all the coastal communities. We do not abandon global trade, but we demonstrate the importance of local economy by having one section of the port set aside just for that. This new terminal can start small, using only 1/3 of the footprint of terminal 46, and leave the rest to carry on the movement of containers, with a focus on local traffic with actual local destinations, and in turn, send containers out to the local communities. On this first third, the Southern part, we will move tube train modules, the containers of the future. They will travel in tubes, all over the region and under the Puget Sound, at up to 700 mph. The tethered underwater tube trains will have direct routes to and from Seattle, starting with Tacoma, Everett, Olympia, Bremerton, Bainbridge, Vashon, Bellingham, Port Townsend, Port Angeles, Victoria, Vancouver, and the San Juan Islands. The tubes will also carry people, with this new Terminal moving as many passengers as the Ferry Terminal and as much cargo as all of terminal 46 moved in a year, and with all local cargo, either originating local or with local destinations. The Terminal is perfectly situated in walking distance of the Stadium district, which will be reached on beautiful glass walkways that also lead into the city and connecting to all forms of transport. These covered glass walkways are expanded in all directions possible and bigger than needed just to get people around. They hold a new kind of market. It can be filled with food carts and market carts, all protected by a glass atrium with an open feel. It is a new type of modular market with all the carts, trucks and trailers on wheels, and the ones with cooking exhaust will park under chimneys that carry away the smoke. It ties into the new parking garage, with a park carried on the top deck and perimeter so that the garage disappears. The best skate park in the world is integrated into the perimeter of the garage, and the skaters can use the elevator to get to the top and get a free ride down. The parks all include tube delivery systems from the food vendor sites to the stadium, ballpark and arena seats or sections, so that once the stadium fills up the vendors who have food can keep selling and delivering. This new second deck park and pedestrian corridor ties into the new park planned along Alaskan Way and fits into the plan to double the capacity to hold parades. It is the final route before the parade goes into a stadium, and we can build it to hold an extra few hundred thousand with all the carts and mobile planters moved away. The parking garages will hold parade watchers as well, and the route may go through the arena, ballpark and stadium. No food carts on parade	**3 cont.**

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	days, but with lots of room and extra weight capacity for the foot traffic for the parade. If we need more space and do not want to use the rest of Terminal 46, then the new transportation hub can be mostly underwater in the middle of Elliott Bay. The Island at the surface may float. It will be a hotel and event center with secure docking and port facilities for up to twelve cruise ships in the largest modular format for big events such at the Olympics when the island is expanded with floating villages. The villages are barges that are fully self contained, and designed to host each countries athletes. After the event and between future events the floating villages will be distributed about the area to draw and serve tourists who saw these facilities during the Olympics and the associated behind the scenes documentaries or reality TV. We have to make the Scandinavian village fit the locks so they can reach Ballard and a few others for Rainier Beach, Kenmore and Kirkland. The ones for Gig Harbor, Poulsbo and such could be larger, and the Port Townsend one should be styled after an old wooden boat. They will be of varied but practical designs for the NW weather and might have corporate sponsors and celebrity architects. I would want them to fit their setting, but you could get Weird for Portland and Modern for Vancouver BC. The barges are designed to fit together perfectly, and are surrounded by a floating dock shaped like a twelve pointed star. Here are the docking berths for the tail ends of the cruise ships. There is a high ramp at each berth that allows pedestrians to bypass the island crowds and head directly to Transportation tubes and the event sites. An arching clear tube might travel high over the water to lead into the city as well. It would need to be quite beautiful, and may be an actual piece of art made by Chihuly. With the barges all removed the Island will remain. It will be smaller, but could still serve as a cruise ship Port handling the largest ships and their cargo and passenger movement with ease. The exterior of the underwater structure and all the tethered tubes can be artificial reefs to improve the sea life and produce food. Even a simple wall of barnacles and mussels would help clean the water. An open bay aquarium, like the excellent Washington Park Arboretum, could display the wonders of Puget Sound to scuba divers and a glass ball submarine/roller coaster like amusement ride could circle the perimeter. Put that on your bucket list. The underwater structure will be positioned out of the way of Ferry and shipping traffic. It will be connected to the city through dozens of underwater tubes that allow travelers to get close to their final destinations. Alternatively, they can travel by foot, bike, Segway or scooter to all of the connected areas of Seattle, or get into a rented electric car and travel the Electric Autobahn anywhere in the West. The cars, bikes and Segways will be parked automatically, and locally in small numbers only. This will speed supply for walk up customers. The bulk of the parking will also be underwater, with tubes connecting the dark, tight caverns to all parts of the city. The powered units will park themselves and charge up. The bikes may fold, like droids, and are sent down tubes toward storage. They will be dispensed, like Pez or Mentos, with the delivery tube always loaded. The bikes will be better than we are used to, will never need repair and, the best part, are always	**3 cont.**

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	right there when you want one. Having your own is no advantage at all, but will be accommodated with parking available. The tethered underwater tube trains (TUTT) will bring about seventeen connections to a hub that will then have connections to around 16 places in Seattle proper as well as at least 36 connections to the surrounding communities. The next lower level is for departures with the same pattern of destinations. The train just drops to the lower tube and return trip. Each destination has two stacked tubes with arrivals in the Tacoma station on the lower deck and departures to Seattle on the upper deck. At each station the upper deck will offer access to twelve way transport travel options as well as integrating into all other options. In Seattle and other major hub stations the tubes will create acreage of parks on the top surface, with much of that covered for year round comfort. The overall effect will to be creating a grand new entrance to the City. Also note that each Tutt will connect to a Hub at the other end. That Hub will connect into existing systems and the Twelve Ways Transport for that area. For example, the Bremerton Tutt Hub will connect all of the Kitsap Peninsula to Seattle and thus the entire region. All people and cargo will be able to travel with this system, and do so inexpensively and very quickly. An emphasis on locally produced products and reusable packaging will reduce the carbon footprint further and will be designed to create job security and food security. From the Seattle Hub you can get to almost anywhere easily, and under cover. You can do it on a bike or Segway, or you can just walk if it is close. You can get in to a fast tube and scoot quickly to the University or walking distance to your actual destination. You can get into a car and drive to a destination where you get out of the car and leave it. Your carry-on has what you need, and even that can follow you, like a puppy dog. Or you might send it ahead and have it waiting at your office or hotel room. The entire Twelve Ways Transport has an automated package handling system that can take your “luggage” and give it back to you anywhere on the system, or you can send it to hold close to where you are going. Let’s now picture the station. I will invoke Harry Potter with the visual image of the Flue network where it arrived at the Ministry of Magic. It is a manifold with multiple tubes meeting at the station. Everybody has a seat or waits for the next one. There is no standing on the tube train. Your ticket is checked at the seat. There is a visual reader that scans one side of your Token. It is a beautiful fractal mandala that notes the specific token and debits the cost for the trip from the token. The tokens will have your numbers as well, and will be pretty enough to wear as jewelry. Sized between a dime and a poker chip, you will be able to customize and upgrade your tokens. Also note that the tethered underwater tube train is built strong and mostly out of harm’s way from a Tsunami. Where it meets the shore will be the vulnerable points, and these will be hardened. The modules will act as escape pods in underwater emergencies, and will reach the surface and act as life boats. It is possible that automated seaweed farms could be cultivated and utilities and transport could be provided to fish and shellfish farms.	**3 cont.**

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	A few more things on the new Stadium Market Square. This is the glass second deck connecting the new transportation hub at the Southern third of Terminal 46, or just South of the Ferries, to the Stadium district and the city. This market is a new type with modular market booths that can travel on the tube trains. They roll out onto the main market square, or are tugged by a Segway and take up a reserved space. The modules have the products all arranged for sale upon arrival. The Stadium Market Square is part of the Twelve Ways Transport system, and all visitors must be Token holders. You pay for your purchases at the Stadium Market Square with your tokens only, providing an easier time for the market workers, better accounting and excellent money security for the farmers. This market is multipurpose and can shift on some nights. The farmers mostly leave and food carts are joined by the night time crowd. Picture the State Fair at night. The center of the market will include an amphitheater with a stage and dance floor. Again, all this clears out for the parades, where the seating and terracing is all set up to increase the capacity for parades. We will use it every year for the Torchlight parade, and every time one of our teams win a championship. First Avenue north of Century link has too many trees to allow for the second deck to take this route. Maybe we skip that and send the 1st Ave second deck along Alaskan Way. Here we take the expensive, unfunded, waterfront park and help pay for it, while adding one very practical feature. The ground level will now have covered walkways. For the nine months of the year when you do not want to be rained on you can walk under a glass cover. Above, the bikes and other pedestrians will be taking the express lanes, separated from each other and covered as well. It could return to 1st Ave North of Pioneer Square. It will be ironic to knock down one elevated transportation system only to build another, but this will be an abbreviated version with only one deck serving both bicycles and walkers. This elevated path would offer excellent views and safer travel, with good access to Ferries and recreations. A video screen on both sides can make the elevated pathways disappear, replaced by live video of what you would see without it there. This "cloaking" will be available anywhere the system blocks or impairs views. Corporate Partners The funding of Twelve Ways Transport starts with people. People are the first partner in this project. Every other partner in this project is just another way to say people. The US has over 300 million, and two thirds of that is 200 million and our goal. Selling 200 million tokens will result in a $200 billion investment and that will be the target. I propose we match this at least twice with equivalent or greater investment by Corporate Partners and by the Public Sector, represented by the Universities, Colleges and State Governors, with weighted votes based on investment and population. The Public sector will be detailed later. This will focus on the corporate partners. I start with the obvious local choices. The ABCs are Amazon, Boeing and Costco. Amazon is

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	filling up a section of the City and will be a huge customer of our system, while also invited to handle all the transactions. This will start with the 1K Tokens. They can manage the money, which will be saved in Credit Union accounts in each State, with the funds marked by zip code. Those funds will remained untouched until the launch. Corporate partners will be different. They may invest a matching share to what the People invest, and maybe much more. Either way, the eventual profits will be limited to the project wide maximum of 12%. Boeing is the obvious choice to build the system. I will suggest a few requirements to qualify for the opportunity. Boeing must move corporate headquarters back to Seattle, and all design and engineering and one third of all Boeing jobs associated with Twelve Ways Transport will be in Washington State. I considered saying that Boeing had lost its Seattle privileges, and having them move to the Long acres site in Tukwila, but that is just cruel, and we are aligning our efforts and challenging ourselves to work together. Boeing can pick where they want their corporate headquarters, but it is in Washington State where they started. Sorry Chicago. Costco is my current favorite local fortune 500 company. I love to shop there and appreciate how they treat their employees. The Corporate Partners could hold differing shares and a mathematical vote based on investment. This could get complicated and is another thing people with more experience in these kinds of things will need to figure out. Costco is invited, and may represent the brick and mortar retail for Twelve Ways Transport. Balancing out Costco is the corner store, or country store. This is the typically small, locally owned store down the street that often sells gas, beer and lotto tickets. We will partner with these stores as well, and use them to get better food and better deals to everybody. At the same time, we want to improve the profits for the corner store by increasing their sales and supplying new products. The corner store will help balance out huge corporation we are partnering with, and give local owners the chance to serve the neighborhood. We need a package delivery company. UPS started out in Seattle, and I invite them to join the effort. Like Boeing, I require a return home to be a corporate partner. You know you want to. We all love the drivers, and it seems UPS loves them too. They know all of our neighborhoods, and it is always exciting to get a package. So please come home, UPS. Harry Casey would be pleased with a return to the Northwest. I will call Oregon close enough. Twelve Ways Transport will change some of the UPS jobs with automated delivery Downtown and in new developments, and eventually in the rural areas. But there will still be a UPS Guy/Gal managing the customer service for these people, and expanding out to other services associated with Twelve Ways Transport including Amazon Fresh and prepared food deliveries, as well as return of standardized containers for all products and packaging. There are other local corporations that are invited. Microsoft is one. Starbucks can be the host at every terminal and Nordstroms could handle customer service or anchor the micro mall at major hubs, together with Costco. Paccar could be considered. Do you think they might want to build 185 mph electric buses? All the Co-ops, with REI, PCC, the PUDs and the largest Credit Union in each state.

3 cont.

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	Weyerhaeuser can be the Real Estate partner and do rural development, and Vulcan can handle urban development. Expeditors International can manage the cargo movement. Could that include the tube trains with people, too? There are some potential conflicts, but I am sure this will work itself out as Twelve Ways Transport takes off. I suggest a target of two thirds of those mentioned, and everyone is invited. Once we expand outside Washington then we have excellent choices for the region. I will say that the Obvious National Choices will rise once we finish with the local corporations, and will include Tesla, Google, Apple, and several more. We want the right fit and the overall fund raising by the combined forces of People, Corporations and the Public Sector to be mapped based on zip codes, and have the routes influenced in the direction of investment while creating the spirit of competition and urgency. I expect that we will get the best corporations for the job, and that those left out will eventually regret declining the opportunity. I further expect for the Twelve Ways Transport to eventually connect the entire West and both American Continents, but first it will be one circular route through the West and a connection to the East. It will then be followed by triple redundancy, with three West to East routes three North and South Routes, with one tethered underwater from Washington State to LA, w/ three stops on the way, and a meeting with the best off shore wind farms. They are out of site off Coos Bay, Oregon. Here the winds are best. The electric power could be carried to shore together with the tethered underwater tube train. The wind farms will also be serviced by the train with a stop at the central floating marina that services the offshore wind farms. We can all agree that we need to do something to fix our infrastructure. By combining multiple systems into one project we take advantage of the combined efficiency and get everybody's efforts moving in the same direction. By thinking outside the box and taking advantage of cutting edge technology we can speed into the lead and give the people what they want. We can build an organization that can succeed and enjoy the benefits of being the first region with Twelve Ways Transport. Twelve Ways Transport Sports Pays it Forward We need a solution to the money of sports. There is an unfairness to the system of High School, College and Professional athletics. There is a lack of freedom and liberty, and a poor distribution of money, power and attention. While we are considering solutions to all the issues at all the levels, let's consider what they have in common and how we can make them all better. With all the sports there is transportation. From little league teams to the college and professional teams there is travel to and from practice, to the home games, and travel to the away games. Also the spectators need to travel to the games. This is where some of the money from sports should go. It will make all kinds and all levels of sports better. It will give the athletes liberty and freedom, and it will give the parents, drivers, student athletes and pros a break that will make each one richer, happier and better. It will give the money making sports a chance to invest in the farm system where the athletes come from. It is time for Sports to pay it forward. No other suggestion will affect all of sports so thoroughly and so fairly. If this new transportation

3 cont.

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	system includes safe human powered transport then the athletes will have the option of working out on the way to and from practice. If it includes some easy and fast powered transport then the athletes, coaches, fans and staff can get to the home and away games with little effort and energy. If it includes some high speed regional transport then the college and pro teams will be able to travel more comfortably, save time for study and practice, and make a stress free trip without a pressurized climb to over 30,000 feet. The Athletes will be for this. Most of us have no idea what it is like to fly the miles and stay away from home like the Pros do. Again, it is less so for the Football players with so few road games. I say anyone who went to college knows how tough it is to study and learn all by itself. Add in sports and you have added a full time job. At the top levels the travel can be extensive, with the Pac 12 the most extreme example, so let's start there. The initial footprint of the PAC-12 also includes most of the Mountain West and Big Sky Conferences. Again, it is the West were we are starting. But who will pay for it? The huge TV revenue is the big money maker, with billionaire owners and well-endowed institutions battling the athletes themselves for the paychecks, all of which comes from the consumers who watch the commercials or subscribe to the service. The Universities are the obvious partners. They benefit many times more than the pros, with all the students having access to the new transport system. We should start there. The Pros will pay, or really the fans will pay, because it is our attention on television and radio that drives the dollars. It is our attention, and our money. So the pros will pay, or we will tax the teams and the players, or we will start new leagues that partner with the players and cut out the selfish owners who resist what is best for all. I think it will all fall into place once we get started, and the Athletes will help lead this effort. The biggest benefit may be local human powered transport. The kids who play soccer will be able to safely get to practice, school and everywhere else with a bike and a little time. It will free up capacity for business purposes and emergency services and reduce the need for further expense on expanding existing systems. It is a concept of mostly separating the human powered transport from the cars, buses and trucks, making it safer and freeing up capacity. On a local level Twelve Ways Transport is simply creating several alternative transportation options that do not conflict with and totally integrate into existing freeways, buses, trains and planes. Except, the new system is built to withstand nearly all catastrophes, carries a new, hardened, regional power grid, data and drinking water distribution. It is an investment in the future that will really pay back when we need it. It is like insurance, but rather than pay out cash after a loss it will serve our needs in the midst of a catastrophe, preventing a worse catastrophe. It is like an airbag in your car instead of life insurance, but without all that bruising. Sports has brought many great moments, memories and epic ages. We look fondly on our favorite memories, teams and eras. This will be the best era yet. We will all, together, be responsible for the greatest step forward in recent history. It will be a contagious spirit that will lead to unbelievable cooperation for the good of mankind and our planet, and it will start with sports. We may cheer for our teams and against the competition, but under it all we will know	**3 cont.**

#	Comment
	we are on the same team, and that team will be a winning team. Sports will pay it forward, leading the way into the future with the transportation system of the future delivered ahead of schedule and under budget. It will be combined with a solution for the Student athletes and amateur sports in general, with all the athletes at all levels benefiting from the revenue sports that we pay to see. Sports will lead, and we can join and follow as our Universities and Colleges help design, fund and finance the Twelve Ways Transport together with the states, corporate partners and all the citizens. It will be a project we can all be proud of. One final point. If we improve travel for all the athletes at every High School and College, it will make travel better for all the students. It will make travel better for everyone near any of these schools, and it will save lives, run entirely on renewable energy, survive any catastrophe and make the future better for everyone.

3 cont.

May 31, 2015

City of Seattle Dept. of Planning and Development
Attn: Gordon Clowers
700 - 5th Avenue, Suite 2000
PO Box 34019
Seattle, Washington 98124

1 Regarding: Input to Seattle Draft EIS. Due June 18, 2015

★ TAKE 22ND AVE NE (NE 45TH ST - NE 54th ST) OUT OF THE HIGH DENSITY URBAN CENTER MAP FOR THE SEATTLE UNIVERSITY DISTRICT (RAVENNA).
- This steep, springs-soaked bluff is not suited for HIGH DENSITY, UNLIMITED APOD construction.

2 - KEEP THE EXISTING TREE CANOPY.

3 STRICTLY LIMIT THE NUMBER OF APODS ON 22 AVE NE.
22nd Ave NE has already reached its APOD LIMIT OF ONE, BUILT IN 2014. (MAY 2015 ① APOD PROPOSAL 22ND AVE NE #3017285 ② APOD PROPOSAL RAVENNA AVE NE #3018644).
- The impact of ONE APOD on the parking (both open and RPZ) is felt all the way down this four, "long-block" street and onto the 3½ "long-blocks" of Ravenna Ave. NE. (NE 54th - NE 47th St). Seattle Park Ravenna Woods (NE 46th - 47th St on Ravenna Ave NE) SHOULD BE ON YOUR MAP.
- You will be displacing existing longterm owners and renters (from NE 50th - NE 54th street: half of 22nd Ave NE), destabilising the social diversity of 22nd Ave NE.
- What will happen if UNLIMITED APOD construction is allowed on 22nd Ave NE and Ravenna Ave NE, over the next 5 years?

Julie Johnson

Julie Johnson
5026 - 22nd Ave NE #2
Seattle, Wash. 98105

#	Comment	
216	Please include more emphasis on the public asset of trees and open space in the City. As the City grows and becomes more dense, these resources will be all the more important for preserving the best of our beautiful City. Listen to the Seattle Urban Forestry Commission please.	1
217	I hope this email works since the one in your document does not. --- From: Norma Jones [mailto:nandmjones@comcast.net] Sent: Friday, June 12, 2015 2:17 PM To: '2305@seattle.gov' Subject: Draft EIS Comment We would like to comment of the Seattle 2035 Draft EIS. Our comments are focused on all of Seattle and the Fremont neighborhood in particular.	1
	There needs to be a link between infrastructure and growth, with particular attention to transportation. The current system is not working-in particular new construction that has no parking requirements. People want to get out of their cars but there is no transportation solution to serve them. Current transportation infrastructure is not meeting demand-let alone future increased demand. The City needs a comprehensive plan-or they need to slow down growth until the infrastructure catches up.	
	Parks and open space need to be addressed with the addition of density. We need community centers in neighborhoods where there are urban villages and other density intensive zones. There is no community center in Fremont.	2
	Our comments on the four alternatives presented are:	
	Alternative four is unacceptable because there are no new light rail stations or transit capacity increases for Fremont. This alternative envisions 1,300 additional units with no increased transit capacity. This alternative is completely unacceptable.	3
	Alternative one adds 900 units, but is just a status quo plan that does not adjust for new planned rail capacity in other areas of the city. This alternative is unacceptable.	
	Alternatives two and three, while driving fewer units to Fremont, still does not adequately address transit problems as noted above.	
	Fremont car, transit, bike and pedestrian traffic capacity is further constrained due to the Fremont draw bridge-a situation most other neighborhoods do not experience.	4
	Taxpayers have mad an investment in rail and we should adjust our growth patterns to reflect that.	
	This draft EIS need considerable change and improvement to address concerns as mentioned above. Thank you for consideration of our comments.	5

#	Comment	
	Norma and Mike Jones 4122 Evanston Ave. N. Seattle, WA 98103 nandmjones@comcast.net	
218	The City should give consideration of how to amend its building code so as to encourage building owners to use flat rooftops for decks and gardens. Nothing is more unsightly than a boxy elevator and hvac equipment shed on top of a flat roof. Technologies are changing that allow shrinkage and consolidation of rooftop equipment. Let a building owner build some additional usable space on their rooftops, even if a non-conforming use, in exchange for putting up some decking and planting beds. Doing this would help with urban summer heat absorption, reduce glare, improve views and have positive climate impacts.	**1**
219	The expansion of the residential urban villages is not clearly spelled out in terms of exact boundaries. Is this intentional? I live near an existing residential urban village that would be expanded under Alternative 4 but I cannot tell if my home would be part of the expansion or just outside. It would be helpful to know if indeed the boundaries are defined.	**1**
220	Gordon. As an activist in the 1980 - l 990's I worked for Balanced and "Comprehensive" Urban Planning. As Seattle AIA Regional Design Chair, and AIA Liason to Gov. Gardners "Growth Strategies Commission" I also was the Planning Principal for 3 of Seattle Neighborhood Plans (Green Lake, Greenwood/Phinney Ridge, Ballard). My reading of Seattle 2035 Comp Plan Policies is that with the new - we are not explicitly and adequately protecting our key historic resources. this can be done with quality design adaptations, but too often it is happening through the erasure of quality architecture. Please register my concern. I support the Allied Arts+ Historic Seattle Comments of June 18, 2015 (attached)	**1**
221	Hi: I read through the whole DEIS. I'd like to know for each area considered within any option, the following: Mitigation required Cost or required mitigation steps Where cost or actions are too high to be realistic Benefit in increased jobs and housing once mitigation steps are taken Then how much 'gentle' growth and improvements can be expected for existing folks first, and new residents and jobs second. I think we are owed return on our tax investments in the form of healthy communities for all people.	**1** **2**

#	Comment	
	All of the information is in the DEIS, it is just not organized in the above summary fashion. My bottom line requirement in all of this is to stop displacement and to have the right kind of jobs FOR existing residents and better educational opportunities especially as we seek to dense up in historically under served and stressed areas of the city. It needs to be planned and action taken to finance, not as hoped for grants. I think assuming neighborhood grants competitions to pay for what needs to be guaranteed preconditions for setting the table for growth is unfair. It's especially unfair in communities where people might lack the resources or resilience to spend the time to work that system. We need to make commitments backed up with real dollars. We are passing huge levies in the past few years to do that, so the resources need to be fairly allocated -- and fairly doesn't mean equally dividing up the pie but focusing it through an equity lens Then that creates great places where they can stay and work, and welcome new people. Also, I think more action needs to be taken to support better tree canopy and less water runoff and risk of landslides. Finally, one of the best mitigations is an active queue that is managed (and groomed in LEAN backlog parlance), measured and reported transparently. Thank you for all of the information collected!	**3** **4** **5** **6**
222	For options 3 and 4 to work, safe and secure access to the light rail is needed. Currently in the south Seattle neighborhoods, with no park and rides and no shuttles from neighborhoods to light rail, access is possible but is neither safe nor secure. The city cannot expect residents, particularly senior citizens, women and children, to walk or bike to light rail stations without significant risk to personal safety and personal property. This is particularly true in darkness which constitutes a substantial part of the commuting year. I would love to be able to use light rail living as close as I do, but the entire south end of the city would require improvements and investment in public safety before this could be my reality. Not only is light rail traffic impacted by the public safety issues in our area, but bus transit is problematic as well. The primary bus hub is on a crime ridden street/corner (Rainier/Henderson). We drive that street and obtain our prescriptions and other drug store products at the Rite Aid there. We have personally witnessed numerous incidents in the area and when not witnessed, hear about them though the news or next-door.com or by hearing the gunshots in the neighborhood. Our neighbors use the 7 bus, but there are continually stories of incidents and uncomfortable situations on that bus. As a result, I'm not comfortable riding that bus either and certainly would not want to take my grandchildren on the bus. I have seen improvements and positive transformation in this neighborhood in the 12 years I've lived here. It is inherently a wonderful neighborhood with access to beaches, parks and biking and walking trails. It is sad to me that these south end neighborhoods cannot offer the safety and security that would allow these wonderful older neighborhoods to achieve their full potential.	**1**

#	Comment	
	We need city investment in a modern, secure (security personnel on duty 24/7) transit hub (think Renton/Federal Way) preferably closer to the light rail to mitigate the risk of walking when connecting via bus. I believe we have always needed and still need secure (security personnel on duty 24/7) park and rides near the light rail stations with bike parking areas that would accommodate more than a handful of bikes provided by the current lockers. If Option 3 or 4 are to succeed, these issues need to be acknowledged, better understood and addressed. Thank you for your consideration, Debi Kelley	**1 cont.**
223	Dear planning staff, Please accept these comments and suggestions on the 2035 comprehensive plan EIS. 1. The definition of what qualifies as open space or green space is too broad. There needs to be a standard for natural areas which does not include other things such as athletic fields. The new papal encyclical describes the need well: " Neighborhoods, even those recently built, are congested, chaotic, and lacking in sufficient green space. We were not meant to be inundated by cement, asphalt, glass, and metal and deprived of contact with nature." 2. There needs to be more green space and natural area by all measures. 3. The plans seem to manipulate and gerrymander the definitions and layout of areas so as to include pre-existing park land in the concentrated development areas and have them count as fulfilling targets for open space. That really doesn't meet the new demand and will tend to overburden and diminish quality of existing spaces. The need should be addressed by adding new green space. 4. I agree with and support the comments sent to you by the Seattle Urban Forestry Commission in a letter dated June 10. That is available on line at: http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/ADOPTEDCompPlandraftEISLetter.pdf 5. I urge you to include and adopt a 40% tree canopy cover goal as an achievable target. 6. Revisions to the environmentally critical areas still seems to be under review and outcome of the open house and other processes in the winter have not yet been disclosed. At time of the open house there were some significant flaws and omissions. That lack prevents full understanding of the comprehensive plan changes would be needed to allow fully informed comment. Hopefully, Tom Kelly	**1** **2** **3**

#	Comment	
	6053 53rd Ave. NE Seattle, WA	
224	In 2035, please consistently enforce all laws/regulations/codes and retain only those that will be. Thank you!	1
225	I commend your work on the Seattle 2035 "Open House" site, this is great community engagement.	1
	The elephant in the room--and an analysis as a resident I would love to see--is each plan seeming to leave 65% of Seattle zoned single family 5000SF in place. My sense is that no similar city has ever achieved affordability goals with this sort of zoning--unless, perhaps, designated areas were significantly up zoned (so, say, urban villages became 6- or 8- story areas, a more Vancouver-like feel).	2
	I appreciate this work but my gut is that each plan is overly optimistic and begging the question of truly accommodating 120k more people in an equitable, efficient, environmentally friendly way.	3
226	I commend the commitment to providing Seattle residents an opportunity to comment on alternative directions for the draft EIS. Among the alternatives presented, I am writing to express my support for Alternative Four. I also wish to express my opposition to Alternative Two.	1
	Specifically in matters of housing affordability and race and social equity, I urge the Department of Planning and Urban Development (DPD) to take the following into account in its analysis of alternatives, briefings to policy makers, and documents prepared for the purpose of public engagement: - The two most expensive forms of urban housing are detached, single-family homes on large lots and high-rise units, respectively. Any consideration of future affordability and displacement of low-income people must take into account not only the risk of gentrification in specific areas targeted for growth (as done with regard to Alternative Four) but also in aggregate. Alternative Two would put Seattle on a path to be largely bifurcated between the two most expensive forms of housing--surely with negative effects on affordability and displacement.	2
	- Many forms of housing are both more affordable and offer opportunities for home ownership and economic opportunity: town homes, row houses, and small apartment buildings are an example. These offer opportunities for courtyard development--and perhaps multi-generational or extended family arrangements; 2-4 unit small apartments in which the owners subsidize the cost of buying by acting as owner-resident landlords; and row houses with basement apartments to the same end.	3
	To be frank the elephant in the room seems to me that there is a vocal lobby of single family home owners who would prefer their neighborhoods never change. Catering to this preference	4

#	Comment	
	is both bad policy and unfair to current residents struggling with affordability and opportunity for future residents. The best strategy for growth in Seattle is to broaden the target areas for growth and by extension the variety of housing forms in the city: Alternative Four. Best regards, Bryan Kirschner Happy Seattle homeowner of an infill house on a small lot 1608 N 49th St Seattle WA 98103 206-295-5880	**4 cont.**
227	I join with Allied Arts of Seattle, Historic Seattle and other preservation advocates to urge the City to also ensure preservation and plays a vital role in shaping the City's future growth in Seattle 2035 Comp Plan updates. Please see comments below. The Draft EIS proposal states "All Comprehensive Plan elements will be reviewed and updated as part of the proposal." The draft does not address Economic Development, Neighborhood Planning, Cultural Resource, and Urban Design. The current plan includes preservation under the "Cultural Resource" element (CR11-CR16). The new Comp Plan replaces "Cultural Resource" with an“Arts & Culture” element focusing on art (public art, cultural space, arts education, creative economy and creative placemaking) yet seems to eliminate historic preservation and protection of cultural resources.	**1**
	How will preservation be included in the future Comp Plan? How are the city's existing preservation policies and regulations also being addressed?	**2**
	The "Environment" element addresses environmental stewardship, one of the plan's core values is primarily defined within the context of the natural environment (air, land, and water resources) and not built environment. The analysis should also address the role of preservation vs demolition in terms of environmental stewardship.	**3**
	Prioritizing and preserving Historic Places including Seattle's arts and cultural experiences is important to community diversity and character, economic vitality, and environmental stewardship. Preservation and creative adaptive reuse of our existing building stock cuts across all four core values of the Comp Plan: o Preservation enhances community vibrancy and cultural identity o Preservation is an economic	**4**

#	Comment	
	driver. o Preservation conserves resources. o Preservation contributes to social equity.	**4 cont.**
	Additionally, the character of a neighborhood, historic district, or individual building is important to community members and should be recognized in any plan to move forward. Older buildings are significant components of neighborhoods and urban villages and community resources in our stewardship. The plan should encourage that some of the buildings which add character to a place are preserved in addition to buildings that receive historic designation status. Character buildings represent a community's history and shape our collective sense of place by virtue of our past. The plan, as proposed, fundamentally encourages that in areas targeted for growth (e.g. urban villages), almost all the buildings will be replaced with new ones (except for the very small % of buildings that are explicitly protected.). Urban villages need a mix of old and new, yet the plan encourages the 21st century version of "urban removal" in our urban villages.	**5**
	The plan must recognize and create incentives to preserve older buildings as 1) they are fundamental and necessary to preserve our City's history, livability, and desirability; 2) they generate successful minority and women business opportunities, 3) they exist in and define the fabric of our homes, urban centers, and residential urban villages; 4) buildings that have already been built are actually greener per square foot than any new building generated from new materials; 5) they are the heartbeat of Seattle that citizens, tourists, and businesses love.	**6**
	The Plan does not appear to prioritize the significance of the City's tree canopy, an environmental and community resource. In 2000 the City of Seattle encouraged a Millennium Tree Planting Program and gave free trees to its citizens. Mature trees being felled will take generations to grow back, creating a warmer micro-climate and defacing our neighborhoods and urban centers.	**7**
	Street setbacks are also important as an element of a neighborhood's character and walk-ability, as essential elements of design in older neighborhoods and should be preserved. Thank you for your consideration. Andrew Kirsh	**8**
228	Unfortunately, there is really no explanation of what the goals of Alternative 1 are; mainly, it says "continuing what the current plan is". As much as I am for Alternatives 3 and 4, if what Alternative 1 describes is true in that disperses growth to have less impact on marginalized populations, then I think that is the way to go. Frankly, it's a real quandary: TOD's make SO MUCH sense but they will happen in some of the last affordable in-city areas thereby slowly pushing affordability out the window. As a lifelong Seattle resident, I want Seattle to continue to be a city for all - but I also know this is a real struggle for Seattle and many other cities. I am not against growth but growth needs to be smart and inclusive to all populations. No doubt, this city will continue to become more expensive. Begin making developers pay a larger portion of	**1**

#	Comment	
	infrastructure upgrades/displacement costs. Please look at other successful, livable and affordable cities around the world for inspiration (Barcelona). Lose the required parking space requirement for DDU's at single family residences, like Portland.	**1 cont.**
229	I don't care who's view of industrial neighborhoods are blocked; we need to build up not out..... I am a delivery driver and can't find parking to deliver and pickup businesses bank, mail, and supplies. What is REALLY pissing me off is trying to get around a vehicle on the freeway or in downtown and when I pull up to it I see a exempt plate and they're on the phone or texting. To me the word WORK means to actually move enough to sweat not just stand around and bullshit like state and county workers do. Everyone knows to population is going up so WHY haven't we been expanding to roads and streets. If its against the law for trees and evasive poisonous plants to be so close to the road; why is it not enforced instead of planting more trees for trucks and buses to hit daily? then every winter you plead with the public to clean out your storm drains. Tell that CORRUPT little bastard at spu waste water management named DAT to do it instead of sending out 3 crews of earth core to pee in our buses.... Iv'e been a DRIVER delivery/courior for over 20 years in the Puget Sound and what Iv'e seen and experienced makes me SICK. I know why people go "postal" get jesse my ass	**1**

Seattle Comprehensive Plan Draft (4 May 2015) Environmental Impact Statement **FREE** REVIEW RESULTS!

Sent 17 June 2015.

1 INTRODUCTION.

The 4 May 2015 Seattle Comprehensive Plan Draft EIS (Environmental Impact Statement) is **insufficient**.

It's conclusions are unfounded and unbounded.

The analysis refrains from expressing the **range** of probable and possible outcomes, and yet generally concludes that the range will be within controlled limits.

The impact analysis falls short of the **intent** of EIS legislation. It is not valid.

The root of the problem can be that the "Plan" being evaluated was **not ready for impact evaluation**. Below can be found a general methodology usable for a more meaningful and useful impact analysis, followed by adjustments that can be made to the plan itself to ready itself for analysis.

2 IMPACT ANALYSIS.

The battery of possibilities can be summarized as 5 possible scenarios:

Scenario 1: Things happen as expected.
Scenario 2: Jobs growth is less than expected... and household growth is less than expected.
Scenario 3: Jobs growth is more than expected... and household growth is less than expected.
Scenario 4: Jobs growth is less than expected... and household growth is more than expected.
Scenario 5: Jobs growth is more than expected... and household growth is more than expected.

(STEP 1)

History provides some data for estimating how far from written expectations the reality will probably / possibly be.

At a **citywide** level, the prior estimate for **household** growth rate in Seattle was off (high) by approximately **90%**.

At a **citywide** level, the prior estimate for **job** growth rate in Seattle was off (high) by approximately **5%**.

At the level of **each urban center/village**, the prior estimate for **household** growth rate was off by varying amounts. These ranged from being ~**100% low** to ~**450% high**.

At the level of **each urban center/village**, the prior estimate for **job** growth rate was off by varying amounts. These ranged from being ~**160%** low to ~**350% high**.

This historic data can be used as a starting point for estimating the reliability of the city's estimates.

(STEP 2)

Since the data sample size is not statistically significant, **sample size adjustment factors (SSF)** can be utilized to improve the chance of bracketing the possible outcomes.

For the **citywide** data, the sample size is very small, there is just 1 city.

2 cont.

Therefore, to attempt to bracket the range of possible outcomes, a sample size adjustment factor (SSFc) of **1.8** can be utilized (and applied symmetrically) for the citywide data.

For the "**each urban center/village**" data, the sample size is larger, but the data points lack the independence from each other needed to meet statistical significance criteria.
Therefore, to attempt to bracket the range of possible outcomes, a sample size adjustment factor (SSFu) of **1.4** can be utilized and applied symmetrically to the "each urban center/village" data.

Since some impacts are citywide effects, and others apply locally, the choice between using the citywide and the "each urban center/village" data depends on the impact being analyzed.

(STEP 3)

The City has described 4 **visions** which it has named
"Alternative 1".
"Alternative 2".
"Alternative 3".
"Alternative 4".

"Alternative 1" is described as a package involving **no change from base policy**, which may or may not result in different results than have been seen from that base policy in recent years.

"Alternative 1" has been labeled "continue current trends", but this seems a **false premise**. No data has been provided to substantiate the premise that the future will resemble the past if only the base policy of the Comprehensive Plan remains the same. There are far too many other factors in play to make that assumption without substantiation. It is notable that the City's "Seattle 2035 Equity Analysis" (5-2015) comes to an opposite conclusion, estimating that the MOST change would occur in the urban centers/villages that have seen the LEAST change in the past.

"Alternative 2" says that it "prioritizes" growth in urban centers. To do so without changing the citywide growth rate would require **equal and opposite forces**, meaning that **stimulus** of growth in urban centers would need to be paired with equal **dampening** of growth elsewhere.
Encouraging more growth to one area can have a dampening effect on other areas, but can also have a stimulating effect.
For example, creation of a job in neighborhood X may
DIScourage the creation of that same job in neighborhood Y,
and/or
ENcourage creation of a complementary job in neighborhood Y.
Such impacts are worthy of coverage in the impact analysis.

"Alternative 3" adds additional locations for "prioritizing" to those of "Alternative 2".

"Alternative 4" adds additional locations for "prioritizing" to those of "Alternative 3".

Each "alternative" would trigger **implementation actions** beyond those of the prior listed "alternative".
These actions add additional uncertainty to the equation for possible outcomes.

Uncertainty factors can by utilized in the equation to account for this.

(STEP 4)

For the additional uncertainty of "Alternative 2" beyond that of "Alternative 1", an uncertainty factor ("UF2") of **1.1** can by utilized.

For the additional uncertainty of "Alternative 3" beyond that of "Alternative 2", an uncertainty factor ("UF2") of **1.2** can by utilized.

2 cont.

For the additional uncertainty of "Alternative 4" beyond that of "Alternative 3", an uncertainty factor ("UF2") of **1.2** can by utilized.

NOTE: "UF1" would be **1.0** by definition.

It has been observed that the only implementing actions mentioned in the EIS are ones to INCREASE development. For example, relaxed requirements and increased incentives are mentioned by the EIS as methods to "prioritize" housing.
(NOTE: "relaxed requirements" is referred to as "increased flexibility" by the EIS.)
Since the EIS does not list equal and opposite actions, it can be estimated that **greater weight will given to stimulus than dampening**.
Given this, and since, historically, city implementation actions have resulted in more growth stimulus than dampening, each UF can be applied **asymmetrically**. For example:

"UF2" would be
1.2 in the stimulus direction,
1.0 in the dampening direction.
"UF3" would be
1.4 in the stimulus direction,
1.0 in the dampening direction.
"UF4" would be
1.4 in the stimulus direction,
1.0 in the dampening direction.

Here then are the numbers to be utilized for the 5 scenarios:

	Citywide Jobs Low	Citywide Jobs Estimate	Citywide Jobs High
Historic (Hst):	5 % over		5 % over
SSFc	1.8		1.8
UF2	1.0		1.2
UF3	1.0		1.4
UF4	1.0		1.4
(Hst)x(SSFc) =	0 %		9 % over
(Hst)x(SSFc)x(UF2) =	0 %		11 % over
(Hst)x(SSFc)x(UF2)x(UF3) =	0 %		15 % over
(Hst)x(SSFc)x(UF2)x(UF3)x(UF4) =	0 %		21 % over

	Citywide Housing Low	Citywide Housing Est.	Citywide Housing High
Historic (Hst):	90 % over		90 % over
SSFc	1.8		1.8
UF2	1.0		1.2
UF3	1.0		1.4
UF4	1.0		1.4
(Hst)x(SSFc) =	20 % over		**160** % over
(Hst)x(SSFc)x(UF2) =	20 % over		**190** % over
(Hst)x(SSFc)x(UF2)x(UF3) =	20 % over		**270** % over
(Hst)x(SSFc)x(UF2)x(UF3)x(UF4) =	20 % over		**380** % over

	UrbanC/V Jobs Low	UrbanC/V Jobs Estimate	UrbanC/V Jobs High
Historic (Hst):	160 % under		350 % over
SSFc	1.4		1.4
UF2	1.0		1.2
UF3	1.0		1.4
UF4	1.0		1.4

2 cont.

(Hst)x(SSFc) =	220 % under	490 % over
(Hst)x(SSFc)x(UF2) =	220 % under	580 % over
(Hst)x(SSFc)x(UF2)x(UF3) =	220 % under	820 % over
(Hst)x(SSFc)x(UF2)x(UF3)x(UF4) =	220 % under	1150 % over

	UrbanC/V Housing Low	UrbanC/V Housing Est.	UrbanC/V Housing High
Historic (Hst):	100 % under		450 % over
SSFc	1.4		1.4
UF2	1.0		1.2
UF3	1.0		1.4
UF4	1.0		1.4
(Hst)x(SSFc) =	140 % under		630 % over
(Hst)x(SSFc)x(UF2) =	140 % under		750 % over
(Hst)x(SSFc)x(UF2)x(UF3) =	140 % under		1060 % over
(Hst)x(SSFc)x(UF2)x(UF3)x(UF4) =	140 % under		1480 % over

Example: See the **bolded** numbers in the 2nd table. These mean that when analyzing a citywide impact, the city should consider the possibility of the citywide housing growth rate being 160% above the city's estimate ("Alternative 1"), 190% above the city's estimate ("Alternative 2"), 270% above the city's estimate ("Alternative 3") and 380% above the city's estimate ("Alternative 4").

The tables show that **the EIS assumption** (an assumption that the city's estimated housing and job growth rates will be accurate) **greatly underestimates the range of possible outcomes**, and therefore the range of possible impacts. There is a radical difference between an outcome that matches the expectation by 100% and one that overshoots it by 380% and goes unresolved for the duration of the period.

Since the above values are RATES of growth rather than total growth, **monitoring** of the rates **and taking action** to address them during implementation of the plan can, hypothetically, limit the impacts.
Please continue reading to see if this can be more than hypothetical.

3

THE MISSING ELEMENT.

The City has expressed an intention to include only these "elements" in the Comprehensive Plan:

1. Urban Village.
2. Land Use.
3. Transportation.
4. Housing.
5. Capital Facilities.
6. Utilities.
7. Economic Development.
8. Neighborhood Planning.
9. Human Development.
10. Cultural Resource.
11. Environment.
12. Container Port.
13. Urban Design.

The Comprehensive Plan lacks an essential element for good, reliable operation of the plan.
It lacks a definition of how the plan will be **administered**, and provides **no role for the public** in its administration.
"**Engagement**" should be added to the list of "Elements".
Lack of engagement as an "element" means a wider range of possible outcomes, as the plan does not commit to a process that keeps moderating forces from being marginalized.

3 cont. For proper **risk management**, it is a necessity that the Comprehensive Plan include a comprehensive accountability process, with safeguards to assure that diverse opinions will have a place in the city's most widely impacting policy during its application.

The adoption of any plan that lacks elements to prevent disenfranchisement of citizens (from a 'vote' in the steps which connect plan to results) means that any associated impact analysis is an accomplice in that disenfranchisement, and is of dubious reliability, as it has been based on a plan that is **unreliable**.

Inclusion of an "Engagement" element and an accountability process would allow the credible utilization of smaller "UNCERTAINTY FACTORS" in the impact analysis math, resulting in a narrower range of probable and possible outcomes, both in the analysis and in reality.

4 EQUITABLE AFFLUENCE THROUGH MODERATION.

The lack of an accountability process and inclusive engagement in the application of the Comprehensive Plan means that the plan contributes to an **elevated level of uncertainty** in Seattle's investment climate. This uncertainty contributes to an increased likelihood of **boom** or **bust** periods.

During both boom and bust periods, those with the least in financial reserves to weather the storm are those who suffer most.

During both boom and bust periods, those with the least margin for uncertainty must utilize various methods of insurance and contingency which make their operations less efficient relative to the competition.

During times of uncertainty, those with the greatest uncertainty burden are those with the least access to, for example, the government employees who are administering destabilizing or stabilizing policies, and again, without inclusive engagement accountability processes, those with the most wealth tend to have the most access and therefore weather the storm best.

Boom and bust periods also result in less total value creation than periods of consistent progress, due to the inefficiency of, for example, retraining employees a while after laying off trained ones.

Boom and bust periods also result in larger negative impacts than a steady course.

In other words, lack of inclusive engagement accountability processes leads to **greater inequity**, **less overall benefit** and **larger negative impacts**.

The EIS has assumed a linear path from 2015 to 2035, but the plan as currently written, can result in a boom and bust path, which would have larger negative impacts than the assumed linear path would.
The EIS assumption seems unfounded, and unjustified by history, and leads it to invalid conclusions.

5 DESIGN FOR SUCCESS.

The plan, as written, without an element of inclusive engagement, is **likely to induce policies contrary to the plan**, such as inducing growth that violates the basic assumptions of the plan and distributing infrastructure investment according to political power rather than according to filling the gap between current infrastructure and current/future need.

As a tool for planning investments, it would seem logical for **gap assessments** to be a core feature of the plan. Transportation gaps assessments, land use (facilities) gaps assessments, and health/safety gaps assessments, for example, would all make sense for informing what the plan should accomplish.

5 cont.

That said, **the gaps assessment most missing** is the one for engagement. It is almost universally agreed that there is a chasm between what people expect (and can be achieved) in regards to engagement and what has been achieved. *Closing* this gap, a root cause for all other gaps, can have wide ranging benefits, including a more active and educated population passing on those benefits to subsequent generations.

Codifying engagement processes in the comprehensive plan can bring durability to the plan and bring greater accuracy to the EIS analysis of that plan.

Assuming that city processes outside of the plan will suffice has not proven true in history.

In 2004, the City Council UNANIMOUSLY passed **Resolution 30728**, which states that neighborhood plans would be reviewed if growth patterns were significantly different from those forecast in the Comprehensive Plan... and yet, those reviews did not occur.

In 2013, the City Council UNANIMOUSLY passed **Resolution 31418**, which states that neighborhood plan reviews would be prioritized according to how poorly they have tracked the estimates of the Comprehensive Plan... and yet, this is not what has occurred.

In recent years, land use regulations have been revised such that residential growth targets have been wildly exceeded, while **impact fees** that might bring that growth more into alignment with the Comprehensive Plan (while also resulting in a fairer distribution of infrastructure costs) have been blocked.

Though the EIS says: "The City has adopted development regulations that implement the plan", in actuality, the city has adopted policies which have ignored the goals of the plan, surging residential growth beyond plan targets while not **leveraging** that growth for corresponding infrastructure.

Any "mitigation" strategies, including those mentioned in the EIS, are merely hypothetical if funding has not been provided for their implementation. The mitigation action called for in resolution 30728 (mentioned above), for example, did not get its implementation funded.

The EIS assumes the availability of mitigation strategies even though the Comprehensive Plan **designates no funding for their implementation**. The engagement element, key to the creation, adoption and implementation of good mitigation activities, would be more reliable with designated funding.

Effective engagement and accountable processes could happen, in theory, if just left to chance and good intentions, but it is wiser to design for success.

6

SUSTAINABILITY: SOLAR POWER ON A CLOUDY DAY.

In order to "leverage growth to create housing choices and to promote healthy, complete communities", there needs to be a resolve to require **fees which link** growth to investment in these outcomes.

Application of, for example, a transactions tax, can result in a "**cloudy day fund**".
This tax would dampen the market when it is overheating (such as when interest rates are low) and make funds available to stimulate the market when stagnating.

This moderating effect can aid **land value stabilization**.

When land values are unstable, **speculation** occurs at a higher rate, with land owners holding land out of use (intentional business property vacancies, for example) awaiting the next boom.

During a boom, many properties that contributed to **green space** get converted to gray (concrete) properties. Then, in the bust, those properties go vacant (as mentioned above) as gray properties instead of green.

6 cont.

Therefore, for best green coverage, boom and bust cycles are best avoided.

For **financial sustainability**, it is necessary to utilize a fee system that generates a revenue buffer for any remaining unforeseeable periods of bust.

7

IMPACT IS LOCAL.

Each urban center or village is unique. Each has its own land use profile, transportation need gaps, and health & safety need gaps, and each has a unique set of impacts from its neighboring centers/villages (such as people racing through one village to reach another).

Grouping all urban centers or villages together for analysis, though convenient, can lead to neglect of that essential fact.

So it is with that disclaimer, that the following table is provided, which groups all of a type together for temporary brevity only.

It shows:
1) The percentage of the city's jobs and households that are currently (2014) in each type of center/village, etc.
2) The percentage of the city's jobs and households that have recently been added in each type of center/village, etc.
3) The current (2014) capacity for growth in each type of center/village, etc.
4) "Vision Range": The range of growth allotment visions mentioned in the "alternatives". This 4th item is provided for reference only. Unlike the others, its numbers won't add to 100%.

Since these number only show allotment, and do not take into account likely citywide growth inaccuracies, they are **not a measure of impact**.

The growth and capacity of each neighborhood would need to be addressed individually.

A chart like this, but detailed with each urban center/village, could make the EIS more useful, as it relates capacity to current state and recent experiences to help people to visualize where things are, where they've gone, and where they should go.

The EIS can estimate that, in some ways, **the least impactful future may be one in which growth allotment** (the percentage of growth that goes in a particular neighborhood) **mirrors the available capacity**.

% Of Jobs	Current State (2014)	Recent Additions Only	Capacity (2014)	Vision Range
Urban Centers:	57	61	47	51 - 72
Hub Urban Villages:	5	7	21	04 - 12
Res Urban Villages:	7	5	9	04 - 10
Industrial:	15	4	16	04 - 13
Other:	16	23	7	07 - 23

% Of Households	Current State (2014)	Recent Additions Only	Capacity (2014)	Vision Range
Urban Centers:	21	42	44	42 - 66
Hub Urban Villages:	7	14	16	09 - 18
Res Urban Villages:	12	21	17	12 - 28
Industrial:	0	0	0	
Other: (add these):	60	23		06 - 23
Other... Multi-Family:	20		18	
Other... Single Family:	40		5	

THE NINE ANALYSES.

The EIS discusses impacts in the following categories:

-1 Earth And Water Quality.
-2 Air Quality And Greenhouse Gas Emissions.
-3 Noise.
-4 Land Use: Patterns, Compatibility, Height, Bulk And Scale.
-5 Relationship To Plans, Policies And Regulations.
-6 Population, Employment And Housing.
-7 Transportation.
-8 Public Services.
-9 Utilities.

8 Here are some comments tied to those categories:

-5 Relationship To Plans, Policies And Regulations.

This section states that "noise levels... **are already above levels considered healthy**",
while also stating that the Comprehensive Plan induces "no... UNavoidable adverse impacts".
If all the adverse impacts of the Comprehensive Plan were truly avoidable, then we would now have no areas with unhealthy noise levels, as these impacts would have been already avoided. Therefore, it seems that the EIS is in error.

9 -6 Population, Employment And Housing.

This section states that "**Growth** in areas outside (of) urban villages **would be limited**."
This seems to be speculation as it appears that **no mechanism for accomplishing this** has been documented in the EIS.

10 -8 Public Services.

POLICE.
The Draft EIS notes that crime levels have been falling, but overreaches in its assumption that they would not have fallen even further had Seattle's population not increased.
As such, the following 2 quotes seem unsubstantiated:
"...there is **not a direct relationship** between population growth and crime rates."
"Since population and employment growth **do not directly correlate** to an increased demand for police services, none of the four growth alternatives would necessarily result in proportional increases in call volumes or incidence of major crimes."
A better wording may be:
"Since the root causes of the falling crime levels that have been occurring for most of the past 10 years are not known, it is not known how the change in the total number of households / jobs has affected crime levels. Since the total number of crimes per year has been falling for most of the last 10 years, which was a period of increasing households / jobs, it has been assumed that the next 20 years will have the same result, regardless of the change in the number of jobs / households or their distribution."

11 FIRE.
The EIS makes no comment on any relationship between **types of structures / complexes** and challenges for fire fighting (and risk of fire starting). If there is no relationship then it would be better to say so.

12 PARKS.
Strangely, the document's text refers to 1 acre per 100 residents as an "**aspirational**" goal, rather than simply a goal.
It is the only application of this word in the 400 page document. An explanation of that is needed.

13 SCHOOLS.
Schools are a significant infrastructure only loosely addressed by the Comprehensive Plan and the EIS.
It is not apparent that the EIS has taken into account **new classroom size rules** that may impact the number of classrooms needed at various locations.
It is not apparent that the EIS has taken into account the effect of displacement on the ability of the school system to keep schools near, rather than over or far under, **capacity**.
Also not apparent is any analysis of the effects of displacement of "school age" residents (**child-compatible housing units**) from their neighborhoods, disrupting their scholastic path and reducing life-long performance for the displaced.

14 THE EQUITY ANALYSIS.

Coincident with the release of the EIS draft was the release of SEATTLE 2035 EQUITY ANALYSIS.

Unfortunately, its definition of "**access to opportunity**" lacks a key determinant for the economic well-being of small business owners, namely the **opportunity for customers to access** that business, from within the neighborhood and from other neighborhoods.

A **transportation needs assessment** would likely reveal that city transportation policy has systematically disadvantaged certain types of business owners relative to others, and that city transportation policy has contributed to barriers between neighborhoods.

There is a need for transportation of customers to businesses (aka jobs) which are **diverse** in type and location. Since there is a correlation between the type of business and the type of transportation suitable for accessing it, diversity in business types necessitates diversity in transportation options. Therefore, the equity analysis ought to conclude that achieving a level of equity in transportation would aid social equity.

15 CLOSING.

The comprehensive plan EIS is **not valid** if the city adopts policies that do not lead to the growth (70k, 115k) assumed in the EIS. It has been shown that this (inaccurate growth estimating) is a probable outcome.

For this and other reasons stated, this EIS draft **falls short of the EIS legislation** intent that an EIS should provide realistic information of sufficient utility to make informed decisions.

The impact analysis attempts to analyze **a plan that lacks essential components** necessary to connect the "plan" to the impacts. Detailing the ground level policies that provide that connection will narrow the range of impacts and make both the plan and the EIS more meaningful for readers.

Thanks,
Rick Klingele,
Seattle.

TO:
2035@seattle.gov;
Sally.Bagshaw@Seattle.Gov; Tim.Burgess@Seattle.Gov; John.Okamoto@Seattle.Gov; Jean.Godden@Seattle.Gov; Bruce.Harrell@Seattle.Gov; Nick.Licata@Seattle.Gov; Mike.Obrien@Seattle.Gov; Tom.Rasmussen@Seattle.Gov; Kshama.Sawant@Seattle.Gov

#	Comment	
231	I will investigate your online planning information when I can, but, for now, I can make these comments: *In the Greenwood area, we now have traffic jams a couple of times a day. We also have numerous bike lanes which narrowed many of our streets, and on which, in the past year, I have not seen a total of 20 bikes. Maybe someone downtown loves the thought of a city of bike riders; so do I, in the many FLAT countries and cities where that exists. This isn't one of those. *You are allowing the building high-capacity apartment buildings in/bordering on residential areas and providing little to no parking. And the mass transit serving this area is close to useless. If there is Karma, the home owners who get home from work and have to search for a place to park and then perhaps hike a couple of blocks, possibly in the dark and/or rain, to just get to their home, will send you a load of it. *You are allowing existing building codes to be blown off by builders - who's getting paid off? And why should anyone show any interest in your questions about changing them - why would we believe you will stick to them? MKoch	**1** **2** **3**
232	Use the Equity Analysis to create the best growth alternative for the City -- one that couples a real investment of resources to create race and social equity to mitigate the increased risk of displacement caused by growth.	**1**
233	We should quit spending tens or hundreds of million dollars on the (next try) bike master plan in a campaign to kill every arterial in Seattle (as was done in the robbing of the 2007 levee). We need to increase density and create alot more viable neighborhood business districts by rezoning the areas around them with commercial uses. And the bizarre land use and building code rules for L and NC zones need t o be changed to allow better and more innovative designs -- as is. we have created the most bland and ugly set of buildings in the country on our poorly distributed zones.	**1**

June 18, 2015

City of Seattle, Department of Planning and Development
Attn: Gordon Clowers
700 5th Avenue, Suite 2000
PO Box 34019, Seattle, WA 98124

Dear Mr. Gordon Clowers:

1 After reviewing just a portion of the massive DEIS on the Comprehensive Plan 2035, I have organized my thoughts within the pages of the enclosed attachment titled, "Comments on the DEIS for the Comprehensive Plan". I was unable to read the entire tome, due to vision issues, but I hope that my comments will be seriously reviewed nonetheless. I have also enclosed an article, as a second attachment, titled, "Cities need Goldilocks housing density – not too high or low, but just right". Written by Lloyd Alter, managing editor of TreeHugger, this article shares the pros and cons of various housing densities and heights in relationship to the quality of life and the health of our communities. I believe he shares a great deal of insight and wisdom.

I request that you seriously contemplate my comments and questions as you seek to proactively design a practical and long-term guide for future development in Seattle.

On behalf of the entire Langhans family, who has lived in the University Park Neighborhood just north of the UW since 1955, I appreciate your thorough deliberations in creating the DEIS and I thank you for your enduring service to the citizens of Seattle.

Sincerely,

Aileen M. Langhans
5215 19th Avenue Northeast
Seattle, WA 98105
206-522-0203 (Lakeview 2-0203)
aileenmargaret@yahoo.com

PS. These comments on the Draft EIS were submitted via email to Gordon Clowers at 2035@seattle.gov on Thursday, June 18th, 2015

PPS. Our family of ten grew up in the University District, where it was boasted that you could "walk to school from kindergarten through college. Presently the following still live in our 100 year old Dutch Colonial: mommy (95 years old) and three sisters: Aileen, Kathy, and Wendy Langhans

--

[attached]

"Comments on the DEIS for the Comprehensive Plan"

REFERENCES	QUOTATION	MY CONCERNS AND /OR QUESTIONS
3.4 - 14 **2**	Most other areas of the city outside of the urban centers and villages would continue to be comprised of low-density predominantly single-family residential uses plus a wide range of parks and vegetated spaces, all shaped by hilly topography and bounded by the shorelines of multiple water bodies.	What is the true commitment of the City of Seattle in securing the character and identity of the family neighborhoods? How will the Comprehensive Plan be affected by and influence the proposed "Neighborhood Conservation District" strategy? Are they compatible with each other and the long-term goals of the City of Seattle?
3.4 - 15 **3**	Over time, infill development and redevelopment would occur in urban centers and villages to accommodate increased growth, gradually increasing the intensity of development in portions of the centers and villages that are not currently developed to their full capacity.	What do you mean by 'full capacity'? Do you really expect that, with time, all buildings within a certain zone will eventually reach the maximum height and bulk allowed? If so, will any construction that doesn't attain full capacity be viewed as temporary? What about the energies wasted when tall buildings are demolished for even taller building? Or, will the city promote and encourage the developer to design a building of maximum capacity? What will that do to the quality of life, if residents in those buildings only face adjacent residences, with little airflow, view, breathing space, or connection with the street level? How do you expect people to live in such crowded communities, all struggling for limited space and privacy**? Remember that the City planners have already warned developers that taller buildings intrinsically cost more to construct. (Please read the attachment entitled, "Cities need Goldilocks housing density – not too high or low, but just right")**
3.4 -15 **4**	If such transitions toward increased mixing of uses occur, there is a greater likelihood that localized adverse spillover effects could occur…. These **compatibility** challenges would not be an uncommon or new phenomenon within Seattle's urbanized context, but they would represent a **potential** adverse land use impact of future growth under any alternative. This potential **adverse impact** would be avoided to a degree by continuing to implement land use policies and zoning patterns that consider the potential for land use **incompatibilities** and avoid them through use of **transitions** in **intensity**, **use restrictions** and/or avoiding **proximity** of certain kinds of zones.	**Please define the following:** • **"Compatibility and incompatibility"** • **"transitions"** • **"use restrictions"** • **"proximity"** • **"adverse impact"** • **"intensity"** • **"potential"** **Without definitions, what meaning do these terms provide within the contents of the Comprehensive Plans? We cannot afford vague usage of the English language.** The passive acknowledgement of "potential adverse land use impact' doesn't appear to be a very proactive stance. And the solution proposed is iffy. If I read the passage correctly, the City is proposing to impose vague rules of compatibility and transitional patterns near adjacent zones to reduce any adverse impact, by restricting certain developments. How are you going to determine which property owners will be sacrificed in order to offset these adverse impacts? It seems to me that, once you announce these

4 cont.		new zoning changes, you cannot go back and say it applies to everyone BUT the following developers on certain blocks of the region. I personally don't believe the code should be so generous in the first place; but once the city makes the change for everyone, it seems to me to be disingenuous for the city to then to decide what is compatible and what is incompatible on each block. Instead of stating that there will be adverse issues, the city should deal with any potential issues in advance, through regulations and codes.
3.4- 18 5	The future construction of buildings would in many cases add building bulk (e.g., physical mass and presence) as properties are redeveloped, that would exceed the size of buildings present today. Such construction also would likely expand the geographic extent of buildings and use patterns with increased building scale (e.g., differences in height and overall proportions) compared to typical existing building sizes within urban villages and centers as those areas experience infill development. This conclusion is based on an existing typical condition in many local districts where buildings are low-scaled and relatively few approach the maximum zoned height limit. **Such increases in building bulk and scale could also occur on properties near urban village or urban center boundaries, where it is more likely that lower-intensity zones and uses (such as single-family homes) could be present.**	It appears that the City of Seattle believes it has an endless supply of space… and it is all vertical! The City needs to look at other larger cities, such as Chicago, where there are varying heights still present in downtown. But more importantly, Chicago's downtown has very wide streets and sidewalks, which contribute to the open feeling and the natural flow of breezes from the waterfront. The City of Seattle must NOT forget that our city is narrow, squeezed between two bodies of water. If the only option is to go up, when do those heights start to compromise the quality of life? The DPD can predict all of the positive benefits and extoll all of the exciting new opportunities for healthy community living in the higher density regions, as envisioned by designers, but do those tall structures really improve the community feelings among the residents and visitors therein? At what point do those residents feel isolated from the street and from each other, only to live within their own worlds? In simpler words, how many people living in large complexes really know their neighbors? **Finally, how can the city justify the comments that the adjacent single-family homes will also be subject to increases in bulk This declaration almost implies that the forces causing these changes cannot possibly be addressed, controlled, and thwarted.**
3.4 -19 6	Under all alternatives, additional future development would result in localized increases in building height and development intensity over existing conditions. As development height and bulk increase, there would be an increased potential for interference with the defined and protected view corridors and scenic routes, as well as private views in these areas.	If you are really serious about protecting view corridors, you will start with protecting the views that are in danger of being usurped by private developers when the Alaskan Way Viaduct comes crashing down. Either that spectacular view belongs to 'the people' or even to the entire city as a valuable asset for tourism, or the city simply values the views as a commodity to be rewarded to speculators for personal benefit. Take your pick and show your true colors!

WHERE IS IT LOCATED? 7	Historic Preservation as a renewable resource and a tribute to our very beginnings and our identity: Does the city even address these concepts within the Comprehensive Plan.	Where is the city's commitment to the historic continuity of our unique neighborhoods? Instead of celebrating and preserving the older stately buildings, homes, and businesses, this plan seems to adhere to the "Economic Theory of Planned Obsolescence", where every building is ripe for replacement, until the maximum space is consumed! Where is the city's respect for the rich heritage left to us to protect and, in turn, leave in lasting legacy for future generations? Even if the city's motive is purely economical, our wonderful collection of history can be used to attract visitors and tourists and also provide the entire city with a sense of purpose and identity, which cannot be provided by the transient nature of present and future developments. The absence of a commitment to our wealth of neighborhoods and their historical perspectives within the contents of Seattle's growth spurts and growing pains is deafening! I agree with the comments made by Historic Seattle, as follows: "The current plan includes preservation under the "Cultural Resource" element (CR11-CR16). The new Comp Plan replaces "Cultural Resource" with an "Arts and Culture" element. This new element focuses on art (public art, cultural space, arts education, creative economy, creative placemaking) and seems to eliminate historic preservation and protection of cultural resources. How will preservation be included in the future Comp Plan? How are the city's existing preservation policies and regulations being addressed? The "Environment" element addresses environmental stewardship, one of the plan's core values. Environmental stewardship is primarily defined within the context of the natural environment (air, land, and water resources) and not built environment. The analysis should address the role of preservation vs demolition in terms of environmental stewardship. Preservation Matters! Preservation and creative adaptive reuse of our existing building stock cuts across all four core values of the Comp Plan. Preserving historic places enhances community vibrancy and cultural identity; serves as an economic driver; conserves precious resources; and contributes to social equity." Has the city looked into the energy it took to build these older structures vs. the energy it takes to demolish them and build new, rather than to repurpose them? **Seattle is very fortunate to have an active Historic Preservation Organization in Historic Seattle to provide expertise and guidance to future growth. To ignore them is to place our future in peril.**

3.4 - 19 8	The City's current Code exempts projects below certain sizes from review under the provisions the State Environmental Policy Act (SEPA). SEPA allows jurisdictions to set higher than standard exemption levels under certain conditions including the preparation of an environmental impact statement to analyze the impacts of the jurisdiction's comprehensive plan… [H]igher exemption limits are possible as long as development would not lead to exceeding levels of density or intensity of use called for in the comprehensive plan. As already previously defined in Seattle per Ordinances 122670 and 12939 (2008 and 2012, respectively), development review has occurred without a project-specific SEPA environmental review process required for projects in urban centers or urban villages containing up to 200 dwelling units and up to 30,000 square feet of non-residential space in mixed-use developments in certain urban centers and urban villages.	This is absurd. In many situations, the only way someone can object to a development is through the SEPA process. This change will allow in-fill to go forward without the formal input from adjacent and nearby owners. It's as if the city doesn't want to listen to potential concerns that might delay the construction of these buildings, but may also produce practical solutions and mutual concessions to make these projects more compatible to and more accepted by the surrounding residents and owners.
9	**Such definitions of density and intensity of use could be defined in different ways, depending on other policy choices to be decided at a later date, and so the density/intensity limits are not precisely defined at this time.** However, they would be stated in terms that would allow for ongoing monitoring of density/intensity outcomes in the urban centers and urban villages where applicable. Development at those previously defined categorical exemption levels recognizes the ameliorating effects of the City's codes and programs in preventing or otherwise reducing the potential for adverse effects. These include but are not limited to the following kinds: Land Use Code and zoning, design review program, environmental critical area rules, historic and cultural resource protections, use of incentive zoning (or similar tools) that address housing impacts and transportation concurrency and impact mitigation methods in SMC Chapter 23.52. Practically, this means that there is not likely to be a need for SEPA-based mitigation strategies to be identified because other City programs, rules and requirements will be sufficient to avoid significant adverse impacts	This creates an open-ended loophole. Why is the City willing to delay these decisions? Instead of depending on the additional codes to possibly kick in to prevent adverse impacts, I believe that the Comprehensive Plan should actually make references to those codes and regulations. The City may have a large arsenal of tools to prevent adverse effects, but it lacks the will and foresight to use them against aggressive and invasive development. Instead, it uses its efforts to clear the path for a speedy process. No amount of changes to code or regulations will be productive and proactive unless the specific rules are enforced.

9 cont.	occurring for development projects below the SEPA thresholds.	
ALTERNATIVE 1 3.4 – 20 10	Compared to the other alternatives, Alternative 1 is projected to lead to the greatest amount of housing and job growth in areas outside urban centers or villages. This would tend to spread the potential disruptions of growth and change across more areas, likely closer to more residents, but typically with a lower severity of change due to what is permissible to build in most areas outside urban centers and villages.	If this comment truly reflects the City's desire to increase the density and growth within the urban centers and villages by explaining how the status quo needs to be changed, then that is great. But then, we should expect the City to respect the single-family neighborhoods, their identities and their cohesiveness, by enforcing the zoning therein. We cannot tolerate the city's caveat that those neighborhoods will be affected by outside forces beyond the control of the city itself.
ALTERNATIVE 2 3.4-24 11	[Under Alternative 2] … increased height and bulk through future development in urban centers could potentially impact surrounding areas by creating more abrupt transitions between taller, more intense development within centers and less intense development outside them. **Alternative 2 would also remove two policies (LU59 and LU60) from the Comprehensive Plan that establish very detailed criteria for when it is appropriate to upzone land included in a single-family land use designation**. The Land Use Code contains regulations that are very similar to these policies. **Removal of these policies from the Comprehensive Plan does not remove any of the procedures or steps required to change designated zoning of a given area, especially if the code provisions remain.** **However, by removing approval criteria, it would provide more flexibility for zoning in single-family areas and multifamily areas nearby, potentially allowing a greater variety of residential uses in and near single-family areas. While this could lead to a small increase in conversion of uses and location of differing development intensities in close proximity, as described in the previous sections, the practical effects of this change are anticipated to be minor.** Proponents of future upzones would be	Let's see how truly the City is committed to monitoring and regulating the transition zones and their impacts on single-family communities. Why are the two policies being removed? What message does that send to the single-family neighborhoods? If these policies are removed, what proof do we have that the city will strictly adhere to the land use code in the future, when its past track record is iffy? Or, did this action result from a concession made by the city to major property owners? What if the applicable 'code provisions' do NOT remain? Can they be removed or altered without justification? Please define and defend the words 'flexibility' and 'minor'.

11 cont.	expected to show compatibility with the comprehensive plan and Land Use Code requirements for any given area. Also, the revised comprehensive plan would include policies to reinforce the need for gradual transitions, so drastic changes in use or intensity are not likely to occur as a result of this policy change.	
ALTERNATIVE 3 3.4 – 27 and 31 12	Alternative 3 … proposes to change how urban villages are depicted on the Future Land Use Map. This proposed change would show each type of urban village (Center, Hub and Residential) as a unique color on the map with accompanying policies that would describe the types and intensities of uses allowed in each type of village instead of the current mapping of individual land use designations within respective urban village boundaries that closely align with zoning categories. This would provide a generalized indication of preferable types and patterns of future development in the respective villages (i.e. urban center, urban center village, hub urban village and residential urban village), but would provide a greater degree of flexibility in future land planning while still indicating some limits to the most intense types of growth…. **This could be helpful to aid in production of housing sooner, for example. Under the current system, any future proposed zoning changes for a given property or area must be consistent with the associated comprehensive land use designation. This limits potential changes in land use type and intensity to a relatively narrow spectrum; more substantial zoning changes first require an amendment to the comprehensive plan land use map. Under Alternative 3, future zoning changes would instead be required to be consistent with the appropriate policies for that type of urban village.**	If I understand this section, it appears that under Alternative 3, there will not be one set of policies to cover all urban centers, etc. If this alternative 'would provide a greater degree of flexibility in future land planning' and if 'future zoning changes would instead be required to be consistent with the appropriate policies for that type of urban village', will the City likewise develop policies in each urban center or village that are more compatible to the surrounding single-family neighborhoods, by protecting their existence and thwarting any invasion from outside pressures? In other words, will the specific regulations for a specific urban center also reflect the unique character of that region? **Don't be so quick to revise the language of or amend the comprehensive plan, in order to allow a more rapid production of housing. Perhaps time should not be considered the enemy, but rather it should afford everyone the opportunity to reflect on any major proposal, its potential good and harm, and its long-term impact.**

ALTERNATIVE 4 3.4 - 32 **13**	Overall, Alternative 4 distributes growth to a greater number of locations than any other alternative, which is likely to result in a citywide land use pattern more focused on residential and commercial/mixed-use nodes with access either to light rail or frequent bus service. The focus on more distributed transportation nodes is likely to result in the construction of more moderate-density, moderate-height development types with a combination of multi-family, mixed-use and commercial uses over time. **Areas outside urban centers and villages would receive the lowest share of future household growth of any alternative at only 6 percent. Corresponding job growth in areas outside urban villages would be 18 percent… As a result, there would likely be fewer expected changes to the largely residential pattern of land use in areas outside urban villages and centers**.	How will the spreading out of growth to a greater number of locations affect the character of those locations? Although Seattle wants to have a unifying plan of development, it must still recognize that its unique communities add to the true spirit of the city. Uniformity of design and development might lead to a monotone city of uniform blandness and eliminate the histories of the various regions that have created the overall special character of Seattle. Is the sum greater than its parts or are do all of the individual parts lead to a greater sense of identity? **This is no comfort to those that live in these outside areas.**
MITIGATIONS STRATEGIES 3.4 - 35 **14**	The analysis in this section identifies a range of adverse land use related impacts, but it does not identify these as probable significant adverse impacts, meaning no mitigation strategies need to be defined. Although not required to address identified impacts, the City could pursue the following kinds of actions if it wishes to address standards or guidelines for addressing possible future condition: • Consider amendments to zoning regulations in existing and future urban centers and villages to more directly address transitions to surrounding areas. • Consider addressing transitions between urban centers/villages and surrounding areas as part of ongoing neighborhood planning efforts. • Consider additional station area planning efforts in locations where new urban villages could be created, such as NE 130th Street, or where substantial expansion of existing villages could occur. **The primary goal of such efforts would be to establish policies, design guidelines and development regulation mechanisms to**	What does the City mean when they say, "Although not required to address identified impacts, the City could pursue the following kinds of actions if it wishes to address standards or guidelines for addressing possible future condition"? If the city is not required to address future issues, what is the purpose of planning for future development? The citizens of Seattle should be able to look to the City for leadership and guidance, not excuses, such as the comment that the 'probable significant adverse impacts' do not require any 'mitigation strategies … to be defined". If they can be predicted, then they should be addressed. Furthermore, what about the city's constant use of these terms: should, could, consider, wishes? Don't they imply that these recommendations are optional and even superfluous? Is the city acknowledging its passive resignation to these impacts? **Don't you mean "to manage the transformation", not "transition"? If I read it correctly, the city is anticipating that current single-family areas will necessarily be subject to the density increases of urban villages. Will this occur as existing urban villages expand out and/or when the city proposes new urban villages? Has the**

14 cont.		**manage the transition of such areas from their current low-intensity, predominantly single-family character to a more intense, mixed-use pattern that characterizes urban villages**. Policies, guidelines and regulations could focus on defining guidance and standards for transitions between development types and mitigating differences of development scale.	**city considered the negative impact on the single family neighborhoods, if their continuity, security, and permanence are threatened? This will lead to uncertainty and a decreased commitment to the vibrancy of those areas, which in turn, will provide developers with the justification they need to ask for an upzone. Has the city even considered the 'adverse impact' to those neighborhoods and to the city at large, should those affected families simply give up on Seattle and, in order to escape the negative impact of encroaching higher density developments, migrate to the outlying suburbs, leading to increased urban sprawl?**
3.4 - 36	15	**3.4.4 Significant Unavoidable Adverse Impacts** Under all alternatives, additional growth would occur in Seattle, leading to a generalized increase in building height and bulk and development intensity over time, as well as the gradual conversion of low-intensity uses to higher-intensity development patterns. This transition would be unavoidable and is an expected characteristic of urban population and employment growth. In addition, future growth is likely to create localized land use compatibility issues as development occurs. However, the City's adopted development regulations, zoning requirements and design guidelines are anticipated to sufficiently mitigate these impacts. Therefore, no significant unavoidable adverse impacts to land use are anticipated.	This must be a real comfort to the City of Seattle, but just what kind of message is it broadcasting? If these major incompatibilities are so inevitable and unavoidable, how is the City able to quantify their effect and to justify the conclusion: "Therefore, no significant unavoidable adverse impacts to land use are anticipated"? In light of this revealing admission, what exactly is the true purpose and goal of this entire process to revamp the Comprehensive Plan?
General Comments	16	Working with Seattle Public Schools to renovate and expand schools in or near Urban Villages	Yes, this is a must. Our neighborhood, the University Park Neighborhood, has become orphaned by the Seattle School District, creating a void for our local families. In the past, children in this neighborhood could walk to school from kindergarten through college!
General Comments	17	Design standards within "urban centers", "urban villages", etc.	Does the city wide definition of 'urban center', etc. require that all areas throughout the city with the same designation have identical design standards? How does the Comprehensive Plan allow each center, such as the University District, to establish specific design standards, setbacks and other restrictions not required in other centers in the city? Do the design standards have to be city-wide? How will the updated Comprehensive Plan affect the proposed EIS for the anticipated University District upzone?

Introductory section and 4.6 **18**	A fundamental goal of this Plan is to steer the majority of estimated growth in housing units and jobs toward urban centers and urban villages, for the following reasons: … preserve the character of Seattle's predominantly single-family neighborhoods. H18 Promote methods of more efficiently using or adapting the city's housing stock to enable changing households to remain in the same home or neighborhood for many years. Strategies may include sharing homes, allowing attached and detached accessory units in single-family zones, encouraging housing designs that are easily augmented to accommodate children ("grow houses"), or other methods considered through neighborhood planning. H 19 Allow the use of modular housing, conforming to the standards of the State of Washington building and energy codes, and manufactured housing, built to standards established by the federal Department of Housing and Urban Development. Modular and manufactured houses shall be permitted on individual lots in any land use zone where residential uses are permitted.	(H18) This is a noble goal, with the caveat that shared homes (or rooming houses) come with their own set of issues, such as garbage, noise, parking, etc, - especially in the University District, in which the predominant tenants are students. (H19) These are incompatible goals. How can the City state its commitment to preserving the character of neighborhoods and yet enable modular and manufactured houses to be built "on individual lots in any land use zone where residential uses are permitted"?
Seattle 2035 Key Directions: Arts & Culture **19**	The Plan sets goals to foster a diverse city that encourages and celebrates cultural differences while at the same time building a shared identity of Seattle. We want to be a singular community that pulls together to benefit the city as a whole. A large part of building this type of community is encouraging and supporting creative expression.	This is so vague… Just what is the 'shared identity of Seattle' and how was it adopted? Whose voices will be the loudest? Whose influence will be the greatest? Will the city become a fluid identity to be determined by the most potent and aggressive 'opinion', whether or not it reflects the historical growth and the founding roots of our town? Will the city's future be dictated by the latest and greatest trends, ambiguous though they are? Will Seattle's identity be fleeting and as confusing as its latest nickname, "The Emerald City"? This is a strange name, given the fact that Seattle's greenspace is in a deficit and its DPD seems to encourage box-like construction void of any positive streetscape or inviting entrances. Instead, these modern structures are surrounded by massive concrete bulkheads and pathways. So much for 'green'. **Please reflect upon the true spirit of Seattle by heeding the guidance, predictions and warnings of our founding inspiration, Chief Sealth**.

After reviewing the various alternatives, I am not sure of which one I would support. I only know that I would like a Comprehensive Plan which addresses the following:

20

1. If the City of Seattle's goals are to concentrate development, higher densities, and greater bulk in certain defined urban villages, urban centers, etc., then it must also recognize and protect the single-family neighborhoods that abut those centers, by acknowledging and committing to their viability within the long-term goals of Seattle. The passive acceptance of inevitable, outside pressures, poised to invade the family neighborhoods is unacceptable.
2. There needs to be a set of design standards that will soften the impact of bulky high rises, such as increased setbacks for increased heights, greater spacing between high rises, and other details that will transform otherwise boxlike, lego-like structures through refined architectural features.
3. Any new developments should reflect and respect the architectural uniqueness of that neighborhood, especially in regions of historically significant buildings or collections of distinct architectural character.
4. Along with the Updated Comprehensive Plan, the City must pass and promote the Neighborhood Conservation Districts to substantiate its commitment to the many unique neighborhoods that define Seattle.
5. Neighborhood schools should become a central goal for the Seattle School District.
6. The City should NOT have the ability to easily and without justification, expand any Urban Center or Urban Village into adjacent areas, nor should the city be allowed to establish new Centers or Villages without transparency in the process and a thorough review with an open discussion.
7. Any goals and regulation changes should be firm and practical, by providing defined and quantitative specifics that can be monitored, assessed and documented. Vague terminology, no matter how inspiring, may lead to conflicting interpretations, and wiggle room, making enforcement a nightmare.
8. The City should make sure, that in its rush to redefine and refocus future growth and development, our town's future doesn't become an endless effort to remake itself by erasing its past through a never-ending cycle of demolition and new construction. If we continue to shed our past, we will lose our identity as determined by those whose vision created Seattle so long ago.
9. No matter what Alternative is chosen, the city must realize and factor in the unique geographical limitations that influence all growth and expansion patterns of our town; that includes are hilly topography and our narrow waist, sandwiched between two bodies of water.
10. The City should address, in advance, any potential and anticipated adverse impacts, instead of hoping that these negative consequences will be minor in their damage. This includes the confiscation of our wonderful, natural views, which belong to us all, in order to hand over to a few.
11. The City must honestly assess and reflect upon the long-term impact of higher densities on the quality of life and the health of that community.

Thank you for this opportunity to share my ideas and participate in the process.

Submitted on Thursday, June 18th, 2015
Aileen M. Langhans
(For contact information, please refer to the cover letter.)

"We have everywhere an absence of memory. Architects sometimes talk of building with context and continuity in mind, religious leaders call it tradition, social workers say it's a sense of community, but it is memory we have banished from our cities. We have speed and power, but no place. Travel, but no destination. Convenience, but no ease."

Howard Mansfield – an American writer of History, preservation and architecture. Book "In the Memory House"

Cities need Goldilocks housing density – not too high or low, but just right

The trend for elite towers that reach ever skywards isn't healthy for a sustainable community or for a balanced quality of life

In London, Boris Johnson brushes aside opposition to a new development scheme at Convoys Wharf that might threaten the remains of the Royal Dockyard at Deptford. He says: "We need to build thousands of new homes in the capital and proposals to do that at Convoys Wharf have stalled for far too long."

In Toronto, where I live, theatre impresario David Mirvish (whose dad owned the Old Vic) is knocking down four designated heritage buildings to build three 85-storey Frank Gehry towers. But as Chris Hume of the Toronto Star notes, "There are two types of heritage, let's not forget: one we inherit; the other we bequeath."

In New York, sleek new towers for the tenth of the 1% are rising through previously sacrosanct height limits. These are hugely expensive to build, but get such high prices that there seems to be no limit to how high or how skinny they can go. Critic Michael Kimmelman sums up the problem in one sentence: "Exceptional height should be earned, not bought."

In so-called hot cities such London, Toronto and New York, the planners and politicians are letting a thousand towers bloom. In others such as Seattle, Washington or San Francisco, battles are raging over height limits and urban density, all on the basis of two premises: 1) that building all these towers will increase the supply of housing and therefore reduce its costs; 2) that increasing density is the green, sustainable thing to do and that towers are the best way to do it.

I am not sure that either is true. I am an architect and I certainly consider myself an environmentalist, but it appears to me that in a lot of cities, these new glass towers don't add much at all to the city in terms of energy efficiency or quality of life. Often they don't add many more housing units than the buildings they replace. I am also a heritage activist, not because I particularly love old buildings, but because there is so much to learn from them and from the neighbourhoods. and cities that were designed before cars or electricity or thermostats, and were built at surprisingly high urban densities.

There is no question that high urban densities are important, but the question is how high, and in what form. There is what I have called the Goldilocks density: dense enough to support vibrant main streets with retail and services for local needs, but not too high that people can't take the stairs in a pinch. Dense enough to support bike and transit infrastructure, but not so dense to need subways and huge underground parking garages. Dense enough to build a sense of community, but not so dense as to have everyone slip into anonymity. At the Goldilocks density, streets are a joy to walk; sun can penetrate to street level and the ground floors are often filled with cafes that spill out onto the street, where one can sit without being blown away, as often happens around towers. Yet the buildings can accommodate a lot of people: traditional Parisian districts house up to 26,000 people per sq km; Barcelona's Eixample district clocks in at an extraordinary 36,000.

Building tall does not necessarily even increase residential density; in fact, it can do the opposite. In New York's tall, slender towers, the elevators and stairs take up a huge proportion of the floor space, and there is lot of expensive exterior wall for each unit. The construction costs for this

kind of building are ridiculous, and only the very, very rich can afford to pay the price, so apartments are therefore often huge as well; consequently the population density can actually go down.

There is less street life too, as ground floors are taken up with lobbies and exits and ramps instead of stores and restaurants. The great majority of the new projects that are busting through height limits, view corridors and historic districts do nothing to ease the housing crisis and nothing to improve the urban fabric.

At the Goldilocks density, construction is a lot cheaper and the buildings a lot more efficient; in Montreal's Plateau district, the buildings are mostly just three storeys high, with exterior stairs. Every inch of interior space is used for living, making them almost 100% efficient, and accommodating over 11,000 people per square kilometre. New, greener forms of construction can be used, as Thistleton Waugh did with their 12-storey timber tower in London's Hackney. In Toronto, architects such as Roland Rom Coltoff of RAW are rebuilding and revitalising neighbourhood high streets with very attractive, modern low-rise buildings, putting the housing where you want it, near transit and schools.

Building to the Goldilocks density is also more resilient: it's easier to get in and out of your flat when the power goes out when you live on the fourth floor than when you live on the 40th. After Superstorm Sandy, the older walkups in New York's Lower East Side were reoccupied a lot more quickly than the taller towers with flooded elevators and elaborate electrical systems.

It is not a coincidence that the lower but dense patterns of development seen in Paris, Barcelona and Montreal were built before there were cars. People tended to live in smaller flats, closer together, with narrower streets that acted as their living room, pantry and entertainment centres. They still do today, and as cars are often so inconvenient to park, it is easier to walk or cycle. Not surprisingly, by occupying less space and not driving, they have a lower carbon footprint per capita.

There is lots of room in our cities to do this: not everyone has to live in Chelsea on either side of the Atlantic. New York isn't even particularly dense, at 2,050 people per sq km, even less than Toronto's 2,650, which is half of London's 5,100, which still puts it only 43rd on the list of densest cities. They're just spiky. Get out of the hot spots and a there's lots of room to grow.

Economists such as Ed Glaeser would flatten neighbourhoods like Greenwich Village and fill them with 40-storey towers, claiming that increased supply will lower the cost of housing. Economist (and Economist correspondent) Ryan Avent says much the same thing, noting that nimbys use zoning rules, historical designations and public pressure "to preserve neighbourhoods, views, and buildings they love from changes they fear". They would let Adam Smith and the law of supply and demand decide how our cities are built.

The key to building a healthy and green city isn't putting wind turbines on the roof of a glass tower; the way to solving our housing crises isn't handing the keys to the planning office to a bunch of living and dead economists. It is to build walkable and cyclable communities at the Goldilocks density: not too high, not too low, but just right.

• Lloyd Alter is managing editor of TreeHugger. April 16, 2014

#	Comment	
235	One quick comment: how can you post the *exact same map* for Options 1 and 2 on growth alternatives? Option 1 claims to represent the least concentrated pattern of growth; option 2, the most concentrated. Surely there must be some distinction that would be readily captured by maps showing the growth areas. By using the exact same map, the unintended implicit message to the reader is that it doesn't matter whether we enact any policies because the results will be the same.	1
236	DPD: The The draft EIS does not provide enough information to make meaningful comments. There also should be more time for public comment. Tom Larsen Greenwood Resident	1
237	Please use correct name of Chinatown International District, as adopted in City Ordinance 119297 (1999). Get affordable housing into the neighborhoods that have long opposed it: Magnolia, Ballard, Viewridge, Broadhurst, Sand Point, in short, the white neighborhoods north of the ship canal. They need developments a la New Holly or Rainier Vista or High Point in order to truly have racial equity and social justice. See latest news that north end property owners were caught violating housing laws by discriminating on the basis of race and sexual orientation. Surprise! Above is why I object to Item 1: "Increase affordable housing for low income households in all neighborhoods, particularly those with frequent transit, walkable streets and other amenities." The truth of the matter is south end neighborhoods and the CID have more than their fair share of affordable housing. Where's the racial equity and justice in that?	1 2
238	I support 'alternative 5' as set forth by The Urbanist editorial board. We need more equitable growth in the city, and it's time all neighborhoods took responsibility for their share of it. The fact Magnolia was allowed to 'opt out' of the original urban village plan is ridiculous. The fact Northeast Seattle doesn't have any villages is ridiculous. Displacement and social justice concerns should require a rethink of these politically driven oversights in the original urban village plan.	1
239	As a Seattle resident, the two priorities most important to me are 1) Environmental Stewardship and 2) Race and Social Equity. Initiatives in both of these areas will enhance the other two core ideals, economic vitality and security, and community. I strongly advocate for Alternative 2, followed by Alternative 1. I think it is important to maintain the existing urban center and village boundaries. There is still substantial opportunity for growth in these areas. Concentrating our growth will also concentrate where and how we prioritize our investments, and if we develop new urban villages we're reducing our capacity to provide for the existing centers and villages. Our existing centers and villages are already lacking in many ways. Prioritizing investments in these places will be a step towards ensuring that they will become high quality and equitable places. Spreading our investments will dull their potential and quality over time. Let's make sure we have the existing centers and villages developed and enhanced in	1 2

#	Comment	
	a thoughtful way before expanding to new areas of the city. Additionally, thank you for adding the Race and Social Equity Chapter. Thank you	2 cont.
240	Frankly, as a native of Seattle I'm not particularly fond of any of the alternatives you are proposing. To me, the single most important thing that needs not only an immediate fix, but must also be absolutely at the center of any other plan or consideration, is improving traffic flow on the I-5 corridor through Seattle. I really don't care about I-5 service into or out of Seattle, but rather through/past Seattle. I'm retired, but do a lot of volunteer work that frequently takes me to the east side (I-90 corridor). Leaving my house in NW Seattle (near the north city limits) anytime beyond about 2 pm, it typically takes me 45 minutes or longer to get to either the 520 interchange or (add another 10 minute) the I-90 interchange. That is pathetic. I fully support increased use of public transportation, and anytime I need to actually go into downtown Seattle I'm happy to take the bus. But when I need to go other places, south or east, it is impossible. I'm also totally opposed to the development of any housing without at least one dedicated parking spot per residential unit. Two would be preferable. That you are allowing construction with no parking is absurd beyond belief. What Seattle is missing in any/all of it's planning is that there are many people who NEED to be able to drive someplace. I-5 is a major commerce corridor, but any business that relies on moving of goods to/through the city can no longer afford the hours of wasted time to do so. The port of Seattle will shrivel up and die if we can't move commerce to and from it. Part of Boeing's desires to leave the area is the impossibility of moving goods and people between Everett and Renton. Etcetera.	1 2 3
241	I think there are too many people in the metro area. I think the city and County should encourage more family planning to mitigate some of this problem. More people only put greater pressure on services and the environment.	1
242	favor least impact on marginalized people. Option 2 I believe. Favor posterity and respect for all, a secure roof over all heads and food on the table. Happy healthy children.	1
243	I am a professional urban planner (AICP) interested in how you deal with the common problem of civic engagement in this time of almost unlimited competition for the attention of citizens. Also, how you plan to deal with the fact that much online comment and participation in your public process might come from a world away - literally.	1
244	I am surprised to learn that the City is proposing the following? Seattle's declared goal is to have each urban center reach its maximum allowable density, that is, develop 'to their full capacity'. That means, if an area is zoned for 340 feet maximum height, the city actually expects development and redevelopment to continue until the area is saturated with 340 foot tall buildings. Therefore any building that falls short of these limits is considered,	1

#	Comment	
	by city planners, as temporary and replaceable. The City's vision also includes an increase in the bulk of these buildings, thus creating massive boxlike structures with restricted airflow, sunlight, views, etc. There is no mention that, with height, there needs to be greater setbacks, so that upper stories in high-rise structures have smaller floor areas. Those of us who remember the Seattle's downtown of the past, will feel overwhelmed and trapped. The city must acknowledge its geographical limitations, such as, a narrow downtown sandwiched between two bodies of water; it must also be mindful of the historic decisions which gave us city blocks surrounded by narrow streets and sidewalks (which are already saturated) and a lack of a major town square or central park. I don't know how the planners believe that we can have numerous sidewalk cafes without interfering with the flow of pedestrians.	**1 cont.**
	The city has declared, by omission, its lack of commitment to historical preservation and the recognition of our wonderful collection of historic homes, churches, businesses, hotels, etc. How can we protect these structures, while surrounding them with massive boxlike structures?	**2**
	The plan includes many vague terms, such as, "transitional areas", "use restrictions", etc. without any definitions. The city has the made this revealing statement of serious consequences: "H 19 Allow the use of modular housing, conforming to the standards of the State of Washington building and energy codes, and manufactured housing, built to standards established by the federal Department of Housing and Urban Development. Modular and manufactured houses shall be permitted on individual lots in any land use zone where residential uses are permitted." It is a scary thought that those buildings will be allowed anywhere in city! The Plan does NOT mention the new proposed strategy to secure the city's many neighborhoods: the Neighborhood Conservation Districts Several of the plan's alternatives provide the City with the option of creating more Urban Centers and Urban Villages, especially around public transit, as well as expanding those areas into the adjacent residential areas. So, if you think that our neighborhood is safe from the U District Center, think again. The Plan justifies many 'adverse impact' by calling them minor or unavoidable. The city is given passive permission to just hope they go away.	**3** **4**
	The revised wording in the plan gets rid of or severely alters several policies. This includes the criteria for when it is appropriate to upzone land included in a single-family area; AND the exclusion of much development from the required SEPA. The plan claims that these policies are already covered in city code. But then, in one place, it adds this caveat: "Removal of these policies from the Comprehensive Plan does not remove any of the procedures or steps required to change designated zoning of a given area, especially if the code provisions remain." What exactly does that mean?	**5**
	And to end the section 3.4 (Land Use: Patterns, Compatibility, Height, Bulk and Scale), the Plan wrote an appalling conclusion: "3.4.3 Mitigation Strategies APPLICABLE REGULATIONS AND COMMITMENTS The analysis in this section identifies a range of adverse land use related impacts, but it does not identify these as probable significant adverse impacts, meaning no mitigation strategies need to be defined. The City would continue to rely upon use of regulations in its municipal code, including Land Use Code (Title 23), SEPA rules and policies (Title 25), the design review program	**6**

#	Comment	
	(SMC 23.41 and related guidelines), and documents such as Urban Design Frameworks that address design intent in various subareas. Other Potential Mitigation Strategies Although not required to address identified impacts, the City could pursue the following kinds of actions if it wishes to address standards or guidelines for addressing possible future conditions: • Consider amendments to zoning regulations in existing and future urban centers and villages to more directly address transitions to surrounding areas. • Consider addressing transitions between urban centers/villages and surrounding areas as part of ongoing neighborhood planning efforts. • Consider additional station area planning efforts in locations where new urban villages could be created, such as NE 130th Street, or where substantial expansion of existing villages could occur. The primary goal of such efforts would be to establish policies, design guidelines and development regulation mechanisms to manage the transition of such areas from their current low-intensity, predominantly singlefamily character to a more intense, mixed-use pattern that characterizes urban villages. Policies, guidelines and regulations could focus on defining guidance and standards for transitions between development types and mitigating differences of development scale. 3.4.4 Significant Unavoidable Adverse Impacts Under all alternatives, additional growth would occur in Seattle, leading to a generalized increase in building height and bulk and development intensity over time, as well as the gradual conversion of low-intensity uses to higher-intensity development patterns. This transition would be unavoidable and is an expected characteristic of urban population and employment growth. In addition, future growth is likely to create localized land use compatibility issues as development occurs. However, the City's adopted development regulations, zoning requirements and design guidelines are anticipated to sufficiently mitigate these impacts. Therefore, no significant unavoidable adverse impacts to land use are anticipated." Mary Louis University Park resident	**6 cont.**
245	Please support the Urbanist's 'Alternative 5' plan. We need to not only grow our urban villages - which are much too small - we also need to add more in more areas of the city. We need a 'Frellard' urban village, some more up north and much more down south, especially in West Seattle and around the Central LINK. We need to decrease the probability of vulnerable populations especially citizens of color by allowing up-zoning in our city around great transit corridors like Capitol Hill and the UDistrict . Thank you for your time.	**1**
246	Pioneer Square's designated urban center is a travesty. The PSM 100/100-120 zone will create a	**1**

#	Comment	
	monolithic row of 120' buildings in front of a low-lying historic neighborhood with no design review and no meaningful attempt to address public concerns. Nothing in the Draft EIS addresses this manipulation of codes that is clearly intended to benefit developers and not the public. I have little faith in the intent of the current proposal. It is unfortunate that rehabilitation is not more of a priority. The excuse being it doesn't "pencil out".	**1 cont.**
247	After taking the survey, the biggest challenge is matching the plan to the ever changing desires of how people want to live and work in the next 20 years. 30 years ago I wanted to live in a brand new house in the suburbs, after 6 years I found out that wasn't for me, so I moved back into the City. The main reason was to be closer to my work place, but just as important were the various activities the City has to offer such as easy access to grocery stores, more shopping/dining options in close proximity, sporting events (Seahawks, Mariners, Husky Football, etc.), and community events/parks. I expect these reasons will still hold true for the next 20 years too. In addition to focusing increased housing density in specific urban growth areas, there also needs to be a plan to include basic services within these areas, such as grocery stores, dining/shopping options and community open spaces. Good Luck	**1**
248	feedback: having encountered the department of planning employees who stomp their feet and are completely irrational, i have little doubt that the plan you create will actually come to fruition. i am unsure why any city plan would include this statement, especially in terms of increasing density: "There could be an increased risk for disturbance of environmentally critical areas." (why are our lakes, without this increased development, filled with toxic algae, unsafe to swim in, and smelly?) i've seen how you/the city/dpd have further marginalized the marginalized populations so that places that were filled with black (or asian) people are now all white (beacon hill, 23rd and jackson, rainier valley, etc). at this point, i hope to not be living in seattle in 2035 unless you bring back affirmative action, decrease police brutality, and have and abide by actual city rules that are not only equitable and just but also easy for all to understand with penalties to the city or its employees if they do not follow the rules as stated. all the levies and increases by SPU or other departments are pricing out people who have lived here so that some new (probably) white couple can come in and buy a place for $700k. at some point, it has to stop. if you're advertising transportation for all, then don't make me walk over a quarter mile to a bus stop and don't expect me to walk that far with groceries because you've penalized me for having a vehicle. if you are increasing infrastructure for people, then you have to actually uphold your laws so that a mom with a stroller, a visually impaired person, and an average college student can all walk down the street without encountering garbage cans or hedges/overgrowth on every block making it visually disgusting and hard to navigate. these same people should not be standing at a crosswalk forever because they did not push the walk button in time to cross with traffic. if you are making dense neighborhoods or whatever you call them, think about how things have changed at one of the locations (at pike/pine) that was formerly gay friendly and now according to recent news reports is a place of hate, a place for frat boys, and a place to terrorize people who are different (read: not frat boys). i have no confidence in your plan or your department. in fact, it would seem that this model will just increase road rage, narcissism, fear and anger toward people of color leading to even more racist people living here and people who are different, lack of diversity, increase in occupations that are high paying until the IT jobs all dry up again, ...	**1** **2**

Dear Mr. Clowers,

1 Having read through the narrative provided in the Draft EIS related to school facility and capacity planning in "3.8: Public Facilities" I have some concerns that there are substantial gaps in the planning for the impacts of growth on Seattle Public Schools in the Draft EIS.

To my understanding, the draft EIS does not accurately reflect the current picture of school facility needs for Seattle Public Schools, now, or in the future. Seattle Public Schools' enrollment has grown substantially faster than expected over the past 7 years (~7,000 new students equaling ~22 schools added since 2007). In 2014, there are ~1300 (2-4 schools worth) more children in SPS schools north of Downtown and in West Seattle than was expected in projections created in 2012. (Please see the attached presentation for more information.) Enrollment for 2015 is already expected to be ~53,000, which is 2000 more than stated in the EIS. Population growth, housing development, and the implementation of the SPS Neighborhood Assignment Plan in 2010 (where students are guaranteed assignment to their neighborhood school) are some of the impacts that have dramatically increased enrollment in the past 7 years, and enrollment growth is expected to continue.

In order to adequately plan for school facilities, I believe that several issues should be incorporated into the Comprehensive Plan and EIS:

2 1. The City and the District are now required by a motion of the Growth Management Planning Council to engage in cooperative planning for school facilities. The plan for implementation of this directive should be provided.

3 2. Contrary to the statement on page 18 of the EIS, the plan under BEXIV does not adequately provide capacity through 2020. The District has stated this publicly, though District documents have not been updated yet. Because of the unexpected and rapid growth in the past 5-7 years, the statements made about the number of school buildings available are already outdated when using 2010 or even 2012 enrollment projections and/or facility use data. Many school sites are holding substantially more children than the buildings were meant for, and there has been a dramatic expansion of portable placement in recent years on many sites. Additionally, SPS may be committing some 60+ classrooms to the City's Preschool Program, which will impact the number of classrooms available in a given building for K-12 needs. Current and updated facility capacity information is needed given all of these new realities. Additionally:

a. WA state basic education laws require that classrooms for K-3 will need to be 17 students starting in 2017. The current capacity of schools calculations use a factor of 24 or 26 students per classroom. (Approximately 20 more school buildings will be needed to meet the state mandate for class size in K-3.)

b. There is a resurgence of public school children in single family homes and neighborhoods, particularly north of Downtown and in West Seattle. Many schools are maxed out with 26 student classrooms (or more) with no room to add additional portables.

4 3. The assumptions around where school children will reside as our population increases, and thereby where schools are needed, needs further analysis . Enrollment trends and projections need to be updated, considering additional factors:

4 cont.

a. In recent years we have likely seen the greatest growth in schools located in some single family neighborhoods, and those with increased low income housing developments (i.e. Sand Point and Lake City).

b. Even as much of the housing development in the City has been in one and two bedroom apartments, there are more children showing up at our schools than expected. Are families living in multifamily apartments at a greater rate than expected?

c. The District does not provide transportation to students that go to schools outside of the assigned neighborhood school (with a few exceptions.) If needed schools are not planned for and sited near where students live, there will need to be substantial changes to the District's assignment and transportation plans.

5

4. The City plans to build a Universal Preschool Program. Where are the facilities for the City's program discussed in the EIS?

Thanks very much for the opportunity to comment and please don't hesitate to contact me with any questions.

Best Regards,

Eden Mack
4211 29th Ave West. Seattle, WA 98199
206-240-6648

Please Note: I am the advocacy/legislative chair for the Seattle Council of Parent, Teacher and Student Associations as well as the chair of the Seattle City Neighborhood Council's Youth Schools and Education committee. My comments above are informed by my roles and in support of these organizations' missions, though I am not writing here directly on behalf of these organizations. I believe that the CNC is drafting a comprehensive letter to which some of my points will be included, and SCPTSA may comment at a later date.

See Appendix B.8 for the attachment to Letter No. 249.

#	Comment	
250	I believe this plan is flawed - see reasons below. I also believe the language used in this "plan" is intentionally vague - leaving future zoning re: "increased zoning flexibility" open to whoever wants to interpret what a community is zoned. Homeowners and business have the right to know when and where they build that the zoning will stay consistent. I also feel that there was very little opportunity to have input on this "plan" for our future. There was one public meeting. While DPD employees may have lifetime jobs - the city council is now going to be by district and I believe this plan is being rushed through the process to beat the deadline of the new election system. 1. The DEIS is a vague document without sufficient detail on specific actions for the public to provide meaningful comments. In short, the DEIS falls short and has little value with respect to decision making about Seattle's future. 2. The four DEIS alternatives considered were developed without sufficient public engagement during the processes. 3. The DEIS lacks a "gaps" analysis and generally fails to address current problems that should be addressed through comprehensive planning. 4. Potential actions hinted at, but not explicitly described, include "increased zoning flexibility" and "development incentives". The impact of such vague action statements cannot be reasonably evaluated by the City or the public. 5. There appears little rational basis for selected amongst the "alternatives". Roberta MacKinnon rmac2002@hotmail.com District 6 VOTER	**1** **2** **3** **4** **5**
251	Looking forward as Seattle grows and people rely more and more on public transportation and car sharing, one area we really need to work on is our sidewalks in the neighborhoods. They are very narrow to non-existent in many places. Any public transportation option includes some walking to the pick-up point, so this is a big issue. Also, we need to look at our zoning with respect to set-backs and green spaces around larger buildings. The recent development on Capitol Hill (and other areas) are boxes which take up every square inch of build-able space. They are detract from the ambiance of the area, have no greenery and often end up overflowing into sidewalks (e.g. leave their dumpsters out year round). Portland's Pearl district on the other hand has nice wide sidewalks, trees and a healthy	**1** **2**

#	Comment	
	aesthetic. Please look at the zoning and think about how to stop the boxification of our neighborhoods and bring green back to the streets. One of the great things about Seattle are our neighborhoods with individual personalities. This are being lost with the recent developments. Please look at the communities and help find ways they can survive. Thank you, Kate Marshall (Homeowner on Capitol Hill)	**2 cont.** **3**
252	Hi there ~ How is Amazon's growth being addressed by the city? By all appearances, its growth seems entirely unchecked. Amazon is ruining this city day by day for many reasons. Seattle is losing its character and quirkiness. Historical buildings and long-time businesses are being bulldozed daily to make room for yet another ugly high rise that caters only to Amazon and its employees. Seattle is becoming bland and boring. If I wanted that, I'd move to the suburbs. Those high rises also block out the sun -- just what we need in Seattle! The new high-rise housing is only affordable to Amazon's own employees (or other high-salaried tech workers). People are moving farther and farther out, not because they want to, but because rents are so high now. $1500 for a 500 square foot apartment in Ballard sounds miserable -- you're living like a sardine in a soulless building and overpaying for nothing special. Amazon is making it incredibly economically difficult to live here, especially for low-wage earners and marginalized populations who are literally becoming more and more physically marginalized. They have no choice but to leave the city, and when they go, so does population diversity. This doesn't apply to only marginalized people -- I have plenty of friends who are educated and professional workers who have moved out of state because they can't find a job, aren't offered good salaries, and can't afford to live here anymore. Do the city and Amazon realize that by only wooing tech workers, there's a brain drain in non-tech industries? Ordinarily a yearly salary of $50,000 would be considered good elsewhere, but not here. It may appear that Seattle is a thriving city with countless jobs, but that prosperity only applies to certain populations, mostly tech workers. My industry hasn't recovered from the recession --there are continued layoffs, salaries haven't kept up with the times and salaries have even gone backward. I'm being paid what I made in 2004. What kind of progress is that? Another housing issue: Every time a single-family home is for sale in my neighborhood (North Beacon Hill), it's bulldozed to put up ugly multifamily urban chic townhouses that only tech workers can afford. The neighborhood is being gentrified, and diverse populations are being	**1** **2**

#	Comment	
	displaced by white people. At the Amazon company meeting a few months ago, an employee questioned Jeff Bezos about the issues I listed above as well as the region's transportation issues. Bezos skillfully deflected the question to a vice president who in turn artfully dodged the concerns about increasing rents and the destruction of Seattle's personality to focus on transportation. And even then, he only spoke of the trolley, which is hardly a solution and more relevant to self-centered Amazon itself because of its location. Bezos was also questioned by an employee about expanding on the Eastside so workers outside of the city didn't have to commute as far. Bezos wasn't interested in that nor in providing workers some relief by allowing them to work from home. One last thing: Have you ever seen Amazon sponsor an arts or non-profit event? Microsoft, Paul Allen, the Gates Foundation, Alaska Airlines and other local companies pull their weight by giving back to the community. Amazon is a stingy, selfish big bully. Thanks for reading. A reply is appreciated. Dottie Martin	**2 cont.** **3**
253	The City has been a dreadful partner to Seattle Public Schools. Instead of doing anything that the City could and should be doing to support the schools, the City appears only interested in taking over the schools. Let the school district do their job and you do yours: collect impact fees for the construction of new schools, build sidewalks and direct the police to patrol near school buildings so children can walk to school safely. The City's worst failure to support the schools has been to encourage and allow increased density in neighborhoods without making any provision for additional classrooms for the children who move into those homes. Shameful.	**1**
254	I realize this is a King county issue but Seattle needs to lean on them. I recently moved to Ballard and have found that it's almost impossible to get a decent ride out of there to downtown whee I work. The buses are all full, standing-room only, and sometimes not even that is available. Politicians and city planners decided to make Ballard a high density district but have not provided adequate bus service to get all those people out in the morning. It's ridiculous. The buses are all full, standing-room only, and sometimes not even that is available. It's also dangerous. Although people hold on for dear life, sudden stops cause people to stumble. In a sudden accident, there would be people flying, which is a lawsuit waiting to happen. With even more people moving in, huge construction projects going up in Ballard, this can't wait until 20135 to be resolved but I suggest it's part of the plan in any case.	**1**
255	With regard to the Light Rail Station being considered for Ballard: I understand that 15th Ave NW and NW Market or 17th Ave NW and NW Market are the two leading sites under consideration. Have you considered 14th Ave NW and NW Market? 14th Ave NW is not only wide (former route for a trolley years ago, I understand), but it's FAR less congested than 15th Ave NW, and	**1**

#	Comment	
	thus could accommodate construction much more easily. Yes, a few businesses would be affected. And yes, folks who now park in the median strip could no longer do so. But it is only a short block away from the 15th and Market "center" and transit connections, and thus seems like a much more reasonable location. Thank you for considering this option.	**1 cont.**
256	I don't like the four current plans proposed. This one, sometimes called "Alternative 5" -- is much better: http://www.theurbanist.org/2015/06/16/support-alternative-5-for-seattle-2035/	
257	I appreciate the outreach associated with the release of the DEIS, and I want to thank Gordon Clower specifically who came to a community council meeting one evening in Greenwood to present aspects of the DEIS and answer questions. I'd like to offer comments in support of Alternative Four as it is presented in the DEIS. I think that growth should be spread throughout the city and I see Alternative Four as an approach that will open up the most new areas to absorb this growth. Alternative Four's emphasis on encouraging growth around high-quality transit corridors I think is also in our best long-term interest for a sustainable and healthy city. Growth is inevitable for Seattle, and I feel strongly that we must prepare for growth as an entire city, as opposed to limiting growth to a few super-dense urban centers and denser hub urban villages. I believe that we can best absorb growth in an equitable and sustainable way if we spread it throughout the city. I also greatly appreciate the considerations of race and social equity in the DEIS. While I support Alternative Four's approach to encouraging growth near transit corridors I understand that this represents a risk for displacement of people in vulnerable communities. I believe that negative impacts of growth related to displacement of vulnerable communities can be mitigated and I would urge that public investments and policies be guided in part by the equity analysis. Tying together my support for spreading growth throughout the city as, Alternative Four would encourage, and being vigilant about issues of displacement and equity, I'd like to see communities that have a relatively high access to opportunity and lower displacement risk opened up to increased density and housing opportunities that are affordable to low income earners. I would like to see affordable housing encouraged in the urban villages and hub villages that exist in these high-access/low-risk communities, and on top of that I would push for changes to zoning that are appropriate for the neighborhood but would also unlock the swaths of single family neighborhoods throughout the city to new densification. Again, I do believe that growth should occur in Southeast, Southwest, and Northwest Seattle communities that are vulnerable to displacement and contain multiple urban villages, but I would want those communities to be prioritized for public investment and policy attention that might mitigate displacement. Thanks for the opportunity to comment!	**1** **2** **3** **4**
258	To whom it may concern: Thank you for the opportunity to comment on this draft EIS for Seattle 2035.	

#	Comment	
	I prefer Alternative 3 or 4. These alternatives are superior in my opinion as they recognize the importance of transit oriented debeloomент. Commuters will likely choose to commute by public transportation in the future and will choose to live in housing in close proximity to light rail stops. I would like to see the focus be placed on allowing high density development near light rail stops. This is why I think alternative 3 or 4 will be best. Thank you for the opportunity to comment. Please contact me if you have any questions or concerns. Best, Daniel B. Mitchell 714 N. 128th Street Seattle, WA 98133 Dmitch78@gmail.com 206-819-8755	1
259	The EIS is incomplete and does not include important information related to the impact of growth on communities of color. The Equity Analysis should be included as a part of the Final EIS. The City should use the recommendations and analysis of the Equity Analysis as you would any other part of the DEIS. The DEIS uses terms that need clarification. The DEIS only refers to direct displacement (eviction, demolition, etc…) not the more common displacement due to increased rents (economic displacement). The Final DEIS should use the terms found in the Equity Analysis. The DEIS does not consider a substantially different alternative that meets the purpose and four Core Values stated in the document, especially the Social Equity Core Value. The City should use the Equity Analysis to create the best growth alternative for the City -- one that couples a real investment of resources to create race and social equity to mitigate the increased risk of displacement caused by growth. The 5th alternative should increase growth targets to 100% of existing capacity in areas that are high opportunity and low-displacement risk like Upper Queen Ann, Phinney Ridge, Ravenna, Crown Hill and Roosevelt. Finally the DEIS omits a major impact of growth on the environment. The DEIS sections on environment and housing/employment should clearly identify the mitigation required to offset the environmental impacts of displacement. Namely that low-income households and communities of color use transit more frequently and have lower car ownership rates and thus if displaced to the suburbs then will be forced to commute more by car, increasing GHG emissions and total VMT.	1 2 3 4
260	I just completed the survey but no section covered future of transportation. My wife and I have been working in international schools for 19 years and after returning to Seattle this last summer	1

#	Comment
	I was surprised to see no improvements in I-5 between Everett and Olympia had been made and would see almost everyday traffic jams going northbound between downtown Seattle and close to the West Seattle Bridge exit. Rail service is ok in Seattle but does not handle high volumes. A more robust rail system need to run north/south and east/west over many areas of Seattle. Our last eight years we were living in Taipei, Taiwan which had the best transport system I have even seen in the world and was constantly being improved with new lines and connections. Seattle's current rail link between SeaTac airport and Westlake is a start but we are far from what we need right now in Seattle. Thoughts, Paul Moreau

1 cont.

Seattle 2035 Comment from Prof. Richard Morrill

Although I'm 81, and won't be around in 2035, I'm still ready to comment on proposed changes to the city I've lived in and loved for 60 years. As you know I have a long history of both academic and professional service involvement in urban issues, locally to nationally.

1 Assumptions. Even though I would personally prefer that Seattle not grow as much as planned for, I must agree that the numbers are realistic, given Seattle's popularity for both jobs and residences, and our reputation for tolerance and entrepreneurship. Likewise, although I would prefer that we could stop gentrification and displacement of minorities and of the poor, and maintain a larger share of "affordable" housing, the market is simply too powerful. Given this reality, which alternatives are the least objectionable – objectionable in the sense of most altering the urban cityscape and of displacing the most vulnerable households?

Before commenting on the alternatives, let me unpack the key assumption of 70000 new housing units/households. Although the DEIS rarely translates to population, I sense that the city population would rise about 100,000. These folks would likely be accommodated by 90 to 95000 in those 70000 added apartments, and 5 t o 10000 people through doubling up, mainly in the extant stock of single family homes, quite reasonable assumptions. The 70000 new units would of course replace existing housing and/or small businesses, fewer, say 5000 in alternative 2, but perhaps 10000 in the other alternatives (e.g., 5000 single family homes, and 5000 apartments or small businesses). Is that about right?

The alternatives

2 I am tempted to want to prefer alternative 2, because it concentrates the densification in the smallest area, by accommodating new housing and people in high rises. But I suspect this would be high risk for the city, because we are not Abu Dhabi or Singapore, and even young singles are not anxious to live in high rises in Lake City or Columbia City! The plan might fail.

I do not like alternative 4, which I suspect is the planners' ideal, because it most totally transforms the existing cityscape to a high density model, and indeed implies what would later be extended to other neighborhoods, as the century wears on. And it is probably the worst for displacement. Alternative 3 is not as bad, because it emphasizes growth where it is already occurring, and where it would be less disruptive of existing communities.

So I am in the peculiar position of slightly preferring alternative 1, "no change in the plan" to alternative 3, since I believe I am correct in assuming that the 70000 units can all be accommodated within already existing zoning, or at least almost so. We need to know if this is the case or not. Does it depend on more U District type up-zones? If so then alternative 3 might be less disruptive. Although the DEIS notes that the capacity under existing planning is 110000,

2 cont. I sense that this is not easy to achieve in practice, so Alternatives 3 and 4 would make it easier??

3 Affordable housing? I put a question mark here, because Seattle 2035 makes no attempt to resolve this issue, which is not a matter of planning, but rather of economic and social policy and market realities. But there is ample research to suggest that inclusionary, incentive zoning of some or all of the 70000 new units, is unlikely to work, whereas preservation of existing, smaller and older houses and apartments could help somewhat.

#	Comment	
262	To whom it may concern, I believe the Draft EIS 2035 does not adequately describe the impacts of green house gases (GHG). Will they go up or down? Which sectors will go up and which will go down. Seattle has a stated goal of reducing our GHG by 62% by the year 2030. It is not clear from the EIS if Seattle's comprehensive plan will get us to that goal. It is key that this is made very clear and transparent in order to make a conclusion about adverse environmental impacts. Please rewrite the sections regarding GHG to point out if the Seattle comprehensive plan will reduce GHG by 62% by 2030. If it does not, the comprehensive plan needs to be revise to achieve this recently state goal. Thank you for considering my view. Sincerely, Arvia Morris. Wallingford. Concerned Climate activist	**1**
263	I am commenting on the City of Seattle Department of Development Comprehensive Development Plan for 2035. I think there are several issues that are not considered at all in any of the four presented "plans": 1. There is no development in the Magnolia, Madison Valley, Mount Baker, Laurelhurst, and Wedgewood neighborhoods. The High-income neighborhoods are not affected at all by the runaway, unplanned growth in the other neighborhoods. I think these neighborhoods should also get the ugly, one-dimensional, six-story, cheaply-built mixed-use buildings as the rest of us. If we're going to ruin the city then we should ruin the entire city, not leave pockets for the rich to be insulated from the ruin. There are plenty of lots in Magnolia where a single-family home could be replaced with a 50 unit building with no additional parking. No worries about the Magnolia bridge not being able to handle the extra traffic. All the new residents will take the bus. 2. Bicycles are not mass-transit. Have you been on 2nd Ave downtown where they removed a lane of traffic to put in a bike lane? It is gridlock at rush hour. And at all other hours there are NO bikes to be seen but still is near gridlock for cars. It is silly and wasteful. Bikes were the passion of mayor McSchwinn but he's long gone now. Get back to reality and solve real problems. 3. Buses and streetcars are stuck in the same traffic as everyone else. There is no incentive to use them as they end up being slower than a single-occupancy vehicle. Mass transit needs to be separated from cars. We voted for the monorail expansion twice because it's a good idea. You all figure out what it takes to pay for it but get mass transit off of the roads. 4. Until you have actual mass transit options that are NOT stuck in the same traffic as everyone else then suspend allowing developers to build housing that does not have at least one parking	**1** **2** **3** **4**

#	Comment	
	spot for each unit. It doesn't make sense to allow this when mass transit is stuck in the 1950s. These folks have cars; they have to park somewhere and now the streets are full of the overflow cars. Have to been to Ballard? Or Capitol Hill? Or West Seattle? Or any of the non-rich neighborhoods?	**4 cont.**
	5. Stop this nonsense of catering to bikes. It's just making things worse. There are much, much higher priorities.	**5**
	6. Build another West Seattle bridge. This one is full. So are the streets.	**6**
	7. Create a Department of Planning. The Department of Development is going full steam but there is no planning at all, let alone comprehensive planning.	**7**
	8. My rent just went up 50%. I'm going to have to move out of Seattle.	**8**
	Patrick Morrison 4100 SW Edmunds #206 Seattle, WA 98116 206-701-4332 patmorr@hotmail.com	
264	Housing needs to become affordable, otherwise people will continue to be priced out of their homes / apartments.	**1**
	Light rail needs to be a thing, and it needs to go from North to South, and East to West. Two bridges aren't enough.	**2**
	Do away with metered merging. Start mandatory educational programs for driving instruction of youth obtaining licenses. Ensure these programs explain how to merge, and you won't need metered merging.	**3**
265	I support an Alternative 5, which spreads growth to other commercial areas around the City, such as Magnolia, View Ridge and other more SF-dominant areas. Many of our commercial strips would do well with some housing on top. Don't assume that residents will just oppose it. These options advance equity because it won't put so much growth in areas at risk of displacement. Please consider it.	**1**
266	Hi, I would like to find out which would it be the impact on Urban forestry and canopy trees in Seattle. How would you address this in the light of the new developments? How many trees will be cut on order to create space for the new developments? Are you going to replant young trees or is it going to be just buildings, sidewalks and restaurants. Thank you,	**1**

#	Comment
	Roxana Nicolae

Seattle Department of Planning and Development
Attn: Gordon Clowers, Senior Planner
@ gordon.clowers@seattle.gov

June 17, 2015

Draft EIS Comments:

1 The Seattle 2035 DRAFT EIS improperly assumes with no show of work an *ideology* espoused for several years by the Seattle Planning Commission (SPC) and a new cover story to extend the ideology's *half-life*.

> *"**Ideology:** A set of assumptions so appealing that one looks at their abstract logic rather than at how the world actually works. (See Insanity.)"*
> *"**Half-life:** By extension, the time it takes for an economic theory or ideology to lose half its influence, e.g. as Marxist value theory, Henry George's Single Tax, Keynesian income theory, Chicago School monetarism, or most recently, neoliberalism.* http://michael-hudson.com/tag/the-insiders-economic-dictionary/page/2/

IDEOLOGY CITATIONS
http://www.seattle.gov/planningcommission/what-we-do/housing
Affordable Housing Action Agenda 2008: page 15 strategy and first recommendation:
> *"reexamine LU59 to determine whether the criteria for rezoning Single Family-zoned land should be adjusted"*

Family-sized Housing White Paper & Action Agenda 2014: page 11 Action 2:
> *"allow flexibility in single-family zoned areas with frequent, reliable transit and in other selected areas"*

http://www.seattle.gov/planningcommission/what-we-do/transportation
Seattle Transit Communities Report 2010: page 39 2nd sentence 2nd paragraph:
> *"evaluate Single Family zoned land within transit communities ...for rezones to higher density..."*

Seattle 2035 Draft EIS 1.5 (page 1-19):
Relation to Plans, Policies, and Regulations...Seattle Comprehensive Plan Land Use Element
> *A redundant policy containing criteria for rezones of single-family properties could also be eliminated; these criteria are currently contained in the Land Use Code (SMC 23.34), and this simplification would be consistent with adopted policy (LU3)....*

Mitigation Strategies: Because no significant adverse impacts are identified with respect to consistency with plans and policies, no mitigation strategies are required or proposed.

I second a fellow architect's dismay at subterfuge and circular reasoning improper in an EIS:
"Eliminat[ing] LU 59 and LU 60, the SF locational criteria, under the notion that it is redundant because it is included in the Land Use Code...is the biggest Trojan horse, because as we know, the land use code is constantly amended, whereas the Comp Plan only comes around every few years and people are focused on it. It seems clear that once the language is removed from the Comp Plan, the next argument will be that it cannot exist in the code without authorization in the Comp Plan. Changes in development regulation now regularly take place, legislators non-the-wiser, without regard for consistency with either the city's Comprehensive Plan or GMA requirements. This needs to stop.

2 COVER STORY CITATIONS
http://www.seattle.gov/planningcommission/what-we-do/our-city-plan
Letter of February 2015 for Council resolution supporting DPD Equitable Development Initiative
http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2273984.pdf
DPD's 2035 Equity Report ignores:

- public policy and regulations' highly counterproductive role, i.e., ceaseless upzoning on top of historical miss-zoning.
- misrepresentation of urban villages as "empty buckets" into which newly fashionable in-city living can be poured without consequence.
- why those of modest means are indigenous to the small houses and wood-frame apartments near neighborhood businesses, aka urban villages.
- abandonment of the affordable side of the urban village equation i. e., corresponding downzones to conserve the majority of the existing housing outside villages while focusing inside villages the construction of additional new housing needed by a growing work force. Per legislative history by Gary Lawrence, 1990s Seattle Planning Director: http://carolinaplanning.unc.edu/volume-20-1/

Towards a Sustainable Seattle: p. 15-16, "*...and reducing the development capacity outside the centers.*"

2 cont.

Seattle 2035 Draft EIS Section 1.4 (page 1-9):
SIGNIFICANT AREAS OF CONTROVERSY AND UNCERTAINTY ...
"Effect of alternative growth patterns on housing affordability, displacement of residents and businesses, and demand for public services and transportation infrastructure investment;
Seattle 2035 Draft EIS Section 1.5 (page 1-21)
SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS
Seattle will face housing affordability challenges under all four alternatives. Rental costs can be expected to be highest in urban centers and hub urban villages—especially Downtown, First/Capitol Hill, South Lake Union, Ballard, Fremont and West Seattle Junction—and to rise the most in neighborhoods where existing rents are low.

The second of these citations improperly prejudges the first, whereas SEPA recommends further study.
New housing, a tiny percentage of existing housing is built at today's costs and therefore will never produce on its own the needed amount of affordable housing. By conserving existing housing, and concentrating the support needed to make villages livable (transit, open space, green streets, infrastructure updating), the lesser amount of affordable housing that will be needed is also be more readily subsidized. Gary Lawrence's paper is proof that Seattle planners once grasped the two-sided equation that comprised the initial plan's *"urban village strategy."* Seattle planners forgot the stability side of the equation, ironically those who stole the strategy do not forget the equation's two sides:
http://www.denvergov.org/planning/BlueprintDenver/tabid/431883/Default.aspx
"In 2014, Denver saw a 5 to 1 ratio of private investment in areas of change compared to areas of stability."
https://sites.google.com/site/livableseattle/Home/who-stole-seattle-s-message

3

Seattle 2035 Draft EIS Section 1.5 (page 1-17)
Land Use, SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS
"...future growth is likely to create localized land use compatibility issues as development occurs. However, the City's adopted development regulations, zoning requirements and design guidelines are anticipated to sufficiently mitigate these impacts. Therefore, no significant unavoidable adverse impacts to land use are anticipated."

Patently false. At industry urging, DPD reinstated a "design freedom" experiment in 2010 that has already failed as badly as 1985-87 when an emergency interim controls halted it and would have been halted again but for "save the planet." As of this writing, developers continue to flaunt loopholes, propose new ones while bemoaning increasing complexity, and piecemeal and otherwise avoid design review. Head-in-the-sand is no substitute for required analysis.

4

DEVELOPMENT CAPACITY & HOUSING TARGETS

April 2014 Washington State OFM Population & Housing Estimates
http://www.ofm.wa.gov/pop/april1/default.asp
King County: 2,017,250 persons
Seattle: 640,500 persons (31.7 % of county)
Bellevue: 134,400 persons (6.7% of county)
King Metro Cities: 774,900 persons (38.4% of county)
post census estimates of total housing units two yr period April 2014—April 2012

King County:	*880,013 less 862,091 = 17,922 new units* (30% SF)	2.29 persons per hh
Seattle:	*323,339 less 312,926 = 10,413 new units* (4% SF)	1.98 persons per hh
Bellevue:	*58,622 less 56,250 = 2,372 new units* (85% SF)	2.29 persons per hh
King County Metro Cities:	*= 12,785 new units* (71% of county's total new units)	2.03 persons per hh

Comment:
38% of the county's 2014 population reside in its Metro Cities
71% of new units built in the last two year period were built in the Metro Cities, overwhelmingly in Seattle where production exaggerated a trend to many fewer people per household than preceded the Great Recession.
Bellevue, the other King Metro City, in contrast produced 85% single-family houses, a higher % than the majority of King Core Cities, e.g. Redmond 29%SF, Kirkland 50SF, Burien 51%SF, Bothell 58% SF, Renton 70%SF.
See details and inevitable results: https://sites.google.com/site/livableseattle/Home/Reality-vs-Vision-2040

4 cont.

2014 King County Buildable Land Report (2014 KC BLR)
http://www.kingcounty.gov/property/permits/codes/2014%20KC%20Buildable%20Lands%20Report.aspx

"King County has an abundance of land capacity for both residential and employment growth through 2031. The surplus for housing capacity is 247,130 units and the surplus for employment capacity is 221,960 jobs. Further, the capacity calculations from which these totals were derived include set-asides for public purpose lands and rights-of-way acreage as detailed in Chapter III, Technical Framework and Methodology. Consequently, King County has adequate capacity for other non-residential growth within the UGA to support the forecasted housing and job growth. The two Metro Cities [Seattle and Bellevue, as designated by Vision 2040] and account for 59% of development capacity in the county and 52% of the employment capacity demonstrating substantial room to accommodate forecasted growth."

http://2035.seattle.gov/seattles-development-capacity-report/
Page 46 of the 2014 KC BLR adjusts Seattle housing target for 2012 to 2031 to **59,014 new units,** and, page 47, its developable capacity to **227,230 new units.** To get from 2014 to 2035 requires deducting Seattle's housing unit change 2012-2014 and then adding an anticipated change for 2031-2035. An account of the target adjustment is not online, but the above noted Seattle 2035 report contains an adjustment of existing development capacity to **224,000 new units** 2015-2035) although the later lacks upzones understudy, e.g University District.

http://www.duprescott.com/articles/article.cfm?ArticleId=693 June, 2015 The Truth About Local Rents
http://www.duprescott.com/articles/article.cfm?ArticleId=686 March, 2015 Seattle's record MF Construction
"Can demand keep up with all this new supply? The honest answer is, who knows. In the past five years new [regional] demand averaged just over 6,000 units a year. That won't work. But keep in mind that developers didn't build a lot in the past five years, averaging only 5,400 units a year. It's kind of hard to create demand for something that isn't there. Looking back a little farther, demand averaged just over 11,000 units a year between 1986 and 1990. It doesn't look like developers will set a new all-time record for annual production in the region. But that's not the case in Seattle. Development hit a record level in 2013 and then topped it last year. We expect that record to be broken again this year and this year's record to be broken next year. Compare these two charts. The first shows development trends for the region and the second shows Seattle only.

Conclusion:
The real estate industry obviously talks two different languages: fear of waning demand to each other, e.g. Dupre + Scott, and fear of supply shortages to public officials, e.g. Smart Growth Seattle. Factors that determine the future regularly wreck havoc with straight line projection and targets. Consequences are seldom as intended. An effective EIS would set aside ideology and cover story for critical thinking. Here are but a few examples of where to begin:
http://www.ofm.wa.gov/pop/april1/poptrends.pdf
http://www.newgeography.com/content/004950-why-we-should-nourish-strong-families
http://www.newgeography.com/content/004951-are-suburbs-causing-crime (expanding role of suburban cities and towns)
Numerous reports in the daily WSJ:
http://www.wsj.com/articles/new-housing-crisis-looms-as-fewer-renters-can-afford-to-own-1433698639
http://www.wsj.com/articles/new-luxury-rental-projects-add-to-rent-squeeze-1432114203
http://www.wsj.com/articles/nicholas-eberstadt-the-global-flight-from-the-family-1424476179
http://www.wsj.com/articles/for-fed-nothing-going-on-but-the-rent-1430070695
http://www.wsj.com/articles/small-city-living-for-multifamily-property-buyers-1432659132
http://www.wsj.com/articles/savings-turn-negative-for-younger-generation-1415572405

5 The deadline for comments precludes adequate response to perhaps the grossest fallacy—development regulations that contradict much of the current plan elements particularly its environmental objectives, in addition to what little green stormwater management the state of Washington attempts to enforce. Two place-markers must suffice: http://soilcarboncoalition.org/water_paradigm and http://www.chelseagreen.com/desert-or-paradise

6 In short, please please update Seattle's GMA plan by restoring the intended affordability strategy of the original and applying it, by retaining the current plan's guidance for low-rise zone set-backs, yards, and density limits to conserve viable neighborhoods and enable most effective/least cost re-absorption of water, by realigning development regulations with same, and by assuring on-going neighborhood initiation and ratification of neighborhood plans.

Anna Nissen, Nissen/Nissen Architect
206 Highland Drive
Seattle, Wa. 98109

Private Research, Anna Nissen, Nissen/Nissen Architect, June 15, 2015

OFM 2012 GMA King County Population Medium Projection
Using 2035- 2015 for review: Seattle 2035 DEIS

King: 2,350,576 less 2,012,782 = 337,794 persons or 16.8% increase over 20 yrs

OFM Current Population Estimate April, 2014
King County: 2,017,250 persons
Seattle: 640,500 persons (31.7 % of county)
Bellevue: 134,400 persons (6.7% of county)
King Metro Cities: 774,900 persons (38.4% of county)

Kent: 121,400 persons
Renton: 97,130 persons
Federal Way 90,150 persons
Kirkland 82,590 persons
Auburn 65,350 persons in King (+9,280 persons in Pierce)
Redmond 57,700 persons
Burien 48,240 persons
Bothell 24,610 persons in King (+ 9280 persons in Snohomish)
King Core Cities: 605,730 persons (30% of county)

King Metro & Core Cities: 1,380,630 persons (68% of county)
omit divided Auburn and Bothell: 1,290,670 persons ((64% of county)

OFM post census estimates of total housing units two yr period between April 2014 & April 2012

King County:	880,013 less 862,091 =	17,922 new units (30% SF)	2.29 persons per hh
Seattle:	323,339 less 312,926 =	10,413 new units (4% SF)	1.98 persons per hh
Bellevue:	58,622 less 56,250 =	2,372 new units (85% SF)	2.29 persons per hh
Subtotal Metro Cities:	=	12,785 new units (71% of county's total new units)	2.03 persons per hh
Kent:	46,333 less 45,891 =	442 new units (99% SF)	2.62 persons per hh
Renton:	41,229 less 40,405 =	824 new units (70% SF)	2.36 persons per hh
Kirkland:	37,450 less 37 235 =	315 new units (50% SF)	2.21 persons per hh
Federal Way:	35,626 less 35,493 =	133 new units (94% SF)	2.53 persons per hh
Redmond:	25,549 less 24,831 =	718 new units (29% SF)	2.26 persons per hh
Auburn:	25,417 less 24,887 =	530 new units (98% SF)	2.57 persons per hh
Burien:	20,031 less 19,908 =	123 new units (51% SF)	2.41 persons per hh
Bothell:	10,643 less 7,633 =	3,010 new units (58% SF)	2.31 persons per hh
Subtotal Core Cities:	=	6,095 new units (34% of county's total new units)	2.50 persons per hh
King Metro & Core Cities 2014 persons/hh	=	18880 new units (105% of county's total new units)	unknown error 2.21 persons per hh
Omit divided cities Auburn, Bothell 2014 persons/hh	=	15340 new units (86% of county's total new units)	error likely still 2.19 persons per hh

Conclusion:
38% of the county's 2014 population reside in its Metro Cities
71% of the new units built in 2012-2014 period were built in the Metro Cities, primarily Seattle

Between 26% & 30% (error range) of the county's 2014 population reside in its Core Cities
Between 14% & 34% (error range) of the new units built in 2012-2014 period were built in the county's Core Cities

Between 64% & 68% of the county's 2014 population reside in Metro & Core Cities
Between 86% & 100% (error range) of the new units built in 2012-2014 period were built in Metro & Core Cities

Preliminary Translation:
In the 2012-2014 period:
Seattle 's production results in many fewer persons per household, than existed prior to the Great Recession.
In Bellevue, the other designated KC Metro City, production was even more one-unit (OFM term) than that the majority of the cities designated KC Core Cities.

Otherwise the response of Core Cities continues a pattern of one-unit (OFM term) construction, with the above noted exception of Redmond, Kirkland, Burien, & Bothell responding with the most two-or more unit (OFM term) construction.

King County's Metro & Core designations together comprise the bulk of the housing construction, redevelopment and displacement in absolute numbers, but not necessarily in percent change nor in accord with Vision 2-040 targets. CAN NOT SAY ACCURATELY WITHOUT PURGING SUMMING ERROR!

#	Comment	
268	Why do you want this city to mirror San Francisco and in some ways New York? This city used to have proud working class roots and clearly not in this tech magnet. Once again migrants from California who are fleeing the costly coastal cities of the south are doing so here. There is nothing wrong with people trying to move to affordable domains but I don't see anyone busting a move to Cleveland, Detroit and other cities with equally if not vacuous cheap infrastructure. This city has no ability to expand roads and housing unless you dense up. And then even more needed infrastructure will be needed to accommodate. Who is paying for this is in the most regressive State in the Union for taxation? How many consumption taxes and property levies can one approve before the ceiling is hit and no one working in normal job - Teachers, Nurses, Bus Drivers, Postal Workers, Machinists, Mechanics and other union oriented positions are driven out? You want a city of diversity? Right now it is largely white male tech workers and the H1B1 Visa holders that comprise this cohort. And yet you call Prostitution human trafficking? Really as that is the only work for women here soon enough as this is a group that the terms misogyny and social misfit as the co-joined twins of the freak show living in Amazonia. Maybe that is what we should change the cities name to. I am looking for a nice freeway on ramp or doorway in which to re-locate as that is where I will be soon enough as a woman of a certain age and a municipal worker I have nowhere else to go unless I leave entirely. Should I gofundme to get the money to leave! It all goes full circle to the tech sector.	**1**
269	I will preface this with the comment that I have lived in and around Seattle for all of my 56 years. There is a noticeable inequity shown in the growth distribution maps and the displacement risk maps. There appears to be almost no increased densities in the most economically affluent neighborhoods in the city on any of the map alternatives. Nothing in NE Seattle, incredibly including around Sand Point Way by Magnason Park ; nothing in Magnolia, nothing from Madison Park all the way down the shoreline to Seward Park; nothing on Sunset Ridge in NW Seattle. Additionally the displacement risk maps are flawed and inaccurate. Financial displacement is already occurring in the Ballard Hub area. Also comparing the truck route maps with current traffic patterns shows that the city still does not have a plan to improve the flow of traffic off of the freeways in corridors across the city, particularly across Mercer St. Stop lights need to be removed, not added and bikes and pedestrians moved off the traffic plain that cars, trucks and busses use. Stop backing up traffic onto the freeways at Mercer Street and Stewart St. in particular. The buses and light rail will not remove traffic from the roadways, it may not even keep up with the projected growth, and the city itself can't accommodate all the migration to the region that jobs within Seattle are driving. Traffic flow must be improved and interruptions to traffic flow must be removed at every opportunity to keep the city and region from falling into the gridlock that happens at certain times of day around here already. These current proposals are inadequate.	**1** **2** **3**
270	Plan does not appear to address the absence of commercial services in some existing multi-family communities, which results in a higher number of single occupancy vehicle trips.	**1**

#	Comment	
271	There is a serious problem with all the alternatives presented. Looking at the transportation element, it is clear non of the alternatives puts the city on a path to meeting the City greenhouse gas reduction goals. At least one of the alternatives should do this. To accomplish this the bike, pedestrian and transit infrastructure would need to be further built out, and more areas of the city would need to be in walking distance to basic goods and services. Alternative 5, as presented by The Urbanist, identifies areas in need of more walkable access to goods and services. I support the concept presented in Alternative 5. However, it needs to be implemented with a build out of our alternative transportation networks.	**1** **2**
272	None of the four alternatives are adequate. The Urbanist Alternative 5 is the best approach to growth over the next 20 years.	**1**
273	Dear Gordon, I am in agreement with Historic Seattle's assessment of the SEATTLE 2035 Draft EIS proposal. Their key points are outlined below. The Draft EIS proposal states that “All Comprehensive Plan elements will be reviewed and updated as part of the proposal.” The draft does not address Economic Development, Neighborhood Planning, Cultural Resource, and Urban Design. The current plan includes preservation under the “Cultural Resource” element (CR11-CR16). The new Comp Plan replaces "Cultural Resource" with an "Arts and Culture” element. This new element focuses on art (public art, cultural space, arts education, creative economy, creative placemaking) and seems to eliminate historic preservation and protection of cultural resources. How will preservation be included in the future Comp Plan? How are the city's existing preservation policies and regulations being addressed? The “Environment” element addresses environmental stewardship, one of the plan’s core values. Environmental stewardship is primarily defined within the context of the natural environment (air, land, and water resources) and not built environment. The analysis should address the role of preservation vs demolition in terms of environmental stewardship. Preservation Matters! Preservation and creative adaptive reuse of our existing building stock cuts across all four core values of the Comp Plan. Preserving historic places enhances community vibrancy and cultural identity; serves as an economic driver; conserves precious resources; and contributes to social equity. As a city, we need to recognize that livable does not necessarily equate to bigger, newer, denser and more vibrant. Care should be taken in the new draft to ensure that future citizens do not simply become cogs in a sterile Sim City maze. Sincerely, Leanne Olson	**1** **2**

#	Comment
274	Limit parking in downtown. Plan housing near existing mass transport. Expand mass transport to Eastside and North to Ballard, etc. Expand bike lanes. Homelessness...push for Federal programs to provide services and housing to homeless who are not veterans. Veterans get separate financial benefits within this program.

1

June 17, 2015

City of Seattle,
Department of Planning and Development,
Attn: Gordon Clowers
700 5th Avenue, Suite 2000,
PO Box 34019, Seattle, WA 98124

Sent VIA Email: 2035@seattle.gov

SUBJECT: Draft Environmental Impact Statement - Seattle's Comprehensive Plan:
Toward a Sustainable Seattle

Dear Mr. Clowers:

Thank you for the opportunity to comment on the Seattle's Comprehensive Plan: Toward a Sustainable Seattle - Draft Environmental Impact Statement (DEIS).

1 The update to the Seattle Comprehensive Plan and the analysis in the (DEIS) provides an opportunity to assess and analyze the success and failure of the residential urban village concept as it relates to specific areas.

Unlike other residential urban villages in the City of Seattle like Greenwood-Phinney Ridge, Admiral or Green Lake which are dynamic mixed use residential neighborhoods, the Residential Urban Village vision in the Aurora-Licton Spring neighborhood plan has never been realized. It calls into question whether or not the Aurora-Licton Spring Residential Urban Village is viable and should even be retained.

2 The 1999 Aurora-Licton Springs Neighborhood Plan Urban Village vision seeks vibrant mixed use centers with neighborhood oriented retail goods and services and housing on the *east side of Aurora Avenue* supplemented by and supported with strong pedestrian connections from the west side of Aurora Avenue to the east side.

However, the 1999 Aurora-Licton Springs Neighborhood Plan recognized that substantial progress would be needed to realize the Vision and states,

> *"Other than Oak Tree Village (which is perceived by the community as serving a wider geographic market and lacking some essential neighborhood goods and services), the Aurora-Licton Residential Urban Village lacks access to local (as opposed to regional) shopping and services."*

Sixteen years later, this is still true. Economic development has languished in the Aurora-Licton Springs Residential Urban Village. Essential neighborhood serving local goods and services have not developed.

3 Unfortunately, it appears the success of the urban village growth strategy seems fixated on how many housing units are built within an urban village. *However, the success of an urban village should not be solely measured by how many housing units have been developed.* By that measure alone, the Aurora-Licton Springs Urban Village would be a success because it has already achieved approximately 120% of its 2005-2024 growth target.

An urban village's measure of success also means that neighborhood serving pedestrian oriented commercial retail and service uses have developed in close proximity to the residential development to meet the needs of the growing population residential urban villages are to accommodate. Those neighborhood serving uses have not materialized in the Aurora-Licton Spring residential urban village.

In addition, the pedestrian linkage and supportive pedestrian environment that would link the west and east sides of the Aurora-Licton Springs residential urban village has not happened either. Aurora Avenue is a divider, not a unifier of the Aurora-Licton Springs Residential Urban Village. Aurora Avenue is a State highway that is dominated by auto oriented land use. Redevelopment to mixed use development with vibrant neighborhood serving goods and services has not happened along Aurora Avenue.

4 Ironically, the most current development proposal on Aurora Avenue is for a four story self-storage mini-warehouse facility extending the full extent from Aurora Avenue to Linden Avenue (west side of Aurora Avenue, City of Seattle Project Number 3019569).

This self-storage mini-warehouse development exemplifies what is wrong with the Aurora-Licton Springs Residential Urban Village. Mini-warehouses are auto oriented uses. They are not pedestrian oriented. Users by necessity need to bring vehicles to a mini-warehouse.

Further, self-storage facilities are not large employment generators that can help promote a jobs-housing balance in Aurora Licton Springs. That the City of Seattle zoning code even allows mini-warehouses of this scale as a permitted use in the Aurora-Licton Springs Residential Urban Village is indicative that the Residential Urban Village strategy in Aurora-Licton Springs is not supported by City land use codes and regulations.

5 In the meantime, the Aurora-Licton Springs area is characterized by prostitution, drug and other illegal activity taking place in the open, in spite of the Seattle Police Department's North Precinct (which is eventually to be relocated further away) presence within a few blocks of 100th Street North and Aurora Avenue. Pedestrian activity and economic development is discouraged by these activities.

6 Keep in mind that Peter Steinbrueck's "2014 Seattle Sustainable Neighborhoods Assessment Project" describes the Aurora-Licton Springs Urban Village as follows,

> *"Aurora North (SR 99) is the closest shopping district to Licton Springs community, and is busy, high speed traffic corridor lacking adequate pedestrian amenities, and deteriorated and/or impassable sidewalks, safe crossings and ADA compliant sidewalks. Most goods and services are not available within easy walking distance, nor is walking between long auto-oriented blocks a pleasant experience."*

The Aurora-Licton Springs Urban Village is not pedestrian friendly. Many areas lack sidewalks and other infrastructure. People are reliant on motorized vehicles in this urban village when compared to others such as Greenwood-Phinney Ridge or Green Lake. Ballard. The market in Aurora-Licton Springs has not responded to the type of development that synergizes a residential urban village.

7 In the meantime, because Aurora-Licton Springs is a residential urban village, developers are able to develop micro-housing with no parking under the guise that there are pedestrian accessible supporting retail stores or services. This is not the case, and the neighborhoods within the Aurora-Licton Residential Urban Village will be even more impacted by development absent parking.

8 Besides a lack of private and public investment, policies in the 1999 Aurora-Licton Springs Neighborhood Plan have not been implemented including the following,

> ***"****Encourage development to enhance the neighborhood's visual character through use of tools such as City-wide and Aurora-Licton neighborhood-specific design guidelines, including Aurora Avenue specific guidelines."*

There are no Aurora-Licton Springs neighborhood specific design guidelines. Absent such neighborhood design guidelines, the citywide design guidelines apply which leads to development inconsistent with neighborhood values. Combined with a City zoning code that perpetuates auto oriented development pattern on Aurora Avenue, the Aurora-Licton Springs Residential Urban Village Vision is destined to fail.

The Aurora Licton Springs Residential Urban Village is an urban village in name only. The needed balance between residential development and supporting commercial services has not occurred. The investment in infrastructure like sidewalks, street lighting that characterize a strong pedestrian oriented environment has not been made.

9 The final EIS needs a thorough analysis of the viability of individual residential urban villages, rather than assume that they are all the same. It specifically needs to assess the transportation, land use and public service impacts of additional residential

9 cont. development when corresponding neighborhood serving commercial development does not occur.

10 With specific reference to the draft EIS, Alternative 1 and Alternative 2 would not be appropriate since each states, “No change in the number, designation or size of urban villages.” There needs to be flexibility under the alternative that is eventually selected to allow for modification in the geography of urban villages. This includes a reduction in the size of a residential urban village if not its elimination altogether.

Alternative 1 is even more problematic since it states,

> “Greater residential growth emphasis in hub urban villages, in selected residential urban villages and more growth outside of urban villages.”

When speaking to residential urban village emphases under Alternative 1, the DEIS states,

> “Residential urban village emphases: 23rd & Union-Jackson, Aurora-Licton Springs, Columbia City, Madison-Miller and Othello.”

In looking at the alternatives and projections, Alternative 1 also makes a housing growth assumption of 2,500 additional housing units in the Aurora-Licton Springs Residential Urban Village while Alternatives 2, 3 and 4 assume 500, 700 and 700 housing units respectively.

Directing more residential growth into the Aurora-Licton Springs residential is not appropriate under any alternative absent a more thorough review of the viability of Aurora Licton Springs as a Residential Urban Village.

The City needs to be more flexible in addressing urban villages and not assume all urban villages are alike or as successful as the other. The final EIS and the Seattle Comprehensive Plan needs to recognize this.

11 For Aurora-Licton Springs specifically, the City needs to:

- Update the Aurora-Licton Springs Neighborhood Plan, including reviewing the urban village boundaries. If the City policy continues to direct mixed use development on the east side of Aurora Avenue, then it is conceivable that the west side of Aurora Avenue can be removed from the residential urban village altogether.
- Conduct a market study to determine the feasibility for mixed use development along Aurora Avenue to determine if the vision set forth in the Neighborhood Plan for neighborhood serving commercial goods and services can even be achieved.

11 cont.

- Develop a capital facilities plan as part of the Aurora - Licton Springs neighborhood plan update, so that public investment to make the neighborhood more pedestrian friendly and safe can be appropriately programmed.
- Consider whether it is the City's intent to allow zoning that perpetuates automobile oriented uses, such as mini-warehouses, along Aurora Avenue and extending into the residential areas of the urban village. If so, then the urban village concept is not supported by land use policy and development regulations.
- Adopt neighborhood design standards for Aurora-Licton Springs.

Thank you again for the opportunity to comment on the Draft Environmental Impact Statement.

Sincerely,

David Osaki

PO Box 75185
Seattle WA 98175-0185

#	Comment	
276	Seattle was once a center of creativity, I'll give you that, but sadly not anymore. The creative spirit gave way to smugness, cliquishness and elitist conspicuous consumption. Seattle revolutionized the desktop software industry in the 1990's and has been resting on it's laurels ever since. I moved here about six years ago from Santa Fe, New Mexico in search of creative minds and have been thoroughly disappointed and disillusioned. This city is inhabited by idealouges, impragmatic people who are driven by ignorance, arrogance and a nonexistent sense of proportion. Urban utopiasts who imagine a city where everyone who moves here is single, childless, able-bodied and content to live in 270 square feet while paying the equivalent of a mortgage on a small house and either walking or biking to work in a cold, wet, climate with hilly topography. No mystery why suicide rate here is unusually high. This is certainly not my idea of utopia, how about you? Additionally, I feel it's worth mentioning, that this is a very limited view of the physical capabilities of a significant portion of the population, and demonstrates a complete and total lack of understanding of the true logistical needs of a true viable modern metropolis. I think, we should aspire to more, simply put, I think the future will have parking. I don't understand Seattle's hostility. What, because cars are somewhat problematic now, they'll be problematic forever? No matter what your opinion of the internal combustion engine, we now have more and more cars that are hybrid, extended range electric, or all-electric and soon they'll be autonomous. That is the next wave of emergent technologies that will change the entire economy and redesign entire cities worldwide. Seattle was put on the map by embracing and developing just this type of revolutionary technology, it was what this city did well, and now I see the city turning into a bunch of luddites who cloak themselves behind a green-washed shroud of self-righteousness. Truthfully, Seattle should have been on the forefront of developing and democratizing this technology, not hiding from it. Seattle could have stayed on the forefront of research and development, and it could have remained a culture of innovation, but now it won't. Seattle's future now is to be a slowly collapsing enclave of the once newly rich.	**1** **2** **3**
277	Please continue the 40% canopy cover goal in the new comp plan. 30% canopy cover is inadequate. The reduction in # of trees would range from 250,000 to 500,000 if the goal is reduced, based on estimates of the current number of trees of 1.3 million to 3 million. The loss of tree canopy is a significant adverse Impact. The Draft EIS refers to reducing the Comprehensive Plan's goal to increase the overall tree cover from 40% to 30%. The cost estimates of retrofitting our decrepit storm drain system can be reduced by increasing the number of trees, especially if contiguous street tree parkways are used instead of isolated pits for individual trees surrounded by concrete. The Urban Forest Stewardship Plan goal of 30% canopy cover is a working plan, while the comp plan goal of 40% canopy cover is an aspirational goal. The UFSP canopy cover goal was developed by a committee composed mostly of professional developers. They were erroneously working backwards to decide how much of the city should be	**1**

#	Comment	
	sterile concrete & impervious rooftops, not determining ecological composition & function of the urban forest. The 50% lot coverage limit of single family zones is greater than the canopy cover goal, and they should be consistent. The canopy cover survey is inaccurate, and no count of the number of trees in Seattle has been made, in spite of the last revision of the comp plan, which enabled a count every 5 years, and which has still not been done. This revision has erased from public consciousness the previous comp plan requirement that an increase of 1% per year must occur in order to accomplish the 40% requirement by the year 2028. The 40% canopy cover goal should not be revised until a tree census has been taken. There is no explanation of why this reduction of 10% is to be made. The claim that the reduction is to be consistent with the Urban Forestry Stewardship Plan is implausible because there is no analysis of how this reduction in our tree canopy will affect the environment. There is no discussion of how reducing our tree canopy goals will affect our air quality and water quality, health and quality of life. Wildlife habitat and heat island effects and other environmental impacts are also ignored. Thanks for listening, Seattle ! Arboreally yours, Michael Oxman ISA Certified Arborist #PN-0756A www.treedr.com (206) 949-8733	**1 cont.**
278	High density housing is fine – but we need to do it in a manner that doesn't ruin the neighborhoods with too many cars competing for two few street parking spots. We need regulations and accompanying enforcement (fines pay for the enforcement) to assure that units that are built without parking spaces are occupied either by persons without vehicles or by persons with demonstrable off-street parking for their vehicles.	**1**
279	Rather than focusing on land use to expand housing, hospitality and business. Why not think of utilizing the vast areas of water in the Puget Sound region for floating developments in housing and hospitality dwellings? Could create a new industry of concrete flotation systems that are transportable throughout the NW waterways.	**1**

#	Comment	
280	One concern I have in reviewing the Draft EIS is that I do not see a plan for how the rest of the city, outside of the urban villages, will help absorb the population growth. If so many more people move into Seatte, but these large areas of single-family homes are completely exempted from having to make room for them, I am afraid that Seattle will become an even more stratified city. The urban villages will fill with small apartments for single folk, while the areas of single-family homes will become so expensive that only the wealthiest families will be able to afford to live there. Where will working class, or even middle class families live? Are there provisions for housing suitable for those populations to be built? A solution that I would like to offer is to expand family-friendly residential growth into areas where it is currently prohibited. The neighborhoodsd of Georgetown and South Park, for example, are primed to grow, but their growth is constrained by the surrounding MIC lands that are zoned industrial and often under-utilized. I fully accept that having industrial land is extremely important to Seattle, and I do not want to see it be done away with, but the City must make a choice. Seattle2035's own reports have stated that industrial jobs are not growing in this city, and as a proportion of the population, they are declining. If industrially-zoned lands are being underutilized (or, in some cases, being left completely fallow) they should be rezoned to an appropriate commerical or residential use. This will serve to both expand much needed family-friendly residential land in the city and to encourage industrial businesses and landowners in the city to put their land to good uses that produce quality, family wage jobs. Thank you for taking the time to consider my comments. Sincerely, Matt Pearsall Georgetown Resident	**1** **2**
281	It's apparent where current city planners want to go; they don't want cars they have a vision of all of us peddling around in our bikes, living in subsidized housing with no real idea how to fund their plan. In my opinion they are a bunch of "Tunneled Vision Shoemakers" who cannot see the "Big Picture". On the other hand they have given Developers a free hand to build what they want with no regards to the inferstructure to support the new construction. West Seattle is a prime example; Developers are going crazy with no plan how to move the additional people in and out of what is essentially an Island. If these same planners are involved in future planning I can see no possibility of a workable plan. I grow weary of Politicians who continue to promote class warfare; their job is to unite not divide their constituents. The fact that your survey divides respondents into every possible group tells me that you place a different value on peoples response based on age, sex, race and other non merit factors. I thought we had gotten beyond that. I would hope the future plan includes compensation for those who suffer lose in the value of their property as a result of future construction; for example many people are losing views diminish their property value by tens of thousands of dollars.	**1**

NE SEATTLE QRISK-JOHNPERKINS@YAHOO.COM
JOHN E PERKINS & JULENE T WEAVER

Date: June 18, 2015

Subject: Seattle 2035 Comprehensive Plan (Comp Plan) Draft EIS[1] Comments

This memo comments on four concerns raised by the Draft Comp Plan: spreading the growing pains, helping our poorest citizens keep their rental homes where they currently live as a show of the City's compassion, improving landlord-tenant-city relationships; and ending a conflict of interest involving the SEPA Checklist.

1

I. Spread the Growing Pains

The Draft EIS states that "Single family homes … account for 84 percent of the residential structures, but supply only 45 percent of Seattle's housing units." (p 3.6-7) The current plan to shoehorn all growth into areas that have already exceeded their planning development according to the current 2015 Comprehensive Plan is unfair as there exists rooms and other arrangements in the single family homes that could be rented out. As all of Seattle will be absorbing incoming residents in the form of traffic delays and increased burdens on public utilities such as water, sewage, and power, the burden of absorbing the increase should be borne by all neighborhoods, too.

In 2013, Alan During in *Unlocking Home: Three Keys to Affordable Communities* proposed three ways changes in local laws could expand housing supply. They were:

- "legalizing rooming houses
- uncapping the number of roommates who may share a dwelling, and
- welcoming accessory dwellings such as granny flats and garden cottages."[2]

Yes, the Comp Plan draft envisions new residents wanting to live close to transit and thus avoid owning cars. Nice dream, but as data in the EIS itself shows, 85 percent or more of peak travel time trips are by single occupancy vehicles or carpools (figure 3.7-13). Those cars, trucks, and vans sit in parking spaces when not in use. There is much more curbside parking open for these vehicles in the residential neighborhoods that will absorb some of the growth if During's suggestions are passed.

II. Honor the City's Commitment to being a Compassionate City

2

To *plan to disrupt* the lives of the city's poorest citizens already burdened with rents and utilities that eat up the majority of their limited incomes is a disgrace. But that is exactly what is being planned. For example, in the EIS one finds many statements like these:

- Demand for housing by a growing share of households with greater wealth and income has put upward pressure on housing costs, particularly rents. (p 3.6-7)
- There is a widening gap between housing costs and income across all income categories. Overall, the percentage of households spending 30 percent or more on housing costs is increasing. (p 3.6-8)
- Areas with high rates of growth may experience greater upward pressure on housing costs relative to slower growing areas. Average rents for units built in 2012 through 2014 were 23 percent higher than those for all units citywide (Dupre+Scott Apartment Advisors 2014) (p 3.6-10).

2 cont.

- Housing affordability will be an issue of concern under all four alternatives, including Alternative 1. As noted in the Affected Environment section, a significant portion of Seattle's households are burdened by housing costs and, over 60 percent of the lowest income renter households (≤ 30 percent of Area Median Income) are estimated to pay more than one-half of their income for rent and basic utilities. (p 3.6-17)

This is shameful. As a self-styled Compassionate City, to plan—as this EIS does—for the disruption of the lives of poor people, many of them refugees escaping oppression or wars, is to knowingly create *Double Refugees* as City policy. The City must reverse its priorities, and do all in its legal powers to **preserve affordable rents** paid by low income and immigrant citizens *where they currently live.*

III. Modernize the Landlord-Tenant-City Relationship

3

The underlying philosophy of landlord/tenant laws have not been fully examined, for the most part, since the Middle Ages![3] It is time for the City to update legal practices that arose during another time when tenants rented the land and built their own simple dwellings.

Institute changes that **increase trust and fairness** between landlords and tenants. Currently, too many of the rights or common practices favor the landlord. For example, many rental agreements require the tenant to give the landlord the first and last month's rent plus a security or cleaning deposit. What happens when there is a disagreement about whether the apartment is "clean enough"? As it is now, the landlord unilaterally makes that decision, and not surprisingly, often decide to keep the cleaning deposit. Tenants who feel this is wrong also sadly conclude there is nowhere to appeal for justice and accept this bitter outcome.

Instead, what if this money were put into an **escrow account** under the administration of a neutral third party such as a department in the city? If both tenant and landlord agree on the state of cleanliness, the money is returned to the tenant. Should there be a disagreement, an independent inspector would visit the property and make a binding decision.

The idea of a third party being available to both the landlord and tenant suggests Seattle create a **Rent Court** to mediate and arbitrate disputes about steep rent hikes, tenants trashing the property, cleaning deposits, etc.—any issue tenants and landlords disagree about.

For public policy and to understand the fairness of rent changes, the city needs to **audit the profits of landlords** to make sure they get a fair but not excessive rate of return. This is done in New York[4], for example, and the information becomes part of the public conversation about rent increases and fairness. **Institute fair limits on the abilities of landlords** to price rents to keep them from pricing tenants out of their rented homes.

4

IV. End the Conflict of Interest

While reviewing the paperwork for Project #3020374 in the Ravenna Springs Park neighborhood, we uncovered a serious ethical flaw—**developers submit the State Environmental Policy Act (SEPA) Checklist. This is a blatant conflict of interest.**

Why? The developers prime motive it to make a *profit*, not to be honest, fair, or preserve the natural and built character of a neighborhood. In practice, this conflict of interest shows up in nonsensical, misleading, or false responses. For example:

Question: What kind and amount of vegetation will be removed or altered?
Applicant's response: Existing trees in bad health (overtaken by ivy) and ivy will be removed from teh (sic) site and replaced with native drought tolerant plants recommended by the city arborist.
Comments: The trees removed for this project will not be replaced with "drought tolerant plants" … they will be replaced with an apartment building!

According to the City's Tree Protection Code, [5] trees 6 inches or greater in diameter cannot be removed from steep slopes without City approval. On this site 8 trees exceed that standard, the largest is 87 inches in circumference. Only two (2) dead trees are overwhelmingly covered in ivy.

This is our favorite bit of make believe found in the SEPA Checklist:

Question: Is the site or affected geographic area currently served by public transit?
Applicant's response: Yes, 22nd Ave NE as well as 25th Ave NE provide very frequent transit service.
Comment: How wonderful, if true, but *there is NO TRANSIT running on 22nd Ave NE!*

Recommendations:
So ,then, who should fill out this form? A city department could fill out the form, as is the case with City Light evaluating dangers from power lines. The Department of Neighborhoods could file the SEPA Checklist.

This conflict of interest is not a frivolous issue, for SEPA can be cited as a reason to deny a permit. Alternatively, a permit may be granted based in part on a SEPA Checklist that is false, incomplete, or misleading. How frequently is that the case?

Please recommend an immediate moratorium on all applications in the pipeline which require SEPA Checklists until new independent ones can be submitted.

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[1] Seattle Comprehensive Plan Update Draft EIS May 4, 2015. Pages cited in text.

[2] Accessed 4/20 at http://www.sightline.org/research/unlocking-home/

[3] Uniform Law Commission, Residential Landlord and Tenancy Act Summary, accessed 4/20/2015 at http://is.gd/bojJDu

[4] New York City Rent Guidelines Board, accessed 6/17/15 at http://www.nycrgb.org/

[5] Accessed 6/9/15 at http://www.seattle.gov/dpd/codesrules/codes/treeprotection/default.htm

#	Comment	
283	All 4 plans are deficient enough in some manner that I did not choose any of them. The deficiencies include: No mention of neighborhoods issues that are largely job based in nature (SoDo, Interbay, Ship Canal, Georgetown, South Park) and no mention of the land bank (the Manufacturing Industrial Centers and Port areas) that is essential for 1/3 of Seattle's tax revenue. No real attempt to link commercial traffic growth problems with urban growth and design problems. No attempt to directly assess mistakes in past planning, missed growth targets (over density, lack of job growth, lack of transportation solutions)--the presumption is that were are starting from a zero index and not from a severe design and maintenance deficit. Questions concerning impacts are value based only and not based on pragmatic community concerns. There is no acknowledgement that the citizens will be able to have any say in negative impacts moving forward 20 years, especially if the city continues its present trajectory of not following its own planning policies. All of these questions needs to be address in a bold, direct, and manner that is relevant to day to day living concerns, and not just the esoteric problems faced by planners.	**1**
284	this city is on a disastrous course with all the growth. it like the decision makers have a certain mindset and are leading down the wrong road....the city should be requiring all apt buildings to have 1 1/3 spaces for cars for every unit. we shouldn't be wasting parking spot on frivolous parklets. we should be discouraging people from moving here because we do not have the infrastructure to handle it. they are causing inflation for the native seattlelites. we really should be encouraging people to move to detroit. they would be able to buy a house and be the change their city would love. or maybe its time to build that high speed rail line to Moses Lake which has plenty of space. and people are getting harassed by real estate agents and developers. we should be putting a moratorium on development. you are ruining our city.	**1**
285	Dear planning committee, Back in 2000 a group called Friends of Ravenna Woods raised funds for and won development rights for an area called Ravenna Woods, a parcel located roughly between the Burke Gillman Trail and Ravenna Ave, and between NE 45th St and NE 51st Sts. In my reading of your plan to develop the region that includes this parcel (http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2273587.pdf), I fail to see that the Ravenna Woods parcel is protected at all. Below I copy relevant correspondance re the development rights obtained in 2000. Thank you for looking into this and letting us know if this steep wooded area with envioronmental impact concerns has lost its protection somehow....??? Sincerely, Pat Prinz Res Prof Emerita, UW and longtime resident of the Ravenna Area north of UW Here is some history showing that this area should be closed to further development:	**1**

#	Comment	
	On 3/8/2000 4:00 PM, Newell Aldrich wrote: > This is an update from the office of Seattle City Councilmember Nick > Licata, for those of you who have written him previously about Ravenna > Woods. > > Today, the Culture, Arts & Parks Committee of the City Council passed > by a 3-0 vote an ordinance acceding the $450,000 contribution from the > community, for the purpose of acquiring Ravenna Woods. Close to > $40,000 in interest on this donation was also donated. > > This adds to the $250,000 appropriated from the 2000 City budget, and > $300,000 granted from the Neighborhood Matching Fund. > > A final City Council vote should take place either Monday, March 13 or > 20. It should easily pass. > > Councilmember Licata worked with Carol Eychaner, representative of > Friends of Ravenna Woods, in drafting several revisions to the > ordinance so that it accurately reflects the community's desires. > > The City's Law department will be proceeding with acquisition or > Ravenna Woods. > > Newell Aldrich > Legislative Aide to Councilmember Licata	
286	I just wanted to compliment this process. It's using modern channels to solicit community input. I heard about this survey through a Facebook community group I belong in. I hope that this form of transparency and community input continues as plans are further refined. I also am offering my support, as a citizen, to support this effort. Please let me know if there are volunteer opportunities on this important effort.	**1**
287	A few extremely general comments. City of Seattle Comprehensive Plan and Environmental Impact Statement should: 1. Reinforce goals of the Climate Action Plan. 2. Infuse the Comprehensive Plan with initiatives that support our commitment to the goal of a carbon neutral Seattle by 2050. 3. Focus on efforts to provide affordable workforce housing units in the downtown core. 4. Consider creation of an overlay district for the Seattle Waterfront neighborhood that requires 5% affordable housing units to be provided as a requirement in all new multifamily	**1** **2**

#	Comment	
	housing projects along the Alaskan Way and Western Avenue corridors. Consider extending this requirement to Urban Centers and Urban Villages. Reinforce multifamily tax credit as developer incentive, not linkage fee. 5. Emphasize the need for access to public services. 6. Take a hard look at the 10 year Plan to End Homelessness and assess what was not successful in the effort and how a reconsidered Comprehensive Plan might inform a renewed commitment and a renewed effort. 7. Incentivize equitable housing in all downtown 'feeder' neighborhoods. 8. Consider closed green infrastructure loop along western avenue and Alaskan way – develop in partnership with Seattle 2030 District. 9. Support Alternative 4- Guide Growth to Urban Villages Near Transit. 10. Utilize the meeting and networking structure of existing social and cultural not-for-profits to create a networked coalition of organizations working together to support the Race and Social Justice Initiative. Convene a task force to comprise the list of target organizations and do initial outreach to potential organizational partners. 11. Emphasize working with SPS to site a school downtown and improve the quality of education at and services to urban school sites. My comments are also provided on the Draft EIS Open House RECAP (http://2035.seattle.gov/recap-seattle-2035-draft-eis-open-house-and-public-hearing/) on the video starting at 55:10. Rico L. Quirindongo, AIA Architect | Associate rquirindongo@dlrgroup.com DLR Group Architecture Engineering Planning Interiors o: 206-461-6000 | m: 206-849-6128 51 University Street, Suite 600 Seattle, WA 98101 Find us at: dlrgroup.com | Facebook | Twitter	**2 cont.** **3** **4** **5** **6** **7** **8** **9**
288	I support "alternative 5" as laid out by The Urbanist.All areas of the city have an obligation to support growth, and the right to access the urban benefits that come with it. Regardless of wealth, race, class, or zoning, each portion of the city must support its share of the city's growth. As an example, single-family residential zones are appropriate for many of the common Missing Middle housing types, such as cottage housing, detached accessory dwelling units, duplexes, triplexes, townhouses, and even rowhouses. These housing options should be broadly allowed with minimal interference from neighbors. These building types are equitable, desirable, and	**1**

#	Comment	
	compatible with the character of residential neighborhoods. While this type of growth may seem painful to some, it presents a wide range of opportunities and benefits: proximity to jobs, access to high-quality transit, grocery stores and restaurants, parks, schools, and more. All these benefits come from growth and density, not the other way around. All residents, whether new or old, deserve to partake in these urban benefits, regardless of where they live. Expand the number and size of urban villages to accommodate growth throughout the city. There are ample commercial and medium-density residential areas in the city that have no urban center or urban village designation, such as Aurora Avenue (north of N 36th St to N 85th St), Upper Fremont, "Frelard", Westlake, Nickerson, Madison Park, Wedgwood, South Magnolia, Interbay, Graham, and many more. Each of these areas presents an opportunity to absorb growth while providing tremendous urban benefits. The city should also consider extending boundaries in these areas beyond just the immediate medium-density residential and commercial core properties. Transit walksheds extend beyond the core, and bikesheds extend even farther. Connecting bike rides with transit, something that will become even easier with Pronto!'s expansion, shows that the urban villages can be much larger. Overconcentration of growth leads to targeted displacement and disruption. Only by spreading growth throughout the city can we ensure that no single area experiences an unreasonable share. Expand urban zoning in urban villages and urban centers. Designating areas as urban villages isn't enough. The city needs to go further and expand the areas of urban development in urban villages and high-intensity zoning in urban centers, especially where there is extraordinary demand for housing (e.g. Ballard, Wallingford, South Lake Union, and the University District). This will reduce the number of people that are displaced due to demolitions. Actively mitigate the impacts of growth in areas where displacement risk is high. We support adopting policies that will alleviate or prevent actual displacement. This might include mandatory participation in the multifamily tax exemption (or a similar program), mandatory inclusionary zoning or linkage fees, one-to-one replacement of affordable units in perpetuity, focusing housing levy dollars in these areas, using the city's bonding authority for sustainable affordable housing options, and other socially progressive housing strategies through the land use code or city actions in the form of programs and partnerships. Seattle deserves an equitable approach to growth, and we believe that Alternative 5 is that approach.	**1 cont.**
289	Congratulations on the effort of think ahead and plan city's growth. I also commend you for soliciting current citizen's recommendations. I have lived in Seattle for the 15 years. I have seen the city grow. Seattle is the smallest large city in which I have lived. Having lived in cities with populations as large as 18 million, many times over the past 15 years, when I expected a plan or foresaw things happening, which unfortunately the city of Seattle did not appear to be equipped to address. I feel that a common theme, is a tendency to devise "Seattle's" way of dealing with certain problems. It is true that Seattle has its own landscape, population and culture; but, population growth and city planning is an art and science that is as old as humanity. I think an element that has been conspicuously missing over the past 15 years, is reaching out to other larger cities (not necessarily in the US but abroad) to see what systems they have planned or what mistakes they have made and build their experiences. Every time I travel to Paris, I am amazed at how a city with such population manages its circulation. I also recently saw an amazing documentary about Copenhagen and its	**1** **2**

#	Comment	
	city planning over the past 60 years. I think as much as it is important to engage Seattle's residents, it is equally important to scope other cities with successful city planning and learn from them. Obviously, the most important element of planning ahead is transportation. Again, public transportation in major cities is almost a completely solved problem. One dilemma that Seattle has had, is the tendency to want to appease all modes of transportation in the same region at the same time, which is impossible (specially with the geographic limitations of the city associated with its bodies of water). Best Regards, Ali Ravanpay, M.D., Ph.D. Neurological Surgery University of Washington, Seattle	**2 cont.** **3**
290	The most important part of this plan, to me, is providing housing opportunities to low-income and middle-income households. I don't fall into a low enough income bracket to qualify for section 8 or other low-income housing provided by the government, but I don't make enough to pay rent in the city where I work. This means I have to move farther away and will contribute to traffic congestion, because I can't afford to live where I work. I live in Ballard and am on the verge of being forcefully displaced. My apartment building was purchased by an investor who is kicking everyone out so that he can renovate and charge more for rent. Because of the recent increase in rent, city-wide, I can no longer afford to live in Ballard, which is really sad because I love my neighborhood. New buildings go up constantly and they are supposed to offer a certain percentage of their apartments at a reduced rate based on need or on a sliding scale, but the majority of them opt to pay the fine rather than offer this discount to middle and low income households. This needs to be stopped! Please don't forget about the folks like me, who are working full time and living just above the poverty line. Thank you!	**1**
291	I love Alternative 3 - Having grown up in Chicago, I personally am attracted to areas that are urban villages - where I can walk to various businesses or catch a bus/train to get somewhere else. I think the future of Seattle, given our inability to make 6 lane highways, is in providing easy access to great public transit and supporting business growth in the surrounding neighborhood and planning multi-income residences. This would bring great opportunity to areas such as south seattle and Rainier Beach area where access to amenities is limited - with focused business and transit growth in these areas, the residents will have access to finding jobs in their neighborhood or having access to public transit that will get them to their jobs.	**1**

#	Comment	
	I live in the Green Lake neighborhood and love my urban village, but I also love that it has a clear boundary. This allows our community to have the best of both worlds - those that want/can afford single family homes and those that want a more urban experience in apartments or condos - but each enjoy the amenities our urban village provides. Thank you for this opportunity! Rebecca F Reuter	**1 cont.**
292	I really appreciate all the hard work that's been done on the various ways to grow Seattle. After reading reviews on the four plans, I read a local blog and really liked the "Alternative 5" here: http://www.theurbanist.org/2015/06/16/support-alternative-5-for-seattle-2035/ I hope to own a place in Seattle in the near future but its been difficult with house prices constantly going up. I grew up in Connecticut and was comparing notes with my brother who lives in Glastonbury, a town of 40,000. He was looking to switch to a bigger house, in that community there was 160 different houses avail to buy. I live in the Wallingford neighborhood of Seattle and in a neighborhood that has I think at least 30000 (depending on boundaries) there are like maybe 5 houses for sale. Personally I think the only way Seattle can become a bit more affordable is to enable a bit more supply to be built and to reorient processes to enable this (or at least ameliorate prices a little) . This really goes for renting and buying. I believe that at the end of the day we need to open up a bit more of the city to more urban development in more places which is what attracts me to "Alternative 5". I know this is a hard process and probably the people that own homes in the area I live in likely in some way want to freeze development "to keep the character" but I think at this point Seattle needs to figure out how to balance specific neighborhood concerns and desires with the larger demographic changes (increasing people to the area). I want to say that I'm in favor or loosening things a bit more like in Alt 5. Good luck with your work, looking forward to the final proposals, I hope that with messages like these maybe things will be nudged in a way I see is better. Thanks, Chris Robinson	**1**
293	My biggest concern is affordable housing. While rent control/subsidized housing mike make a difference more will need to be done to keep up with demand. I think the current setup and current council gives to much weight to single family property owners. 68% of the city is zoned for that use. To make housing more affordable we really need to take a hard look at changing zoning to allow for more development of dense housing. Good Luck!! Thanks, Bryce	**1**
294	Dear City 2035 staff,	

#	Comment	
	Thank you for listening to public comments. A quick reply would be appreciated if you read it (amongst probably hundreds of comments).	1
	* Alternative 3 seems the best: spread growth around, not concentrated just near lightrail (though that will happen anyways). Thus I prefer alternative 3 to alternative 4. Alternative 1 is not the way to go because it is "same as usual". Alternative 2 makes moderate sense for downtown, but I would like to spare University District the same fate, with the proposed zoning for up to 400 feet high buildings, which would in my opinion destroy university district and turn it into Bellevue.	2
	* Residential and Job density need to harmonize: The city needs to make sure that the jobs grow with the residential growth, minimizing commutes. That people live where they work. However, that will drive up home prices in those areas, but minimizing commutes is key to lowering our footprint and continue to function as a city when we will face resource shortages in 2035 and beyond. In some ways we have to go back to the old ways, intermingling residential and local jobs. The work should not just be retail jobs by far. So when I hear 'urban village', I cringe if it is just more boutique retail shops and restaurants and not more diverse jobs such as health care, high tech, insurance, auto repair, plumbing shops, etc. We need to have a policy that encourages job diversity and regional spread of this diversity. Sort of back to the old times where different urban centers had their shoe repair shops, barbers, restaurants, auto repair, etc all in the same local core.	3
	* Be selective which employers come in: Please keep overall growth in check. Do not invite more companies into the city than we can accommodate long term. We already see the devastating effects of Amazon building up downtown by driving home values and rents up to unsustainable and painful levels. We can and should dissuade more growth by asking more of those companies (higher local taxes to fund transportation and affordable housing and road maintenance) and only the ones coming through on those commitments will stay and survive. Invite companies that are likely to be around in 2035 and are not based on a short term unsustainable model. Amazon for instance is not sustainable since our consumer culture is ravaging the planet. * High density: the high density mantra is a mixed bag. If we tear down old buildings to accommodate more people moving in, we increase our environmental footprint. High-rises, even new ones, may falter in the next earthquake that will come some day. High density cities are by definition somewhat problematic since the food is trucked in and in times of crisis cities deteriorate quicker than small towns. And crisis will come, I am pretty sure. Rising food prices, climate change, social unrest. We should encourage people not to come here more than we can absorb long term. Just what size is right for seattle is unclear. I would say we were the right size probably from 1980 to 1990. * Harmonization with national policy, population-management: The city of Seattle needs to have a long term outlook that is harmonized with state and notional policy. Of course there is no 30, 50 or 100 year state and national policy as far as I can see, but Seattle could lead the way and encourage thinking along those lines. Some of the answers may not sit well with our overall liberal open-to-the-world identification, but we have to be realistic, rational and scientific in our	4

#	Comment	
	approach. We need to have a conference and regular dialogue with other cities on the topic of long term sustainability, sharing the burden and re-open the dialogue on (over-) population, be it regional or national. Paul Ehrlich (the population time bomb) was wrong in his timing but not wrong in principle. Rising rents and homelessness are multi-causal, but population pressures are certainly one of its causal factors. We will get more climate refugees from the local and global South. But Seattle cannot accommodate more than relatively-speaking tiny fraction of them (100,000 people are a tiny fraction and even that will hurt). More people have to and should live in the countryside since we need to grow food with more manual labor since small scale organic agriculture after peak oil is likely the best way forward (in fact even I think about going that path). * Encouraging would-be newcomers to live within their means: By pricing newcomers out (or by limited-supply rent controlled living space or subsidized housing) we can somewhat force/encourage people to live within their regions within their means will also encourage population stabilization across the nation. If we ease off the pressure of other regions (like California with its drought problems) by basically inviting more people in, we further encourage "business as usual" in those region. We cannot afford to wreck our city by becoming like Los Angeles or S.F.. We will face California-style droughts and water shortages if we invite in ever more people. Does Seattle have a long-term sustainability plan/model to deal with the consequences of lower snow pack, droughts that flows into the 2035 vision ? If so, I would be curious to hear about it. We have to start talking about over-population, both locally and nationally and globally, as politically fraught and politically incorrect that is seen in many political strata. * Social equity: The dissuasion of growth should not come just through higher prices due to demand outstripping supply. Otherwise we become very tilted towards the High income earners and diversity suffers. Rent control and affordable housing are answers. But we have to live with the fact that not everyone who wants to live here fulltime will be able to. People can rotate in and out of the city and they will. * community living: The higher density does not have to come in the form of new buildings. The city can encourage (through tax policies for instance) the formation of intentional communities or other forms of community housing that has a far lower foot print and encourages other new models such as child sharing, car sharing, etc that all reduce resource and population foot print. Maintenance on buildings that are owned by communities is done with more manual labor and locally sourced and again less environmentally taxing. Transforming the city to a city of locally owned and operated communities would put us on the map. * Cooperative ownership: Just like community living, the city can encourage and foster more employee owned businesses. That is better than inviting companies like Amazon that price everyone out and that do not donate much money for philanthropic causes. We can lead the way and be a great example and inspiration as a city. We already have done so many great things. In closing I would like to offer to be part of the solutions:	**4 cont.** **5**

#	Comment	
	I gladly can offer to be part of the conversation and consult on the issues with ideas and inspirations since I have written on and thought plentiful about this topic and I believe I have answers to it. For more ideas, please contact me: Christian Roehr 206-418-0755 Kind regards and thank you for reading my comments. Christian Roehr ====== sources: The 4 alternatives 1. http://seattle2035.publicmeeting.info/Media/Default/PDF/2015_0514_UrbanVillage_Alt1_v4c.pdf 2: http://seattle2035.publicmeeting.info/Media/Default/PDF/2015_0514_UrbanVillage_Alt2_v4c.pdf 3. http://seattle2035.publicmeeting.info/Media/Default/PDF/2015_0514_UrbanVillage_Alt3_v4c.pdf 4. http://seattle2035.publicmeeting.info/Media/Default/PDF/2015_0514_UrbanVillage_Alt4_v4c.pdf	**5 cont.**
295	I completely support the comments set forth by the Seattle Nature Alliance: We are concerned that pressures from population growth and development will subject our natural areas to overuse and will ultimately degrade nature for wildlife, and the nature-experience for people. In addition, we would like to emphasize that the Plan should include much more specific goals with regard to protecting existing trees, and for increasing overall tree canopy. The stated reduction in tree canopy goals from 40% to 30% coverage is unacceptable. We should be increasing the goal, not decreasing it. City dwellers as well as urban wildlife depend on the urban forest for health and well-being, and this need will be much more dire in the future, with more people and fewer natural areas to serve them. The Plan should have more specific goals for increasing open space, and allowances for using surplus city-owned land as protected and preserved open space specifically designated and reserved for wildlife habitat and passive/low-impact recreation or scenic beauty. Instead of	**1** **2**

#	Comment	
	selling off this surplus acreage for development, the City should be improving and restoring this land for our open space needs. In the future, people will desperately need more natural areas close to where they live, as transportation to outlying natural areas will be much more difficult, and for many lower-income people, virtually impossible. They will need nature close to home.	**2 cont.**
	Chapter 3.4 includes some very odd references to "Proposed Expansion Areas", with maps showing Residential Urban Villages with dot-hatched areas overlapping onto existing parkland. This makes it look like the Urban Village—and residential development—will be extended into part of Ravenna Park, and other parks as well. We assume this is a mistake, or that there is some explanation that makes sense. It cannot be that the Plan is truly proposing to build in existing parklands, because that would be far outside the bounds of wise planning. Please clarify this in the next Plan document. Please state clearly that parklands, greenspaces, open spaces and natural areas are expressly and forever exempt from urban village development.	**3**
	In conclusion, we feel the Plan should be much more nature-friendly, and should increase, protect, and preserve natural areas and tree canopy.	**4**
	Sincerely, Arlene Roth 3725 SW Austin St. Seattle, WA 98126 206-349-3767	

4128 Burke Ave N
Seattle WA 98103
June 16, 2015

City of Seattle Department of Planning and Development
Attn: Gordon Clowers
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124
via:2035@seattle.gov

In re: Comments on Seattle 2035 Draft EIS

Dear Mr. Clowers:

Thank you for preparing a draft EIS that is so well written. I would like to offer the following comments.

1 In summary, I have three major concerns about the draft as presented. First, nowhere can I find either as an attachment to the draft or on the Seattle 2035 web pages the precise proposed action that is being reviewed. It is summarized in general terms in Section 2.3 and other parts of it are hinted at from time to time in the draft but you should not have to tease out what is being proposed. Second, too often the draft reaches the conclusion that there is no adverse environmental impact expected based on an incorrect reading of either the impacts or what constitutes an adverse impact. As a result important mitigation strategies are never presented. An example is its treatment of the estimated greenhouse gas emissions increases over the next 20 years. Third, the draft EIS fails to propose important mitigation strategies within the context of the Comprehensive Plan even when there are clearly enumerated adverse effects. The most obvious example is the identified deficits in park acreage within various villages (Table 3.8-3) while the draft EIS only laments existing inadequate funding for park acquistion and urges the Parks Department to "strive" to acquire more property. While the use of impact fees on new multi-family construction is mentioned with respect to funding transportation improvements, the use such fees for parks and open space acquisition is ignored.

2 Now, with respect to the first concern: Resolution 31451 states that DPD is to "2014: Continue public outreach. Develop a set of draft revisions to the Plan. In the spring, . . publish a draft EIS . . ." Clearly it was the intention of the Council that a draft of the proposed action was to be made available prior to the publication of the draft EIS. Not having that proposal to refer to, it is very difficult to know if one is correctly interpreting the sometimes seemingly contradictory suggestions as to what might be in the proposal that are outlined in Section 2.3 and scattered throughout the draft EIS. Some goals and policies from the existing Comp Plan are presented in appendices but this is no substitute for publishing the proposed action. The discussion in Section

2 cont. 2.3 is a self-consciously vague summary covering all four alternatives, but is not the actual proposal. Not having a proposed action before us, one cannot know if, in fact, all the proposed changes have been reviewed and analyzed in the draft EIS. One cannot know exactly what is proposed as the comments, both in Section 2.3 and elsewhere in the draft EIS, are clearly paraphrases at best. Unfortunately my comments here will have to be based on my interpretation of these often vague statements and may not correctly reflect DPD's intent. I would urge DPD to publish the draft document they have prepared, or prepare one if they have not, and then reopen the comment period on the draft EIS, after amending it as they find necessary having reviewed their specific proposed action.

3 My second concern is most clearly illustrated with respect to discussions of greenhouse gas (GHG) emissions. On page 3.2-8 the draft EIS states goals from the published 2013 Climate Action Plan that include reductions in GHG emissions from vehicles (75% reduction per mile traveled and 20 reduction in VMT) and buildings (10 to 25% reduction). I have been told that these goals equate to an overall reductions is more than 60% but I'm unable to provide you with a citation for that number. On the other hand, the draft EIS states that transportation GHG emissions will be reduced by 9.2 to 9.6% (Table 3.2-3) and VMT will be increased by 0.5 to 1.3% from 2015 to 2035, depending on vehicle mode (Table A.1-4/5). In Table A.1-2 we see that without action by the federal government on motor vehicle fuel economy GHG emissions from transportation will increase by 15%. Given the presentation in A.1-7/10 using reductions against 2015 for transportation suggests increases in emissions from non-transportation sources are estimated to be on the order of 100,000 metric tons CO_2e by 2035. The draft EIS then concludes that "no significant adverse impacts have been identified" so "no mitigation strategies are required". Excuse me, but the goal necessary to achieve Seattle's needed reductions is easily 6 times the projected reduction and both building emissions and VMT are projected to increase rather than decrease. This will be a very significant environmental impact. Without achieving the adopted goals we will all be toast; burnt toast. The mitigation strategies that will achieve the City goals should be presented.

4 Similarly, the draft EIS downplays the adverse impacts of air toxics by using an EPA suggestion in uncited guidance of 100/million population excess deaths as a goal in analysis of air toxics when Washington regulations (WAC 173-460-090(7)) clearly establish a standard of 10/million for air quality analysis. It should also be noted that both EPA and NIOSH have frequently used 1/million in establishing various emission standards for hazardous air pollutants. The text states that risk from major highway exposure declines dramatically about 650 feet from the highway centerline, which it does, but the map in Figure 3.2-2 illustrates that all of South Park residential areas and the western edge of Beacon Hill at distances as much as 2,500 feet from the roadway centerline are exposed to risks exceeding 100/million. This is a dramatic decline from the value closer to the roadway of as much as 2000/million but remains as significant risk under adopted Washington policy. In addition to residences, two Seattle Public Schools, Maple and Concord Elementries, are located such that the children in those schools are at significant risk. Other schools near major highways are at less risk since they are either farther away or are located upwind on the west side of the roadways. While the options in the proposed action may not result

4 cont. in any significant difference in risk among the four options, the draft EIS should note that there are significant adverse environmental effects due to air toxics in all the options. The comment on page 3.2-28 that the Comp Plan could recommend sensitive land uses be located beyond 650 feet is clearly inadequate and based on a misreading of the risk analysis report behind Figure 3.2-2. The advice should use a value of at least 1650 feet and probably 2000 feet. Further the use of a MERV 9 to 12 filter as mitigation within the adverse effect zone is clearly inadequate. A MERV 10 filter only removes about 30% of $PM_{2.5}$ particulate matter. At least a MERV 13 filter, which can remove 50 to 70% of $PM_{2.5}$ particulate matter should be recommended with MERV 16 (removes 88%) necessary for sensitive uses such as schools and hospitals.

A comment on page 3.2-5 that "attainment designations are not expected until December, 2014" and air quality data in Table 3.2-2 that only goes through 2012 could both now be updated.

5 The discussion of the noise ordinance (pg 3.3-5 et seq.) seems to completely ignore the waivers (SMC 25.08.580 et seq.) that are routinely granted to construction operations. Variances for public works (SMC 25.08.655) can be granted for multiple years, making the standards discussed by the draft EIS meaningless. The draft EIS should discuss the noise impacts of future construction within the context of granted variances.

The short history of the noise ordinance (pg. 3.3-5) suggests it came down from above, based on State law. In fact noise ordinances in Washington began in Seattle when a stakeholder group began work in 1971, partly in response to public complaints reported in several neighborhood newspapers. The work was initiated by the Executive but included Council members and staff. After the ordinance was adopted by the Council one of the City Council members became County Executive and urged the County Council to adopt a similar ordinance. Slight revisions were then made by the City in its ordinance to harmonize the two. This led the legislature to provide authorization to Ecology to develop and establish regulations, which are based almost entirely on the original Seattle and King County ordinances.

6 The section on land use clearly anticipates major changes in the treatment of single family-zoned properties. It speaks of "new uses . . . introduced into areas originally developed under single-use zoning" and suggests "rezones to mixed-use" (pg. 3.4-15). On page 3.4-35 the draft EIS, when discussing possible changes to the Future Land Use Map (FLUM) and the zoning code, states that "it does not identify these [changes] as probable significant adverse impacts". Yet the summary of the proposed action, on page 2-33, states that the FLUM will be revised so all the property within a center, hub or residental village would be shown as the same color. Presumably this means, and this is suggested elsewhere (pg 3.4-24, 3.4-25, 3.4-35), that rezoning of property to a more intense use would be allowed within each center, hub or residential village boundary. In other words, a resident well within a single-family zoned area inside a village boundary could wake up one morning to a notice that a spot rezone of his next door neighbor to multifamily is proposed. Yet this is not a significant adverse impact? The trauma of the experience will certainly be an adverse psychological impact on the property owner and will, most likely, be a significant adverse financial impact on all single family-zoned properties within residential

6 cont. villages. The use of this EIS to qualify that action for the SEPA Infill Exemption (page 2-33) would further adversely impact the beleaguered resident.

As mitigation the draft EIS suggests that "existing regulations solve any changes in height, bulk and scale" (pg. 3.4-21) and that "complaint-based enforcement of the City's applicable regulations . . would provide protection against some of these potential impacts." Since neither of these remedies has been effective in the past, why is it assumed they will be effective in the future?

Looking at the map on page 3.4-11 we can see that the Morgan Junction and Wallingford Residential Urban Villages (and quite likely a new village at 135th and I-5) are quite different from all the others in the great amount of low height limit, and therefore most likely single family-zoned property, that is included in the village boundaries. These villages should be addressed specifically with respect to the possible redrawing of the village boundaries to exclude much of the single family-zoned area that is now included so that both look more like Greenwood-Phinney Ridge or Admiral.

That none of this is identified as a possible adverse impact that requires mitigation strategies is quite a feat. The draft EIS does proceed to suggest that some modifications to the zoning code might mitigate some of the impacts but none are really necessary. Then it turns around and describes the impacts as Unavoidable Adverse Impacts and says they are just the result of urban growth and we should just relax and enjoy it.

7 In the Policy Relationships discussion it is proposed that Comp Plan support for single family location criteria be removed from the plan (pg. 3.5-8) since the same information is contained in the zoning code. This is quite concerning as removal of the requirements from the zoning code will be an easy next step without the support of the Comp Plan.

8 The discussion of the Urban Forest Stewardship Plan notes that the plan has a working goal of 30% tree cover by 2037. On pg 3.5-1 the draft EIS explicitly calls for an adjustment of the current Comp Plan goal of 40% down to the lower value of 30%. It is important to note that the Comp Plan goal is just that, a goal, while the Urban Forest Stewardship Plan is a working document stating what a developer-dominated committee felt could be achieved each year without disrupting development goals. Another and more sophisticated way of looking at the two numbers would be to state the 40% goal as a city-wide goal and to provide lower numbers for each of the Urban Center, Hub and Residential Urban Villages, with the 30% goal retained for the Residential Urban Villages. There has not been a definitive tree inventory for Seattle, only estimates based on aerial photographs. Until there has been an actual inventory we do not really know where we are with respect to either the Comp Plan goal or the Stewardship Plan objective.

9 The draft EIS does offer a detailed analysis of the difference in impacts for the four alternatives. What is surprising is how little, almost insignificant, the differences are among them (Table 3.7-6), particularly the lack of any difference between Alternative 3 and each of the others. However,

9 cont a projected increase in travel times between some sectors that is stated to be a "roughly 40-70 percent increase" is found to be "No Impact" (Table 3.7-8). Impacts on available parking are acknowledged for all alternatives. Mitigation strategies are suggested but all would apply for all four alternatives and no proposals specific to the individual EIS alternatives are offered. Mention is made of the possible use of impact fees for transportation projects but no details are offered regarding the amount of money that might be raised by different designs of the fees so an evaluation can be made of how effective this possible mitigation strategy might be. It is interesting that in evaluating Unavoidable Adverse Impacts the authors of this section conclude that in the long term drivers will always adjust to different modes such that there will not be any adverse transportation or parking impacts.

10 The transportation section does not discuss the frequent lack of sidewalks north of 85th Street and how this adversely affects pedestrian traffic. Nor do any of the cited programs address a comprehensive response to this issue. Not even the often-suggested 20-year plan to match LID improvement funds is offered as mitigation for pedestrian use in this area.

11 The discussion of parks and open spaces does acknowledge that the significant gaps between supply and demand for open space (Table 3.8-3). People do have a tendency to travel great distances outside their own neighborhood to access desirable parks and playfields, which tends to hide the adverse impact of the local shortages. The only mitigation strategies offered is an urging of the Parks Department to "strive" to leverage local funds to match state grants. Clearly this is something that impact fees, such as suggested for transportation, are intended to address. Here the draft EIS should offer an analysis of what the costs might be for the acquisition of the necessary park lands and how different designs of an impact fee might result in future growth paying to meet the needs caused by future growth.

12 There are two elements of the Comp Plan that seem to be missing. There is no discussion of the required Port of Seattle element. The conflict in SoDo with the proposed sports stadium is a clear example of the need for the City Comp Plan to coordinate with the plans of the Port of Seattle.

13 And there is no discussion of the aesthetics of the new development. Seattle is burdened by particularly plain and unimaginative large apartment and commercial buildings. One has only to go north to Vancouver, B.C. or across the Pacific to Tokyo, Seoul, Beijing or Shanghai to see truly beautiful new buildings. Some have blamed the local architectural community as having developed a culture that assumes there is enough beauty in our surroundings and none is needed in the man-made world. Others have suggested that the plainness of privately-constructed buildings in Seattle is because so many are built by developers who intend to sell them as soon as they are occupied, while in other areas the buildings are built for a particular owner who identifies with the building and sees it in terms of self expression. While we can do nothing about this fact of our architecture and construction industry we can perhaps nudge it a bit by more aggressive use of Design Review on a larger range of buildings and with more opportunities available to the Design Review Boards to reject just plain poor design, rather than being forced to nibble at the edges, and the inclusion on the Boards of more folks who are not a party to the development industry but have a clear creative bent.

14 Conclusion

Based on my reading of the draft EIS I am compelled toward Alternative 3 as the best approach to developing the new Comprehensive Plan. The taxpayers of Seattle and its surrounding cities have made a substantial investment in Light Rail. They deserve a return on that investment. It is clear from the data presented that they will have the best chance at achieving that return by focusing new residential and commercial/service growth within the transit station walksheds, particularly around the stations south of the Beacon Hill station.

15 It was often said in the 1970's that Seattle was as John Spaeth planned it. That was, in large part, because the zoning maps and code were so prescriptive. With the new flexibility advocated by the current generation of planners and developers it is unlikely that the goals of this Comprehensive Plan will be realized, even approximately. If, in fact, we would like any one of the three alternatives to be the way forward for Seattle there need to be some very significant carrots and sticks moving development into the desired spaces. For example, let us assume we choose Alternative 3. We might begin by assigning a city-wide development impact fee. We would then double that fee if a multi-family or multiple-use structure is built in a Hub or Residential Urban Village that is not on the Light Rail line and triple it if it is built outside any of the three villages. I rather doubt this is permitted under the law, but the intent is clear and perhaps some legal variant could be devised.

An alternative might be a moratorium on new townhouse, condominium, apartment, multi-use, etc. development in the Residential Urban Villages and outside the three villages until the villages on the Light Rail line have reached some percentage of build-out. Obviously I am proposing that a very large stick is needed to get the next 20 years of development to follow the lead of the Comprehensive Plan. Perhaps DPD can offer a better approach to actually making it happen.

Yours truly,

Mike Ruby

#	Comment	
297	I would like share my support for alternative 3 (or possibly 4). I think the success of the light rail will be partially dependent on directing growth to areas around the stations. I grew up in Atlanta, which has a heavy-rail system built in the 70s and there was no effort to direct growth in a transit-oriented manner. This has resulted in very low densities around almost all of the stations outside of the downtown area. There is little to no pedestrian infrastructure linked to the any of the stations, making the system very hard to access (I've tried!). It has resulted in the whole system being almost useless for the overwhelming majority of the metro Atlanta population. I really don't want to see the same thing happen to the Light Rail here in Seattle. I am concerned that Alternative 3 and 4 may result in increased displacement of marginalized groups of people, but I'm glad to see that this plan recognizes that and is including strategies to address that. I hope these strategies will be implemented and monitored and adjusted as need with lots of input from the marginalized groups. Also - more parks, please!	1
298	I am disappointed to see that the city is attempting to steer discussion of the city's future in a certain direction through the choice of its thematic question, "How should Seattle grow?". How about, "How much should Seattle grow?" Or "Should Seattle grow?" Two of the city's most pressing problems, transportation and housing costs, are a direct consequence of the number of people living in a constrained area. There has been a blind belief on the part of the current and past city governments that growth, by definition, is good and that there is no such thing as too much growth. This all premised on the vain belief that we are so clever that we can "design" our way around these problems. City government continually re-zones the city to accommodate businesses thinking about relocating here which, of course, increases the number of people. Family planning is widely endorsed because we understand that numbers matter. We use herbicides and insecticides because we understand that numbers matter. We proactively control rodent population because know that numbers matter. We encourage the neutering and spaying of pets because we understand that numbers matter. We endorse limited class sizes in our schools because we understand that numbers matter. I could go on and on citing policies and actions we implement because we understand that numbers matter, yet we stick our heads in the sand and pretend that when it comes to population growth in the city numbers don't matter. I understand that this is not going to change because growth is about money and in the "new" Seattle money trumps everything. That fact, however, does not make a policy of endless growth good policy. That point of view comes from a 68 year old Seattle native who fully understands that the city has always been a great place to live and that this obsession with growth has not made it better place to live, it has just made it a more difficult place to live.	1
299	To Whom It May Concern: It would be nice if the city would require builders to provide adequate parking for the amount of units in their building and to require that the units are offered as part of the rent price instead of	1

#	Comment	
	charged separately. Currently, a lot of apartments and condos charge extra for parking which forces cars to park on our residential streets while the garage parking sits half empty. Another thing that happens is many builders are allowed to build multiple townhome style units on former single family lots, without providing garages. Again this clogs up the residential streets with parked cars. I also think builders should be charged fees to provide things like lighting, sidewalks and even set aside parkland when they build huge buildings that bring more people to the neighborhoods. They should contribute more to our roads, traffic light systems , parks and etc for the privilege of being able to build these huge places. It's a way to keep our neighborhoods nicer while keeping residents taxes from going up.	**1 cont.** **2**
300	Dear planners, I responded to your online questionnaire, basically supporting the 4th growth alternative. I since then have read the thoughts, set out below, in The Urbanist (they call it "Alternative 5"). I find the ideas to be compelling, logical, and just. An emphasis on social equity, sharing of benefits, affordable housing, and minimizing displacement of low-income residents should be a core philosophy in all of our decisions regarding growth. We can do it. Thank you. J Peter Shapiro Inverness Community in NE Seattle 1. All areas of the city have an obligation to support growth, and the right to access the urban benefits that come with it. Regardless of wealth, race, class, or zoning, each portion of the city must support its share of the city's growth. As an example, single-family residential zones are appropriate for many of the common Missing Middle housing types, such as cottage housing, detached accessory dwelling units, duplexes, triplexes, townhouses, and even rowhouses. These housing options should be broadly allowed with minimal interference from neighbors. These building types are equitable, desirable, and compatible with the character of residential neighborhoods. While this type of growth may seem painful to some, it presents a wide range of opportunities and benefits: proximity to jobs, access to high-quality transit, grocery stores and restaurants, parks, schools, and more. All these benefits come from growth and density, not the other way around. All residents, whether new or old, deserve to partake in these urban benefits, regardless of where they live. 2. Expand the number and size of urban villages to accommodate growth throughout the city. There are ample commercial and medium-density residential areas in the city that have no urban center or urban village designation, such as Aurora Avenue (north of N 36th St to N 85th St), Upper Fremont, "Frelard", Westlake, Nickerson, Madison Park, Wedgwood, South Magnolia, Interbay, Graham, and many more. Each of these areas presents an opportunity to absorb growth while providing tremendous urban benefits. The city should also consider extending boundaries in these areas beyond just the immediate medium-density residential and	**1** **2**

#	Comment	
	commercial core properties. Transit walksheds extend beyond the core, and bikesheds extend even farther. Connecting bike rides with transit, something that will become even easier with Pronto!'s expansion, shows that the urban villages can be much larger. Overconcentration of growth leads to targeted displacement and disruption. Only by spreading growth throughout the city can we ensure that no single area experiences an unreasonable share. 3. Expand urban zoning in urban villages and urban centers. Designating areas as urban villages isn't enough. The city needs to go further and expand the areas of urban development in urban villages and high-intensity zoning in urban centers, especially where there is extraordinary demand for housing (e.g. Ballard, Wallingford, South Lake Union, and the University District). This will reduce the number of people that are displaced due to demolitions. 4. Actively mitigate the impacts of growth in areas where displacement risk is high. We support adopting policies that will alleviate or prevent actual displacement. This might include mandatory participation in the multifamily tax exemption (or a similar program), mandatory inclusionary zoning or linkage fees, one-to-one replacement of affordable units in perpetuity, focusing housing levy dollars in these areas, using the city's bonding authority for sustainable affordable housing options, and other socially progressive housing strategies through the land use code or city actions in the form of programs and partnerships.	**2 cont.**
301	You are letting too much dense development occur where there is not transportation to support it. Even if you develop along transportation corridors, you still need to be able to get to the corridors from less dense residential areas either walking, biking, driving a car/carpools/shared vehicles or buses. PLEASE STOP LETTING BICYCLES USE BUS LANES!!! Riding a bus is not a faster commuting option when they go 5 mph behind and incompetent bicycle rider who obstinately will not get up on the sidewalk and let the bus go by. Instead of wider sidewalks and bicycle lanes very few people use, get rid of the utility poles and stupid short worthless trees and put the bike lane between the sidewalk and the surface street, which is usually the bus lane in the first lane of traffic. Maybe plant the trees in the sidewalk if you have to have them. That would also discourage bikes, skateboards, etc from using the walkway part meant for pedestrians. First test location, 15th AVE W and ELLIOTT AVE W!!! Really, you are going too far with the bicycle thing. You took out two lanes of traffic on Greenwood Ave N for bicycle lanes NO ONE uses! Why do you not at least try putting bike lanes on streets NEXT to arterials and leaving the arterials alone?! You are causing more traffic congestion and none of us believe Seattle DOT that they do not. Just give those side streets the right of way for bicycles and keep the parking with Local Traffic Only rules. It is probably safer for bicycle riders that way anyway. Try a test location somewhere and see what happens. You have nothing to lose and Seattle DOT could bolster their image. They would work kind of like the "parklet pockets" you did on some streets in Belltown except the focus is on bicycles, not parklets. You cannot get away from needing car parking until the USA starts allocating cars via a permit lottery system! You are doing nothing but giving builders more profit by letting them build housing with no parking, yet the people who end up living there go out and buy at least one car if not two. It just puts more pressure on street parking which makes you define a new	**1** **2** **3**

#	Comment	
	neighborhood zone parking permit system which then drives away anyone else who used to go there. I never go to downtown Ballard anymore because I cannot find safe and reasonably priced parking. You keep adding housing but have added NO new parking there at all! Put a parking garage in commercial urban villages at least, even at the perimeter is fine. People do not mind walking into a plaza from nearby parking but they do mind not finding parking anywhere. We cannot all ride bicycles! Some of us are old, have children, in a hurry and have other things to do than an all day trip to Ballard and the list goers on. How about encouraging electric and hybrid vehicles? Especially the subcompact kind, you could offer them special parking over large SUVs and pickup trucks. And while you are supporting all of these international, worldwide causes... how about supporting Planned Parenthood?!!! Because the #1 issue around global warming is too many people! It also happens to be the #1 issue of what is irritating many long time Seattle residents. Thank God Emmett Watson is not here to see this! Lastly, you have got to get better police response times. After a couple of the horror stories in Ballard, I am literally planning on buying a gun because I cannot count on the Seattle police to get here in time to help me. The main reason is staffing and the other is priorities. People must have protection from their government first or they will vote in changes, you can count on that. Especially in Seattle where it has happened before. (As a side note, what happened to the plan to use the old car dealership at N 130th St and Aurora Ave N for a new north precinct police location? I thought that was a great idea. It would have visibility in an area that needs it. It could be anywhere on Aurora Ave N from there south to N 85th St.) thank you.	**3 cont.** **4** **5**
302	I am strongly in favor of Alternative 2. By concentrating people it will result in the least displacement, minimize impacts on transportation infrastructure, and foster the most vibrant downtown. However, it must be accompanied by continued emphasis on middle- and low-income housing development to mitigate the risk that new construction only targets higher-income individuals and families.	**1**
303	Hi, thanks for taking comments. It's obvious density needs to increase. And less cars need to be had inside that density. I live in a home I own. I would love to have a renter in my garage, as a mother in law space. I don't have the money to make that happen. What if the city somehow underwrote cheap lending to homeowners willing to contribute to density in housing amongst single family homes? I'd do it in a heartbeat. I live near the Mt Baker light rail stop. Folks renting from me don't need cars. (I already rent rooms in the house.) What if the city had a program to offer single family homeowners cheap money to provide more housing near the light rail stops? It would allow folks to age in their homes, while allowing their homes to provide a little income from renting. Plus create community right within the walls of	**1**

#	Comment	
	their homes. Vancouver BC has a lot of mother's in law I hear. What if the city made a concerted effort to get more folks to build out mother's in law? It's a way to grow density within the existing housing stock. Without building high rises. I wish Seattle could start a conversation about the efficacy of density. Living with less space, and more people. It's more fun. Community done right is more fun and it's possible. With proper remodelling of space, It's great to have places in your home where you'd run into housemates or whatever you'd call them, yet maintain your privacy when you need privacy. We can all live in a lot less space. It's ridiculous to have so much unused space in our nice homes. There is a large movement now for smaller homes. With proper architectural changes, we could remodel to maintain a modicum of necessary privacy, and, include more people under one roof. The thing is, who has the money to redo their whole interior to remodel it to accommodate twice as many people? I would like to do that, but lack the borrowing power. I've been thinking about this for 10 years since my son grew up and left home. Thank you! Syd Shera 206.250.0988	**1 cont.** **2** **3**

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June 17, 2015

Gordon Clowers
Department of Planning and Development, City of Seattle

Subject: 2035 Seattle Comprehensive Plan and DEIS

1 As a long-time Seattle planner, and a former member of the Seattle Planning Commission, I have been involved in the previous two comprehensive plans. In the Seattle 2035 plan, the proposal to limit the current Cultural Resources section to only Arts & Culture is both astounding and appalling. It appears to eliminate historic preservation and archaeology from the Comp Plan.

A comprehensive plan is prepared in order to lay out the city's vision and goals--to discuss how the city should grow and what it should be. This purposeful deletion sends a powerful statement to developers and residents that Seattle's historic buildings and districts are not important or worthy of protection. However, public comment has supported preservation and neighborhood character. For example, on DPD's "Measuring What Matters" survey, "historic landmarks" was rated nearly the same as "arts and culture access."

While Historic Preservation is not a required element under the Growth Management Act, the Department of Commerce makes it clear that "cities...must consider and incorporate the historic preservation goal in their comprehensive planning. Historic preservation plans, elements, goals, policies and strategies should be integrated with other goals, policies and strategies." This is certainly expected in the state's largest city with a significant number of historic resources.

2 An EIS is to identify potential impacts on elements of the environment from the proposed alternatives. This DEIS appears to say only that existing SEPA policies and codes provide sufficient protection for historic resources. This inadequate discussion raises questions: How well do existing policies and codes work? How many potentially historic buildings have been demolished since its been in effect? How many fall below the SEPA threshold? How do the planning alternatives differ in their potential effects on historic resources?

3 Historic buildings (included designated landmarks and historic districts) are very vulnerable to changing city policies and the economy. A strong economy and a lack of city preservation policy is a recipe for increased loss of historic resources. Most importantly, however, is this question: What is the policy basis for having SEPA review, an historic preservation program or historic districts if historic preservation is considered so unimportant that it is deleted from the Comp Plan? Again, this is a powerful statement to developers and land use attorneys.

If it is the City's intention to reduce its support for historic preservation, this should be clearly stated for public comment and Council review. If this is not the intention, a new section with goals for historic preservation, heritage and archaeology should be added to the Comp Plan.

Mimi Sheridan

Mimi Sheridan AICP

#	Comment	
305	The City of Seattle has had difficulty handling the growth it currently has and we don't foresee the City being able to address the growth you project with no environmental impact. 1. Seattle has 53,113 acres or 83 square miles 2. We are the fastest growing city in the U.S., 1,000 arrive each month 3. 3,649.4 acres (supply of land)(from King County's Buildable Lands report) 4. Vacant, re-developable parcels Between now and 2031, have to find space for an additional 168,216 units Where will the trees go? Where Will We Relax? Bars? 5. 2006-2011: 1724 land use change "events" Of those events, 1,076, or 62%, had canopy loss 702 had impervious surface gain (WDFW, Land Cover Change Data, 2015, Spatial Analysis) 6. 60% of Seattle's Trees are located on private property: • Where you can cut down 3 trees a year • Where familiarity with tree regulations is low • Where a building department writes the tree regulations with almost no public input (and which is a blatant and legally actionable conflict of interest) 7. Seattle Regulations prohibit residential tree removal if 24" diameter and greater More than 60% of trees are on private property But only 14% of private trees are 24" which means 86% are at risk. Poof! 8. Regardless of what you believe are sufficient incentives from Green Factor, not one shred of vegetation—including large conifers—has been retained during development. Seedlings are no visual or biological match for their muscular, conifer counterparts. You are probably not accounting for other stress factors like invasive species, half life of street trees (Roman, USFS),	**1** **2**

#	Comment	
	soil compaction and pollution. 9. Our tree canopy analysis has been a 2 dimensional exercise which ignores the variation, uneven aged management and complexity in the distribution of trees across the city. Park trees will not suffice to support the City's broad ecological and livability objectives, nor will street trees which lose their infiltration capacity for half the year (because they are deciduous and not evergreens). Our tree regulations are laughably and dangerously weak, particularly for private citizens and properties under development. 10. It is hard to see how the current pace, location, type and lot size of development supports clean water, Saving Puget Sound, reducing greenhouse gas emissions and supporting livability. Despite our noble attempts at urban restoration, most pre-spawn Coho die within 12 hours of reaching Seattle Streams (NOAA, WSU, USFW 2013). This is the result of pollutants carried from hard surfaces (read: development). Much of the development in Ballard in apt. buildings is speculative, with high vacancy rates (and lack of design review to add insult). Our haphazard approach to development has very serious consequences. If the city is paying millions of dollars on CSOs and other forms of highly valued Green Infrastructure, it also should be paying attention to larger scale tree and open space retention. With respect to the HUVs, private porticos and party decks are not public and therefore cannot be rightly (or passing a laugh test) claimed as open space. I have read and adopt Steve Zemke's comments on the comprehensive plan and adopt them as my mine and are incorporated into this particular comment record. Heidi Siegelbaum Heidi Siegelbaum Calyx (206) 784-4265 http://www.calyxsite.com Read about Inclusion as a Core Strategy Here (3rd blog down) Facebook Join the Conversation with Calyx on Facebook! http://www.linkedin.com/in/heidisiegelbaum http://www.marketplace.org/topics/sustainability/greenwash-brigade Support Our Gorgeous Economic Drivers, State Parks: www.discoverpass.wa.gov	**2 cont.** **3**
306	I am sending this comment because I am very concerned about the plan for Seattle 2035 In the	**1**

#	Comment	
	current plan, there are several preservation goals under Cultural Resources section. THe section that is called Arts and Culture does not include anything specific about preservation. As one of the citizens that was involved with Saving the Market back in the 70s I have grave concerns that "arts and culture" does not specifically reference preserving what's left of this cities history. I would very much like to see that as a separate section. Thank you, Joan Singler,	**1 cont.**
307	I've been struggling with how to inoffensively ask you a serious question. It's a fairly simple one, that I consider it regularly. "What if you are wrong?" See here's the thing, I know if I'm wrong, new construction will cost a bit more, and the city will remain less-dense then some have envisioned and we can expect traffic to remain congested like it has for the last decade, not ideal I admit. But, what do you think will happen if your wrong? What if it turns out that all the microhousing tenants do in fact take up every available space for blocks in every direction? What if such buildings do end up attracting dysfunctional people, who are unable to support local businesses as hoped? Do you have a backup plan to rectify your mistake in this event, or will everyone else in the nearby neighborhoods, people who quite literally have invested millions in the area have to suffer with the consequences of your mistakes indefinitely?	**1**
308	I support Alternative 4, with amendments; expand the number of areas targeted for growth and place more growth in additional high opportunity areas. In addition, provide programs, policies and investment strategies included in the plan that will address displacement risk and ensure that all Seattle residents will benefit from future growth and change. These strategies should include aggressive affordable housing investments, protection for locally-owned businesses and better support for our most vulnerable families.	**1**
309	I can't find a single reference to the rapidly advancing and maturing technology of robotic driving that is being developed by several major software and automotive companies predicting 5 years to initial availability. This report feels to me like a 1980 report advising investing exclusively in typewriters. I invested $600 in a modern electronic typewriter in 1982 and it was obsolete and worthless in 5 years. A better use for the report is to measure the degree to which the City of Seattle prioritizes politics and money over sensible observation and discussion of developing technologies and their impact on our future.	**1**
310	Thanks again for the blog post.Thanks Again. Cool. Bdfkaaceebkdkfcg	**1**

#	Comment	
311	1. Lots off affordable housing throughout Seattle. If minimum wage is $11/hr, should be not more than 30 percent or around $600/mo. 2. I would have dedicated bike lanes, like 2nd Ave downtown or 12th ave on Cap. HILL. The bike lanes on the same routes as arterials are unsafe And cause congestion and frustration! 3.Housing and Shelter for all homeless-it is asin to have people living on Free way! 4. Fix the potholes and give us sidewalks before any more bikelanes. 5. Don't get rid of all of the local bus stops, or I will not be able to get home. 6. Please try and keep the views for all, not just the rich. Thank you! way. 4. Fix the potholes before more	1
312	Location, location, location. The Othello light rail station is located at a cross roads of regional importance. This location has the potential to become a destination. Attract and retain business with cultural venues, that will provide engagements (gigs) and jobs to our neighbors, entertainment, culture, services, and amenities. It is a node that can offer options in directions, shopping, and transportation. If providing a reasonable amount of parking, it will help South Seattle Transition to a more street life neighborhood and stop sprawl out side city limits.	1
313	Dear Diane Sigimura, I thank you all for the opportunity to mention my professional recommendations to the City of Seattle. I also thank you for answering my e-mail a couple of years ago. Since 2005 I have been studying and working with our neighborhood of Othello. As a volunteer I produced schematic architectural drawings and papers. All with the goal of promoting the actual character of South Seattle, while avoiding predatory housing developments. Such housing developments that will preclude a pedestrian town center with structured parking on a regional node. Othello Station is located on the cross roads of two major thoroughfares, Martin Luther King Jr. (North -South) and Othello Street,(East-West). It is South Seattle's only /continuous/East-West route. Othello Street (Myrtle/Swift) is connected to I-5 (exit 161) and to the neighborhood of Georgetown and further to West Seattle through Michigan. To the East, Othello Street connects	1

#	Comment	
	to the Rainier Beach neighborhood and Seward Park. This regional node with the north-south light rail link and east west route has the potential to become a Destination that will greatly impact the entire south Seattle. South Seattle has historically been an urban district populated by a concentrated number of poor artists. The absence of town centers with large public spaces. Such as bazaars, markets, theaters, lively outdoors for gatherings create a big burden on our creative class. As an artist my self with a musician spouse we have learned to look for gigs in Kenmore, Bothell, Redmond and other sprawling suburbs. I am inclined to believe that if the DPD gave the incentives and promoted the right balanced program artists and musicians would not have to leave Seattle for L.A., London or NY. As you might know the city passed a blanketed ban on long term parking, (over 2hours) through out ALL light rail stations within the city of Seattle. This means if a station is located in a node it will be doomed dysfunctional with the terrible results we have been seeing, less walk ability, increased crime rates and police brutality, inequality, instability and sprawl in neighboring towns. Now, that leads us to the question. What is more expensive, building well located structured parking , and civil structures or dealing with the Fergusons, Cleveland, L.A., Baltimore and more that are coming. I believe these isolated housing projects deprived of urban civil structures, street life, and structured paid parking, create inequality in our midst, and is not sustainable. For this reason the sprawling around our cities are getting bigger our environment is paying the price along with our culture. Goals I see for 2035. 1. To foment our culture, avoid inequality, instability, crime and poverty, it is paramount the creation of physical financial self supporting future destinations. Neighborhood town centers. These destinations need be large architectural landmarks, civic places, with public spaces, clustered business with large pedestrian urban town centers / bazaars, with structured parking where pedestrians can have options of transportation, transit , and amenities catered to our culture; Music, art, sports and crafts. 2. For future neighborhood developments such as Othello, there is a need to predict and protect these destinations locations/neighborhood centers with special zoning to meet the populations' cultural, civic, and transportation needs, from low to middle incomes as well as the developments and developers. This will promote a smooth transition to an integrated transportation system while managing parking, curbing congestion, facilitating and promoting our culture and deterring sprawl out side city limits. 3. I would recommend a comprehensive study through out the entire city for the important existing node locations and plotting of urban neighborhood centers at approximately (8) eight kilometers apart	**1 cont.** **2**

#	Comment	
	At has been noted that even in areas of high density, public transportation cannot thrive in the absence of neighborhood structure. (See Dallas) Because, walk ability requires a street life center to survive. For this physical planning in detail is paramount, locate, plan, size and plot the neighborhood centers as the active part of the town; commercial /light industrial, schools, job/business, before locating housing. Also important to recognize these centers may be market driven. 4. Because in our neighborhood we are great in numbers but short in time to go to meetings, the NIMBYS and car haters take over policies and financing causing economic stagnation in most neighborhoods in South Seattle. We need to rely on the DPD to protect the Othello node for it to become a destination. Please do before it is too late. Two more corner sites are under threat at this point. I would not be surprised if this is not happening in other areas of the city. 5. Neighborhoods in Seattle and other cities need to build and improve their image and legibility. As said by Kevin Lynch about the image of the environment. "At every instant, there is more than the eye can see, more than the ear can hear in a setting or a view waiting to be explored. Nothing is experienced by itself". 6. Since these developments will create neighborhood town urban centers, it may be more appropriate to dismiss the title "village" or urban village since a village translates as a small isolated group of buildings in the country side. As for the "four alternatives" they may be opted at anytime or at the same time since development is subject to a specific location. 7. Although, it is of maximum importance to recognize, that we in 2015 are living a time of intense social tension, not only here in Seattle but around most of our country. However, here in South Seattle we are bestowed with opportunities that aroused from the 5 year construction of the light rail and of the early 20th century planning of Rainier Ave. These areas are currently mostly dysfunctional with blighted buildings between black top parking lots. This existing lay out is inappropriate for walkable urban centers, or neighborhoods of our time. New proposals for clustered business with new program combinations with pedestrian and parking amenities are necessary, along with an updated construction code to motivate professionals and entrepreneurs, to repopulate South Seattle. Yes, we need the blanketed ban on long term parking at the city light rail stations to be lifted and every site analyzed for its full potential in 50 years. In his book Walkable City, Jeff Speck coauthor of Suburban Nation says: "It would seem that only one thing more destructive to the health of our downtowns than welcoming cars unconditionally and that is getting rid of them entirely. The proper response to obesity is not to stop eating, and most stores need car traffic to survive." I would like to point that is much more then curbing congestion , managing parking and integrating our transportation system. The clustering force of an integrated community is a human rights, social justice and climate change issue. I know, I know, many don't believe it will	**2 cont.**

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	be possible, I know, it took Seattle 60 years to realize the damage done by the Alaskan viaduct, at the water front. However I still hope this will be the chance for Othello to be a transportation multimodal hub and a beautiful South Seattle destination with clustered businesses and a pedestrian town center, and in time an example for the rest of the city. Sincerely, Liza Stacishin, B.Arch. MLAEP	**2 cont.**
314	Summary: Alt 2 - not equitable; city investment would be directed to limited area and limited # of residents Alt 3- does not incl Ballard, NW or West Seattle Alt 4- linear vs walkable; misses Delridge and SE. NEED an Alternate 5- there must be a strategy with a finer grain that 5/2. Another way to addressing increased housing in SF - something that looks at 2035 lifestyles- more options.	**1**
	Mitigation- too vague. How can plans in progress- not passed be considered? 1-17. Should be defined. The only mitigation that appears defined is related to temporary construction impacts.	**2**
	Downtown and Northgate should have an actual plan- framework - test capacity- direct development. The land use approach is inadequate to consider impacts.	**3**
	2-3: Where is tie to adopted Urban Forest Stewardship Plan? How will the city meet 30% tree canopy? How can a 2035 Comp Plan not address this and be considered the Plan?	**4**
	Table 2-4 ? How can Alt 3 & 4 have same strategies as Alt 2?	**5**
	Pg 2-34 Address trees	**6**
	Transportation is weak on walking and biking. Weak on accessibility.	**7**
	3.1.4 Does not mention tree and vegetation protection. 3.1.6 Range of impacts does not mention tree canopy. 3.4-14 Relying on existing policies and a complaint based system is not mitigation.	**8** **9**
	The City should invest more resources in this planning - step back and give this more detail if we intend to use this to guide our future. We want a clear vision and understand the impacts so we can work together to address them upfront and create a wonderful place for more people and more jobs. Take time- lets do it!	**10**

#	Comment	
	Peg Staeheli Sent from my iPhone	
315	It is a fact that Seattle is, and will continue, to grow but it must not be at the expense of the marginalized population, the working class, and the small, LOCAL, "Mom-n-Pop" businesses. Seattle must NOT become a "Haven" only før the wealthy, and must not be overrun by large, out of area corporations. Those wealthy individuals and corporations that are here, and that will move here, need to start paying their fair share of taxes. wealthy, especially out of area, property developers must NOT be allowed to continue to run roughshod over our City. They must follow all DPD policies, not be allowed to skirt, or be given significant variances to zoning laws. Any variances must TRULY benefit the community as a whole with keeping residential and small business rents affordable, and making sure infrastructure is more than adequate, or improved upon when existing infrastructure is not. It must not be just lip service to make it appear that developer contributed, they must *actually* contribute to improving the area where they are being allowed to build, and likely make a generous profit from. They must not be allowed to intimidate, with claims that they will simply pass costs along. To ensure taxation equity, and the following of policies, Seattle may need cooperation from the State, and/or other jurisdictions, to impose the same. We also need a strong transit system, accessible to, and affordable to all. We must continue to discourage single occupancy vehicle use, while at the same time recognizing that certain people may have no choice to an SOV user. Those may be the people, especially the elderly and disabled, that don't have easy/adequate access to transit, but are able to own and operate a car. There are people whose jobs simply don't allow for much flexibility in the ability to ride share, or use transit. However, infrastructure and incentives for transportation other than SOV must continue, and expand, even though it will likely be at the expense of the SOV user. We have a bit of a unique geography, where we really can't build more roads. SDOT/City of Seattle, must not allow themselves to be bullied by the SOV users, that (falsely, IMHO) cry "war on cars!" Road Diets a a *great* idea in my opinion; as we need to ensure the SAFETY and ease of getting around for pedestrians and bicycles. Enforcement of speed limits, the obedience of stop signs/red lights, and an overall crackdown on aggressive/reckless driving needs to be a priority. As transit is expanded, improved, and becomes much more reliable; basically frequent, free flowing, continuing to discourage SOV use, among those who actually CAN stop/cut back on their reliance of SOV usage, but choose not to, can continue to be discouraged. Seattle needs to be a strong City, and a successful City, accessible to and livable for ALL, with Living Wage jobs. For several years now, many have talked about Seattle being/becoming a "World-Class City". To me, that is a hollow term. The vision I get when hearing that from the types that say that, is that "World-Class" may be all brilliantly shiny and spiffed up on the outside, while inadequately reinforced , and perhaps even crumbling on the inside. What Seattle *really* needs to be is solid and strong throughout. It CAN be that, AND still look quite attractive on the outside. I'm not all that crazy about the term "Vibrant" either, but as long as Seattle has its solid core, and strength throughout, I will concede that "Vibrant" is acceptable.	**1** **2** **3**

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	Sadly, Seattle has lost much of its character, which is probably natural progress to some extent. We must not lose what is remaining, and remember the kindness, humanity, and generous and thoughtful attitude of our Great City's Namesake....	4
316	To Whom It May Concern: For over a quarter of a century Puget Sound Advocates for Retirement Action (PSARA) has been representing the interests of Seattle's older Americans, their children and their families. The goals of our organization speak directly to the need for a comprehensive plan that addresses: • affordable housing, • high quality transportation options, • a strong network of social services, and • a sustainable urban environment for residents of Seattle. While we have some concerns with the execution of the City's 1994- 2014 comprehensive plan, we commend the City's farsighted approach with the development of urban centers and urban villages. Looking forward we recognize that the ongoing success that Seattle is experiencing, as it continues to evolve into one of the most sustainable and livable cities in the U.S., will continue to challenge the City to creatively manage growth. In that light we have reviewed the 2035 Comprehensive Plan and DEIS and have the following comments concerning the Plan. 1. Alternatives: Nick Licata, through his City Council Blog, has suggested a fifth alternative that distributes higher growth in "high opportunity/low-displacement risk" areas and distributes less growth to areas with "high displacement risk." We strongly support this recommendation. 2. Affordable Housing: We commend the City Council for recognizing the need to address risks to affordable housing and the risk of displacement that affects marginalized populations. We note that the currently adopted Comprehensive Plan in its Urban Village Element does not have explicit goals for expanding affordable housing or fully addressing the risks of displacement that affects marginalized populations. The currently adopted Comprehensive Plan Housing section goal HG14 states "Preserve existing low-income housing, particularly in urban centers and urban villages where most redevelopment pressure will occur" speaks to our concern but does not recognize the impact that Seattle residents have experienced both from the loss of affordable housing within the City and	1 2

#	Comment	
	the displacement of marginalized populations over the last 20 years. We recommend that this goal be strengthened to address affordable housing more aggressively. We also recommend that a goal be adopted to address impacts of the plan on marginalized populations. A step that the City Council can take separate from the comprehensive plan is to increase affordable housing broadly across the City by loosening restrictions on mother-in-law apartments and backyard cottages. This will serve both to expand affordable housing as well as to provide homeowners with additional income permitting existing residents age in place. An estimate for this growth should be subtracted from their displacement projections. 3. Transportation: The City and Sound Transit are to be commended for a number of projects in the last few years which strengthened Seattle's public transit network. PSARA strongly supports increasing our public transportation network while minimizing impacts on residents. The DEIS states that all alternatives will improve public transportation to meet growth requirements. But as the City moves forward key transportation objectives remain unfunded. The City should not make any changes to current urban center or urban village boundaries, nor should it designate new urban villages until funding commitments are made to the public transportation infrastructure required to meet the additional demand. An example of this issue is the Alternative 3 proposed 130th St/I-5 urban village predicated on a new North Link 130th St. station (which is currently not in Sound Transit's Plan). 4. Open Space: PSARA is concerned that the current approach in implementation of MR and NC-65 or 85 zones does not provide for the quality of life that we want in our denser neighborhoods. Our concern is that the Comprehensive Plan needs to be strengthened to assure that more open space exists in these neighborhoods. Designations should be made for the creation of plazas and in certain cases increased setbacks to avoid a canyon effect that is occurring in some urban villages. 5. Financing: The primary method of financing the need for infrastructure enhancements to accommodate growth appears to be property tax levys. PSARA is concerned that this method of financing is putting a significant burden on homeowners and is making it impossible for low and moderate income families to consider home ownership. The 2035 Plan needs to have objective financing goals and policies such as expanded development fees that reduce the current burden that has been placed on moderate and low income home. Thank you for your consideration of these comments. We look forward to working with you on the next phase of the 2035 Comprehensive Plan process.	**2 cont.**

#	Comment	
	Sincerely, Robby Stern, President	
317	The assumptions in the various plan options seem overly optimistic. For example, you concede that traffic congestion will increase under any scenario, but that air pollution will not increase. By definition, more cars sitting idle in traffic for longer periods of time can only increase pollution. While I applaud any effort to boost transit options and affordability, I worry that excessive focus on forcing cars off the roads, or building little used bike infrastructure that removes lanes of traffic, will lead to worsening gridlock instead of improving mobility. Why not try free buses, for example, and see if that gets people out of their cars? Regarding schools, our current network is woefully overcrowded already--30 kids in many classes and more coming each day. Your plan needs to immediately address the crowding crisis in public schools, which are critical to the success of middle class families. Your plans include no option for increasing parks and other public open spaces, or other neighborhood amenities, which are crucial to quality of life. Recreational opportunities will be increasingly unavailable to all but our wealthiest citizens, who can afford private club memberships, vacation homes and boats. To put it another way, what are all these new people going to do besides work, sleep and commute? Thank you for the opportunity to comment. Chris Stetkiewicz 6235 27th Ave NE	**1** **2** **3**
318	Here's a motto for your commission : A quote from Yogi Barra-- "The future isn't what it used to be."	**1**
319	Hello, I just wanted to leave a formal comment in writing. I attended the in-person open house at City Hall and have since had the time to review the new plan. I think that there were many thoughtful comments and I agree with various suggestions, such as lining mass-transit areas with trees to increase foliage, tree population, and reduce noise. My main input was, nervously, delivered as coordinating more with our neighboring cities. Sharing the wealth so to speak. Tacoma and Everett are more than capable and, likely, willing to take the necessary steps to house and prepare itself for this boom as well. If we can work together, I feel like people wont need to be as displaced.	**1**

#	Comment	
	My concern lies mostly in the increased housing costs. California put in place Proposition 13 which protected home owners and long-time Seattle Residents. Thank you. Odessa Stevens 206.949.9786	2
320	Question No. 8 makes no sense; maybe rephrase it? I put NEUTRAL on al four answers simply because i had no idea what the question is asking.	1
321	Hello! I have been trying to learn more about the 2035 Comprehensive Plan update and read what I think is very compelling analysis from Alex Brennan at the Urbanist. I would like to put my support behind his suggestion. The problem with the existing alternatives is that they concentrate too much development in places that have high displacement risks. While I strongly believe in building around transit, I think we can do this while also respecting the need for spreading out development and creating more urban villages. We can have both transit-oriented development AND reduced displacement risk. I think that this will help us address the affordability problems that we are struggling with as a city as well. For background, you can read Mr. Brennan's articles at the following links: http://www.theurbanist.org/2015/06/12/seattle-2035-toward-a-more-equitable-growth-plan/ http://www.theurbanist.org/2015/06/16/support-alternative-5-for-seattle-2035/ Please come back with an "Alternative 5" that captures the best of the other alternatives without their worst downsides. Thanks! Eric Suni 2331 Franklin Ave E Apt 203 Seattle, WA 98102	1
322	Limiting urban villages to light rail stations is to restrictive. Need access to other neighborhoods. Very important for shopping and recreation. Commuting is only one aspect of city living. Need a variety of transportation options that interconnect without hub and spoke. Problem with urban villages and high density areas with limited parking, is that neighborhoods are isolated making people a prisoner in their own neighborhood. That is why Seattle needs to improve its transportation - to fragmented right now and nothing is connected.	1

#	Comment	
	There is also a big disconnect between affordable housing and place of employment for many people. Not everyone is young, single and can work for Amazon. Another problem with urban villages/centers is that they are not family/child friendly . Mo yards or play space. Where will people with children go? Apartments and condo's don't work well because it requires a parent to take a child down an elevator to some (hopefully close) to a play area. Can high density areas be built with multiple open spaces and or small yards? Another question is what is your definition of walkable. Mine is 2-3 blocks right now, making getting around very difficult without a car and parking options. Please remember, not everyone is young, single, childless and healthy.	**2** **3** **4**
323	Hello City of Seattle: I would like to see historic preservation integrated more strongly as a core value and element of planning the city's future. This should be accomplished in multiple ways. In terms of general policy goals related to cultural resources protection and preservation planning strategies, King County's comp plan includes some good model policies that are sadly lacking from Seattle's approach. The Seattle 2035 plan's key areas of housing, jobs, transportation, quality of life, and environment all should include specific goals and strategies reflecting a preservation ethic. Seattle has done a decent job of identifying and protecting isolated iconic landmark structures through the tremendous growth spurts of recent years, but Seattle has done an incredibly poor job at coming up with regulations and incentives that guide and encourage preservation of the city's historic urban fabric. This is not sound preservation policy, and not sound urban policy. To use an environmental analogy, it is preserving a hand-picked few old growth trees while allowing the forest to be clear cut. We can and should do better. Please focus the city's creative efforts on integrating historic preservation throughout the 2035 plan. Thank you, Holly Taylor University of Washington CBE Box 355740 Seattle, WA 98195-5740	**1**
324	I support The Urbanist option 5. All areas of the city need to accommodate growth if we are to maintain an affordable and livable city. The 2035 plan should allow for great er development throughout the city. Areas of Low Rise zoning should be expanded. The proposed alternatives put too much effort into preserving single family neighborhoods at the expense of affordable housing for a growing population. The size and number of urban villages should be expanded. Additional investments in transit and affordable housing should be made to support higher levels of development and to maintain a place for low income people in the city. Additionally land use regulations should be eased to allow for a greater diversity of housing types (micro-housing/SRO/etc) to accommodate low income people in the city. I don't want to live in an elitist techo city or be forced to move to the suburbs.	**1**

#	Comment	
325	*Land Use: Tiny TOWN HOMES are fine BUT they MUST be required to include actual and real on-site parking. The existing allowance for NARROW lanes into tiny parking area below the town homes that no car can navigate into is a JOKE, and means the street parking is sorely impacted. Suggest common below-unit carport parking with wide drive for all new town home construction; *Police: Must increase personnel and equipment to allow better surveillance and burglary response and prevention. Goal should be to obtain ZERO rapes and assaults in all city parks. The idea that a neighborhood has to set up its own local district to hire off duty cops to patrol is an outrage; *Broad Band: The city should own its own web utility and make this available to all residents; * Rent-Equity: After an apartment complex is built and the developer has recovered the investment, further rents paid should entitle the renter to an equity portion in the property. The owner would need to invest in more improvements to maintain the owner's share of equity.	**1**
326	Light rail up and down the I-5 and I-405 corridors is something that I feel the Seattle area really needs to concentrate on. Of all the major cities in the US, Seattle is way behind on major public transportation and always have been. It seems like we allow all this new construction, more people show up, and then think about transportation. There should be a fund dedicated to transportation that construction companies have to pay into to cover some of the costs.	**1**
327	Mr. Gordon Clowers Seattle Department of Planning and Development Dear Mr. Clowers, I have been a planner in Seattle for more than 30 years, and I have a number of comments on the Draft EIS for the Seattle 2035 Comprehensive Plan. As a consultant I've worked with several city departments including the Department of Neighborhoods. DCLU (now DPD), Department of Parks and Recreation, and long-range planning (now also DPD). I also served on Seattle's Landmarks Preservation Board for six years and on two of the city's design review boards. I am very concerned that the draft does not address economic development, neighborhood planning, cultural resources, historic preservation, and urban design. The city's current comprehensive plan includes preservation under the "Cultural Resource" element (CR11-CR16). The new Comp Plan replaces "Cultural Resource" with an "Arts and Culture" element. This new element focuses on art (public art, cultural space, arts education, creative economy, creative placemaking) and seems to eliminate historic preservation and protection of cultural resources. How will preservation be included in the future comprehensive plan? How are the city's existing preservation policies and regulations being addressed? Although historic preservation is not a required element of a comprehensive plan under the GMA, it is clear that cities must consider and incorporate the GMA historic preservation goal in their comprehensive planning. Historic preservation plans, elements, goals, policies, and strategies should be integrated with other goals, policies, and strategies in the comprehensive plan. This is particularly important in Seattle, the state's largest city with a considerable number	**1** **2**

#	Comment	
	of historic resources and an active historic preservation program.	2 cont.
	The "Environment" element addresses environmental stewardship, one of the plan's core values. Environmental stewardship is primarily defined within the context of the natural environment (air, land, and water resources) and not the built environment. The analysis should address the role of preservation vs demolition in terms of environmental stewardship.	3
	Preservation and creative adaptive reuse of our existing building stock cuts across all four core values of the Comp Plan. Preserving historic places enhances community vibrancy and cultural identity; serves as an economic driver; conserves precious resources; and contributes to social equity. I urge the city to add a new section to the comprehensive plan that includes goals and policies for historic preservation, heritage, and archaeology. Thank you for the opportunity to comment. Carol Tobin Planning and Preservation Consultant 4219 Phinney Ave N Seattle, WA 98103 206-547-9629 cctobin@earthlink.net	4
328	Dear people, I believe the draft EIS should not be used as it lacks the correct objectivity. DPD has been writing the Comprehensive Plan, designing and leading the public outreach, is the entity that enforces environmental laws and regulations, permits exceptions, and now evaluates and reports on its own creation.	1
	The Comprehensive Plan itself and the EIS show a remarkable lack of specific measurable results, lack of mechanisms to achieve goals, and makes several assertions that the mechanisms already in place are sufficient to achieve our goals. The words to describe goals suggest mutually exclusivity in practice, such as 'we will protect sensitive areas' and then we will allow development if it is 'reasonable' which is undefined and unmeasurable. The specific goals named are not shown to be able to achieve the overall goals. For example the goal of being environmentally responsible and a leader in sustainability is not consistent with with the reduction of the tree canopy goal and acres of open space per household goals which are under-reaching.	2
	Of special concern are the reduction of canopy goals; the assumption that the two for one tree replacement planting program is sufficient to mitigate the damage of removing mature trees; the assumption that the environmental damage caused by no open space goals and tiny open	3

#	Comment	
	space goals in industrial and urban village zones respectively, can be offset by adding more open space elsewhere; how the funding is to be found to increase the open space; that current systems on tracking tree canopy cover are accurate or sufficient. Please authorize a more objective entity to do the EIS and fund them to do it. And please let me know how this email will be used for reporting. Cass Turnbull 906 NW 87th Street Seattle WA 206-783-9093	**3 cont.** **4**
329	Proposals focusing on growth in transit centers (existing and future) with walkable access are by far the best. Each node must have a well thought out master plan including plans for leveraging of public land and institutional development to provide well rounded community centers. Growth plans should HIGHLIGHT good examples of historical development for neighborhood character - such as historical districts and areas of strong character identity . I am very concerned about when density bonuses for mixed use could provide incentives for demolition of existing historical buildings and structures which can be preserved as part of community texture - Economic and social justice programs can also be effectively incorporated into public-private joint ventures (housing above libraries, commercial space below or adjacent to schools, parks shared as open space with adjacent private housing.	**1**
330	Hi Ed! Thank you for asking what our vision is for Seattle in 2035. I'll start with assumptions: 1. The population of Seattle will continue to grow 15% to 20% between now and then. 2. People will finally wake up to climate change and demand sustainable non-fossil energy 3. Technology, Medicine, and Shipping will be Seattle's biggest industries. 4. The state legislature will still not help us or take leadership. 5. People will finally realize that market solutions benefit only the rich. 6. Bertha will still be stuck in the mud. What I would like to see: 1. Mayor Norm Rice's concept of Urban Villages implemented instead of developer driven housing popping up randomly in neighborhoods. 2. 20% of Urban Village housing dedicated to low income renters. The goal is to allow people to live close to where they work. 3. City owned and managed broadband internet throughout the city. Like City Light, it will be an urban utility with no competition.	**1** **2**

#	Comment	
	4. Free city owned and operated public transit funded by property taxes. 5. Positive encouragement of neighborhood volunteers to help maintain parks and green spaces. 6. School board meetings in local schools throughout the city instead of in their SODO palace. Janice Van Cleve PCO 37/1875 206-322-2436 www.jvox.doodlekit.com	**2 cont.**
331	I'm quite alarmed that our supposedly liberal and social justice oriented city seems perfectly happy to wage it's "War on Cars" along economic lines: Eliminating street parking and/or increasing it's cost to rival that of privately owned parking garages. Some of us are too old to walk and/or ride bikes long distances, let alone carry a chop saw or bass amplifier on the bus. What we end up with under the current direction are top management types driving expensive cars while local government seems to work diligently to get the riff-raff out of their way.	**1**
	I'm quite alarmed that our city and state seem content to fund all government services on regressive property taxes and user fees. Most of our incomes are not keeping up with those in the tech sector and, apparently, city government.	**2**
	I'm also more than a little hacked that the city is doing nothing to encourage people to use motorcycles, scooters, and mopeds. They use far less energy and take up far less space than their 4-wheeled counterparts, yet they are expected to pay the same parking fees and transit taxes...if a person keeps an 80 MPG motorcycle for use on sunny days, they get to pay the new transit tax twice, while there is no such expectation for the owner of a 5 MPG $2.5 Million dollar Bugatti sports car.	**3**
	The Eastside turning it's freeway "High Occupancy Vehicle" lanes to ones that allow those who can afford it to skip traffic, while increasing the occupancy requirement for High Occupancy Vehicles to get them out of the way of the wealthy to my mind is criminal, goes against the "HOV" mandate of Federal Law, and I hope this rationale does not expand to Seattle in the future, yet I hear supposedly "liberal" politicians and pundits nod their approval in public forums such as KUOW. Persons WITH 3 or more passengers and motorcycles will be required to purchase a pass in order to serve the intent of HOV lanes? This disgusts me. With "Liberal" politicians like these spearheading this effort, who needs "conservatives"?	**4**
	While reducing dependency on single-driver automobiles is a worthy goal, doing so by enacting laws that make it more difficult for people of moderate means to get around..."Let them eat bus"...shows a distinct lack of the empathy Seattle should be famous for. Our Metro system is hopelessly overcrowded, and frankly the service adds time to our day that people just don't have. We desperately need dedicated-line RAPID transit. The West Seattle to Ballard monorail project was an excellent start toward this, before greedy developers expanded the project to serve their needs and ended up killing the whole thing. Light rail that runs on city streets will not	**5**

#	Comment	
	help. Light rail, monorail, pneumatic tubes, whatever they are, need their own dedicated path that works independently of street traffic, and the city should be studying alternate means not discussed, for example we want to encourage people to ride bicycles in a city of hills. The ski area at Whistler BC has vast experience moving bicycles to the top of hills where gravity can do the rest. Perhaps we should be talking to them?	**5 cont.**
332	Question: Is there no assessment of LIGHT POLLUTION? I think the high level of lighting in the RO W's will cause everyone insomnia, night blindness from glare, and psychosis (really) - as truly in many areas the high level Lumens blasting out of our new cool/BLUE Light (bad for brain melanoma levels at night) . .. and very few refuges from these street lamps (and too bright auto headlights, but ? not sure we can do anything there) but also insane flashing headlamps on biker helmets no less. Soon many will be elderly, w/eyes unable to transition from bright lights to low lighting (exaggerates night blindness). Reduce excessive lighting! ALSO Air Pollution: Barbecues and Lighter Fluid - I am slowly dying from my 'frat boy' neighbors' regular use of their grill, just feet from my only sleeping areas/bedroom windows. Allow One Grill night per month?? Groves of Trees, Exceptional Trees need true protection/enforcement! Allow one? or two or zero bonfires at Shilsole/Golden Gardens Increase Tree Canopy! Provide/maintain/allow for Natural Habitat ·and undergrowth - ban leaf blowers! No rubber or plastic turf in parks. Slower speed limits'." enforced! Prioritize Pedestrian experience, bikes second, busses 3rd, then autos. Water Fountains every few blocks in town, And in parks - that work!! We need water and toilets in public areas. Reduce unequal access to these	**1** **2** **3** **4** **5** **6**

#	Comment	
	Make DPD Honest! Fire the liars in the bunch who cater to RE/Developer ease and profits. Stop tearing apart Low Rise zones - save the houses, gardens and trees - do density in higher density areas (NC/MR/HR). We SHOULD be about 'climate change climate change and all of us somehow uniting and saving what's left of the earth and fellow earthlings Thanks much, Genevieve	**6 cont.** **7**
333	In an effort to address the housing shortage, Seattle needs to loosen the restrictions on ADUs. Eliminate the owner occupancy rule and allow both an internal ADU and a backyard cottage. The single family residential residential zone dominates most of the city but today's demographics do not suggest a need for owner occupied 3-4 bedroom houses. On the flip side, there is very little downside to allowing additional small dwelling units. Fears that they will change the character of the single family zone are unfounded.	**1**
334	I support More canopy cover (urban forest) than is provided by the proposed plan. The proposed plan takes into consideration some of the anticipated population growth but not the direct effects and collateral effects ? We will be living in an urban desert! Follow Portland's and Victoria, BC's (among others) examples	**1**
335	*Transit paths solely for bicycle commuters* If there were more bike lanes that were totally separate from cars -so, the bikes and cars were not sharing the same road- I would commute by bike, but as it is with cars and bikes sharing road even with some of the improved bike lanes gaining more space on a side of a road, I will not venture out in traffic on a bike - and I have tried it here in Seattle in the past. *Normalize a new kind of car* Incentive and provide infrastructure for technological developments of the car. For those Seattlites that choose to have their own, personal cars, support them in demanding and investing in vehicles that are newly developed, are not unreasonable large-sized, and do not require gasoline for fuel. Other fuel types explored should be of a less polluting option and making sense holistically so, perhaps something like a more affordable version of a Tesla or something that might run on cleaner diesel options. *Consider night life with the population growth -and early morning activities available to people as well- and include public transit for those hours but also include a discussion about light pollution in the choices related to that which might lead to a tamer night life or advanced, low-light plans.*	**1** **2** **3**
336	The Urbanist proposal for alternative 5 is clearly a better choice- and SEattle needs to make such	**1**

#	Comment	
	a choice that actually and powerfully addresses the opportunities and challenges that face us. The other alternatives are conservative approaches that do little to make seattle the type of city we need in the future.	**1 cont.**
337	The alternatives presented, are not particularly diverse, and they assume that the right thing to do in transit challenged areas (West Seattle, and Ballard for example), is the right thing to do in a transit rich area like SLU and DT. It also virtually assures the displacement of immigrant communities - further reducing diversity in our city. Without meaningful strategies BEFORE we pick one of these plans, we'll further displace minority and immigrant communities.	**1**
	So far, I see no meaningful connection nor commitment being made to add the livability features to a community, just lets cram more people in. Unacceptable, because what this does is drive sprawl and vacation homes. It's missing strategies for putting in parks, urban farming, urban solar, green spaces, walkable communities, and more.	**2**
	At best, this is incomplete work. I'm hoping the comments will help fill it out, but it's in desperate need of another pass before the next phase.	**3**
338	Hello, This is way cool. I am a fan placing growth density near the light rail. Jobs should be close to the light rail too. Light rail stations need secure, simple, covered bike storage. Thank You.	**1**

June 17, 2015

Dear Department of Planning and Development,

1 This letter represents a comment on the currently open EIS for the City's Comp Plan Update: My comments pertain to Open Space and the Tree Canopy. As per requirements of the EIS process, I understand all comments will be addressed in writing.

Open Space:

Reference: Draft EIS page 3.8-34. As a possible mitigation strategy to remedy the need for more open space, DPD suggests: "Update Comprehensive Plan goals and policies related to the acquisition of new park lands and development of usable open space within existing parks."

This language suggests that the City would convert existing open space and natural areas to active parks, not surprisingly an initiative currently residing within Seattle Parks Department. This appears to mirror current Parks Department efforts to allowing the converting of natural areas and green spaces to mountain bike parks and rope areas and other more active sports use as well as maybe more walking trails depending on what your definition of open space is. Conversion does not add to the open space nor the ratio of open space to resident as suggested in the plan.

This language appears disingenuous in that the existing open space and natural areas are (and should be) already considered for calculating open space distribution. Converting the use from natural area to active park would not, in any way create additional open space as implied in the statement.

If your intent is to not have to create any additional open space for an urban village but instead to expand the existing residential urban village's boundaries so as to increase the amount of open space per resident in the urban village is also a sleight of hand that does not create any new open space nor improve the accessibility of open space to urban village residents. In short, adding existing space to within the boundaries of an expanded urban village you are not creating any new open space across the city, but merely adjusting boundary lines. I recommend that new open space be acquired or identified within the urban village to retain the quality of life we all revere for Seattle residents. You can't add 1400 acres of open space by converting what is already open space to more be "developed" areas.

Tree Canopy

2 The draft EIS does not address a number of impacts that occur with any one of the proposed different growth scenarios that will result in tree canopy loss from increased development. The City's existing Comprehensive Plan contains an aspirational goal of a 40% tree canopy, as adopted by the Seattle City Council. This EIS appears to abandon that goal and, appears to do so

2 cont.

even in the absence of data and a lack of evaluation of the impacts of proposed growth on the tree canopy.

Tree canopy and turning back the impacts of our urban environment on the future of global warming are an expressed goal of the City of Seattle—declared by Mayors and City Councils for decades. Yet, this EIS seems to give slight to the analysis on the impacts of growth on the tree canopy. Much more analysis is given to view impacts and noise impacts while ignoring potential significant impacts caused by increased tree canopy loss. And eliminating by oblique reference the long-term, aspirational canopy goal of 40% as adopted by the Seattle City Council in the current Comprehensive Plan without any discussion the impacts this plan will have on Seattle's future urban forest is unacceptable. Much more work is needed to both assess impacts and consider goals to protect our urban forests and the tree canopy provided by private property owners. The long term 40% canopy goal should remain in the plan and reference that the 30% goal by 2037 is a stepping stone to the larger goal and not the final goal.

As a City, we cannot address reaching a 30% canopy goal without adequate information as to the amount of canopy that is being lost during development. I understand that the Urban Forestry Commission recommended a Forest Canopy Impact Assessment for all development projects and so far has received a response to this request. I recommend that the EIS address these concerns AND that DPD add a forest/tree impact assessment to all development projects.

Thank you for your consideration

Sarah Welch

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340	Options 3 and 4 are preferred, with 4 being the current winner. Seattle 2035 must recognize that prevention of displacement must occur vis a vis programs such as the Yesler Terrace relocation and housing guarantee, and cannot preempt market forces without having a problematic effect on housing costs. Similarly, attempts to constrain growth will all necessarily result in increased housing costs. The question then, is what concessions can be realistically asked for. The PSRC and Seattle 2035 have had historically low projection of population growth. It is very likely that Urban Villages and other locations within the city will vastly exceed their growth targets, while downtown may not, as it is significantly built up already. Efforts must me made to mold these growth areas into working urban centers, instead of attempting to hamstring their growth. I share the desire of many in Seattle to preserve certain neighborhood character. Historically, this has been attempted by limiting height, bulk, and scale, but this is a mostly ineffective method and results in high displacement. Instead, neighborhood conservation districts and overlays should focus on two things: the pedestrian experience and the architectural style. More than anything else, these define the neighborhood 'feel' and characteristics. A common complaint of many Seattleites about new construction is the perceived 'cheapness'. Barring materials like corrugated metal siding, or enforcing brick cladding, or styles such as neo-renaissance can alleviate these concerns. Regarding scale, the pedestrian experience is defined by the lower 25-30 feet of a building. Beyond that, height becomes largely irrelevant. Thank you for your time, -David Whalen	**1** **2** **3** **4**
341	I don't see any schedule in the plan. All can't be done at the same time. Some catch up areas like opening schools previously closed will help the end solution. Charles Sent from Windows Mail	**1**
342	The comp plan may lead to zoning changes which may lead to development. City action is only one hand clapping; the market needs to respond. The development market is atomistic with many builders, buyers, and renters. I would like more Seattle. I would like an option that considered more growth, and not just the same growth spread out four different ways. So, please consider the enabling more growth. Option four seems best, as it would allow growth is more of Seattle. In the transportation section of option four, the term node should be diminished in use; the station spacing of bus and streetcar lines leads to a linear development pattern, as was the case in the first third of the 20th century along streetcar corridors in Seattle (e.g., Phinney-Greenwood, California Avenue SW, Rainier Avenue South). Nodes may develop around Link stations. Hopefully, Link stations are placed in existing nodes. The low rise zones should be up zoned. SF zones along frequent transit service could be up zoned to allow townhouses and cottage houses. ADU could be more liberally legalized. if we have a housing affordability crisis, the city can allow the the supply curve to shift out. If city laws constrain supply, prices will only increase faster. To mitigate the noise of more	**1** **2**

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	frequent transit service and global warming, Seattle should shift more bus transit to electric traction, either trolleybus or battery bus, if that become feasible.	**2 cont.**
343	Greetings DPD Friends: Thank you for all your work on this very important piece of planning. I would like you to know I strongly endorse and support the Seattle Urban Forestry Commission's letter with regard to our trees and the services they provide us. The link for the letter is below. Sincerely, Ruth Williams, Thornton Creek Alliance President, writing as an individual http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/FinalIssuedDocuments/Recommendations/ADOPTEDCompPlandraftEISLetter.pdf	**1**
344	We are submitting comments we previously sent to the city for consideration of a Comp Plan revision. Those comments follow and apply to the 2035 Draft EIS. We are proposing up zoning six (6) LR 3 parcels to NC 3P-65 to increase the density on these parcels, expanding the transit oriented development (TOD) potential given that all of the parcels are within 1.5 blocks of an entrance to the Sound Transit Roosevelt Station. The change to the Future Land Use Map is minimal – simply up zoning those six LR 3 parcels to NC 3P-65 so the entire block is all zoned the same. The City's Comprehensive Plan is silent on the specific benefits of this particular upzoning. However, this proposed upzoing is entirely consistent with the City's Comp Plan. The proposed change would increase urban infill density within easy walking distance of a significant transportation hub for buses and light rail. It would promote Transit Oriented Development and open the opportunity for increased affordable housing and community amenities such as a child care center – all in ideal proximity to the Roosevelt Sound Transit Station. It could also be a showcase of "green" building design and techniques, as its location would reduce the need for personal vehicles and accompanying off-street parking. The proposed upzone amendment of residential properties along NE 68th Street fully meets the criteria spelled out in Resolution 31402. Here's how: · The amendment is consistent with the role of a Comprehensive Plan under the State Growth Management Act. · It is consistent with Countywide Planning Policies and multi-county policies in the PSRC's Vision 2040 Strategy. · It cannot be accomplished by regulatory change.	**1**

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	· It cannot be addressed by either budgetary processes and solely through neighborhood planning. · The amendment is legal under state and local law. · The amendment's timing is appropriate and will give the Council sufficient time to make an informed decision. · City staff will have sufficient time to develop appropriate language for amending the Comp Plan and, if necessary, and changes to the Seattle Municipal Code. · The amendment aligns with present Comp Plan goals and advances those policies. · The amendment has not been recently rejected by the City Council. The change would promote TOD in the Roosevelt Neighborhood, put those parcels to their highest and best use, and create greater neighborhood friendly density close to the actual Sound Transit station. This will reduce the need to everyone to own a vehicle and the density will allow some potential open space or day light opportunities while preserving the character of the neighborhood. Because of these factors, along with it being upzoning of property already designated for multi-family development, it would have a minimum, if any, impact on the environment. Actually, because the proposed idea would increase walkability, reduce the need for personal vehicles, and reduce the amount of off-street parking required it would have a net positive impact on the environment. The Roosevelt Neighborhood Association just completed suggested design criteria for the area, which included looking for opportunities to increase density so perhaps other space might be more open while still meeting increasing needs for housing near the Sound Transit station. This accomplishes all that. Furthermore, as the City's Comp Plan goals – creating Community, Environmental Stewardship, Economic Opportunity and Social Equity – are all enhanced by granting this upzone. Upzoning these parcels will build a stronger sense of community in the core Roosevelt neighborhood. By increasing housing density so close to a major transportation hub, it will reduce the need to use single occupancy vehicles, reduces the need for parking, create a more walkable neighborhood, open the way for more economic activity in the vicinity, and expand the opportunity for greater social equity and diversity. The upzone of NE 68th Street would align with all three of the alternatives outlined in the Draft EIS to the Comp Plan to guide growth into Urban Villages, especially those with significant mass transit and light rail service. These parcels will be within 1.5 blocks of an entrance to the Roosevelt Sound Transit station. As the 2012 Comp Plan update notes:	**1 cont.**

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	"A fundamental goal of this Plan is to steer the majority of estimated growth in housing units and jobs toward urban centers and urban villages, for the following reasons: · Help preserve green spaces, forests, and farmlands outside of the urban growth area; · Preserve the character of Seattle's predominantly single-family neighborhoods; · Reduce dependence on private motor vehicles (the emissions from which are the number one source of air pollution and climate-altering greenhouse gases in the Puget Sound region, as well as a major source of water pollution); · Use natural resources such as land, water, and energy efficiently; · Improve public health by promoting walking and bicycling; and · Reduce the costs of building and maintaining public infrastructure and services, such as roads, water and energy supply, and waste management systems." Upzoning of NE 68th Street homes would help accomplish all these goals, thus it is perfectly consistent with the Seattle Comprehensive Plan goals and would help advance them for generations to come. Roosevelt is already designated as a Residential Urban Village in the recently released Draft EIS John Arthur Wilson, a homeowner on NE 68th Street and leader of the homeowners seeking rezoning, has briefed the Roosevelt Neighborhood Association and actively participated in public discussions of neighborhood design guidelines and ways to increase density in the area. This proposal has been presented to the Roosevelt Neighborhood Association and received a generally positive response. CONFIDENTIAL COMMUNICATION This e-mail message and its attachments are confidential. It is intended solely for the use of the individual named above. If you are not the intended recipient, or the person responsible to deliver it to the intended recipient, you are hereby advised that any dissemination, distribution or copying of this communication is prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and delete and/or destroy the original and all copies of the e-mail message.	**1 cont.**
345	REQUIRED QUESTIONNAIRE: Comprehensive Plan Amendment Application Please answer the following questions in text and attach them to the application with supporting maps or graphics. Please answer all questions separately and reference the question number in your answer. The Council will consider an application incomplete unless all the questions are answered. When proposing an amendment, you must show that a change to the Comprehensive Plan is required. 1. Provide a detailed description of the proposed amendment to the FLUM and a clear statement of what the proposed amendment is intended to accomplish. If the proposal includes	**1**

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	change(s) to policy language that is/are relevant to the FLUM change, then clearly identify the policies by number and Comprehensive Plan Element (Land Use, Transportation, etc...). a. Please, provide a map that clearly outlines the area of the Future Land Use Map proposed to be changed. b. For any specific language of the Comprehensive Plan you would like to be considered, please show proposed amendments in "line in/line out" format with text to be added indicated by underlining, and text to be deleted indicated with strikeouts. We are proposing up zoning six (6) LR 3 parcels to NC 3P-65 to increase the density on these parcels, expanding the transit oriented development (TOD) potential given that all of the parcels are within 1.5 blocks of an entrance to the Sound Transit Roosevelt Station. The change to the Future Land Use Map is minimal – simply up zoning those six LR 3 parcels to NC 3P-65 so the entire block is all zoned the same. 2. Describe how the issue is currently addressed in the Comprehensive Plan. If the issue is not adequately addressed, describe the need for it. The City's Comprehensive Plan is silent on the specific benefits of this particular upzoning. However, this proposed upzoing is entirely consistent with the City's Comp Plan. The proposed change would increase urban infill density within easy walking distance of a significant transportation hub for buses and light rail. It would promote Transit Oriented Development and open the opportunity for increased affordable housing and community amenities such as a child care center – all in ideal proximity to the Roosevelt Sound Transit Station. It could also be a showcase of "green" building design and techniques, as its location would reduce the need for personal vehicles and accompanying off-street parking. 3. Describe why the proposed change meets the criteria adopted in Resolution 31402 for considering an amendment to the Comprehensive Plan. The criteria are listed at the end of this application form. Is a Comprehensive Plan amendment the best means for meeting the identified public need? What other options are there for meeting the identified public need? The proposed upzone amendment of residential properties along NE 68th Street fully meets the criteria spelled out in Resolution 31402. Here's how: • The amendment is consistent with the role of a Comprehensive Plan under the State Growth Management Act. • It is consistent with Countywide Planning Policies and multi-county policies in the PSRC's Vision 2040 Strategy. • It cannot be accomplished by regulatory change. • It cannot be addressed by either budgetary processes and solely through neighborhood planning. • The amendment is legal under state and local law. • The amendment's timing is appropriate and will give the Council sufficient time to make an informed decision. • City staff will have sufficient time to develop appropriate language for amending the Comp Plan and, if necessary, and changes to the Seattle Municipal Code.	**1 cont.**

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	• The amendment aligns with present Comp Plan goals and advances those policies. • The amendment has not been recently rejected by the City Council. 4. What do you anticipate will be the impacts caused by the proposed change? Why will the proposed change result in a net benefit to the community? The change would promote TOD in the Roosevelt Neighborhood, put those parcels to their highest and best use, and create greater neighborhood friendly density close to the actual Sound Transit station. This will create density closer to the station, thus reducing the need to everyone to own a vehicle and the density will allow some potential open space or day light opportunities while preserving the character of the neighborhood. Because of these factors, along with it being upzoning of property already designated for multi-family development, it would have a minimum, if any, impact on the environment. Actually, because the proposed idea would increase walkability, reduce the need for personal vehicles, and reduce the amount of off-street parking required it would have a net positive impact on the environment. 5. How would the proposed change comply with the community vision statements, goals, objectives, and policies of the Comprehensive Plan? Please include any data, research, or reasoning that supports the proposed amendments. The Roosevelt Neighborhood Association just completed suggested design criteria for the area, which included looking for opportunities to increase density so perhaps other space might be more open while still meeting increasing needs for housing near the Sound Transit station. This accomplishes all that. Furthermore, as the City's Comp Plan goals – creating Community, Environmental Stewardship, Economic Opportunity and Social Equity – are all enhanced by granting this upzone. Upzoning these parcels will build a stronger sense of community in the core Roosevelt neighborhood. By increasing housing density so close to a major transportation hub, it will reduce the need to use single occupancy vehicles, reduces the need for parking, create a more walkable neighborhood, open the way for more economic activity in the vicinity, and expand the opportunity for greater social equity and diversity. The upzone of NE 68th Street would align with all three of the alternatives outlined in the Draft EIS to the Comp Plan to guide growth into Urban Villages, especially those with significant mass transit and light rail service. These parcels will be within 1.5 blocks of an entrance to the Roosevelt Sound Transit station. As the 2012 Comp Plan update notes: "A fundamental goal of this Plan is to steer the majority of estimated growth in housing units and jobs toward urban centers and urban villages, for the following reasons: • Help preserve green spaces, forests, and farmlands outside of the urban growth area; • Preserve the character of Seattle's predominantly single-family neighborhoods; • Reduce dependence on private motor vehicles (the emissions from which are the number one source of air pollution and climate-altering greenhouse gases in the Puget Sound region, as well	**1 cont.**

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	as a major source of water pollution); • Use natural resources such as land, water, and energy efficiently; • Improve public health by promoting walking and bicycling; and • Reduce the costs of building and maintaining public infrastructure and services, such as roads, water and energy supply, and waste management systems." Upzoning of NE 68th Street homes would help accomplish all these goals, thus it is perfectly consistent with the Seattle Comprehensive Plan goals and would help advance them for generations to come. Roosevelt is already designated as a Residential Urban Village in the recently released Draft EIS 6. Is there public support for this proposed amendment(s) (i.e. have you conducted community meetings, etc.)? Note: The City will provide a public participation process, public notice, and environmental review for all applications. John Arthur Wilson, a homeowner on NE 68th Street and leader of the homeowners seeking rezoning, has briefed the Roosevelt Neighborhood Association and actively participated in public discussions of neighborhood design guidelines and ways to increase density in the area. This proposal has been presented to the Roosevelt Neighborhood Association and received a generally positive response.	**1 cont.**
346	Hi - I have taken a long time to consider the four growth alternatives proposed in the plan. As a resident and home owner in North Beacon Hill, my initial reaction was to favor either alternatives 3 or 4 as I thought that would "benefit" my neighborhood the most. The fact that both of these alternatives are considered to carry the greatest risk of displacement for vulnerable populations was deeply troubling to me, but I thought with the right programs and accountability in place, 3 or 4 could still work. I'm glad I took some time to consider this more deeply because I think now that options 3 and 4 will inevitably lead to the destruction of our few remaining diverse communities and drive their displacement to surrounding cities and suburbs. For me, it came down to the notion that, yeah, I would like to see shiny new buildings in my neighborhood, but even more so, I don't want to lose my neighbors or the character of my neighborhood. Options 3 and 4 are really, at their base, about shiny new buildings and businesses, not about my neighbors or their needs. They are, by design, going to create displacement without very intentional interventions and programs to prevent. And, what that really comes down to is not that the city and its leaders can promise this will be a part of these plans, but that no one, big or small, government, NGO, or private foundation, has ever succeeded in preventing displacement as a result of development. The Central District is changing and there is nothing anyone will do to stop it. These options (3 and 4) are not about creating good schools or helping poor people succeed, or making low-opportunity people's lives better in any real, tangible way. And that is what I think we really need: we should adopt alternatives 1 or 2 going forward, let development continue in those areas that do not carry risks for displacement while simultaneously guiding city resources to those areas that will benefit the poor and the vulnerable. Our city resources should be going	**1** **2**

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	toward improving the schools, streets, transit, and infrastructure for folks living in those areas that have been and continue to be underserved by government investments so that they can access the opportunities our growing city has to offer. Thank you for your time and consideration, Michael Wong	**2 cont.**
347	Seattle 2035 must not be like San Francisco today. (rezone so that housing is plentiful, make transit frequent so that public ROW is used efficiently, and Seattle will be vibrant for all.)	**1**
348	In any plan, we must include changes to zoning across the entire city to allow different housing types - townhouses, row houses, ADUs, etc.	**1**
349	I really like this essay that applauds some of the aspects of Alternatives 3 and 4 but also suggests going in a slightly different direction that encourages increased density in more places: http://www.theurbanist.org/2015/06/12/seattle-2035-toward-a-more-equitable-growth-plan/. I grew up in single-family housing in central and NE Seattle and it was fabulous, but now that I'm trying to buy a place of my own (much later than my parents did and requiring a much higher salary/education/spousal contribution/etc. to even make it a possibility), I very strongly believe that Seattle's obsession with single-family housing is destructive. People my age and younger need 2-bedroom townhouses, condos, duplexes, etc., not wasteful and prohibitively expensive single-family houses in areas ill served by transit. We should try to retain some of the most characteristic and well-preserved examples of '20s era construction, but I think the market will do that. And adding well-designed (no bottom story parking!) townhouses that aren't terribly expensive to build to otherwise single-family neighborhoods like Ballard, the CD, Mount Baker, etc. seems like one of the best options. People who are resisting it are fighting more walkable neighborhoods, young families, and the future. Loosen up and learn to parallel park, it's not that bad.	**1**
350	First, I appreciate this very reader-friendly website version of the draft EIS of the Comprehensive Plan. I've lived in Seattle for nearly 18 years and over the years have generally been pleased with how the Department of Planning and Development has balanced the growth of the City with the quality of life of its residents. I'm a landscape architect by trade and have also been pleased with the types of open space provided by the Parks Department. However, almost all of the largest parks in the City are found within the wealthiest, often predominately single family neighborhoods in the City. I believe that all people need a place to get away from the busyness of city life and enjoy nature (not just paved urban plazas) to restore their bodies and minds; I also think that single family homeowners, particularly those with yards, need this opportunity less than people who live in multi-family housing. Some of our suburbs can support a nice mixing of classes in larger City Parks (Seahurst Park in Burien is a good example) thanks to huge parking lots. In Seattle, where providing adequate	**1** **2** **3**

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	parking for everyone to drive, would dwarf our existing parks I'd like to see DPD and Parks and even Metro (if possible) "hold hands" and consider better transit options between our growing urban hubs and large city parks like the Arboretum, Magnuson, Carkeek, Discovery and Lincoln Park). I'd also like to see provisions for new parkland space with vegetation (again, not just wider, fancily paved sidewalks) near or within our urban hubs. These new spaces could be private/public partnerships like Waterfall Garden in Pioneer Square, or they could be associated with government spaces like the Federal Courthouse plaza in Downtown/SLU. I believe that retaining a feeling of community in a growing City is possible, but only if there are successful third places that can restore our residents. The City has done a good job "activating" streets by allowing mixed-use development, sidewalk cafes, food truck rodeos, etc. But in the end, there are many people in Seattle that cannot afford to enjoy these spaces and walking by them everyday adds insult to their economic injury. Please consider development regulation that benefit all of Seattle's economic classes and look into incentives that improve or expand restorative (vegetated, water views, etc) open space and other low-cost third places (like libraries) in the City. Thank you.	**3 cont.** **4**
351	I am newish to seattle. random thoughts on 2035 planning... best way to increase density in single family zoning areas is to make adu's simpler. removing parking restriction would help (I actually support keeping owner residence requirement) row houses in single family zoning areas would be ok - but need to keep height restrictions in line with neighborhood. both of above reflect that as a home owner - I'm ok with smaller lots and increased density - just don't want the enormous mcmansions/condos (3 stories, etc) that ruin views of area... finally - I commute to everett, but live (own) in single family residential zoning area of fremont. I take the bus in town fairly regularly. Ballard to UW light rail (with ability to link up to "spine") makes the most sense. Need to focus on in city/out of roadway public transit in city more than expanding "spine" Cary	**1** **2**
352	I don’t see any schedule in the plan. All can’t be done at the same time. Some catch up areas like opening schools previously closed will help the end solution. Charles	**1**
353	Rent control, affordable housing, and displacement all need to be addressed more. With the rise of the tech boom in the city, populations with a lower salary need to have more access to affordable housings and subsidies, particularly since there are many projects going up that are tear downs, which result in the out pricing of many populations because of new construction. The sense of having urban villages, cores, etc. is an idea that I have loved in Seattle and it makes even more sense once the light rail is finished. A TOD design will serve the city well, particularly if	**1**

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	growth is wanted around the light rail stations, however upzoning in height may need to occur if the density around these cores wants to happen.	**1 cont.**
354	I am excited about these TOD plans, but I would only support them if there is a strong, financially sound plan to help address displacement and the inclusion of marginalized populations into the fabric of the neighborhoods. What's the point of a walkable neighborhood if it's just filled with white people?	**1**
355	I think allowing more types of slightly more dense housing will be important to allowing Seattle to grow: mid-rise apartments, row houses, etc. I think Seattle has too much space zoned as single family housing, and this is an inefficient use of space. I think increasing our supply of affordable housing is important.	**1**
356	Seattle should follow the lead of France and some other countries/ cities and require 'green rooftops' on all new commercial/ industrial/ and larger multi family buildings. Thinking in the 25-50% coverage range depending on the size of the rooftop. I'm also in favor of alternatives 3 and 4 as we MUST take advantage of the billions we are spending on light rail at a minimum. I'm also a strong supporter of Seattle Subway's west tunnel idea for ST3. http://www.theguardian.com/world/2015/mar/20/france-decrees-new-rooftops-must-be-covered-in-plants-or-solar-panels Thanks, Gary	**1** **2** **3**
357	Bitterly disappointed that South Seattle is the dumping ground for low income housing, Why jam even more people into an area that is roiling everyday with crime. From the Rainier Valley Post: These events are not isolated incidents. You have illegal activity EVERY DAY in the parking lot at Adams & Lake Washington Blvd. It's not a secret. Attempts should be made to make the area more livable for those of us law abiding citizens already here instead of making matters worse in the quixotic hope of making Seattle a car-free zone. Criminals get a pass. Bicycles become kings.	**1**

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	What is going on here? <SOUTHEAST SEATTLE — There have been three south-end shootings in just four days, with one man injured and two cars riddled with bullets in separate incidents. Two of the brazen daytime shootings occurred in traffic on busy thoroughfares in full view of other motorists, yet no arrests have been reported. It was about 3:15 pm Thursday when gunfire erupted in the middle of traffic at Renton Avenue South and South Cloverdale Street — blocks away from several schools and the neighborhood community center. Witnesses say a gunman stepped out of a car stopped at a traffic light and opened fire on another vehicle stopped ahead of his car. According to police, Both the gunman and the driver of the car targeted in the shooting sped away from the scene before officers arrived. Police collected shell casings from the street and discovered found a third car that was uninvolved but damaged by gunfire. There were no reported arrests. The incident comes less than 24 hours after another car was hit by a barrage of gunfire in the Mount Baker neighborhood just a few miles away. In that case, it was shortly after 6 pm Wednesday when shots were fired in the 2300 block of Rainier Avenue South near South College Street. Witnesses described a passenger in a silver Audi firing shots out the window towards a fleeing black BMW. Responding officers found the BMW and its driver parked three blocks away in a convenience store lot. According to police, the victim said he couldn't describe the shooter and only realized, after stopping at the convenience store, that his car had been hit with nine bullets. There were no reported arrests and police say they are still searching for the gunman. Three days prior, a 20-year-old man was wounded in a late-night shooting outside a Hillman City convenience store. According to police, it was just before 11:30 pm, when a 20-year-old man pulled into the store's parking lot in the 5700 block of Martin Luther King Jr. Way South. About 10 minutes later, a gunman opened fire on the man as he sat in his vehicle outside the store. The 20-year-old victim was shot in the arm, and seven bullets also struck in the passenger side of his vehicle. Another uninvolved vehicle was also struck as it drove past the scene. That driver was uninjured.

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	The 20-year-old was transported to Harborview Medical Center with non-life-threatening injuries. Gang Unit detectives are investigating.>	
358	I am sitting in a parked bus at Battery and 2nd, it is 12:30 pm. I am astounded by the number of speeding cars. 2 cars were actually racing with each other. Where are the traffic cops? This is nuts as well as unsafe. Sent from my iPad	**1**
359	In the section on traffic it says, "Traffic congestion will increase but is not expected to exceed the city service standard. " Can you tell me where I can find the city service standard?	**1**
360	Dear sir or ms, These comments correspond to headings of the survey. Thank you for your consideration. -M 1. Effectively preserving character of single-family neighborhoods would require trade-offs—perhaps in exchange—where these may necessarily be farther from transit and especially high-capacity or higher-speed transit such as Rapid Ride, true BRT, or light rail. That is, preserving character of SF neighborhoods may have to be quite selective and be in deference to (and in some sort of exchange for) promoting density and amenities near centers and hubs. Carefully thought-out diversity of design in within neighborhoods of some size might be practical. An occasional historic "Up" house or community center building or property with P-patches might be made a characteristic feature in a few neighborhoods. The former Carnegie library building in downtown Ballard is one obvious candidate for permanent preservation. 2. Encourage job growth near urban centers (top priority), near high-frequency transit (second priority). Consider high-frequency transit coordinated to promote diversifying scheduled work hours (spreading peak traffic hours and diversifying time opportunities for recreation). 3. Strategies to reduce our reliance on cars: top priority should be providing appealing alternatives or education about benefites, or both. An advantage of rail (at least when not overcrowded) can be an apportunity for reading or deskwork. Greenways can be an integral part of making more walkable neighborhoods and engaged communities; cf. §5, below. Build appealing walking or cycling routes to transit connections—especially to high use connections, since these would offer the greatest cost-benefit. 4. Encourage Seattle Public Schools to increase school capacity by facilitating repurposing of existing office buildings or floors of buildings, or remodeling existing buildings. Encourage more use of existing facilities, with such as extended and weekend hours, particularly for high-capital	**1** **2** **3** **4**

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	cost such as up-to-date laboratories, libraries, resource centers. Facilitate coordination with public libraries and parks. Thornton Creek is just one example. These are in addition to SPS using properties already owned. Work with schools in planning particularly family-friendly neighborhoods and infrastructure around schools. Look at allowing that not every neighborhood is particularly for families with school-age kids, and neighborhoods for school-age families are especially for such.	**4 cont.**
	5. Open space amenities for growing urban centers and villages. I think parklets are largely demonstration pilot projects and band-aids for existing poor urban livability. Each of the other suggested options can be a best application in best-suited circumstances. For just one example, more street trees should be especially important in locations with such as most-suitable solar exposure, while wider sidewalks should be where surroundings, sky exposure, shielding from inclement weather are most amenable to people gathering. Urban centers and urban villages need ready access to a useful mix of gathering spaces, tranquil green places, and outdoor activities facilities. Where people would walk, cycle, or gather, make as pleasant as possible as many places as possible. We can do a lot better with better design, without necessarily costing much more in capital. The city can mandate developer fees and effective, equitable exchanges of developer-provided needed pubilce amenities in exchange for development privileges.	**5**
	6. Strategies for achieving racial and social equity: recognize that the status quo is baked into the cake and we need to fundamentally improve our diet. I have serious questions about "prevent and mitigate" without addressing the fundamental causes. "Prevent and mitigate" can be a band-aid for avoiding needed social engagement and discussion. First, we as a city and as neighborhoods need to have prerequisite conversations. Single-family residents, families and retirees need some mitigation from gentrification, too. We need mitigation. A fundamental component of marginalizing populations and local businesses is gentrification.	**6**
	7. Core values to the future of a Seattle we would want to have: #1 (clearly) environmental stewardship. Good environment, good jobs can be as hand-in-hand as the avoidable reverse (cf. such as Beijing). #2, economic and social justice. Note that this is somewhat different from the proposal in the survey. This is the heavy lift. The others (equity, community) could follow from informed, participatory democratic proccess. We as a city and society need to engage in the necessary conversations to recognize where we are, and choose where we want to go before we are overtaken by circumstances. The time for that opportunity is quite short. References available on request.	**7**
	8. How each alternative supports the four core values: given (for purposes of this discussion) that we, as citizens of a city, do not have effective control over macro forces pushing growth, the best of available choices would be an integration of primarily guiding growth to urban centers, secondarily to near light rail and such as true BRT, with concentrations of amenities, park, green space, and access to true natural areas serving that density. Overall, we need to invest a lot more in improving quality of life for everyone (in proportion to need in order to approach equity) and a lot less on glamorous mega-projects primarily for serving single-occupancy motor vehicles.	**8**

#	Comment	
	[end]	
361	http://www.theurbanist.org/2015/06/15/seattle-2035-toward-a-more-equitable-growth-plan-alternative/ Please look at the urbanists vision for planning urban villages. The main point is to spread the burden and benefits of growth throughout the city. The proposals would basically add urban villages into northeast Seattle, in the Wedgwood area, Madison Park, magnusen park and magnolia. This creates a wider spectrum of development and less pressure on affordability throughout the city. Thanks, Peter	1
362	If Seattle wants to be a truly diverse city- it needs more programs that promote housing OWNERship in low income and communities to color. Consider housing co-operatives, European style co-housing units (shared yard and courtyard, community space for gardening, community etc). Build housing that feels permanent- not the now typical and terrible looking "mixed use" buildings that do not offer out door space. Build housing the creates and fosters community development.	1
363	Hi! Your plan totally ignore the environmental impact on canopy trees! Buildings developers and business that's all you dream for this city but you totally ignore Seattle as being part of Washington State which the Evergreen State. Look around to Seattle now and see what is left. You can barely see the sky ...you want to create a new Silicon Valley...Amazon ..one day can fall like Microsoft..people will find another place and other jobs and will leave behind a 2035 Seattle... built from glass and metal where birds and trees will be seen maybe only in Sleepless in Seattle. Look around , when you try to park a car in a parking place, you feel happy you found a tree so it can be in a shady place. You hope to have underground parking lots but it's not the same cause those parking lots won't be green and won't give you so much happiness. Why do you think are people coming over here? Ok, jobs! But they also came over for our forests...for our fresh air. Ask your experts to check on the environmental impact and don't totally ignore it just for business's sake. Maybe it's not mature enough but try to watch Avatar ..don't get blinded only by business life. Look around and don't ignore all the climate change signals. Maybe a focusing event won't happen soon in Seattle cause it's still a virgin land for developers and that's why they exploit it but, when it will happen, you might be be not city councillors and won't care. So, you should include in your plan an Environmental Impact analysis on canopy trees. It's enough that many developers cut trees that needed 30-50 years to grow.	1
364	Thanks for the chance to give my opinion. I looked at the draft transportation plan as I worked on this survey and was disappointed to see that for West Seattle there is no plan for high capacity rail or streetcar. The bus technology for West Seattle needs a great deal of improvement to provide an acceptable level of transit service.	1
365	Dear Planners, I would really like to see you include Central Area near Jackson & MLK in your plans for Transit -	1

#	Comment	
	train, bike & getting sidewalks redone. Also, it would be great to see revamp of commercial real-estate in the area . Seems like an absolutely underserved area in terms of grocery stores, restaurants etc. Thank you Shipra	**1 cont.**
366	It is crucial to maximize TOD and loosen regulations on new construction.	**1**
	in order to maximize social equality and mobility the city should: 1. impose parking maximums 2. introduce variable rate congestion tolling to maximize throughput and increases transit speed/relieability 3. prioritize the development of pedestrian and bike friendly zones (parklets, widened sidewalks, protected bike lanes) 4. introduce tax on commercial parking to incentivize transit use. 5. establish exchange for parking permits and limit their number to increase revenue and decrease car dependency. 6. remove height limits and investigate zone regulations similar to Vancouver, Canada which prioritize density while maintaing sight lines and direct light. 7. allow residential buildings offer parking to the public. the aforementioned list would maximize affordability and mobility while creating a more livable and socially equitable city. If the city does not embark on an aggressive housing building campaign which reduces car dependency the city will become unaffordable for the average Seattlite.	**2**
	additionally: the city should consider changing the tax code from being a tax on property which deters investment to a tax on land which encourages development.	**3**

Comments Received on the Seattle Comprehensive Plan EIS via Social Media

Note: Comments 376, 409, 424, 427, 434 and 436 are threads that include multiple individual comments

#	Source	Comment
367	Twitter	@SeaTransitBlog @Seattle2035 Are the pop numbers updated or out of date PSRC ones?
368	Twitter	@SeaTransitBlog @Seattle2035 Can't get excited about that, until the city plans for 2015.
369	Facebook	Y'all did such a bad job on these options.
370	Twitter	.@Seattle2035 @SeaTransitBlog I noticed the @SoundTransit line pictured includes a Boeing Access Road station but no Graham Street station.
370	Twitter	@CityofSeattle @Seattle2035 Sustainable growth means taking a very long view. When you visit a city like Tokyo, it is clear they did that.
372	Facebook	To late.
373	Facebook	Put more crappies in the lakes
374	Facebook	Going to have to allow a lot of upzoning if you actually want to prevent displacement.
375	Twitter	Seattle Alt4 links equity with access to transit of all kinds. @seattleplancom @seattle2035 http://www.seattlemet.com/news-and-profiles/publicola/articles/murray-versus-the-port-part-two-may-2015 via @SeattleMet
376.1	Facebook	Don't don't DO NOT yuppify The Pike Place Market. It will not "fix" any of this crap, but it will ruin The Market.
376.2	Facebook	Explain what you think yuppify means, and how that might happen to Pike Place.
376.3	Facebook	David Whalen.. The "yuppification" of the business corridor of the Freemont District is a prime example of what could happen to the Pike Place Market. Put a Chase Bank on every corner!
376.4	Facebook	Seattle be underwater by 2035. Xo
376.5	Facebook	Chase vs. health threat Greek restaurant .... Think Fremont is better off with Chase imho.
376.6	Facebook	Hugo...,Hahaha! I prefer to refer to the Greek Restaurant as having "old world (very, very old) world charm!"
377	Facebook	If I'm thinking of the right plan, it seems to me that all the alternatives are the same plan. there don't seem to be any real alternatives. just shades of blue, and always in a very narrow range.

#	Source	Comment
378	Twitter	all of these are #doingitwrong @Seattle2035. @SeattleCouncil must open up the SF zones for equitable development. http://pic.twitter.com/dq4SZUQ1XL
379	Twitter	@Seattle2035 @SeattleCouncil obvs best way to address affordability issue is lock out 3/4 of the city from development. OMFG, guys.
380	Twitter	New Gehl Institute Will Bring “People-First Design".. http://nextcity.org/daily/entry/ne… http://pic.twitter.com/IxAtKVtBdO" @Seattle2035 needs #peoplefirstdesign
381	Facebook	I really do hope they are working as hard as they can to keep the culture alive there and keep things affordable for the people there. It's nice for them to say they are trying, but if the entire neighborhood is planned to change, a plan being given from the outside, the risk of complete displacement seems very high.
382	Blog	Everybody seems to want public transportation like bus, monorail, light rail, subway, etc. But when it comes down to it, nobody wants to pay for it. Everybody wants their home value to increase, but nobody wants to pay the associated increase in taxes that results from the increase in value. Everybody wants their rent to be lower or at least capped, but nobody wants to pay higher costs in goods and services that rent control will bring. We vote in light rail, a tunnel and other public transportation, and immediately everyone files lawsuit because it may have a negative effect on them personally. Everybody wants, but it seems that precious few are willing to sacrifice any of their own comforts to get what they want. Instead, they want others to do the sacrificing for them. It isn't up to the mayor or the city council to decide the future of Seattle; it's up to us, the residents and taxpayers. But we don't seem capable of making that decision. Instead we bicker, complain and bitch about how everyone else is ruining it for all of us. We whine for public transportation, but then we don't use it, preferring instead to drive our own cars so that we can bitch about the lack of parking. Then, when we do find that rare spot to park, we complain about the high cost of parking. We whine about high rents, but then when a dearly departed aunt leaves us her home, we immediately charge top dollar to rent it out.

#	Source	Comment
		Suddenly, the rent isn't high enough! We support minimum wage hikes... unless, of course, it will mean that eating out is more expensive for us. Tired of corrupt politicians and greedy developers? Fed up with high rent and higher taxes? SIck of the lack of progress in efforts to reduce our carbon footprint? Weary of the pollution, the population, the poverty and homelessness, and all of the other social issues that seem to plague Seattle? Then how about you run for office? Or, at least vote out the politicians who support this stuff. Or how about getting involved in local government and politics yourself? Start a campaign. Join a cause. Get your voice out there and be heard. But for Pete's sake, stop complaining and do something!
383	Blog	While I wish I could have delivered this message personally at one of the Town Hall meetings last month I was otherwise engaged. Here are the three central choices for the direction this city will take: Scenario 1: (Continuing) Little or No Control over the housing market's ever rising rates Effects: Homelessness continues to skyrocket Property values push an increasing number of people into indentured servitude Minimum Wage increases are not only nullified, they enable higher price gouging on real estate leading to an accelerated increase in homelessness. Result: Seattle becomes a smaller version of the Slave-Farm known as New York City, where residents effectively pay $2000 a month to live in a cubicle. Conclusion: This would result in substantial increases in crime, vastly lower the quality of life, and likely result in a breaking point event where at least 1% of able minded citizens choose to fight back. (I'm not counting anarchists such as the May Day “rioters” as able minded)Scenario 2: Medium Control is put into legislation in an attempt to give checks and balances to the housing market's skyrocketing

#	Source	Comment
		trendsExample:The trend towards expanding Affordable Housing incentives continues, leading to a slightly higher percentage of all new housing developments built adding on a portion of their space to accommodate. Effects: Homelessness continues to rise, but at a slower rate Property values push an increasing number of people into “affordable housing” to give them temporary/partial shelter from rising ratesMinimum Wage increases effectively help people in affordable housing for the short term, but still push the overall market values up faster, causing a fractional and delayed backlash on the people who need it most. Loopholes are inevitably discovered and exploited, resulting in acceleration towards the extreme once more. Result: Same as Scenario 1, just delayed by no more than several yearsConclusion: This would prove a stop-gap measure, which would buy no more than enough time for one election cycle. Scenario 3: Comprehensive, Adaptive, and Unprecedented measures are taken to insure an end to the current dilemma Example: Market Values have soft and hard limits set, meaning that profit margins are given reasonable limits that still allow for rewards and growth to investors, but prevent gouging the market. Effects: The rising homelessness problem is halted, allowing for means of treatment to be effectively explored Property values of dilapidated or under-utilized urban lots temporarily drop due to decreased competition, allowing for an immediate increase in development as the cost of development drops. This also allows for an increased variety of new developments being built. Minimum Wage increases become effective, requiring only minor tweaking to bring them up to current living wage levels in the coming years.Loopholes are closed as they appear, preventing abuse of the system.

#	Source	Comment
		Conclusion: Despite the most likely fearmongering counter-argument, this would not limit growth and investors, it would only reduce competition for property, thus reducing costs for buying and building practically overnight, as where there is reliable population growth there will always be investors. Over-arching Conclusion: Scenario 3 is the only primary scenario which doesn't have an eventual high probability of violence targeting investors and government officials. Due to the Internet and Social Media it is unlikely that another Slave-Farm such as New York City could be established without considerable bloodshed, and even the targeting of a single investor could lead to a trend that would dismantle the attempt. Negative reinforcement aside, Scenario 3 is also the only one which is fair to everyone, not just the insanely wealthy, but without that fairness being legislated it won't exist, as it doesn't evolve naturally in the current economic/social paradigm. Personally I find elements of the local and state government to show great promise, the issue of Net Neutrality being one such example, and I sincerely hope never to find myself pitted against them, more for their sake than mine. That being said, there is much work that needs to be done to prevent this growing metropolis from being soured, but there is still time to make changes that would lead this city down a better path.Side Note: Many other sectors such as public transportation appear to be trending by and large in the right direction, as public transit becomes more viable and less people find themselves requiring or indeed desiring their own personal vehicle to sit idle over 90% of the time.
384	Blog	More density, more retail, more public transit -- build more light rail and non-car travel options. Millennials are going to be the major generation in 2035 and we don't want more cars -- we want walkability and more affordable housing, so build more density.
385	Blog	traffic and housing just like everybody else has brought up. you realize all the artists and bands are moving out of seattle right? might not seem like a big deal but our status as an arts city is in jeopardy. oh well i hear everett has a growing music scene ;)
386	Blog	I'm so glad you asked. Who decided that this growth, this "increased density" was a good thing? No one I know. This is a marketing concept foisted on us by bought-and-paid-for politicians pandering to out-of-state developers, while growing the cash-cow tax base to increase government salaries while cutting public

#	Source	Comment
		benefit. Seems like "increased-density-as-public-good" was just casually thrown out there as if it were a self-evident Good Thing, and a lot of people just bought it. STOP TEARING DOWN THE BEAUTIFUL OLD HOMES AND BUSINESSES THAT GIVE OUR NEIGHBORHOODS CHARACTER!! JUST. STOP. You are destroying "Seattle". If they want to build condos, fine, but there are plenty of non-historic shabby buildings that could go, instead of perfectly sound historic craftsman homes. I can think of a dozen or so prostitute and crack motels that could go. How about redeveloping areas that need it, instead of invading perfectly stable and beautiful neighborhoods? Build the new ones where they're needed, but don't build them to invite more people to move here, build them for the people who are already here. You should be working hard to get our homeless and disenfranchised citizens rehabilitated and make the most of the WORK FORCE THAT SLEEPS UNDER OUR BRIDGES. If you want to "minimize impacts to low-income people, people of color and English-language learners and ensure that everyone in Seattle benefits", you need to beef up your public services programs instead of spending billions on entertainment projects. How many sports arenas do we need? And a toll tunnel? Through downtown? Ridiculous. Want to give people a place to live? Incentivize landlords and property owners to stop holding out for unrealistic prices while properties go vacant for years, decades even. How about increased taxes on vacant properties? Make it non-feasible to let a property sit vacant. Stop running the city as a for-profit corporation benefitting foreign interests. THIS IS OUR HOME, WE ARE THE STAKEHOLDERS.
387	Blog	With all these buildings going up, and all the money being made for real estate developers and owners, how are they being taxed? How are they improving Seattle beyond just bringing in more people and more business? Those making millions (billions?) off of the Seattle boom should have to pay at least the same tax rates as I do and get NO incentives or tax breaks. The city should be rolling in money right now and that money could fix a lot of infrastructure and transportation issues.
388	Blog	Housing must have equal parking. Our city is clogged with traffic. Cars need to be off the streets. Micro housing only lines the pockets of developers and it hurts our city and it's existing residents. It does nothing to encourage transit use.

#	Source	Comment
389	Blog	How Much is Enough? How should Seattle grow is the wrong question. For the sake of the planet, and a decent life for people and other species that live here, open space, food, water, housing, climate change, etc., we must plan to stabilize our population. We should not take unlimited growth as a given, it just leads to disaster. No species can have its population expand forever. We can take proactive steps to stabilize our population, or it will be done to us by the environment, and that will be ugly. Instead of planning for growth, we should be planing for stability and even reduction in our population until we are providing well for the needs of all.
390	Blog	I'm wondering if you guys have forgotten what it was like to be here in the 70s and you had all your job eggs in the Boeing basket .. remember? This city has become a job snob and we ain't gona be growin' if we keep that up. Our economy is vibrant because of diversity. You're running your economy of will all your's and other's environmental Jihad. And we've become transportation snob (cars are evil). you need all the tools in the tool box for both these issues. Public Transportation, bikes and cars. You don't really have public transportation or real hope of what's needed to REDUCE not eliminate cars. We need: 1. Jobs 2. A BART like system + bikes+cars+transportation corridors I suspect it's too late, because now we lack the physical space to fix our transportation problems and I hope I've sold my house in this before the tech sector takes the giant down turn its going to inevitably take.
391	Blog	Earth is our only home. Whatever we do to make it cleaner is a priority. Seattle must be known as a compassionate state treating it's disabled, elderly and poor with dignity. A state known to share it's bounty with all it's citizens. Malinda Lewis
392	Blog	traffic issues and housing affordability need to be addressed.
393	Blog	The listing of categories in the graph shows the continued impression that green space and canopy are something other than a capital investment and part of the infrastructure. They are utilitarian and essential, saving the taxpayers money in health care costs, road repair, sewage treatment, non-point pollution reduction, noise abatement, energy and more. Not quality of life, not amenity, infrastructure like raingardens and bios wales.

#	Source	Comment
394	Twitter	@MayorEdMurray @Seattle2035 NHL NHL NHL NHL
395	Twitter	@MayorEdMurray @Seattle2035 Like Blade Runner
396	Twitter	@MayorEdMurray @Seattle2035 about 20 pounds heavier
397	Blog	I understand that Seattle has to grow. However I am concerned about our streets looking like canyons with tall condominiums and apartments going up. We are loosing our neighborhood identities and culture. With all our buildings looking very corporate and generic we seem transient and like we could be anywhere. People care less and are less invested in their communities when we have nothing to identify with. Allison Agostinelli
398	Blog	Develop progressive and effective problem-solving policies which take into account the citizens of Seattle as they are, in all their variety, not as some sort of hypothetical beings which a limited-power city government might like them to be.
399	Blog	For the better growth of any country it is required to increase the economy rate and financial status to develop the country completely. One solution to increase the financial rate is to invest in share market. But while investing in the stock market proper consultation should be taken form independent equity research firms.
400	Twitter	@BruceNourish @VamonosLA @MarketUrbanism @CityhallTom's classist n'hood is opposite rack city needs to take. No SFD upzone in @Seattle2035
401	Blog	It's not just Seattle that should be thinking about and making plans for a very large population. The Census Bureau is predicting an additional 10m to 12m in CA, and 100+m for the US as a whole. They also indicated that most of that increase will be related to immigration. I never hear any politicians making any plans for such increases and how they will affect food, energy, housing, education, water, transportation, healthcare, etc. I guess they figure they will be long gone and are happy to leave these problems to future politicians. The politicians seem to like the "crisis" mentality. Don't do anything 'til it hits the fan. Unfortunately a crisis situation is always more difficult to solve and always more expensive to solve. I worry about the US that our kids and grand kids will have to live in unless we change our thinking.
402	Blog	Why is there no Parks and Open Space Element in the Comprehensive Plan? Nearly all of Seattle's neigbhoring governments adopted Parks and Open Space Elements as far back as 1995, like Bellevue and King County.
403	Facebook	I love Sesttle, State of Washington. I love Seattle…

#	Source	Comment
404	Facebook	We must raise our voices
405	Twitter	@SeattleSPU @Seattle2035 plan four 2.5x current population: or more
406	Twitter	@SeattleSPU @Seattle2035 and upzone Wallingford to 6-8 story along arterial blocks
407	Facebook	Jean Darsie, should be interesting...
408	Facebook	Seattle will be underwater in 2035. Xo
409.1	Twitter	@MikeLindblom Ha-ha. @Seattle2035 DEIS mostly about car LOS & parking. Transpo element:http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2273584.pdf Appdx:http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2273577.pdf
409.2	Twitter	@MikeLindblom Saddest line in @Seattle2035 "The only walkshed that is expected to substantially change in area by 2035 is in Northgate."
409.3	Twitter	@SNGreenways @MikeLindblom @Seattle2035 #90MinuteNeighborhoods
410	Twitter	@SNGreenways @MikeLindblom @Seattle2035 upzone the SF neighborhoods. Uff da
411	Twitter	@SNGreenways @MikeLindblom @Seattle2035 Hate the "I'm fine you're fine we're all fine" attitude of this plan. How about saying "We have 1/2
412	Twitter	@SNGreenways @MikeLindblom @Seattle2035 2/2 "the goal of decreasing car-use especially SOV as much as possible." Take a stand!!
413	Twitter	@SNGreenways @MikeLindblom @Seattle2035 And here's an idea: if forecasted walksheds aren't projected to change...improve f***ing walksheds!
414	Twitter	@SNGreenways @MikeLindblom @Seattle2035 "Seattle has over 300 miles of bicycle facilities" <- this needs to be seriously revised downward
415	Facebook	Well, it shouldnt grow downtown and the Amazon area without a decent transportation plan. One artery or so from Amazon to the 5, and really only three highways - you need to build outside Seattle. Ever hear of the Mercer mess?
416	Facebook	Langeweile pure.. jemand lust versaute Bilder zu bewerten? :3
417	Facebook	https://www.reddit.com/r/explainlikeimfive/comments/38a0yr/eli5_now_that_the_freedom_act_has_passed_what/
418	Twitter	@LIHIhousing @Seattle2035 have fun! Really important to #makeroom for homes affordable to working families and seniors in the plan.
419	Facebook	So does plumbing. And electricity. And earthquake standards. And

#	Source	Comment
		sidewalks. There are often costs to quality of life amenities.
420	Twitter	@Seattle2035 isn't a plan for how city should grow. it's a plan to further enrich homeowners/landlords https://twitter.com/strangerslog/status/603992938478178304
421	Twitter	I hope Seattle's @Seattle2035 plans for the "missing middle" so we don't just have single family houses or condos https://twitter.com/TreeHugger/status/605787516990423040
422	Twitter	@GordonOfSeattle @Seattle2035 And we need more than just those “townhouses” that are really houses on stilts in a pond of parking…
423	Twitter	@SeaOfficeofArts @pa4culture @Seattle2035 We would love to read these results! Great question.
424.1	Twitter	@SeattleParks @SeattlePlanCom @Seattle2035 any plans to get some outdoor #fitness equipment installed along #belltown running paths?
424.2	Twitter	@asclepiusgal @SeattlePlanCom @Seattle2035 Currently we only have plans for Delridge, Hiawatha, Van Asselt centers & Powell Barnett Park
425	Twitter	Benefits of restoring ecosystem services in urban areas http://www.sciencedirect.com/science/article/pii/S1877343515000433 @StewardshipP @ecoschemes @grist @cristina_rdr @Seattle2035
426	Facebook	I went through the whole survey to get to the comment box, and got a message saying it was disabled. Can you fix this?
427.1	Twitter	@cruickshank the @Seattle2035 plans are so inadequate that they essentially already are no growth options
427.2	Twitter	@bruteforceblog @Seattle2035 totally agree
427.3	Twitter	@cruickshank @Seattle2035 especially with nearly 80% of city closed off from development
427.4	Twitter	@bruteforceblog the @Seattle2035 isn't nearly ambitious enough. Missed opportunity, yet most common criticism is it allows too much growth!
428	Twitter	@AdamPaulAmrhein "Stop building empires and start building living communities" @Alorenzen @guardianeco @WRIClimate @ClairehBC @Seattle2035
429	Twitter	40% of Seattle's carbon emissions are from our roads, but the @Seattle2035 does little except hope cars get cleaner http://pic.twitter.com/Fmk3ZWekzm
430	Facebook	Do not use the word "smellscape" again, thank you.
431	Facebook	I commented on zoning and electric transit.
432	Facebook	Agree

#	Source	Comment
433	Twitter	OTBT: One perspective on the @Seattle2035 comp plan update; social equity is a serious concern. http://www.theurbanist.org/2015/06/12/seattle-2035-toward-a-more-equitable-growth-plan/
434.1	Twitter	@UrbanistOrg @Seattle2035 Tying this into my earlier question: how will Seattle 2035 and HALA influence each other? Which takes precedence?
434.2	Twitter	@UrbanistOrg @Seattle2035 I.E what if HALA suggests widespread SF upzones and 2035 says "we don't have an option for that"?
434.3	Twitter	@Nick_Etheredge @Seattle2035 Depends on what HALA says, but HALA is likely more immediate regulatory and program actions.
434.4	Twitter	@Nick_Etheredge @Seattle2035 Could influence 2035 though. 2035 will direct actions and future development regulations and programs.
434.5	Twitter	@Nick_Etheredge @Seattle2035 Depends what "upzone" means.
434.6	Twitter	@Nick_Etheredge @Seattle2035 If it's literally a zoning change that is in conflict with FLUM designations and Comp Plan policies, that...
434.7	Twitter	@Nick_Etheredge @Seattle2035 would be found incompatible.
435	Twitter	Nothing better than good dose of @StrongTowns @clmarohn for reality check as we review @Seattle2035 & #MoveSeattle https://www.youtube.com/watch?v=AdXh8cQZyMc&feature=youtu.be&t=1h14m8s
436.1	Twitter	ICYMI: The Urbanist endorses a fifth alternative @Seattle2035 growth plan for an equitable and accessible city. http://www.theurbanist.org/2015/06/16/support-alternative-5-for-seattle-2035/
436.2	Twitter	@mjgiarlo @Seattle2035 Let the city know you feel that way!
436.3	Twitter	@UrbanistOrg @Seattle2035 I will! Thank you for fleshing out a well considered, reasonable, and fair alternative for folks to advocate.
436.4	Twitter	On a more positive note, @UrbanistOrg is dead right about how to improve @Seattle2035 http://bit.ly/1J3ujyn & http://bit.ly/1J3ugTc
437	Twitter	@Seattle2035 @seattlecouncil @seattleDPD @MayorEdMurray that lightest shade of pink? berlin's SF zone < seattle's SFZ http://www.stadtentwicklung.berlin.de/planen/fnp/pix/historie/12_FNP_2015_kl.pdf
438	Twitter	Thrilled to partner w/ @SeaArch?itecture to bring City Stories: @seapubschools youth 2 share ideas with @Seattle2035 http://pic.twitter.com/cKV0WGa3s5

4.2 Public Hearing

Section 4.2 of this Final EIS contains public comments provided on the Draft EIS at the May 27, 2015 public hearing. Distinct comments are numbered in the margin of the hearing transcript.

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CITY OF SEATTLE

DEPARTMENT OF PLANNING AND DEVELOPMENT

SEATTLE 2035 COMPREHENSIVE PLAN

DRAFT ENVIRONMENTAL IMPACT STATEMENT

OPEN HOUSE AND PUBLIC HEARING

Deputy Director Nathan Torgelson Presiding

TRANSCRIPT OF PUBLIC COMMENTARY
Deborah Munkberg, Moderator

7:00 P.M.
May 27, 2015
Seattle City Hall
Bertha Knight Landes Room
600 Fourth Avenue
Seattle, Washington

GRETCHEN HUBBERT, CCR
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OFFICIAL APPEARANCES

City of Seattle
Department of Planning and Development:

Nathan Torgelson
Gordon Clowers

Also Present:

Deputy Mayor Kate Joncas
Deborah Munkberg, AICP

MEETING AGENDA

6:00 - 6:30 PM: Open House

6:30 - 7:00 PM: Overview of Seattle 2035 and Draft Environmental Statement

7:00 - 9:00 PM: Public Comments

PUBLIC FORUM SPEAKERS

Rich Voget
Mary Fleck
Cindy Barker
Ubax Gardheere
James McIntosh
Jody Grage
Kirk Robbins
Alrick Hollingsworth
Henok Woldu
Kevin Volkmann
Irene Wall
Rico Quirindongo
Eden Mach
Steve Zemke
David Sauvion
Yemane Gebremicael
Donna Hartmann-Miller
Bill Chemnick
George Winn
Andy Maclean
Don Stevens
Ryan Schmautz
Odessa Stevens

(Public Hearing opened at 6:58 p.m.)

MS. MUNKBERG: I just might mention, for logistical purposes, I have a list of -- not a very long list -- of people who signed up to speak. And we'll get more, more of you signed up after we get started, but we're going to go through this list first. And I'm going to apologize in advance if I bungle your name. We're going to start out with three minutes per person, and as you hit two minutes, I'll show you a yellow (indicating), and as you hit three minutes, I'll show the red color. It's not intended to be rude or to cut you off, but I just want to give everyone a chance to speak who wants to speak.

So with that, I thought I would start out by just calling the first three names. And the microphone is over there (indicating.) If you -- as I call your name, if you could sort of migrate in that direction, that would help us. Rich Voget, V-O-G-E-T, Mary Fleck, and Cindy Barker.

1 MR. VOGET: My name is Richard Voget. I'm a retired dentist, living in Wallingford.

Reducing greenhouse emissions must be a core focus for growth plans, or we will not be able

1 cont. to pass a livable future climate to our children and our grandchildren. If climate change wasn't factored into the 120,000 growth estimate, then you can double or triple that number due to climate refugees from other states. Mayor Nichols and the City of Seattle adopted a goal of achieving the Kyoto goal of reducing its greenhouse gas emissions to seven percent below 1990 levels by 2020. The recently released emissions inventory for 2012 found that Seattle had reduced its greenhouse gas emissions by only one percent from 1990 levels. Portland decreased its greenhouse gas emissions by 14 percent and San Francisco by 23 percent while growing faster than Seattle. Seattle has now announced a new goal of reducing emissions from automobiles and buildings by 62 percent by 2030.

The whole focus of my talk here is to say that without proper planning and followthrough, Seattle will fail to meet its new goal, just as it failed to meet its old goal. So I'm asking that (1) you develop a detailed plan with five-year intermediate targets which will, if implemented, actually achieve the goal of reducing greenhouse gas emissions from transportation and buildings, (2) develop implementation strategies, capital projects,

1 cont. operational programs, and city ordinances applying to public and private activities that do not rely on or require any action by the state legislature or funding from other levels of government to achieve the first five-year intermediate goal, (3) consult with the Seattle School District, the Port of Seattle, the University of Washington, King County, and other local political entities that are not subject to Seattle's legislative authority in developing the plan and implementation, (4) pass ordinances and include in each capital an operating budget for the next five years for the necessary funding to achieve implementation of the necessary plans to meet the intermediate target; and, finally, develop an analysis necessary to determine the extent to which the 2035 plan will contribute to reduction in greenhouse gas emissions.

Thank you.

2 MS. FLECK: Hi. I'm Mary Fleck from the Seattle Green Spaces Coalition.

I found it interesting, in the Power Point, to hear that we're going to need 1,400 additional acres of open space. Where is that going to come from? Right now, Seattle has about 414 acres of open space that are slated to be sold over time, and where

2 cont. are we going to find the new open space from, that we're going to need? And it seems to me that the city has absolutely no business selling off surplus property when we need it so we can breathe, so I urge the Comp Plan to take a look at the surplus properties.

One question that comes to mind is, "Where is the enforcement mechanism to ensure that we are going to have the open space that we are promised?" When the neighborhood plans went into affect, people thought we were going to have some guarantees for the open space, so it seems as though we need some real teeth in the plan to make sure that we get what we're going to be needing.

3 I didn't hear too much about trees and environmental stewardship, which is supposed to be a core value. How is that going to actually take place? Our environmentally critical areas need protection.

Thank you.

4 MS. BARKER: I like how she talked to you guys. Tell me when she goes red.

I'm following along with a lot of what Mary said, and I'm not going to say this very elegantly because I haven't thought it all the way out, but I

4 cont.

think our EIS is flawed. When we did neighborhood planning twenty years ago, we had growth targets that were assigned, and we monitored to that, and we've watched as those growth targets have been way blown past or not even close to achieved.

I realize they've changed the terminology. They're not "targets." They're just "estimates," right? The new winner in the race is Pike/Pine. They're at 577 percent of their growth estimate. At the other end is Rainier Beach, still, 14 percent. So something is wrong with the way that growth gets distributed and -- while they did a fairly accurate job of how much happens inside the urban villages versus outside, which was the point of the Comp Plan -- where our impacts are down at the local level.

So I think that the EIS should have been done at what's called the "development capacity" for each urban village. That development capacity has been reported, and we know where each urban village is in how much it has maximized the available land that's there for development. There are some neighborhoods that are already three quarters of the way through their development capacity. So no matter where you think you're going to grow, if the market

4 cont. wants to grow in Pike/Pine, once you have gone past what you estimated, there are, as she said, no teeth, there's no mechanism, there's nothing that puts anything in place that says, "This was what we knew we needed to mitigate when we hit certain thresholds." That's what we're missing in this EIS.

The EIS should be done at the develop capacity for each urban village. Once we know what those impacts are on the environment, then we can enact the mitigation as we go along and react to where growth happens, because the city has said, over and over again, it cannot grow the city. The market grows the city. They cannot do anything, and even when they try incentives, it doesn't work. So we're at the mercy of what the market wants to do, so let's prepare for that. Let's do our EIS like that.

Uh-oh. I'm yellow. Okay. And that's it.

MS. MUNKBERG: Thank you. All right. The next -- I'm going to talk really loud. The next three names are Ubax GORE-jeez (phonetic), James McIntosh, and Jody Grage.

MS. GARDHEERE: Good evening. My name is Ubax Gardheere. I am the Program Director at Puget Sound Sage. I'm also the lead organizer for South CORE, South Community Organizing For Racial/Regional

Equity. It's a coalition of about eighteen organizations rooted in Southeast Seattle, with a mission to be an organized voice for community-controlled and inspired development. Thank you for the opportunity to comment on the Draft EIS.

5 First, the current draft only refers to direct displacement. However, studies have shown that economic displacement due to increased rents is occurring at a rapid rate. Demographic changes in Seattle and South King County indicate that people of color have been and continue to be displaced outside of the city. The DEIS does not take into account the historic inequities that led to some populations being more vulnerable to displacement and more likely to be excluded from high opportunity areas. We ask the City of Seattle to consider its adopted Race and Social Justice Initiative as a lens through which to view the current alternative, by incorporating the equity analysis into the DEIS, not in an appendix or an afterthought.

6 Also, the DEIS does not take into consideration the direct environmental impacts of displacement. Low income households and communities of color use transit more frequently and have lower car ownership rates, and if displaced to the suburbs,

6 cont. then they'll be forced to commute more by car, increasing emissions and total vehicle miles traveled.

7 Although the DEIS proposes mitigation to the displacement effects of the four alternatives, it does not speak to timing or urgency. We know displacement is happening now, and the action by the city is needed now if Seattle is to remain a place for all communities. Also troubling is that the DEIS limits assessment of displacement to replacing of existing housing and is silent of displacement caused by just rising rents.

8 Last, the cumulative impact of increased vehicles, miles traveled, and economic displacement of lower income communities must be taken into consideration when selecting and developing the chosen alternative.

Thank you.

9 MR. MCINTOSH: Hi. My name is James McIntosh. I happen to live in Seattle's Magnolia neighborhood, and I had a degree in Urban Planning a long time ago, and there's stuff happening in transit now that we only dreamed about in the 1970s, so that part of things is really kind of neat.

I also happen to be a person who is

9 cont.

visually impaired, so public transit is very important to me, as well as open space, you know, places for parks and recreation. So in the transportation I tend to favor the Alternative 3, but I would highly encourage what planners are talking about as the "Western Line," the Western Light Rail Line, which would be light rail from West Seattle through downtown and through Ballard and on, all the way to Northgate.

Seattle is a city with old, narrow streets that goes back to planning out in the 1880's, 1890's. So we've got these narrow streets, so bus rapid transit, you know, it's a start, but everyone kind of agrees it could be better. Like I say, there's stuff in transportation we only dreamed about, but I would like to see improvements in -- you know, you need local service, like the old No. 15 line, which stopped at all the stops, and then you also need service that is truly rapid transit.

We need to address, also, the neighborhoods with lower density, such as Carkeek Park area and Magnolia and Alkai, that lost their late evening service. And there are many people that are transit-dependent in those neighborhoods that no longer have transit that can get there.

10 Also, when it comes to open space and parks, I would like to see the addition of what's called the "Fort Lawton Reserve" added to the Discovery Park system. That would be about an extra 21 acres of land that happens to be kind of in limbo. The city is apparently leasing that land from the Department of Defense. It's just land that is just open. There's a lot of potential good uses in there. It could be an area, a part of Discovery Park that would be just a little more intense use, such as a picnic area, or, you know, maybe a dog run. I don't personally have a dog, but I know many people in this city do. And there's an auditorium in that area that could be used for events. It's just an area that really should be added to the final 640-acre system that is the Discovery Park system.

And Discovery Park is a very large regional park. It's enjoyed by many and talked about all over the United States. And what's neat about Discovery Park is that it's accessible. You can get there by bus. You can get there -- you know, you don't have to get in a car and drive to the Cascades. It's got beaches, beach access, so it's just a wonderful park, and it really needs to be completed out with those 21 acres. We talk about the shortage

10 cont. of acres. Here's twenty-one.

Thank you, very much.

MS. MUNKBERG: Thank you.

11 MS. GRAGE: I have a couple of specific points. Alternative 4 talks about excellent bus service. I think that if that's going to work -- we know that excellent bus service kind of comes and goes -- if excellent bus service is going to be used as a factor, then I think it needs to be on a scale compared to other neighborhoods. And that if the bus service as an area, compared to other bus services over time, gets below excellent, that that should have some effect on what the neighborhood is required or asked to do. I think that will help a lot of people who have, in the past, found that their excellent bus service disappeared, and they were stuck with what they had agreed to do because of excellent bus service which now no longer existed.

12 The second thing that I would like to suggest is that areas -- my name is Jody Grage. I'm from Ballard. Ballard has about 300 percent of its growth target so far, and I remember one time they said there were 31 new dwellings in Ballard about a decade and a half ago, and I said, "We've got more cranes than that. I don't know what you're counting,

12 cont. but, you know, you need to look at your statistics a little better." Places like Ballard, that have already really exceeded their growth targets in the old Comprehensive Plan need to be cut a little slack on the new one. If you're just going to take the trends that have happened and expand on them, places like Ballard, that have exceeded their limits, are going to be really disadvantaged in the planning.

13 And my third comment is, when you prepare slides, please don't use pale yellow for the lettering.

MS. MUNKBERG: Thank you. All right. The next three names are Kirk Robbins, Alrick Hollingsworth, and Henok Woldu.

MR. ROBBINS: I'm Kirk Robbins. I'm also from Ballard, and I've got some other specific comments.

14 One is the remark that was made earlier about seniors aging in place, and how that's a good thing to do. In Ballard we've had a lot of displacement, and the algorithms on the Equity Analysis seem to say that Ballard isn't going to -- really isn't at much risk of displacement. And I don't know if that's because it's already happened -- and, thanks, guys -- but another category for people

14 cont. at risk of displacement ought to be the low-income elderly, or maybe just elderly, over 75 or so. It's hard to move when you get up to that point. It's really hard. It's a lot more burdensome at 75 than it was at 45 or 25. And if you're -- and if you really believe that aging in place is of value for seniors, you ought to actually do something with it and not simply call it out in the course of the introduction to an EIS.

15 Related to that, the algorithms over there (gesturing) on the maps are showing the adopted boundaries for Alternative 4. They ought not to do that. Alternative 4 is one of four, but in the Equity Analysis, that's where the boundaries are. And I live in an area that would be proposed to be annexed. It doesn't show up.

16 There was reference made to single-occupant "vehicles." I don't know if that's just an eight-syllable euphemism for "car." I'll believe it's something more than an eight-syllable euphemism for "car" when I see something done about carpools. If -- whether pooled vehicles, carpools, are any part of the city's strategy, all the carpool lanes seem to be on the interstate, or bridges operated by the state. The city does almost nothing for carpools.

16 cont.

Maybe it should. Otherwise, you know, they can just call them "cars."

There was a reference made to Seattle's adoptive standards for congestion. There's an old slogan that says, "When all else fails, lower your standards." I'm not sure that that's the best approach to congestion around here, but that does seem to be the one that has been taken, and there's a matter of concern about that.

And, finally, just to echo what Jody said, we've had a lot of growth targeted. Now it's just estimated in prediction. When -- from what I know of archery, if you overshoot by three hundred feet, it's as bad as undershooting. It's wrong. It's off. And we are suffering from all of this. We have planned transit on maps that are down -- kept down here. We don't have the actual buses, guess we're going to do a little better, but most people I know live near bus stops that have been closed, and there's some concern that promises made by the city about where the buses are going to go will not be kept by the county, who is running, still, the bus system. So --

The light rail trains, I think, are going to remain as light rail trains. You can't move them around. You can't build light rail stops and close

16 cont. them with anywhere near as much frequency and fluidity as you can with a bus stop. So please take all this into consideration. The promises -- you know, concurrency is a serious matter. It's a requirement of state law. We wish that you would pay attention to it.

Thank you.

MS. MUNKBERG: Thank you.

MR. HOLLINGSWORTH: So how do I start this? I just say my name and where --

MS. MUNKBERG: Please.

MR. HOLLINGSWORTH: -- the area?

MS. MUNKBERG: Just your name is good.

17 MR. HOLLINGSWORTH: Well, my name is Alrick Hollingsworth, and I basically wanted to talk about how they want growth in the community. Well, you should -- I say that you should start with the youth in the community, and let the youth know, like, the good and the bad things that should happen in the community.

Such as if a child goes to Juvenile, they should get help out the juvenile system instead of just putting them in the system and leaving them in there, having their fingerprint in the system, such things as that. I think that there should be

17 cont. educational lessons from that, and they should move on from there, from the system, and get jobs with the system, and work with the system so they can understand that the street life or lifestyles of the lower, impoverished community is not a good life to live, and there's other lifestyles outside of that. And you can do better for your community, such as come up here, speak, and actually take actions in your community and do things for your community to better that.

And I feel that if you let the youth know that there's other things that you -- we would have a better change in 2035 because the upcoming growth is the youth. So if you let the youth know what should happen, and what will go down, and then we would have a better year. Overall, the -- that's what I have to say. Just let the youth know, and just make sure the youth are a part of these things. Make sure you guys have internships, make sure, like, there are mentors, and I just want the youth to be more a part of this.

I see a lot of elderly people. There's a lot of elderly people that do a lot of things for the community, but there's youth out here that know and have things that they can offer that can make us do better.

MS. MUNKBERG: Thank you.

18 MR. WOLDU: Hi. I'm Henok Woldu. Actually, my name's like the word "hen" and "knock" combined, so in this case, you guys, you know, that might help us out.

So I have an idea where -- I don't know -- if you want to help the community, I think, or be a part of the community, I think if you're able to afford to live in the community, that would be really, you know, beneficial for the community. I think rent's, like, insanely high right now, and I think right now, I mean, if you compare, like, ten years ago to now, I think it's kind of outrageous. Or, at least, that's something I hear a lot, especially I read a lot, in a lot of newspapers.

But the other thing I kind of want to see is that it creates, like, just gentrification, which, I don't think it just creates this effect of gentrification, but also it creates more things out of that, where, like, it kind of affects everyone, where, now college students, you know, want to live out and move out, but, I mean, they can't, really, because rent at the U.W. is, like, $1,200. So, I mean, it's like you can't really afford it.

Also, I mean, creating rent this high kind

18 cont. of makes it impossible to really get a place, especially if you -- especially if you're homeless. Like, if you're homeless, and you try and find a place, I mean, homeless rates have been increasing, like, for the past ten years, and I think that's just, like, awful, especially since most of these homeless people are youth. So, I mean, showing the effects of it, and how the -- how rent can actually affect a lot of things, I think that's something that should be really regulated, and there should be a limit on how much rent should be.

MS. MUNKBERG: Thank you. All right. The next three names are Kevin Volkmann, Irene Wall, and Rico -- I can't quite read the last name. I think it starts with a "Q."

MR. QUIRINDONGO: "Quirindongo."

MS. MUNKBERG: Thank you. Sorry.

MR. VOLKMANN: I'm Kevin Volkmann. I have three points that I'd like to cover, three suggestions.

19 One is to have more resources for planning. We should have a sensitivity analysis that would allow for higher numbers in planning, in case we do have twice or three times as many people in the city coming in, and affordability is becoming more of an

19 cont. issue, so we want to -- we want to have planning that will take that into consideration.

20 The second point is that we should have less dependence on transit. The transit system is pretty -- pretty well loaded now, and it would make -- it might make more sense to have greater density of residences near workplaces in the planning. Utility plans should also plan for very high density if we're going to go with that type of a plan.

21 And then the final point is more focus on open space. We want to have a very high quality environmental and urban planning effort with respect to having quality open space.

MS. MUNKBERG: Thank you.

MS. WALL: Irene Wall, Seattle native. Phinney Ridge resident. I'm only about a third of the way through the Draft EIS, so I'm not going to make all my comments tonight, but I will submit them in writing. 22 But I have to tell you that my first impression is one of kind of a surreality.

For those of us who've been watching Seattle grow over the last decade, to read in the summary that there are no unmitigable impacts to any environmental, you know, event that could occur as a

22 cont. result of adding 120,000 more people to the city, that is an enormous change, and it's a little hard to get your mind wrapped around the fact that everything's hunky-dory, and that our existing regulations can cover it, all the mitigation as far as height, bulk, scale, and land use can be handled with design review and other land use regulations, when, in fact, there's been battle after battle in Seattle in the last decade over just those problems, and the regulations have not helped. You know, they've taken -- we've taken a lot of effort of citizen panels to try and spend months hammering out solutions to those problems, many of which are not yet resolved. So my set -- I have to also agree with other speakers, that we do need a more fine-grained look at the environmental impacts on the neighborhood level.

23 Talking about things like vehicle miles traveled per capita seems a bit curious. No one experiences that on the roads when they drive. They experience congestion for themselves or their families in their vehicles, their neighbors, so this notion of spreading it across a population is a little odd. No one experiences traffic problems that way, so somehow it needs to be analyzed differently.

24 And that brings me to the final point, about we need a better explanation of what the level of service and the screen line methodology means to people, because those of us know that crossing from east to west in this town is pretty tough. So if you're trying to get away from Aurora or Highway 99 or I-5 because it's completely congested, and you're aiming for some other north-south corridor, some other mystical north-south corridor, how do you get there if you live north of 80th, you know?

There's just some -- there's a little unreality going on here. Thank you.

MS. MUNKBERG: Thank you.

25 MR. QUIRINDONGO: Sorry. I'm slow. My name's Rico Quirindongo. I'm with DLR Group, here, in Seattle. A born and raised Seattlite, I'm also the Chair for the Pike Place Preservation and Development Authority Market Front Project Committee. Very long. It's a really exciting project. I'm very happy to be involved, and I think -- I think it's an example of how the city is supporting great work in development, and I think it should be an example for how we move forward, and I hope that it also somehow informs this EIS process.

26 So the ten-year plan to end homelessness

26 cont. didn't quite end homelessness, so there's a lot of work to do there. Access to public services and equitable housing, we're -- hopefully a part of this EIS, what we look at is how we do not become San Francisco, how we ensure -- thank you -- how we ensure that there is affordable housing, workforce housing in downtown, in our neighborhoods, on the waterfront.

27 You know, when there was a presentation of the Seattle Sustainable Neighborhood Assessment Project, it was clearly stated that it did not include a review of land use code because it was a hard metric to measure. That's fine. However, what we do know is that land use code drives development in this city, and so when we look at this EIS, what I hope is that we do evaluate that, and that we do concretize in the land use -- I think that's a word -- in the land use code some things that really do have a positive effect on our neighborhoods.

28 Downtown, the core, the waterfront, it's a very important piece of the puzzle of our community. As we look at the Corner Plan, I hope that we look beyond the creation of a park, the creation of a boulevard. It's not just a transportation hub. It's a community. It's a community of residents, it's a

28 cont.

community of business owners, and I think that the opportunity for the city is the creation of an overlay district -- I think there's some interest in that -- that could catalyze interested parties, both not-for-profits, developers, residents that live there currently, regardless of their income range, to get their head around how do they actually take part in transformation of the core and the neighborhood and a sense of place-making along the waterfront, along Alaska, and along Western.

We need to -- we need to take a hard look at social equity. We need to take a hard look at cultural value, the history along the Duwamish and the Native American culture that really has very little presence on the waterfront presently. I would also suggest that as -- if that overlay district could inform how developers do invest, and that they are part of the solution, the not-for-profit methodology -- HUD, resources for providing affordable housing units -- isn't going to be enough. Developers actually can be a part of that solution if five percent of affordable housing units was a requirement for development in the core, for development along the waterfront. That was a requirement within the overlay district. That would

28 cont. be really a great part of being part of the solution, that would also help developers' bottom line because it would give them the affordable tax credits that would help their performance.

Little details, but all part of the work. Thank you.

MS. MUNKBERG: Thank you. All right. The next three names are Eden Mach, Steve Zemke, and David Sauvion.

29 MS. MACH: Hi. I'm Eden Mach. I'm with the Seattle Council PTSA. We're the council that supports the 82 PTA's in the Seattle Public Schools, and my comments on the EIS are related to the planning around school facilities.

School buildings are a basic provision of education -- it's one of the major parts of the public service piece -- and as we all know, Seattle is growing in leaps and bounds. It's the fastest growing city in the nation. And I really appreciate the Deputy Mayor's words about -- that this is all about who lives here, and who is coming, and how are we growing.

I also wanted to tack onto the previous speaker, who talked about us as a community. Our schools are a part of the community, and we are

29 cont.

growing incredibly fast. Just as the city's growing, so are our public schools, and I think a lot of people don't realize how fast it's happening, and how rapidly, that we're not keeping up. Just in the past seven years, we've added 7,000 students. That's a whole other district for the rest of the state. And so by 2010 we closed twelve school buildings, but by 2014 and 2015, we basically opened twenty-two. We are growing at an incredibly fast rate, and we need buildings. Currently, we have 6,000 students in portable classrooms. It would be great if those kids could actually be in real classrooms and have sufficient playground space.

And so my concerns and our organization's concern around the -- well, we haven't officially stated this, but we do have our No. 1 issue, which is fully funding education, and our No. 2 issue is planning for school buildings. So the concern is that the District's Facilities Master Plan that is cited in this (indicating) is already outdated, substantially, even though it's a few years old, and that I would encourage that we need to have a more accurate, updated picture of what is, and so that we can look towards the future and actually more accurately look at what we need for school buildings,

29 cont. because also by 2017, just two years away, we're supposed to have a K-3 class size reduction of seventeen, and this is already state law -- it's Basic Ed -- and in Seattle that means we need another twenty buildings. I just want to mic drop that one (gesturing.) Twenty buildings is a lot, and it's not in the plan. It's not in the Comp Plan. The District's not really planning for it either, because will it happen? I don't know. But it's what's supposed to be happening. So this is another element that I think needs to be incorporated.

30 And I also think that one of the concepts, that the growth is only happening in the urban centers, needs another look-see, because, in fact, what is happening is that we've had 1,300 more kids north of downtown and West Seattle this year than they expected two years ago in their planning. That's about four buildings full of kids in two years. So we actually are seeing monstrous kid growth in our neighborhoods and in the single-family homes, because those are being recycled into family homes again. So I think this is another thing that I'd love to see rethought through.

31 And then, lastly, the King County Growth Management Planning Council, who oversees the whole

31 cont. Comp Plan, also recently required that the City and the District cooperatively plan together on school facilities. This is a relatively new thing -- it's a few weeks old -- but I think that that actually needs to be written into the plan, as to how the City and the District are going to plan for the growth we're experiencing.

Thank you.

MS. MUNKBERG: Thank you.

MR. ZEMKE: My name is Steve Zemke. I'm a member of the Seattle Urban Forestry Commission, but I'm not speaking for them tonight. It's just for identification purposes. I'm also the Chair of Friends of Seattle's Urban Forest.

32 And, frankly, I'm very disappointed in an Environmental Impact Statement, that, as far as I could see, has the equivalent of one page dealing with urban forestry issues. And when you look at what they say about it, there's a lot of, just, things left out and errors.

For instance, they note that they don't know if the trees have an impact on people's health, and that was -- has been coming into the forefront a lot more recently, with what happened with the Emerald Ash Borer back east. They found

32 cont. statistically significant deaths as a result of asthma, heart attacks, etcetera, from people where the Emerald Ash went and wiped out large areas of canopy in the eastern cities.

Also not mentioned is the impact of reducing urban runoff. If you remove the trees, you're going to have to put in more infrastructure to replace that loss. I see a lot of what's mentioned here is wishful sort of thinking. It says, "Oh, we have an ordinance that will take care of this. We have an Urban Forest Stewardship Plan that's going to take care of it." Now, the Urban Forest Stewardship Plan is a direction to go. It doesn't say how you're going to take care of it.

33 DPD is one of the entities that's responsible for the problems that we have because most of the loss you have in trees in the city -- besides when people move and remove trees when they move, and new properties -- is during development. DPD acknowledges that there's a significant loss during development, but the Urban Forestry Commission has asked them to prepare a canopy loss -- a canopy impact analysis of their development; in other words, something that we, on the Urban Forestry Commission, for instance, could

33 cont.

use to help assess whether we're gaining or losing canopy. But that's something they chose to not even respond to our letter and request that they do this; in other words, what trees are on a property, how many they're removing.

And there isn't, now, a requirement for replacement of trees. We are way far behind other cities in the region. Portland, Oregon, for instance, requires if you remove a tree over twenty inches, you have to replace that tree inch for inch. They require replacement of trees eight inches and larger. We don't have any such requirement in terms of what Seattle does. The best we come is our SDOT, which has a requirement for tree permits. If -- those yellow tags you see around trees, they give notice, and they require -- and they do have replacement for a tree removed. But private property development, no, we don't require that.

What we really need -- and this isn't at all discussed here -- is the cost of this whole thing, of replacing the urban canopy that gets lost, because this increased growth puts much more demand on trying to get to the canopy to 30 percent by 2037. Obviously, if it's being removed by development, and you're trying to replace at the same time, an

33 cont. analysis I did, looking at Portland's analysis for trees, was saying that just without looking at development impacts, if we wanted to increase the trees to the 30 percent by 2037, we need to be planting about 12,000 or more trees a year. Right now we're only planting the equivalent of about 2,000.

So I see a lot of problems with this particular analysis, things not in it. We'll provide -- I'll provide more detail to you, but I think for an Environmental Impact Statement to have one page, and then not even give basic information of what trees do, and that this -- and saying, "It's all taken care of, don't worry about those trees that are going down," it's very wrong.

MS. MUNKBERG: Thank you.

34 MR. SAMION: Good evening. My name is David Sauvion, and I'm a Rainier Beach resident. I'm also an architect and a Community Representative for the Southeast Design Review Board, and I get to see firsthand what displacement does to this city.

I mean, we see project after project migrate to apartment buildings. The problem is the city, at least the zoning, is not, you know, equipped to address displacement. The Comp Plan might be that

34 cont.

chance to do something about it, because as much as we welcome development, even Rainier Beach -- even though there is nothing happening now, I think we have that opportunity, probably, you know, a blessing and a curse that it hasn't happened in Rainier Beach yet, like it has happened in other parts of the city -- but at the same time, if the development is -- if there is to be, it has to be done right, and it has to be done in a way that, you know, provides opportunities for the residents.

And when we talk about opportunities, I'd be curious to know what kind of jobs we're looking at, you know, those 115,000 jobs. What are they going to be? Because those will have an impact on the environment as well. Any kind of job doesn't, obviously, require the same amount of energy and displacement -- well, vehicle displacement.

So I would urge the City of Seattle to include the equity analysis into the Draft EIS and EIS and really look at this seriously.

Thank you.

MS. MUNKBERG: Thank you. Okay. The next three names, the first one I know I'm going mispronounce: Yemane geh-BREM-I-cull (phonetic), Phillip Van Volkenberg, and Donna Hartmann-Miller.

MR. GEBREMICAEL: Thank you, Ma'am.

MS. MUNKBERG: Thank you.

MR. GEBREMICAEL: My name is Yemane Gebrmicael, and I am representing organizations of immigrant and refugee Africans in the City of Seattle.

35 I am here, first of all, to very strongly support the very important comments made by Ubax of Puget Sound Sage. Every aspect of the deliberation -- of their deliberation is their representation of the position of a wide, wide range nonprofits and community organizations and their coalitions. I stand here to entreat that the City Council and the Department take their recommendation very seriously.

36 I would like to add a footnote to all that has been said by bringing to attention -- attention to the glaring fact that so far, while a lot has been spoken about physical, and to some extent, financial implications of gentrification, very little or no mention has been made of the social, cultural, political ramifications and their impact on the lives of those displaced, and to the few who may remain behind to suffer social, cultural, and political isolation and to become practically worthless

36 cont. minorities in the City of Seattle. Gentrification, aside from creating forced, unwanted dislocation, dismantles social capital and social and cultural safety nets. It disenfranchises political strength by fragmenting collective political discourse, political conviction, political expression, and political decision. It is tied around the disempowerment that was typical of colonial scheming.

I stand here to vehemently request that you turn attention and corrective measures reconsidered to combat the overt social, cultural, political ramifications of gentrification that comes under the pretext of development. Thank you.

37 I would like to add a few words to support the gentleman (gesturing) who spoke about trees. I come from Ethiopia, where we suffered a lot of land degradation because we cut our trees. It was American (inaudible), American experts who helped us to review our ways and to do a massive reforestation. It's very important. Land degradation brings about landslides like the one we saw in Oso, this city where people died, so we have to be very, very concerned about trees.

Thank you. Thank you very much.

MS. MUNKBERG: Thank you. Phillip Van

Volkenberg. Not here? How about Donna Hartmann-Miller?

MS. HARTMANN-MILLER: Hi. I'm Donna Hartmann-Miller.

38 I want to agree with Steve Zemke. One of the things that really surprised me in this version of the EIS was how little there was about tree canopy in there. I was shocked and surprised and appalled by that. I had attended several of the 2035 meetings that have taken place over the last -- I don't know -- nine months to a year, and at every single one of those meetings, tree canopy was discussed, and so I was very, very surprised to see it was so limited in what was discussed in this (indicating.) Okay. My little notes aren't working here.

39 One other thing I wanted to say is I think we need to start viewing trees differently in the City of Seattle -- quite honestly, in the country. But trees, tree canopy is part of our infrastructure. It is a multi-tasker in a way that no other part of our infrastructure is. It deals with mental health. It deals with physical health. It deals with environmental issues. It helps keep our groundwater clean for health issues. It provides wildlife so that we can keep rodent populations down. It keeps

39 cont. water out of our drainage system, which is way overwhelmed. It's a positive, positive, positive, and it provides more than just, you know, these pretty leaves that are on the trees that we can take a look at.

Specific things: Noise pollution. I forgot about noise pollution. Air pollution. I mean, it does everything, and we have to stop thinking of them as pretty things. It's something that supports our system. It's something that supports our city and our quality of life. Specific tree canopy issues that really ought to be included in this, and I really pray that it's included in the next version of this, is: We need to improve the health of our current canopy. Any project that threatens the health of our current canopy is a bad project and needs to be reviewed. We need to look at that. We need to increase the canopy itself. That's something that's been discussed time and time again.

40 But I also think we ought to -- need to look at, "Where is the best placement of our canopy?" There was some conversation in the slides about air pollution and noise pollution, and there have been studies, when you place the trees close to the roadways, where all the air pollution and the noise

40 cont. pollution is coming from, it really helps in cutting down the benefit. Where is the biggest bang that we can get for our buck in this placement? Where do we need it the most? Next to I-5 might be a really good idea, to help cut down on that.

And then the last thing is: What kind of trees make up our canopy? Conifers, conifers, conifers, conifers, conifers. Deciduous trees don't have their leaves on them most of the year. They don't provide the same sort of infrastructure support that it does, but conifers do. Conifers are a huge positive for the city, and they need to be given more credit than deciduous. Or deciduous needs to be given less credit than a conifer. So I'm really hoping the next version of the EIS, that tree canopy is paid attention to.

41 And, just a second, Cindy Barker, I think that her comments were thoughtful, and that if we take these into consideration, we're going to make this a stronger document for the future of our City.

Ta-Da. That's it. Thank you.

MS. MUNKBERG: Thank you. All right. I'm just going to try one more time. Phillip Van Volkenberg? Not here. That is everybody who I have on the sign-up list. Is there anyone here who didn't

sign up who would like to speak? Come on up. If you are planning to speak, and you didn't sign up, if you could state your name clearly and spell it for our court reporter, that would be helpful.

MR. CHEMNICK: Hi. My name is Bill Chemnick. Last name is C-H-E-M-N-I-C-K. Thanks.

42 $4,225.00 a month. That's $50,700.00 a year, the new medium price for rent in San Francisco. Why is this relevant? This is relevant because a new Redfin study shows that one in twenty people searching for housing in the Silicon Valley are now searching for housing in Seattle on Redfin, growth four times as high as it was just a few years ago. People in Silicon Valley are scratching their heads and wondering, "Is it really worth the pay cut to stay in California?"

We had 15,000 people move here last year. That means we have 105,000 to meet that 120,000. I think the growth is happening. I think it may be a little rosier and more conservative than what the growth will actually be, and with that growth may come displacement, and it may become a serious issue in terms of affordability in a place that we thought was far enough away from Silicon Valley for us not to really have to worry quite so much about it.

42 cont.

One thing that I was interested in with the EIS is there were two different options, and I was wondering whether or not there have been any serious looks at maybe a hybrid of the options, that really look into -- take into consideration the issues with the displacement and the issues with long term affordability. And the options that I was interested in was No. 2, which concentrated everything in the city center, and Option 3, which also allowed for growth along the light rail lines.

Now, the issue with Option 1, or the issue with Option 2 was -- or Option 3 was the displacement issue, and that is a serious issue. But it's also a more affordable place for a lot of people to grow. And one thing I'm wondering about is, is there a way that you could actually increase growth in specific transit-friendly areas under the condition that it does not displace people in the community, that it creates longterm, affordable rents for people in the area so that we don't have what's happening in Oakland, we don't have what's happening in San Jose? That we actually say, "Look, if you want to grow here, if you want to do this, you're actually creating something for the community that's going to create longterm, sustainable, affordable rents," but

42 cont. also acknowledging that we also need to build up in the center, because that is where a lot of our tech businesses are, that's where a lot of the people that are moving here are going to be wanting to be concentrated.

And so I don't know if you've considered whether you have to do an all-or-nothing two or three, but if there is a way to create more affordable housing without -- with consciously not displacing people, that seems like a possible solution.

Thanks.

MS. MUNKBERG: Thank you. Anyone else who's interested in speaking?

MR. WINN: Hello. My name is George Winn, G-E-O-R-G-E, W-I-N-N. I'm a student at the University of Washington. I'm involved in Beacon Hill as part of the Beacon Hill Food Forest, and then I'm passionately involved in First Hill, working to create public space and public greenways.

43 I want to speak to the students of the city. There's roughly 100,000 students in this city, which currently compromises about ten percent of the population. They are being priced out of their homes and their apartments, and I hope that they are --

43 cont. both feedback and their pocketbooks are considered when this Environmental Impact Statement is written and 2035 is written. I organized about ten students from my school to come here tonight.

44 And I also am extremely supportive of evergreen coniferous trees in our cities' neighborhoods and along transportation hubs. I also think that some of those trees should be and allowed to be edible trees, so that people who do not have access to healthy green food at Whole Foods can get some of those foods that they so desperately need.

Thank you.

MS. MUNKBERG: Thank you. Anyone else? Come on up.

MR. MACLEAN: My name is Andy Maclean, M-A-C-L-E-A-N. I work for the Sustainable Seattle.

45 So my comment is: Actually, I moved here from London about nine months ago, and I can tell you that the rent prices will continue to go up. So, I mean, it certainly does need to be addressed in the Comprehensive Plan, but I think Seattle residents need to do something about it now, because San Francisco is not nearly as bad as London. I can tell you, it will get worse.

46 The other comment I really had was in terms

46 cont.

of the predictions by the Climate Impacts Group at U.W. One of the biggest impacts for Seattle and for the region is going to be increased precipitation kind of events and cloudbursts. Now, Copenhagen, the Danes have looked at this, and they're actually now seeing -- and this is partly -- they're actually planning some of their parks could be flooded parts of the year.

Now, with this, and with so many of these issues, including equity, including rent controls, including tree forest canopy -- and here this partly could be dealt with with very good green infrastructure planning, and the city is doing a lot already -- but I think that beyond this, this comprehensive plan is also something that can create jobs here. And Seattle is -- Seattle, at the moment, it's a -- it's definitely -- it's an international hub for tech, it's an international hub for public health. I think it has aims to become an international hub for the environment and environmental management, city environmental management. It's not quite there yet, but you could.

Now, in New York they're currently talking about "Copenhagenizing" some streets. In terms of, "Why can't it be "Seattle-izing," if you get this

46 cont. Comprehensive Plan, you could be really pushing -- push the vote forward because the rest of the country will eventually follow you, and it's the worth spending the money on this now because you will create jobs in the long term, and the international community will notice.

MS. MUNKBERG: Any other speakers? All right.

47 MR. STEVENS: My name is Don Stevens. I was born in Seattle when F.D.R. was president. I grew up in South Dakota and moved back to Seattle thirty years ago and went back to South Dakota now because I can't afford to live here. I tell people, "Don't knock California because you live in Northern California. California end a hundred miles north of Vancouver, B.C."

Market forces that are driving prices up in Seattle are inexorable and enormous, and the easiest way to stop that is to get stupid people and criminals to move to Seattle. But -- so it's -- yeah. The challenges that a longterm plan for Seattle faces are enormous, absolutely enormous, and I guess everybody, especially the gentleman from London, touched on that.

48 In practical things, I am for high density,

48 cont. and I am for using natural gas in the bus system. That's something that could be done, and it would be cheaper and cleaner. You look at the world price in natural gas, it's much lower in North America than the rest of the world. Thank you. And you have an enormous challenge before you, I'll tell you. And you do, too (gesturing.)

MS. MUNKBERG: Thank you. All right. Anybody else like to speak? I saw a hand.

MR. SCHMAUTZ: So my name is Ryan Schmautz, and I'm from the University of Washington Bothell Branch. I don't think I see any of my friends here tonight, but it's why I'm here.

49 So we've heard a lot about, like, affordable housing and that sort of thing, and it is an extremely important issue, I think as a lot of people have pointed out. But one thing I didn't hear much mention on is the emphasis on families. We want to talk about a twenty-year plan and talk about sort of the development of the City's future. What about families living within these urban centers? We want to talk about increasing density in constructive and productive ways, but what about the development of good environments so that people can actually live here and don't have to go escape to the suburbs as

49 cont.

they've been for the past couple decades?

We can see that there's different ways to organize this that are really, really productive and effective, particularly -- I've heard some mention already of, like, Portland, and, of course, New York is, like, one of the -- it's an extremely dense city, but it's the greenest city, actually, in the entire United States. So there's things that -- you know, different cities out there already that are -- that have already embarked on the paths that we could sort of look at, and I'm curious as to whether or not there have been any sort of partnerings between ourselves and Portland or New York as to developing the sorts of programs that would be most productive for ourselves at this stage. You know, we don't have to go it alone, and we can look at what works best in areas that are perhaps most similar to the vision that we might want to look at.

And a huge part of making, I guess, a good space for the development of families would be -- you know, other people talked about it -- are trees, the development of, you know, green spaces within the city. This is extremely important because it actually entices people away from the suburbs, which is something that I think is really, really important

49 cont. for any sort of city development. And, of course, I believe it was Mr. Winn that talked about the Food Forest and stuff like that. I actually work at a community garden. I think that's an absolutely terrific idea, and I know a lot of U.W. student are very, very strongly supportive of that. And it also -- well, that's a huge community building tool as well. If we want to see greener cities and more interactive people within our cities, I think that's the best way to go.

So that's my piece. Thank you.

MS. MUNKBERG: Excuse me, sir. Excuse me, sir. Could you spell your name, please? Sorry.

MR. SCHMAUTZ: Oh, yeah. The last name is S-C-H-M-A-U-T-Z. It's German.

MS. MUNKBERG: Thank you. Any other comment? Anybody else? I knew there would be someone. Thank you.

MS. STEVENS: My name is Odessa Stevens. That's O-D-E-S-S-A.

50 You just heard my father speak. I'm not quite as funny as he is -- sorry -- but I just wanted to speak on behalf of my mother. She's not here now, but my mother is just reaching her Social Security age, and, you know, I'm only 25, but I kind of worry

50 cont.

about her losing her house because of the price of her house increasing to points where she can't afford it anymore. And, you know, my father has already had to move to South Dakota, and it would be a shame if my mom had to move back to South Korea.

One thing that I would like to see maybe at least considered is kind of maybe not just the focal point on Seattle, but maybe outside cities as well. For instance, maybe we can talk with Everett about, you know, bringing -- maybe if Expedia wanted to move a certain place there, then it might actually take the focal point not just from Seattle, but also outside. I mean, Seattle's great, but so is Everett. There are other places, so --

Anyway, thank you.

MS. MUNKBERG: Thank you. All right. Anyone else that would like to speak? You're welcome to talk right now.

Okay. Well, thank you all, very much. I just want to remind you that the comment period runs through June 17th. I really want to encourage you. We heard some great comments tonight. We'd love to hear more. You can e-mail your comments directly to 2035@seattle.gov, or go to the website, 2035.seattle.gov, and put your comments in there, or

pick up a -- pick up a form here and just mail it in.

I really want to encourage your comments. If anybody is watching, streaming at home, we want to specifically encourage your comments. We'd love to hear from the folks that were watching this on TV tonight.

Thank you, very much. Good night.

(Public hearing concluded at 8:00 p.m.)

IN RE: Seattle 2035 Draft EIS Public Hearing

VENUE: Seattle City Hall, Bertha Knight Landes Room

A F F I D A V I T

I, Gretchen Hubbert, do hereby certify that the foregoing transcript prepared under my direction is a true and accurate record of the proceedings taken on May 27, 2015 in Seattle, Washington.

_____

GRETCHEN HUBBERT

CCR# HU-BB-EG-*374PA

4.3 Responses

Section 4.3 contains all responses to comments contained in Section 4.1 and 4.2. Responses to the non-public hearing comments are found in Section 4.3.1. In addition, because many of the comments touched on common issues and themes, responses to frequently raised issues are provided in Section 4.3.2. Responses to public hearing comments can be found in Section 4.3.3.

Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted. Comments that address substantive EIS issues are responded to with an explanation of the issue, a correction or other applicable reply.

4.3.1 Individual Responses

Section 4.3.1 of this Final EIS contains responses to non-public hearing comments provided on the Draft EIS. Each comment is provided a response.

Distinct comments are numbered in the margin of the letters in Section 4.1 on page 4–1.

Letter No. 1 King County Department of Transportation, and Public Health—Seattle and King County

1. **Prefer Alternative 4 Given its Transit-Oriented Growth Pattern.** Your comments indicating efficiencies and sustainability elements of transit-oriented growth patterns are noted. See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

2. **Growth and Equity Analysis.** Your comments noting the importance of social equity and displacement are noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Displacement.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also Final EIS Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to minimize displacement. See also Draft Comprehensive Plan Growth Strategy, Land Use and Housing element policies that address displacement.

4. **Air Quality.** The buffer distances identified in the Draft EIS are those suggested by the Washington State Department of Health. Specifically, one of the findings of the cited health consultation study states "risks and hazards are greatest near major highways and drop dramatically about 200 meters from the center of highways" and was the basis for establishing the buffer distance suggested as mitigation in the Draft EIS. For industrial sources the appropriate buffer may be different depending on numerous factors such as emission rate and contaminant of concern. The purpose of the buffer is to prevent potential impacts with regard to siting of new sensitive land uses. With regard to siting of new or intensified industrial sources, the risks from such development are within the purview of the Puget Sound Clean Air Agency, which requires screening risk analysis of such sources through its Regulation III Article 2, Review of Toxic Air Contaminant sources.

5. **Freight Master Plan.** Although not part of the proposed action considered in the EIS, the Seattle F*reight Master Plan* is referenced in the EIS.

6. **Climate Change Planning.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

7. **Recommend Future Collaboration in Planning Public Transit Service.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 2 Port of Seattle

1. **Timing of Draft EIS and Draft Comprehensive Plan.** It is acknowledged that the Draft Comprehensive Plan was publicly issued after issuance of the Draft EIS. The description of the proposal and alternatives in the Draft EIS Chapter 2, plus preliminary draft plan goals and policies, provided the basis for analysis of the potential impacts associated

with each alternative and for comparison between the alternatives in the Draft EIS. It should be noted that, following issuance of the Draft Comprehensive Plan, additional public comment was solicited apart from the SEPA review process.

2. **Priority Freight Projects.** The City is committed to implementing the priority freight projects in the Draft Industrial Areas Freight Access Project as funding is available. These types of projects are consistent with the transportation network analyzed in the EIS.

3. **Travel Time Analysis.** The travel time analysis was intended to allow a comparison of how long it takes for travelers to move within the city under each alternative. Therefore, while the requested analysis (travel times from sectors to Sea-Tac Airport) may be of general interest to some, it would not likely identify substantive impact differences between alternatives and therefore was not included.

4. **Partner Agencies.** The comment is noted; the Port of Seattle is a key partner agency for the City.

5. **Priority Pedestrian Projects.** The information presented in Draft EIS Figures 3.7-2 and 3.7-3 is from the P*edestrian Master Plan*. The methodology used to prioritize pedestrian facility recommendations is available on the City's website at: http://www.seattle.gov/transportation/pedestrian_masterplan/docs/Methodology_Appendix040209_fixed.pdf.

Letter No. 3 Seattle Human Rights Commission

1. **Growth and Equity Analysis.** The comments are noted. For a discussion of updates to the separate draft Growth and Equity Analysis, see Final EIS Section 4.3.2, Growth and Equity Analysis. For recommended policies addressing housing and vulnerable populations, see the Draft Housing Element in the Draft Comprehensive Plan policies.

   The comment requesting incorporation of international human rights standards in the Seattle 2035 Comprehensive Plan has been noted for City consideration in the Draft Comprehensive Plan.

2. **Human Rights.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Displacement.** See Final EIS Chapter 2, Description of the Preferred Alternative, which adjusts growth estimates to help reduce displacement. See also Draft Comprehensive Plan Growth Strategy, Land Use and Housing element policies that address displacement.

4. **Displacement.** See response to Comment No. 3, this letter, above.

5. **Access to Opportunity.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

6. **Closing Comments.** The comments are noted. See responses to Comments No. 1–5, this letter.

Letter No. 4 Seattle LGBT Commission

1. **Social and Racial Equity.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also Final EIS Section 4.3.2, Growth and Equity Analysis for updated information. The comments related to preferred policy direction have been noted for City consideration in the Draft Comprehensive Plan.

2. **LGBTQ History and Trends.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Growth and Equity Analysis.** The comments are noted. See Final EIS Section 4.3.2 for discussion of updates to the separate draft Growth and Equity Analysis.

4. **Growth and Equity Analysis.** See the response to Comment No. 5, this letter.

5. **Growth and Equity Analysis.** Thank you for your letter "*Recommendations for Seattle 2035 Comprehensive Plan Draft: Growth and Equity Public Review Draft*." Thank you for your explicit support that racial equity should be the largest lens through which we examine our work. We agree that many people live with complexity and intersectionality. The Mayor and City departments appreciate the recommendations for strengthening the Equity and Growth Analysis of Seattle's Comprehensive Plan. The depth and breadth of demographic data and clarity of recommendations is especially helpful as we reflect upon your two questions.

   1st Question: How does DPD in concert with the RSJI Core Team intend to protect the mitigation measures specifically, the equity and access efforts more broadly, from the well-known consequences of internalizing a reliance on market strength?

   The Comprehensive Plan's 20-year vision for an equitable Seattle will require a meaningful and early commitment to equity, not waiting until 2035. Therefore, the Mayor is releasing an *Equitable Development Implementation Plan* concurrently with an updated Equity and Growth Analysis and his Comprehensive Plan this spring. Its objectives are to:

   - ***Support the Mayor's vision*** to create an equitable city and to eliminate institutionalized racism.
   - ***Clearly articulate the race and social equity position*** of the Mayor's Comprehensive Plan and 20 year Growth Strategy and to coordinate and integrate this significant body of work.
   - ***Create a road map to race and social equity*** through new systems within the City to address inequities and translating the Equity and Growth Analysis into action that can be advanced concurrently with the Comprehensive Plan.
   - ***Identify targeted strategies*** for areas of the city with high-risk of displacement to increase access to high opportunity areas for marginalized populations.
   - ***Create systemic change*** that coordinates policy, planning, programs, budgeting and public investments around an equitable development framework that goes beyond individual transactions and focuses on transformational action to change the systems that disadvantage marginalized communities.

- ***Resource the leadership of marginalized communities*** so that their race and social equity expertise can inform, implement and steward the City's equitable development.

2nd Question: How will DPD in concert with the RSJI Core Team intend to include the needs of LGBT children, youth, adults, seniors, and families and differently abled/disabled children, youth, adults, and seniors in the Seattle 2035 Comprehensive plan?

The final Equity and Growth Analysis will incorporate an LGBTQ perspective in the following ways:

- ***Disaggregate data.*** We are looking to map the LGBTQ population(s) using the data sources your letter directed us to. Also, future reports will incorporate data received from the RSJI Community Survey which collects information on what the community is experiencing in terms of jobs, housing and community needs and reports on that information by race/gender identity/sexual orientation and other demographics. The 2016 survey data will include important information on how communities are experiencing displacement.
- ***Introduce Intersectionality.*** We have included the following language describing intersectionality and targeted universalism in the final Growth and Equity Analysis.
  - In the report's introduction:
    "This analysis recognizes people live multiple and layered identities. All historically marginalized groups – people of color, LGBTQ, women, people with disabilities, low-income households, to name a few – experience systemic inequity. Many people and communities live at the intersection of these identities, for example transgender people of color, experiencing multiple inequities at once. It is important to respond to the intersecting ways that barriers limit opportunities for people to reach their full potential. By focusing on race and racism, the City of Seattle recognizes that we have the ability to impact all communities. This focus is not based on the intent to create a ranking of oppressions (i.e. a belief that racism is "worse" than other forms of oppression). For an equitable society to come into being, government needs to challenge the way racism is used as divisive issue keeping communities from coming together to work for change. The institutional and structural approaches to addressing racial inequities can and will be applied for the benefit of other marginalized groups."
  - In the report's description of mitigation measures:
    "A mitigation strategy to equitably distribute resources rather than equally is necessary to produce equitable outcomes. Though targeted to specific neighborhoods with the greatest need, these measures will benefit all neighborhoods throughout the city. Similarly, some measures should target specific marginalized populations with the greatest disparities, such as existing Black youth unemployment. These measures can and will be deployed to also improve outcomes for the benefit of other marginalized populations. "

- ***Implement Strategies.*** A number of the strategies your letter recommended including in the appendix to the report are being acted upon currently.
  - 1.4: Part of OCR's Gender Equity work in 2016 includes working with City departments on LGBT inclusive customer service as well as a community-wide LGBT Visibility Campaign. OCR is partnering with the LGBT Commission on this work.
  - 1.5 and 2.1: OCR's 2015 Fair Housing Campaign includes an emphasis on LGBT residents, disabled people and communities of color. OCR contracted with community based groups to provide over 40 workshops in the community centered on these populations. LGBTQ groups that we contracted with in 2015 were Entre Hermanos and Equal Rights WA/Ingersoll. Thank you to the Commission for informing this work. We will continue to provide outreach and education in 2016.
  - 3.3: OCR is partnering with LGBTQ Allyship to ensure their affordable housing work is framed in terms of racial equity and intersectionality.

The LGBTQ Commission's support of the City's RSJI is invaluable. We thank you for challenging the City to advance the field of intersectional analysis and action. All of Seattle benefits from this approach and we look forward to working with you to further this work as our knowledge and capacity grows together.

6. **Growth and Equity Recommendations.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 5 Seattle Urban Forestry Commission

1. **Urban Forest Impacts.** The comments that highlight the relevance and important benefits of tree canopy, and the threat of canopy loss by future development are noted. Following the EIS scoping public comment period, DPD staff (now within SDCI) reviewed comments and wrote a memo indicating that a discussion of the *Urban Forest Stewardship Plan* would be included in the scope for the EIS's Relationship to Plans and Policies section. Also, the Draft EIS on pages 3.5-11 to 12 provides a programmatic level overview of the impacts of each of the alternatives to tree canopy in various locations of the City. This comment's request for further extensive analysis beyond that included in the Draft EIS to evaluate direct, detailed, yearly or cumulative potential canopy loss and estimation of related impacts on air pollution, human health, noise, stormwater runoff, wildlife habitat, open space, and heat island effects goes beyond the scope of this programmatic EIS.

2. **Tree Protection Ordinance.** The comments seek stronger tree protections, including amendments to code protections in Section 25.11 of the Seattle Municipal Code, to achieve greater progress in canopy cover. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Tree Canopy Goal.** Following issuance of the Draft EIS, the recommended wording of Draft Comprehensive Plan policy E.1.2 has changed to include the following goal: "Strive to increase citywide tree canopy coverage to 40% over time." The tree cover proposal item on page 2-3 that would have changed the tree cover goal to 30%, and the similar reference in the last bullet of the Draft EIS at page 3.5-1 have been deleted.

Letter No. 6 Washington State Department of Archaeology & Historic Preservation

1. **Cultural and Historic Resources.** No changes to the City's current regulations protecting cultural and historic resources are proposed in the Proposed Action or alternatives. Recommended policy language is updated to be more direct and supportive of cultural and historic preservation than past Plan language. It is anticipated that this existing regulatory and policy framework will continue to protect historic and cultural resources from significant adverse environmental impacts. See also the Draft Comprehensive Plan Land Use Element for recommended historic and cultural resource policy guidance.

2. **Impact Mitigation for Cultural and Historic Resources.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the Draft Comprehensive Plan Land Use Element for recommended historic and cultural resource policy guidance.

3. **Policy Protection for Cultural and Historic Resources.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also Draft Comprehensive Plan Land Use Element for recommended historic and cultural resource policy guidance.

4. **Impact Analysis for Cultural and Historic Resources.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

5. **Policy Protection for Cultural and Historic Resources.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the Draft Comprehensive Plan Land Use Element for recommended historic and cultural resource policy guidance.

6. **Implementing Protection for Cultural and Historic Resources.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

7. **Closing Comments.** See responses to Comments No. 1–6, this letter.

Letter No. 7 Cascade Bicycle Club

1. **Alternative 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

2. **Multimodal Level of Service (LOS) Standards.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Final EIS Appendix B.3 discusses a proposed multimodal level of service metric. The mode share metric evaluates the amount of travel by all modes (but with a final outcome relative to reducing SOV mode share).

3. **Household Travel Survey Data.** PSRC's final 2014 Household Travel Survey data was not released in time for inclusion in the Draft EIS. The new release of data has been incorporated into the analysis and revised mode shares estimated for all alternatives, including the Preferred Alternative, in the Final EIS Section 3.1. The conclusions of the EIS are unchanged; completion of the network outlined in the *Bicycle Master Plan* is an important component of the City's overall transportation network and the desired mode share LOS goals may not be met without full *Bicycle Master Plan* implementation.

4. **Alternative 4 and Displacement.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative, which adjusts growth estimates to help minimize displacement. See also Draft Comprehensive Plan Growth Strategy, Land Use and Housing element policies that address displacement.

5. **Consistency with the Climate Action Plan (CAP).** The *Climate Action Plan* and the Draft EIS differ in two important ways.

   First is the purpose of the documents. The CAP outlines a possible pathway to achieve carbon neutrality by 2050. As such, the plan includes a robust set of strategies that require a substantial increase in funding at the local, regional, and state levels. The draft Comprehensive Plan's Environment Element indicates support for the objectives of the CAP, in the Climate discussion and accompanying goals and policies.

   In contrast, a SEPA document takes a more conservative approach geared toward impact identification. Therefore, the analysis for the EIS assumes only "reasonably foreseeable" changes such as the currently mandated Corporate Average Fuel Economy (CAFE) standards, and does not include large scale congestion pricing or sweeping technological advancements. This is not to say that additional advancements will not occur, simply that they cannot be assumed with certainty in the EIS analysis of future conditions.

   Second is the type of emissions considered. The CAP goals refer to passenger vehicle emissions only since that is the area in which the City can exert the most influence. The Draft EIS analysis includes freight travel as well, which accounts for a substantial portion (roughly one-third) of total road transportation emissions.

   The Draft EIS analysis indicates that absent an aggressive suite of strategies and technological advancements, the City would not meet its GHG emissions goal by 2035—this is consistent with the "business-as-usual" finding in the CAP. However, no impacts are identified because the Action Alternatives are measured against the No Action Alternative. Although no impacts are identified from a SEPA perspective, the City will continue to pursue the strategies outlined in the CAP to make progress toward its carbon neutrality goal regardless of the alternative selected. This would entail

advancing a variety of possible legislative changes for future decision-making, the outcomes and timing of which cannot be known at this time.

Given the nature of this analytic approach, the EIS has identified worst-case impact levels consistent with the purposes of SEPA analyses, without making presumptions about exactly what additional measures will be adopted, and when or how they would be implemented. Study of the feasibility of specific possible strategies, such as the ability to achieve a 25% drive alone rate by 2035, is beyond the scope of this Final EIS.

6. **Vision Zero.** The traffic safety effects of the alternatives are discussed on page 3.7-45 of the Draft EIS. As stated in the Draft EIS, the Vision Zero policies and strategies will be pursued regardless of the land use alternative selected. At this programmatic level of analysis which considers area-wide land use zoning changes rather than a project-specific proposal, there is not expected to be a substantive difference in safety among the alternatives. Individual development and transportation infrastructure projects will undergo separate and more detailed SEPA review to assess compliance with the Vision Zero goals. See also the Draft Comprehensive Plan Transportation Element for transportation safety policy guidance.

7. **Closing Comments.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

8. **Bicycle Facilities Map.** The Transportation Appendix of the Draft Comprehensive Plan includes a recent map with more detail in terms of type of facility.

9. **Multimodal Map.** To preserve legibility, the pedestrian, bicycle, and transit networks are not overlaid into a single map.

10. **Restricted Parking Zone (RPZ) Program.** The Draft EIS text meant to describe signed time limits (such as two hours) that typically apply in RPZs. A generalized maximum limit of 72 hours for a given vehicle legally parked in one location is acknowledged. Regarding the request for an update to the RPZ program: this is a policy decision, rather than a comment relevant to the EIS analysis. Note that SDOT is currently evaluating changes to the RPZ program.

11. **Bikeshed Analysis.** Walkshed areas were defined based on the walking distance for a 20-minute neighborhood. Because the 20-minute walking distance is less than the 20-minute biking distance, the walkshed was used as a measure to identify the number of households and jobs within a 20-minute area. This keeps the focus on the land use changes proposed within urban villages, rather than diluting the totals with single-family neighborhoods that would see little change. Therefore, evaluating bikesheds would tell a similar story to the walkshed analysis in terms of variation between alternatives.

12. **Mode Share Graphics.** The Draft EIS was developed to focus on the defined sectors as a basis for comparing differences on a citywide basis. No additional graphics are planned.

13. **Walkshed Graphics.** The square mileage of each walkshed is provided in the table below. See the response to Comment No. 11, this letter, regarding bikesheds.

Study Intersection Sector Location	Walkshed Area (sq. miles)
Northeast Seattle	0.65
Northwest Seattle	1.09
Queen Anne/Magnolia	1.04
Downtown/Lake Union	1.05
Capitol Hill/Central District	1.20
West Seattle	1.20
Duwamish	0.67
Southeast Seattle	1.12

14. **Multimodal Transportation.** Appendix B.3 includes analysis of a proposed new multimodal level of service metric based on mode share. The goal for multimodal transportation is described in numerous goals and policies in the Transportation Element of the Draft Comprehensive Plan. In general, draft plan policies focus on preserving mobility, making efficient use of streets, and reducing reliance on personal automobiles.

15. **Household Travel Survey Data.** PSRC's final 2014 Household Travel Survey data was not released in time for inclusion in the Draft EIS. The new release of data and revised mode share estimates have been incorporated into the analysis of all alternatives, including the Preferred Alternative, in Final EIS Section 3.1.

    The current travel demand model is the best forecasting tool available at this time, but potentially underestimates the shift from SOV to alternate modes based on recent trends and data. PSRC is undertaking a major effort to release a new type of transportation model that will be more sensitive to multimodal transportation options and the impacts on travel choices. This new model, SoundCast, is not yet ready for application. Additional information about SoundCast is available at: http://www.psrc.org/data/models/abmodel.

    The commenter notes that they expect to see lower VMT per capita in the future; as stated in the Draft EIS, the current travel demand model forecasts a decrease in VMT per capita from 3.3 miles in 2015 to 2.9 miles (12 percent decrease) in 2035 under all four alternatives.

16. **Vehicle Miles Traveled (VMT).** The commenter incorrectly states that VMT is expected to increase by less than 1 percent. VMT is expected to grow by 15 percent in total, largely driven by increased population and employment (Draft EIS page 3.2-20). This increase in VMT is in line with the change in mode share published in the Draft EIS.

17. **Preference toward Parking Issues.** The Draft EIS analysis does not indicate a preference toward discussion of parking issues over other transportation issues. A

parking impact is identified because supply already exceeds demand in some areas and the City has few if any plans to provide additional on-street parking. Pedestrian and bicycle impacts are not identified because the City is planning on robust improvements to non-motorized facilities regardless of the alternative selected.

18. **Bicycle and Pedestrian Mitigation Strategies.** This is a programmatic Draft EIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects (as well as details including schedule and financing) that will be required are also unknown. Future individual development projects will undergo separate SEPA review if required by City rules; specific code-based mitigation and/or mitigations based on substantive SEPA policies can be determined at that time.

19. **Prefer CTR and TDM.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

20. **Funding for Bicycle and Pedestrian Infrastructure.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

21. **Bicycle and Pedestrian System Improvements.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

22. **Concurrent Multimodal Projects.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the Draft Comprehensive Plan for proposed policy direction.

23. **Travel Demand Management and Parking Strategies.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

24. **Portland SmartTrip.** The SmartTrips program began by targeting specific neighborhoods, rather than citywide. On average, the neighborhood program resulted in an average nine percent shift from drive alone trips; the timeframe of the before and after surveys is not provided. Additional information about the SmartTrips program is available at: http://www.portlandoregon.gov/transportation/article/497780.

25. **Potential Mitigation Measure Implementation.** Your comment is noted.

26. **Mode Shift.** Revised mode share estimates based on the most recent PSRC travel survey are included in the Final EIS Section 3.1. Auto mode share (SOV and HOV) is forecasted to drop anywhere from 2 to 9 percent among the sectors studied. The cited text in the Draft EIS (Significant Unavoidable Adverse Impacts, page 3.7-51) is clarified to note that in addition to on-street parking scarcity causing mode shift, many drivers may shift to using off-street parking facilities. The on-street parking supply is a relatively small fraction of total supply.

Letter No. 8 City Neighborhood Council

1. **Growth Assumptions.** As noted in the comment, the alternatives considered in the Draft EIS are based on a 20-year planning horizon for future housing and employment growth. As described in the Draft EIS, these population forecasts were prepared by the Washington Office of Financial Management and allocated to individual cities through a regional decision-making process. The growth assumptions considered in the EIS are consistent with guidance provided by the Growth Management Act, the Puget Sound Regional Council Vision 2040, and the King County Countywide Planning Policies.

   The maximum theoretical development capacity, or an assumed percentage of capacity, is not considered to be a useful measure or predictor of future SEPA environmental impacts for this 20-year Comprehensive Plan update. It cannot be predicted if, when, or how full buildout, or a percentage of buildout, will occur, and any analysis of a buildout condition at an undetermined future time would be overly speculative.

   In response to this and similar comments, the Final EIS includes analysis of a scenario derived from the Preferred Alternative that tests the sensitivity of identified impacts to increased growth levels. This sensitivity analysis assumes a growth estimate of 100,000 housing units, compared to the assumption of 70,000 housing units in the Draft EIS. Please see Final EIS Chapter 2 and Section 3.1 for a discussion of the Preferred Alternative and the sensitivity analysis scenario.

2. **Timing of Draft EIS and Draft Comprehensive Plan.** See response to Letter No. 2, Comment No. 1.

3. **SEPA Infill Exemption.** As described in Draft EIS Section 2.4, the SEPA infill exemption is described in RCW 43.21c.229. This provision allows a local government to categorically exempt residential, mixed-use and non-retail commercial development[1] proposed to infill an urban growth area, where, among other things, current density and intensity of development is lower than called for in the comprehensive plan. Final EIS Chapter 2 provides additional description of how the infill exemption will work and Final EIS Chapter 3 includes additional analysis of likely environmental impacts of such an infill exemption.

4. **Single Family Rezone Process.** The comments questioning the proposed deletion of current Plan policies LU 59 and LU 60 are noted. A review of the policy content of LU 59 is illustrative. LU 59 states "Permit upzones of land designated single-family and meeting single-family rezone criteria, only when all of the following conditions are met:
   - The land is within an urban center or urban village boundary
   - The rezone is provided for in an adopted neighborhood plan.
   - The rezone is to a low-scale single-family, multifamily or mixed-use zone, compatible with single-family areas.
   - The rezone procedures are followed." *(emphases added)*

1 Only commercial development up to 65,000 square feet may be exempted.

By its language, current Policy LU59 appears to prevent single-family land to be rezoned if it is not within an urban center or urban village, and requires a rezone to be indicated as possible in an adopted neighborhood plan. Given the infrequency of neighborhood plan updates (with some urban villages relying on neighborhood plans from 15 years ago), and uncertainty regarding future content of neighborhood plan updates with respect to single-family zones, the practical effect of this policy has been to highly restrict or negate the possibility of rezones of single-family land from occurring. Rather than a two-step process (Future Land Use Map change followed by a rezone process, both decided by City Council), this policy in many cases creates a de facto third step (successfully inserting location-specific Single Family rezone recommendations in a future neighborhood plan). If these policies are removed, rezone criteria and zone functional and locational criteria in SMC 23.34 would remain in place and would continue to provide for regulatory and decision-making criteria and processes for rezones.

The recommended removal of policies LU 59 and LU 60 is included in alternatives 2, 3 and 4 and the Preferred Alternative, but not Alternative 1 (the No Action Alternative). The discussion of Relationship to Plans, Policies and Regulations in Section 3.5 of the DEIS discusses possible changes in a broader and more generalized fashion without strictly tying them to Alternatives; this is consistent with conventions of SEPA EIS preparation that allow for streamlined, summary-level discussions, especially for relationship to plan and policy discussions for non-project EISs.

5. **Future Land Use Designations.** The policy discussion in Draft EIS Section 3.5 does not need to necessarily identify that FLUM changes are associated with only two alternatives. However, this relationship to alternatives 3 and 4 is already specified in the Chapter 2 description of alternatives, in Draft EIS Table 2-4. The concerns expressed with this strategy are acknowledged. The impact analysis in Section 3.4 for alternatives 3 and 4 does reflect the inclusion of the FLUM changes as part of these alternatives.

6. **Mitigation Strategies.** The analysis on Draft EIS page 3.4-15, first paragraph, identifies the potential for adverse compatibility impacts, but does not characterize these as probable significant adverse impacts. This is also indicated by the introduction to Draft EIS Section 3.4.3 Mitigation Strategies, page 3.4-35. Therefore, there is not a need to specifically identify proposed mitigation measures for those impacts. However, the Draft EIS addresses applicable regulations and commitments and "other potential mitigation strategies" that would be relevant to the identified adverse impacts. Under Applicable Regulations (page 3.4-35–36), the Draft EIS states that the City will continue to utilize its existing land use code, design review process and guidelines, and Urban Design Frameworks, which have been established for the purpose of influencing architectural design.

   The Draft EIS also lists potential additional mitigation, such as zoning code amendments to address transitions between urban villages and surrounding areas (page 3.4-36).

7. **Significant Unavoidable Adverse Impacts.** If any additional growth is to be allowed at all beyond current conditions, localized increases in density and building intensity are inevitable. As a result, the City has adopted development regulations, design standards and a design review process that assist in avoiding or mitigating the effects associated with future new growth. Though the commenter may not agree that these measures have been properly applied by the City in the past, they have been adopted for that purpose and are therefore documented as relevant impact-mitigating factors in the EIS. The level of detail provided in the discussion of mitigation strategies in Draft EIS Section 3.4.3 is sufficient to indicate a range of possible actions without needing to further specify details for this non-project EIS.

8. **Growth Allocations for Urban Villages.** The referenced text on Draft EIS page 3.5-1 describes using growth estimates for designated urban centers, urban villages and manufacturing/industrial centers, but also the possible change of eliminating these estimates for specific urban villages. The recommendation for this Final EIS is to not eliminate growth estimates for urban villages, but to substitute in a new way of defining these estimates. See the subsection entitled "Proposal Overview" in Chapter 2, Section 2.1 of this Final EIS for more discussion of proposed new methods of defining growth estimates for urban villages. Also see Section 3.2 for more analysis of this recommendation. For purpose of analysis, the Draft EIS identifies housing and employment growth assumptions for all urban centers, urban villages and manufacturing/industrial centers, as shown in Draft EIS tables 2-2 and 2-3.

   Comments regarding the preference for continuing growth targets for all urban villages are noted. See Draft Comprehensive Plan Goal GSG3, supporting policies and Growth Strategy figures 2 and 3 for the City's recommended approach to growth estimates for urban centers, villages and manufacturing/industrial centers.

9. **SEPA Infill and Growth Targets.** The concerns expressed in this comment are noted. See the responses to Comments No. 3 and No. 8, this letter. As described in this response, use of the SEPA infill exemption is permitted only when current density and intensity is lower than called for in the Comprehensive Plan, among other criteria.

10. **Relationship between Zoning and Transit.** The concerns expressed in this comment are noted. The Draft EIS, pages 2-24 through 2-33, includes a description of rationales for possible changes related to transit proximity. The description of these changes, in relation to possible urban village expansion areas, suggest they would consist of comprehensive-plan-designation changes and rezones toward denser zone designations, with zoning standards to be determined in more detail at a later date. The comment requests "linkages" to be "established" between land use actions and transportation conditions, without which significant adverse impacts are implied. However, it is the conclusion of this EIS that sufficient description and analysis of the transit-related zoning proposals and transportation and land use impacts has been presented, and that significant adverse transit/ traffic impacts are not identified.

The primary rationale for proposing greatest density and intensity of land uses in proximity to transit is to make it as convenient as possible for the largest number of residents to use transit and to maximize the efficient use of transit facilities. While there is some flexibility in rubber-tired transit routing, the identified locations of possible change are located along primary bus-transit route spines or light rail routes that are likely to remain well-served. Also, all of the alternatives rely to an extent on existing and planned light rail facilities, with concentrations of growth focused around light rail stations. As significant fixed infrastructure investments, the location of these rail facilities is unlikely to change over the long-term. Consideration of the location of transportation facilities in conjunction with land use planning is a standard professional practice in most major cities, including Seattle.

11. **Future Land Use Designations.** Most of the requested information regarding FLUM simplification is explained on Draft EIS pages 2-28, 2-32, 2-33, and on pages 3.4-31 and 3.4-35. The proposed change relates in part to increasing flexibility in choice of zone types and zone boundaries in future rezone proposals, with potential for varying types and intensities of uses in different urban villages, rather than being constrained by FLUM mapping practices that tend to narrow the ranges of zoning choice and constrain zone/land use designation boundary-setting due to rigidity of mapping conventions. No specific changes to rezone procedural steps are identified or known in relation to FLUM simplification.

12. **Utility Impacts.** The analysis of water, sewer and storm drainage systems is appropriate for a citywide programmatic EIS. The comment does not acknowledge the analytic and programmatic content provided under the heading of "Existing Management Strategies" on pages 3.9-12 through 3.9-15, which describes several utility operational and management practices as well as other factors that provide information to reach the conclusions in that EIS section.

    As noted in the comment, Draft EIS Figure 3.9-7 shows facilities that may be at or near their capacity. Potential impacts to specific locations, such as improvements to selected flow lines, may be identified during future development reviews for individual projects. These improvements are identified through development reviews and would be accordingly required to be implemented via developer funded facility improvements. The sewer repair and rehabilitation program reduces infiltration and runoff of stormwater into the separated sewer system to retain capacity for sanitary sewer flows. SPU has an on-going sanitary sewer overflow/back-up program to identify and mitigate unforeseen problem areas (SPU 2015, *Strategic Business Plan*). Also, refer to Final EIS Section 3.2 for revisions and clarifications to the utility impact analyses.

13. **Water Supply and Climate Change.** Water demand projections based on PSRC and OFM growth forecasts were last updated in December 2012. This analysis included review of three climate change scenarios and determined that these scenarios would have little to no cost impacts (SPU 2013, *Water System Plan*).

Seattle City Light's *Integrated Resource Plan* is updated every two years to assess projected load and adapt resource needs. As part of the *Integrated Resource Plan*, SCL continues to track the impacts of climate change. SCL is also developing a *Climate Change Vulnerability Assessment and Adaptation Plan* for the utility. Through a research partnership with the National Park Service and the University of Washington, SCL is modeling the effect of climate change on glaciers and streamflow at the Skagit Hydroelectric Project (20% of power resources). This research can inform potential adaptation needs for fish protection flows and generation. A research project is also underway (expected completion end of 2016) by the Bonneville Power Administration and the University of Washington to model projected changes in streamflow for the Columbia River Basin (includes 30% of power from Boundary Project and 40% from contracts with BPA). This study will provide information on how climate change could affect hydropower generation on the Columbia. As results of these research projects become available, they will be included in the *Integrated Resource Plan* and updates to the *Adaptation Plan* (SCL 2014, *Integrated Resource Plan*).

City and state regulations now require on-site stormwater management. Redevelopment of properties that were previously developed without stormwater flow control and treatment facilities must reduce runoff and non-point source pollution at or below current levels. On-site stormwater management practices include: retaining existing trees, planting new trees, amending soils to restore soil infiltration and water holding, reducing impervious surfaces, and installing facilities to store and infiltrate stormwater runoff (SPU 2015, Draft 2016 Stormwater Manual). Cumulatively it is anticipated that as properties in the City are redeveloped, the stormwater runoff and transport of pollutants to streams, lakes and the combined sewer system will decrease.

Potential impacts of the Preferred Alternative on climate change are discussed in Draft EIS Section 3.1. Regardless of alternative, the City will continue to pursue measures to both reduce the pace of climate change and to improve resilience to the impacts of climate change. See the Draft Comprehensive Plan for proposed climate change policy guidance. Also, refer to Final EIS Section 3.2 for revisions and clarifications to the utility impact analyses.

14. **Energy Management Strategies.** The analysis of electrical power is appropriate for a citywide programmatic EIS. As described in the Draft EIS, taking into account anticipated conservation measures, overall demand growth is forecast to average 0.4% annual growth through 2035 (SCL 2015, *Integrated Resource Plan* process). SCL is continually seeking out new renewable resources in the region and acquires them to meet customers' needs for safe, reliable, clean energy. Recent acquisitions include biomass and landfill gas. SCL's conservation program includes: general consumer education, rebates, energy code development, energy benchmarking and installation of advanced meter infrastructure (SCL 2015, *Integrated Resource Plan* process). These measures will continue regardless of the alternative selected.

15. **Police Service Impacts.** As noted in the Draft EIS, population growth and shifts in area characteristics could influence the characteristics of crime. Information from the Seattle

Police Department (SPD) states that SPD does not use projected population and job growth in a linear fashion to determine their staffing and facility projections. Many other factors are known to affect the volume and type of crime such as employment, wages, social equity and the levels of and effectiveness of policing (see pages 3.8-25 and 3.8-26 of the Draft EIS for a list of additional factors). Past trends show an overall decline in violent and property crime even when Seattle's population was growing. An increase in the number of crimes may occur as the City grows over the next twenty years; however, the magnitude of change in number of crimes is not known.

According to the 2008–2012 *Neighborhood Policing Staffing Plan*, SPD identifies staffing needs based on geographical and temporal variables rather than population. The Draft EIS acknowledges that SPD does not currently have adequate staffing but is pursuing staff levels consistent with the staffing targets established in the *Neighborhood Policing Staffing Plan* as well as increasing the efficiency with which facilities and staff are deployed (see page 3.8-5). SPD will continue to analyze where best to focus its resources to respond to changes in demand for police services regardless of which alternative is selected.

16. **Police Facilities Impacts.** See response to Comment No. 15, this letter, regarding the relationship between population growth and crime. At this time, SPD has determined that the facilities for the East and West precincts are adequately sized to accommodate staffing targets established in the 2008–2012 *Neighborhood Policing Staffing Plan*. The Department regularly monitors staffing and facility needs and would do so for the East and West precincts along with their other precincts.

17. **Emergency Response Time.** Unlike the Seattle Fire Department, the Seattle Police Department did not identify ongoing efforts to change roadway design to reduce traffic collisions as affecting their emergency response time. Anticipated increases in traffic congestion, as outlined in Draft EIS Appendix A-5, would likely affect Police response times. The transportation analysis identifies strategies to address congestion, which would also mitigate for this potential impact of growth under any of the alternatives (for example, see FEIS Appendix B.3).

18. **Emergency Vehicle Access to Hospitals.** A mitigation measure has been added that acknowledges the potential impacts to the Seattle Fire Department's response time goals as a result of changes in roadway design and increased traffic congestion by suggesting that response time goals be taken into account when siting new fire stations. The Department does not track the amount of time it takes emergency responders to deliver victims to hospitals because the time it takes to treat the victim on-site varies based on the injuries incurred. The scope of the Draft EIS does not take hospital locations into account because hospital planning is outside of the purview of the City of Seattle's planning responsibilities.

19. **Fire and EMS Service Impacts.** Unlike Fire Stations 2 and 31 in South Lake Union and Broadview-Bitter Lake-Haller Lake, fire stations in Alki/Admiral and Rainer Valley have the equipment, facility, and staffing adequate to handle a projected increase in

emergency and medical services. A new fire station, equipment and resources in South Lake Union would also serve the Denny Regrade area (see Draft EIS page 3.8-12).

20. **Fire and EMS Service Impacts.** The commenter is correct in identifying that increased population would likely result in increased emergency service requests. In general, the Draft EIS notes that under all of the alternatives, the population in Seattle is projected to increase during the planning horizon of this Comprehensive Plan. As the population increases the number of service call is likely to increase. This increase is noted as an adverse impact.

    The impact of potentially slower response times is termed as an impact that "could" occur, because there are steps that the police and fire departments could take to offset the growth in the number of calls. These steps are part of the ongoing planning at each department. Under Alternative 2, growth would be more concentrated in the Urban Centers, as the commenter notes. Citywide, the demand would be the same as for the No Action Alternative. The conditional term "could" was used to characterize this potential impact because, while overall calls would be the same, the concentration of calls under Alternative 2 could have an effect on specific emergency response resources, requiring a different response from the emergency service providers.

21. **Lake City Fire Service.** The Lake City fire station was not cited by the Seattle Fire Department as currently deficient in equipment, facility or staffing needs when they were consulted during the preparation of the Draft EIS. The Department regularly monitors response time goals and run volumes and determines if redistribution of equipment and staffing resources are warranted to address changes in call volumes. The Department has the appropriate equipment to address structural fires in 4-8 story residential buildings.

22. **Fire and EMS Mitigation.** The purpose of this programmatic SEPA analysis is to broadly evaluate how anticipated the distribution of population and employment changes over the next 20 years will change the demand for emergency services. The EIS does not review how funding those services could affect the funding for other services. SEPA rules (WAC 197-11-448(3)) stipulate that EIS documents do not need to provide economic analysis or assess potential economic impacts.

23. **Parks Impacts and Mitigation.** The Comprehensive Plan recognizes that the City has sufficient Parks to serve the projected population growth through 2035. SPR owns approximately 10% of the total land area in the City of Seattle, maintains over 400 parks and open areas totaling 6,200 acres of natural area and park landscapes within our urban area; 2,300 acres of this is developed parkland. Discovery Park alone is 534 acres in size. Nevertheless, SPR has additional aspirations of acquiring and building additional parks. The Draft EIS acknowledges it is unlikely that Seattle will meet its existing stated goal of one open space acre per 100 residents with the population growth expected over the next 20 years. As was noted on page 3.8-27 of the Draft EIS, meeting this goal would require adding 1,400 acres of parks or open space to the City's current inventory of 6,200 acres. Therefore, the proportion of need for additional park/

open space per current goals was identified in Draft EIS, equivalent to the 22% cited in this comment. See Section 3.2 of this Final EIS for updates to the Parks and Recreation impact analysis, including about changes in impact findings and mitigation strategies.

Discussion on Draft EIS page 3.8-28 noted the difficulties in finding land to acquire. An analysis of where the City would find 1,400 acres of land to acquire is beyond the scope of this programmatic EIS, and would be a matter for future park development planning by the Seattle Parks Department (SPR). It should be noted that the proposed Comprehensive Plan removes the current quantitative standards in the Plan for parks/open space, and instead will defer to the *Park Development Plan*.

Generally, the ability to achieve the city-wide goals is limited by the cost of purchasing land and the willingness of the city's voters to support purchase, development and maintenance of additional parks and open space. SPR undertakes a review of its facilities and parks every six years and prepares an updated *Development Plan*. This effort identifies those areas where additional parks are desired to meet goals such as those for amount and proximity to open space areas. This analysis enables SPR to target those "gap areas" for acquisition and development. This is an ongoing process as local populations expand, and SPR works to acquire new property and new parks are developed over time. The six year parks planning timeframe is shorter than the City's Comprehensive Plan timeframe.

Current and future parks levies have been used to acquire parks and open space and anticipated future purchases with levy money. Between 2008 and 2014, SPR purchased fourteen properties throughout the city with funds from the 2008 Parks and Green Spaces Levy and land banked them until funds are available for development. With the passage of the Metropolitan Parks District, SPR will start developing these land banked sites in 2016, increasing the availability of parks in the city. Additional property at Smith Cove and on the north side of Portage Bay was also purchased during this time frame and is in the process of being developed as park land. The Comprehensive Plan has a 20-year planning horizon, while parks levies fund activities for a shorter time. Therefore, it is difficult to determine at this time precisely how successful parks levies will be over 20 years as an acquisition mechanism.

24. University District Urban Center. In general, the EIS analysis is conducted on a citywide basis. In some cases, such as parks and recreation, smaller EIS analysis sectors are used in discussing impacts. The University District Urban Center is located in the NE Seattle sector. In response to this comment, it is noted that the University District Urban Center was inaccurately left out of Draft EIS Table 3.8-3's findings for Sector 2, because an open space gap is identified in this Urban Center, for both existing and future projected conditions, on the order of approximately 10 acres. A revision to Table 3.8-3's findings is included in Final EIS Section 3.2.

The University District Urban Center, like several other areas in the city, does not meet some of the parks and open space goals established by Seattle Parks and Recreation. The 2011 update to SPR's Assessment of Gaps in Seattle's Open Space Network noted that the University District Urban Center does not meet the

established 2004 or anticipated 2024 population goal of one acre of open space per 1,000 households. This assessment does not include public schools or the University of Washington campus, which SPR considers "offsets." Offsets are areas that "may not be owned by SPR that are still used or experienced similarly to City operated parks and greenspaces."

The Assessment of Gaps report notes that previous parks levies have provided resources to fill some of its identified gaps and that "In consideration of the remaining open space gaps in urban villages and single family areas, SPR will continue to work with City, County and other partners in the future to increase park lands in neighborhoods that lack Usable Open Space." Also, the deficit of open space in the University District Urban Center is addressed through the U District Urban Design Framework, which acknowledges the deficit and provides specific mitigation strategies.

See also response to Comment No. 23, this letter.

25. Parks Mitigation Strategies. The purpose of an EIS is to disclose information about significant impacts to the environment and to identify a range of mitigation measures that could address identified impacts. Please refer to WAC 197-11-400.

The information in the EIS is intended to be used by decision makers when they consider taking some action, which in this case is text and map amendments to the Seattle Comprehensive Plan. If taken, this is a legislative decision that will be made by the City Council, and the City Council has the discretion to commit to particular mitigation measures. The Seattle Department of Construction and Inspections (SDCI), the lead agency for the EIS, can recommend that the City Council adopt a particular course of action and/or mitigation measures, but does not have the authority to commit the City Council to take a specific action, such as adopting legislation. For these reasons, mitigation is presented as a range of measures that SDCI recommends that the City Council consider.

With reference to specific aspects of the referenced "other possible mitigation strategy," "…development of usable open space within existing parks" refers to a valid improvement strategy that could be undertaken to create more 'usable open space' by improving a portion of a park. For example, by providing a childrens' playground or a dog-park, latent demand for such facilities would be addressed by the improvement, in a way that would not be addressed by retaining a given open space unimproved. Such actions can be seen as providing mitigation value toward satisfying a "gap" in recreational facilities. Additionally, although not explicitly mentioned in the mitigation strategy's wording, it means to refer to a process for disposal of surplus property that is designed to take into account many possible City priorities, including open space and recreation, housing, and other City service needs. The referenced mitigation measure implies that the priorities in that surplus property disposal process could be revisited. For example, if a neighborhood had an identified open space deficit, open space uses could be given higher priority than other potential uses, such as affordable housing, schools, or other public services. See Section 3.2 of this Final EIS for revisions and clarifications made to the parks and recreation impact analysis and discussion of mitigation strategies.

26. Parks Mitigation Strategies. See responses to Comments No. 23, 24 and 25, this letter. Also, see Section 3.2 of this Final EIS for revisions and clarifications made to the parks and recreation impact analysis and discussion of mitigation strategies, specifically about additions to Draft EIS page 3.8-28. This indicates the EIS's analytic conclusion that the parks and recreation impacts evaluated and disclosed are adverse environmental impacts but not significant adverse impacts. Therefore, it is not necessary to make a finding of "significant unavoidable adverse impacts."

27. School Facility Impacts. The programmatic analysis in the Draft EIS represents a snapshot of the data available at the time Draft EIS research was done, primarily in 2014. As indicated in the list of references, it included the Seattle Public Schools' 2012 *Facilities Master Plan* and selected other information from 2013 and 2014. It is acknowledged that there has been a rise in enrollment recently, and it is accurate that recent growth has exceeded prior projections. This comment notes a 2,000 student higher enrollment was expected for 2015, but that was for a point in time after the issuance of the Draft EIS, rather than being a factual error in the Draft EIS. Other inadequacies of the Draft EIS analysis are not clarified in this comment; its implication is that trends from the last year or two that have substantial facilities implications should be recognized. The responses to Comments No. 27 through No. 32 in this letter acknowledge the commenter's perspectives on these matters as relevant perspectives.

The Seattle Public Schools (SPS) bases its facilities planning on enrollment projections that are established every five years as well as annual updates. A more recent five year projection from October 2015 has been produced by SPS. It covers the 2015/2016 through 2019/2020 school years, and is being used by SPS as it continues its ongoing facility planning efforts. The projections forecast overall growth throughout the district. According to SPS, they are recognizing recent trends and actively taking steps to provide capacity improvements as effectively and timely as possible, both by implementing BEX IV projects and taking additional steps as necessary. For example, Lincoln High School is slated to be reopened and pre-schools are being reopened. Magnolia and Webster elementary schools will address deficiency issues in Ballard.

It should also be noted that SPS facilities planning has a long-term perspective that encompasses planning for multiple levies into the future, to plan out its course for providing facilities for the overall future needs of students and the district. This includes addressing the effects of more recent mandates and programmatic interests, which include but are not limited to class-size considerations. SPS is pursuing additional funding to respond to increases in enrollment. BEX V, if approved, would start in 2019. BEX V may include a new high school at Seattle Center and more elementary schools. Lastly, SPS received a Distress School Grant from the State.

SPS has not seen a direct correlation between population growth and student enrollment. Development and population increases do not strictly indicate increased school enrollment locally. Growth in student enrollment in public schools is dependent on the number of families that have school age children, and the number of families choosing to enroll children in public schools versus private schools.

Single-family housing development (which is not increasing significantly in the city) continues to be the housing type that is associated with more school children. The City has been examining policies that would encourage more multi-family housing to be oriented toward families with children, but the current and expected future market for multi-family units is not expected to be heavily weighted toward family sized units. With the exception of housing units provided by Seattle Housing Authority, SPS has not found that multi-family residential development significantly increases school enrollment.

28. **Cooperative Planning for School Facilities.** Staff from SPS and the City are working together to determine when and how to coordinate efforts with each other. This involves a range of the City's offices, including the Department of Education and Early Learning, Office of Planning and Community Development (OPCD) Seattle Department of Construction and Inspections (SDCI), Seattle Department of Transportation (SDOT), and others. Activities include: consideration of Land Use Code implications for school expansion planning, and help in identifying sites for additional schools.

29. **Future Enrollment Locations and Trends Need Further Analysis; More Growth in Single Family Neighborhoods.** Your comment advocating for more enrollment trend analysis is noted. Such analysis is undertaken by Seattle Public Schools in its ongoing facilities planning. See responses to Comments No. 27 and No. 31, this letter.

30. **Outdated School Facility Information.** This comment does not explain in specifics what information is outdated, and it does not substantiate its inferences about errors in data on school buildings available, enrollment projects or facility use data. See responses to Comments No. 27 and No. 31, this letter, which indicate that the Draft EIS referred to and relied on the 2012 *Facilities Master Plan*, levy and other similar information.

31. **Student Enrollment Projections.** This comment does not accurately reference where in the Draft EIS it detects an inaccurate statement. It may refer to content on page 3.8-26 rather than "page 18." On page 3.8-25, a lengthy paragraph explains various facts about the *Facilities Master Plan* and the Building Excellence (BEX) Phase IV levy. Selected quotes illustrate the factual referencing made: "*The capacity limits identified in the Facilities Master Plan through 2022 is used as the basis for developing the SPS's capital programs, including [BEX] Phase IV…The planning period for this capital program is 2014-2019. BEX Phase IV assumed capacity needs based on the high projection for kindergarten through 5th grades and for 6th through 8th grades in the North region. Capacity needs were based on the medium projection for all other regions and for 9th through 12th grades…BEX Phase IV will provide an added capacity of 7,900 students to address the shortage identified in the Facilities Master Plan…*" This commenter does not explain their rationale by which this factual information presented is inaccurate in its representation of the *Facilities Master Plan* and BEX Phase IV. The rest of this comment makes assertions that the District has admitted in public meetings that more capacity is needed through 2020 beyond what is stated in BEX IV, with or without considering class-size reduction mandates. And, it notes a resurgence in enrollments in particular parts of town, and speculates that approximately 20 more school buildings would be needed to meet state mandates for

class size. While such hearsay and estimations are not confirmed by this response, the commenter's perspectives that recent higher-enrollment-growth trends combined with class-size reduction mandates may create additional capacity needs and challenges are acknowledged. Also, see the response to Comment No. 27, this letter.

32. **Universal Preschool Program.** The Seattle Preschool Program is in an early stage of development. The District is working with the City and has made some classes available for this program. The City acknowledges that the District has to provide for school age children as a priority and that additional facilities will be needed for the preschool program.

33. **Traffic Analysis.** As appropriate for a citywide programmatic EIS, the Draft EIS includes figures and tables summarizing the expected travel time increases on various paths within the City; see Draft EIS Figures 3.7-17 through 3.7-24 and Tables A.4-4, A.4-7, and A.4-11. The Air Quality and GHG Chapter indicates that total VMT is expected to increase by approximately 15 percent over 2015.

    As the commenter states, the Draft EIS Transportation Appendix included PM peak hour volumes for readers interested in the forecasted demand on specific arterials.

34. **Roadway Capacity.** The Transportation Appendix includes the technical memorandum describing the capacity methodology and adjustments made. The adjustment factors cited by the commenter are not arbitrary, were determined by using Highway Capacity Software, and were used to calibrate the Florida Department of Transportation's (FDOT) "typical" values to reflect local observed traffic flow conditions on Seattle streets and highways, which allows for results more accurate to this jurisdiction rather than a Florida jurisdiction. It is not accurate to identify FDOT "typical" values as "national standards." Requests to provide details about the "impacts on maximizing green time in one direction…" are noted, but this characteristic of existing conditions does not equate to being an impact of the Comprehensive Plan alternatives. The City's current level of service policy considers only the arterials crossing each of the designated screenlines; additional analysis of potential "diversion" onto local streets is not related to the designated screenlines, and is not planned at this time.

    Most of the counts used for analysis were collected in 2012 and 2013. As stated on page 3.7-23, count volumes older than 2012 were factored using growth trends along similar roadways. Traffic counts were seasonally adjusted by the month and year they were collected, based on factors provided by SDOT. Recent traffic growth trends were reviewed to determine if volumes should be factored up to approximate 2015 conditions. That evaluation found relatively steady traffic volumes over the past five years; therefore, the recent counts are expected to adequately represent 2015 conditions.

35. **Intersection Delay.** The City's level of service policy does not include intersection-level analysis. This is a programmatic Draft EIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of

future development are unknown at this time, specific intersection volume forecasts would be overly speculative.

36. **Ballard Downtown Rail.** Transit routing assumptions are based on the City's *Transit Master Plan* to study how the planned transit network would affect travel patterns. The Draft EIS is a forward-looking document, and assumes the regionally accepted levels of future transit as directed by SDOT and PSRC. It should be noted what while transit funding fluctuates in the short term, transit funding and service over the last 20 years has expanded substantially in the Puget Sound Region. The Ballard Downtown Rail project is also included in both the *Transit Master Plan* and the Sound Transit 3 preferred project list, the latter with an estimated completion date of shortly after the 2035 timeframe of this Comprehensive Plan. Also see the response to Comment No. 38, this letter.

37. **TrendLab+ Tool.** The TrendLab+ tool was not used to generate the analysis results shown in the Draft EIS (screenlines, mode split etc.). The Draft EIS analysis uses a travel demand model based on PSRC's regional model, which has relatively static assumptions of demographic characteristics. The TrendLab+ discussion is included to make readers aware of the potential for demographic shifts in the future.

38. **Transit Impacts.** The travel demand modeling completed for the Comprehensive Plan forecasts a 60 percent increase in transit ridership to, from, and within Seattle between 2015 and 2035. King County Metro, Sound Transit, and PSRC all have long-range planning efforts underway that are aimed at accommodating roughly double the current ridership, i.e. a 100 percent increase. Therefore, the transit agencies that operate Seattle's transit system are designing service to accommodate the transit ridership forecasted by the Comprehensive Plan.

    The City regularly purchases additional transit service from King County Metro. In this way, the City helps to ensure that transit service is distributed to most effectively meet demand and encourage additional ridership by providing a cohesive network of frequently-operating transit routes. The City also influences transit operations through its management of city streets on which transit travels, and sets limits on the number of transit buses that can operate on every street in the city.

    Regarding the relationships of transit service to arterial capacity, see Appendix B.3 for a discussion of the relative road system capacity benefits of transit over automobile travel modes, in relation to the City's proposed adoption of a mode-share based standard for transportation system capacity.

39. **Accidents and Other Traffic Delays.** Travel demand models do not account for temporary capacity restrictions or inclement weather. There are no plans for the I-5 express lanes to be restricted to transit only; the planned I-90 changes related to light rail are assumed in the future year model. The capacity evaluation of Aurora Bridge includes all six lanes of the bridge because the counts reflect the vehicles served in all lanes. The commenter notes that the GHG emissions evaluation should take the future year scenarios' increased congestion levels (i.e. decrease in speeds) into account. The

emissions analysis in the FEIS has been updated to reflect the change in average speed between the 2015 and 2035 scenarios. The revised evaluation forecasts that the 2035 emissions for all alternatives would be slightly higher than the 2015 condition. However, impacts are identified relative to the No Action Alternative. Given the similarity in congestion levels among the 2035 alternatives, the relative differences in GHG emissions identified in the DEIS and the finding that the Action Alternatives have lower VMT and therefore lower GHG emissions than the No Action Alternative means that the impact finding would not change.

40. **Equity.** See Final EIS Section 4.3.2, Growth and Equity Analysis, which discusses updated data.

41. **Competition for Funding.** Potential future competition for funding is not identified as an element of the environment for consideration in an EIS, either in the SEPA Rules (WAC 197-11-444) or in Seattle's SEPA policies and procedures (SMC 25.05.675.2.O.1).

Letter No. 9 Fremont Neighborhood Council

1. **Growth Assumptions.** The Growth Management Act requires cities to plan for projected growth in their comprehensive plans. The King County Countywide Planning Policies (CPPs) set growth targets for all jurisdictions in the county, based on state growth projections. The city's Draft Comprehensive Plan is consistent with state and regional guidance and uses the CPP growth targets. If different levels of growth occur, the Comprehensive Plan can be revised to reflect changes through the regular annual review and amendment cycle.

2. **Growth Assumptions and SEPA Process.** The comment is noted. A Determination of Non-Significance (DNS) was issued in 2015 as noted in this comment. The City took this action in order to comply with legal mandates to formally update its citywide growth targets in 2015, and to make timely updates for accuracy to the Plan's appendices for transportation, capital facilities, housing, utilities, economic development and land use. The mandates included State deadlines for authorizing the citywide growth targets. This EIS evaluates a separate and subsequent action that evaluates the range of environmental impacts associated with different possible patterns that could be authorized, as well as due to recommended text amendments of the Comprehensive Plan itself, and related actions. While the 2015 DNS allocated a subset of growth estimates to urban centers (which are reflected in Alternative 1—No Action Alternative in this EIS), those estimates are subject to possible change and SEPA review as part of the Preferred Alternative in this Final EIS, for example, and are subject to final decision-making for the Comprehensive Plan update. The comment does not offer a supporting rationale as to why the prior SEPA DNS was "wholly inappropriate."

3. **SEPA-related monitoring of past outcomes.** The comment requesting an assessment of prior SEPA analyses is noted. However, such an analysis is not required for this SEPA EIS. It should be noted that an EIS does not project, plan for, or guide change, nor

does it implement mitigation measures. Rather, the purpose of an EIS is to disclose information about probable impacts to the environment and to identify a range of mitigation measures that could be implemented to address identified significant adverse impacts. The information in the EIS is intended to be used by the public and decision-makers, in conjunction with other relevant considerations or documents, to reach decisions about the preferred course of action, including possible mitigation.

4. **Neighborhood Planning.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The commenter's assertion that neighborhood planning has been "wholly abandoned" is not accurate.

5. **Range of Alternatives.** As described in the Draft EIS, each alternative emphasizes different patterns of projected future growth and intensity of development among the urban centers, urban villages and transit-related areas. The alternatives provide for consideration of the potential impacts associated with differing growth patterns that would allow the City to fulfill its responsibility under the GMA to accommodate 70,000 new households and 115,000 new jobs by 2035. The EIS discloses that alternatives 2, 3 and 4 would generate varying degrees of land use, transportation, public service and other impacts, several of which would represent lower levels of impacts than identified for the No Action Alternative. Some of these differences would occur due to thematic differences among the alternatives, such as the land use concentrations defined for Alternative 2, for example. Thus, the EIS is consistent with the intent of WAC 197-11-440 in its defining of a range of alternatives. Mitigation measures that would help reduce impacts are identified for each alternative. With respect to concurrency, see the response to Comment No. 6, this letter.

6. **Concurrency.** The comment appears to suggest that the EIS should identify application of the GMA concurrency policy as means to mitigate the effects of growth. Regardless of whether that policy is characterized as a possible mitigation measure, that policy applies to future City actions. Application of GMA concurrency policies, which correlate the availability of infrastructure to expected growth, should help reduce, rather than increase, the impacts of growth.

   Possible future implementation actions described in the EIS include re-establishing SEPA infill exemption provisions in Seattle's environmental policies and procedures (SMC 25.05), which are a SEPA strategy defined by the State in RCW 43.21C.229. The EIS discusses and evaluates potential impacts of future growth and proposed actions on various elements of the environment including but not limited to transportation, public services, and utilities, for the purpose of providing information to decision-makers.

7. **Gentrification.** The comment is noted.

Letter No. 10 Friends of Cheasty Greenspace at Mt. View

1. **New Urbanism and Biophilic Cities.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Access to Nature.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 11 Friends of Frink Park

1. **Seattle Urban Forestry Commission.** See comments and responses to Letter No. 5, Seattle Urban Forestry Commission.

2. **Seattle Urban Forestry Commission.** See comments and responses to Letter No. 5, Seattle Urban Forestry Commission.

Letter No. 12 Friends of Seattle's Urban Forest

1. **Tree Canopy Goal.** See comments and responses to Letter No. 5. Regarding the recommended tree canopy goal, see the response to Letter No. 5, Comment No. 3.

2. **Urban Forest Impacts.** The comments are noted. See the comments and responses to Letter No. 5.

3. **Tree Protection Ordinance.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the comments and responses to Letter No. 5.

4. **Urban Forest Impacts.** See the comments and responses to Letter No. 5.

5. **Urban Forest Impacts and Strategies.** See the response to Letter No. 5, Comment No. 1.

6. **Open Space.** See the response to Letter No. 8, Comment No. 23.

   The comment refers to the "Plan" in the document and it should be noted that the EIS is not a plan or policy guidance document, nor does it address all possibly policy considerations. For information about recommended parks and open space policy guidance, see the Draft Comprehensive Plan Parks and Open Space Element.

7. **Cost of Growth.** This comment raises multiple issues related to potential future costs. With respect to costs to the City for maintenance of public facilities and public services, it is acknowledged that the EIS does not include an economic analysis of the alternatives. As described in WAC 197-11-448, SEPA anticipates that the general welfare, social and economic aspects of policy options will be considered in the weighing future decisions, but an EIS is not required to evaluate all of the possible considerations of a decision. Rather an EIS focuses on environmental impacts and is expected to be used by decision-makers in conjunction with other relevant considerations and documents.

   With respect to housing affordability, see Final EIS Section 4.3.2, Housing Affordability.

8. **Cost Impacts.** See the response to Comment No. 7, this letter.

Letter No. 13 Futurewise

1. **Alternative 1.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

2. **Alternatives 2, 3 and 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

3. **Support Amended Alternative 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

4. **Equity Analysis.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

5. **High Opportunity Areas.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

6. **Total Impacts of Growth.** Depending on the topic and availability of reliable information, the Draft EIS provides comparative and/or absolute estimates of potential impacts for each alternative. For example, the land use analysis provides absolute information about how much growth would be directed to urban centers and villages under each alternative, describes potential impacts associated with this growth and, where appropriate, compares the relative magnitude of impacts between alternatives. The EIS analysis is cumulative in nature, considering impacts and identifying potential mitigation from a citywide perspective.

7. **Economic Displacement Risk.** The separate draft Growth and Equity Analysis considers displacement holistically and does not distinguish between residential and businesses in assessing potential for displacement. It is also noted that the Draft EIS discussed potential displacement impacts on businesses in its analyses on pages 3.6-20 through 3.6-33, including the topics mentioned in this comment, and possible mitigation strategies.

8. **Maintain the Goal of Homeownership.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the Draft Comprehensive Plan Housing Element for policy guidance on this topic.

9. **Employment Growth by Neighborhood.** The analysis of employment is appropriate for a citywide programmatic EIS. The EIS provides a quantitative description of employment by economic sector and geographic location and a projection of future jobs by centers and villages. It also identifies the centers with higher vulnerable populations and increased risk of displacement. It is noted that several of the cited topics are being addressed in the update to Rainier Beach's neighborhood plan, which focuses on employment, education and economic development topics.

10. **Housing Choice Analysis.** The analysis of housing is appropriate for a citywide programmatic EIS. The Draft EIS recognizes that not all housing units are equal and that

a diversity of housing units is a good fit for diverse populations and diverse household types (i.e. larger families, single adults, older couples, etc.). The alternative-by-alternative analysis of impacts to housing is meant to provide an idea of where impacts will be felt most and the mitigation measures section identifies measures in place to help ease the negative impacts felt by the community.

11. **Social Network Impacts.** The EIS does not include an analysis of social networks. As described in WAC 197-11-448, SEPA anticipates that the general welfare, social and economic aspects of policy options will be considered in the weighing future decisions, but an EIS is not required to evaluate all of the possible considerations of a decision. Rather it focuses on environmental impacts and is expected to be used by decision-makers in conjunction with other relevant considerations and documents.

12. **Earth and Water Analyses.** The comment's interests in disclosing a wider range of public health impacts due to environmental quality are acknowledged. The EIS analysis does not conclude that significant adverse impacts to public health would result from earth and water impacts. As described in Draft EIS Section 3.1.3, the continued application of the City's existing policies, review practices and regulations, including the operational practices of Seattle Public Utilities, would help to avoid and minimize the potential for significant adverse impacts for these environmental elements. Other investigations of public health impacts, beyond the cited air quality evaluation, were not included in the scope for this programmatic EIS.

13. **Transportation Model.** PSRC's final 2014 Household Travel Survey data was not released in time for inclusion in the Draft EIS. The new release of data and revised mode share estimates are incorporated into the analysis of all alternatives, including the Preferred Alternative, see Final EIS Chapter 2 and Section 3.1. PSRC is undertaking a project to improve the travel demand model such that it is more sensitive to shifts to biking, walking and transit trips. However, this model is not yet ready for application and the City is using the best currently available tool for analysis.

14. **Placemaking Typologies for Urban Villages.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Cited concerns regarding the character of new development and its role in affecting neighborhood character are typically addressed through the City's design review program, including numerous neighborhood-specific design review guidelines. Also, as documented in the Draft EIS, future impacts to historic resources would be addressed through project level SEPA review and historic preservation requirements (Seattle Municipal Code Title 25), and development regulations to protect views are contained in the City's land use code (Seattle Municipal Code Title 23).

15. **Growth Monitoring.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

16. **Impacts to Other Government Services.** The Draft EIS was not scoped to include, and thus does not consider the potential impacts to other government services, such

as the departments of Planning and Development, Housing and Neighborhoods, because there are no established standards for these services and no known linear relationship between population and demand for these services. Separate from this action, it should be noted that the City is proceeding with a reorganization of some of the services referenced in this comment to integrate strategic planning functions more comprehensively.

17. **Closing Comments.** The comments are noted.

Letter No. 14 Haller Lake Community Club

1. **Criminal Activity.** See response to Letter No. 8, Comment No. 15. Specifically, the City has found that many mixed use neighborhoods do not have higher crime rates. As noted in the response to Letter No. 8, Comment No. 15, crime is influenced by many factors beyond land use, density and population. The Draft EIS does discuss Crime Prevention Through Environmental Design (CPTED) and other Seattle Police efforts to reduce crime. It is acknowledged that the Police Department is continually working to analyze and plan for efficient resource deployment with the intent of reducing crime in high crime areas and throughout the city.

   With respect to the Bitter Lake area, the planned new facility at N 130th St/Aurora Ave N is anticipated to accommodate additional staff to support police protection needs in this area.

2. **Zoning and Density.** The EIS focuses on urban centers and urban villages because these areas are where the majority of future growth in Seattle will occur. Neighborhoods that lie outside urban center or urban village boundaries, such as most of the Haller Lake vicinity, are not analyzed in great detail due to the low amount of future growth anticipated for these areas. As shown on Figure 3.4-11 on page 3.4-16 of the Draft EIS, areas outside urban centers and urban villages are anticipated to experience a net change in housing density of less than 1 unit per acre. It is acknowledged that Alternative 4 and the Preferred Alternative studied in the EIS, include the possible action of designating a new urban village or light rail station area, which could lead to future proposed changes to zoning or land use designations that would increase permitted densities in the Haller Lake area. This, however, would occur through future land use action proposals that would be accompanied by additional public outreach and additional analysis once options for land use changes are identified in more detail. This kind of action may depend on whether Sound Transit makes future decisions that will indicate more clearly whether a light rail station at N 130th Street/Interstate 5 will occur sooner, later, or not at all.

3. **Traffic Safety.** There are no specific plans for a change in street use related to this proposal. This is a programmatic Draft EIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Individual development projects will undergo separate SEPA review; any street use changes that could result from future

possible City planning-related land use actions, or individual developments, will be determined at that time. It is acknowledged that maintaining and improving safety of street use and traffic conditions is important and relevant today as well as with potential future growth in the Haller Lake neighborhood. The City has a traffic safety program in place, with a goal of zero traffic fatalities and serious injuries by 2030. The policies and strategies supporting that goal will be pursued regardless of the land use alternative selected. See Draft EIS pages 3.7-14 and 3.7-45 for details.

4. **Potential Village at NE 130th St.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the description of the Alternatives, including the Preferred Alternative, in Chapter 2 of this Final EIS.

5. **Future Land Use Designations.** The description of possible Future Land Use Map changes continues on Draft EIS page 2-28 following the portion quoted in the comment. Also, impact discussion for this concept is provided on pages 3.4-31 and 3.4-35. For Haller Lake, if a new urban village is designated, the change in mapping principles would allow for a generalized mapping of the urban village on the Future Land Use Map, which would allow for flexibility in the development of possible area rezone patterns, if such actions are pursued at a later date. Under current Future Land Use Map practices, the presumed approach would necessitate the City first defining land use designations by land use category but in relatively specific geographic detail on the Future Land Use Map, whether rezones would immediately occur or not.

6. **Alternative 1.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

7. **Alternatives 2 and 3.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

8. **Alternative 3.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

9. **Alternative 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 15 Historic Seattle

1. **Historic Preservation.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

2. **EIS Analysis.** These comments conflate the SEPA "elements of the environment" with the topical elements of the Comprehensive Plan itself. Draft EIS page 1-1 indicates revisions are being made to the Comprehensive Plan itself; and page 2-7 lists all of the elements of the City's existing Comprehensive Plan and states that the City is considering and updating elements of the Comprehensive Plan as part of the comprehensive plan update process. The SEPA elements of the environment are

different than the Comprehensive Plan elements, because SEPA describes distinct topical categories that comprise the natural or built environment, per State law. The scope (range of topics studied) of the EIS was defined during a scoping process in 2013–2014 that included a lengthy opportunity for public comment. The lead agency (Seattle DPD, now SDCI) determined that historic preservation was not included in the EIS due to a lack of probable significant adverse historic preservation impacts to be generated by the Comprehensive Plan update.

Historic preservation policy guidance is included in the Comprehensive Plan as part of the draft Land Use element. Draft Comprehensive policy language is intended to maintain or enhance the strength of the City's commitment toward historic preservation purposes.

3. **Environmental Analysis.** The comments are noted. See the response to Comment No. 2, this letter.

   The EIS considers the natural environment elements of earth and water quality, air quality and greenhouse gas emissions, and noise. The EIS considers the built environment elements of land use (patterns compatibility, height, bulk and scale), relationship to plans and policies, population, employment and housing, transportation, public services and utilities.

4. **Preservation and GHG Emissions.** Facts and research conclusions about the value of building stock preservation in helping to avoid greenhouse gas emissions are noted. City departments, such as the Office of Sustainability and Environment, are developing other actions that will encourage and require improved performance in existing buildings over time. However, those actions are not a part of the action considered in this EIS, which is the Comprehensive Plan update.

   Analyzing the potential greenhouse benefits of preserving more existing buildings was not scoped to be included in this EIS. Such an analysis would require speculation on several points, not the least of which would be whether more population growth could be accommodated in retrofitted or re-used existing buildings, and how much of the 20-year growth estimates could be accommodated in that manner. Such an analysis would be less suited to the purpose of the EIS, which is oriented toward identifying worst-case environmental impacts. See also the response to Comment No. 5, this letter, below.

5. **Mitigation Strategies.** Community character is considered in the EIS through the discussion of land use patterns, land use compatibility and height, bulk and scale. It is acknowledged that the EIS does not focus on a consideration of impacts that might occur in a future scenario where there is greater preservation of existing buildings and structures and more sensitive forms of infill development. This is largely because the purpose of an EIS is to consider potential significant adverse impacts of the proposal. Because preservation of existing structures and patterns of development are unlikely to result in significant adverse impacts, the focus of the discussion is on potential impacts resulting from new development. Also, the impact analysis assumes continuation of the protective policies of historic preservation rules and policies in the City's codes today,

with no expected decrease in the probable level of protectiveness of existing buildings. A wide range of buildings are likely eligible to be reviewed for their historic preservation merit in the future; the EIS future growth scenario merely assumes the existing processes and criteria on historic preservation and landmarking merit would continue to be employed as they are today. Proposed comprehensive plan policies related to preservation are found throughout the Draft Comprehensive Plan, including the Land Use, and Neighborhood Planning elements.

6. **Housing Affordability and Social Sustainability.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability. See also the Draft Comprehensive Plan Land Use, Housing, Transportation and Neighborhood Planning elements for policy guidance related to walkable compact areas.

7. **Land Use Element.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Historic preservation policy guidance is included in the draft Comprehensive Plan's Land Use Element. The City's existing preservation policies and regulations will continue to be supported in the updated Comprehensive Plan.

8. **Preserve Historic and Cultural Resources.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 16 Housing Development Consortium of Seattle-King County

1. **Planning Efforts.** The commenter's appreciation of Seattle's efforts to plan for growth while advancing equity and the support for the proposed Draft Comprehensive Plan's amendment on use of city surplus land for affordable housing is noted. Regarding affordable housing and the City's Housing Affordability and Livability Agenda (HALA), see Final EIS Section 4.3.2, Housing Affordability.

2. **Mitigation Strategies.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Regarding mitigation strategies to address housing affordability and displacement, the Draft EIS identifies existing strategies in the mitigation section, and the draft Housing Element will guide the development of future mitigation strategies, such as those prioritized by HALA. Specific comments addressing home ownership, housing affordability, and displacement are addressed in responses to Comments #3, 4 and 5, below in this letter.

3. **Home Ownership.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the Draft Comprehensive Plan Housing Element for applicable policy guidance. In addition, some policies currently being explored by HALA include consideration of options for increasing access to Sharia-compliant loan products programs that would prevent displacement of low-income homeowners who are experiencing financial hardships (HALA Recommendations, 2015).

4. **Housing Affordability.** See Final EIS Section 4.3.2, Housing Affordability.

5. **Displacement.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also Final EIS Chapter 2 for a description of the Preferred Alternative, which incorporates changes based on the findings of the draft Growth and Equity Analysis. Draft Comprehensive Plan Growth Strategy, Land Use and Housing element include policy guidance that address displacement.

6. **Closing Comments.** The comments are noted.

Letter No. 17 Interim CDA, and Seattle Chinatown International District Preservation and Development Authority

1. **Chinatown/International District.** The comments are noted.

2. **Growth and Equity Analysis.** As described in the Draft EIS, the City of Seattle has identified equity as a high priority issue and launched an Equitable Development Initiative specifically focused on clear policy guidance for equitable growth and development that will be incorporated throughout the Comprehensive Plan. Although a fundamental policy issue considered in the Comprehensive Plan, equity is not identified as an element of the environment for consideration in an EIS, either in the SEPA Rules (WAC 197-11-444) or in Seattle's SEPA policies and procedures (SMC 25.05.675) The EIS environmental analysis is intended to be used by decision-makers in conjunction with other policy considerations and documents in making final decisions on proposals.

   In recognition of the importance of this issue to citizens, this Final EIS includes updated information about the separate draft Growth and Equity Analysis, see Final EIS Section 4.3.2.

3. **Growth and Equity Analysis.** See Final EIS Chapter 2, Description of the Preferred Alternative. This alternative was influenced by the findings and considerations of the separate draft Growth and Equity Analysis.

4. **Focus growth in high opportunity/low displacement areas.** The comment's request for alternative growth strategies and investments to avoid displacement and equity impacts is acknowledged. See Chapter 2 for more discussion of the Preferred Alternative, which was formulated after publication of the Draft EIS and was guided by the findings and considerations of the separate draft Growth and Equity Analysis.

5. **Displacement.** In Draft EIS Section 3.6, the description of displacement includes direct displacement, resulting from redevelopment, and displacement as a consequence of market forces, in which rising prices may cause residents and businesses to be displaced due to lack of affordability, see excerpt below.

   As growth continues in Seattle and development accelerates to meet increasing demands for housing as well as commercial and retail space, some existing uses are likely to be redeveloped to accommodate new growth, creating a potential for displacement of

existing homes and businesses. This displacement would occur where there is demolition and eviction, as well as where market forces would increase the cost of living or doing business to a level that is no longer affordable to certain groups. (Draft EIS page 3.6-20)

For a discussion of updated information in the separate draft Growth and Equity Analysis, see Final EIS Section 4.3.2. This expanded definition of displacement is used in the separate draft Growth and Equity Analysis and in development of the Preferred Alternative and Draft Comprehensive Plan policies.

6. **Definition of Marginalized Communities.** The definition of marginalized communities has been expanded to include small businesses. It is also noted that the Draft EIS discussed potential displacement impacts on businesses in its analyses on pages 3.6-20 through 3.6-33, including possible mitigation strategies.

7. **Displacement.** The commenter states that the VMT and GHG emissions are understated because low-income households may be displaced to lower-cost suburbs and forced to commute by car. While there may be anecdotal information about this displacement trend, there is no reliable data that can provide insight to whether displacement occurs or where people are being displaced to. A state of the practice model was used to estimate GHG emissions from VMT, and this tool did not have evidence of displacement with neighboring cities.

   Draft EIS Section 3.6 identifies potential mitigation to address potential displacement that may result from the alternatives. In addition, see the description of the Preferred Alternative in Final EIS Chapter 2, which adjusts growth estimates to help address displacement.

8. **Historic Preservation.** See response to Letter No.15, Comment No. 2.

9. **Closing Comments.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 18 International Community Health Services

1. **Access to Opportunity.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Chinatown/International District.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **C/ID Neighborhood Plan.** Thank you for your suggestion to pursue updates to the Chinatown/International District neighborhood plan. The City already has devoted resources to neighborhood planning during the Livable South Downtown zoning process, which also generated spinoff recommendations and strategies for neighborhood growth. Also, the City is also participating in planning work that is evaluating actions to improve Little Saigon's businesses and public spaces, with the Seattle Chinatown International District Public Development Authority (SCIDPDA). The Executive is also convening

a special task force on public safety and livability topics for this neighborhood. It is acknowledged that additional actions can be considered in the future to consider ways to direct investments that will make the greatest difference for the community in the neighborhood.

Letter No. 19 Lake City Neighborhood Alliance

1. **Clarification of Alternatives.** Lake City is included as a Hub Urban Village under all Draft EIS alternatives, but no boundary expansions of the Lake City Hub Urban Village are planned under any of the alternatives. Draft EIS housing growth assumptions for Lake City are for 1,400 units under Alternative 1 and 1,000 units under alternatives 2–4. For employment, the Draft EIS assumes 1,500 new jobs under Alternative 1, 900 new jobs for alternatives 2 and 3 and 1,200 new jobs under Alternative 4. For a description of growth assumptions for the Preferred Alternative, see Chapter 2 of this Final EIS.

2. **Growth and Equity Analysis.** The comment's variety of factual information and perspectives on existing conditions that highlight several challenges and limitations relating to Lake City conditions are noted. Planning staff in multiple City departments have taken this range of input into consideration as they reviewed and updated the equity evaluation framework. Specifically, they have reviewed factors relating to school performance and adjusted factors relating to transit, employment and educational accessibility, and sidewalk system completeness.

3. **Growth and Equity Analysis.** The comment's perspectives on lack of sidewalks in much of the neighborhood, and distant location to senior centers are acknowledged.

4. **Displacement.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The work that comes out of HALA is consistent with the intent of the proposed Comprehensive Plan and will be implemented as appropriate. The City Council has created the *Council Work Plan* for HALA Recommendations, which can be found on the City's website at: http://www.seattle.gov/council/committees/HousingAffordability/attachments/Reso.-31609---HALA-Work-Plan-Attachment-A.pdf.

5. **Public Outreach.** The commenter's preference for meetings with the neighborhood councils around the city is noted. Regarding public outreach, see Final EIS Section 4.3.2, Public Outreach.

6. **Alternative 4 Clarification.** Please see the response to Comment No. 1, this letter. As noted in the comment, because Lake City is not adjacent to a light rail station or a priority transit route, this Hub Village is not projected to accommodate the higher levels of growth estimated for the urban villages that are near light rail or priority transit routes.

7. **Fire Service Impacts.** See response to Letter No. 8, Comment No. 21.

8. **School Impacts.** The analysis in this programmatic Draft EIS is meant to provide a citywide analysis of the provision of public services over the next twenty years. The development of specific facilities will be analyzed and planned for more closely by the specific City entity involved in the project—in this case Seattle Public Schools. While the Comprehensive Plan will help guide future growth in the City, the District is responsible for providing sufficient school space to accommodate enrollment. Additionally, the City (SDOT) has an ongoing sidewalk program.

9. **Parks Impacts.** See response to Letter No. 8, Comment No. 23 related to the level of service standard noted in the Draft EIS. Figure 3.8-11 in the Draft EIS indicates that Seattle Parks and Recreation has identified the Lake City Hub Urban Village as an area with a gap in usable open space in parts of its area (northern edge and southeast corner).

   Seattle Parks and Recreation have several improvements and acquisitions planned for the Lake City area. Cedar Park is being renovated with funds from the Parks and Green Spaces Levy and will continue to be open to the public during non-school hours after the adjacent Cedar Park School is reopened. The shoreline access at NE 130th Street is being purchased by the City and will be re-opened to the public. The land banked site on 33rd Avenue NE is scheduled for development in 2016.

10. **Capital Facilities Planning.** The comment with respect to seeking assurance of funding for services, amenities and other investments to address growth-related impacts is noted. Please see the response to Letter No. 9, Comment No. 6 for more discussion of concurrency policies.

11. **Growth and Equity Analysis.** The comments with respect to north-end demographics changing substantially since 2010 are noted. Analysis in the EIS contains some information and data points for population and housing that are more recent than 2010. Also, the discussion of relative differences in the alternatives' proportion of assigned growth is forward-looking, assessing the projected growth in the period from 2015 to 2035. It is agreed that equity assessments should be mindful that demographic shifts will continue to occur over time, and that future allocations of city resources will have effects in all parts of the city, providing improvements and added service to some areas sooner, and some areas later.

12. **Growth and Equity Analysis.** Your comments about the Access to Opportunity map are acknowledged. Planning staff in multiple City departments have taken these comments and others into consideration by revising the equity and access to opportunity analyses maps. See the response to Comments No. 2 and 3, this letter.

13. **N 130th Potential Urban Village.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the response to Letter No. 9, Comment No. 6.

14. **Growth and Equity Analysis.** See Final EIS Section 4.3.2, Growth and Equity Analysis, for a discussion of updated information.

15. **Closing Comments.** See response to Comment No. 5, this letter.

Letter No. 20 Lake2Bay Coalition

1. **Lake2Bay Corridor.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Housing and Employment data.** The authors' information regarding housing and employment growth is noted but has not been reviewed or confirmed through the EIS process.

3. **Open Space.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

4. **Public Improvements.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

5. **Connectivity.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

6. **Benefits of Growth in the Central City.** The commenter's information about carbon footprints at various locations is noted but has not been reviewed or confirmed through the EIS process.

7. **Water Management Strategies.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

8. **Lake2Bay Benefits.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 21 Othello Station Community Action Team

1. **Growth Projections.** The EIS considers the potential impacts of the Draft Comprehensive Plan, which plans for future growth consistent with the requirements of the Growth Management Act and King County Countywide Planning Policies (CPPs). In order to test the sensitivity of the 20-year growth estimate, this Final EIS also considers the potential impacts of an additional 30,000 housing units by 2035; see Final EIS Section 3.1. If different levels of growth occur, the Comprehensive Plan can be revised to reflect changes through the regular annual review and amendment cycle.

2. **Alternative 4 and HALA Recommendations.** See Final EIS Section 4.3.2, Alternatives. The work that comes out of HALA is consistent with the intent of the proposed Comprehensive Plan and will be implemented as appropriate. The City Council has created the *Council Work Plan* for HALA Recommendations, which can be found on the City's website at: http://www.seattle.gov/council/committees/HousingAffordability/attachments/Reso.-31609---HALA-Work-Plan-Attachment-A.pdf.

3. **Growth and Equity Analysis.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. It should be noted that the Growth and Equity Analysis is a separate

document from the EIS. The EIS does disclose information developed in the Growth and Equity Analysis, in particular in Draft EIS Section 3.5 Population, Employment, Housing and in Final EIS Section 4.3.2

4. **Affordable Housing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

5. **Small Businesses.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

6. **Growth and Equity Analysis.** See the response to Comment No. 3, this letter.

7. **Alternative 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 22 Puget Sound Sage

1. **Displacement Impacts.** The displacement analysis is appropriate for a citywide programmatic EIS. Attempting to estimate precise levels of displacement for each alternative would be speculative, at best. The Draft EIS determines that displacement will differ by alternative and thus can only make a general determination of the location and general severity of the displacement. The alternatives analyzed are intended to help compare different courses of action and to identify approaches that could create the best outcomes, despite the anticipated growth.

   Consideration of the relative impacts of displacement was included in the Growth and Equity Analysis (a separate document than this EIS), which is being used by the City to inform the Comprehensive Plan update. See Final EIS Section 4.3.2 for information on the updated separate draft Growth and Equity Analysis.

2. **Population, Housing and Employment Mitigation.** Regarding housing affordability and population, housing and employment mitigation, see Final EIS Section 4.3.2, Housing Affordability.

3. **Modeling Displacement Impacts.** See response to Comment No. 1, this letter. The alternatives analyzed in this programmatic non-project EIS are intended to help compare different courses of action for long-term growth patterns influenced by comprehensive planning, and to identify approaches that could create the best outcomes, despite the anticipated growth.

   While it is possible that future land use actions and growth planning choices could lead to future demolition of low-income housing, the implementation of comprehensive planning policies and mitigation strategies may help create the opportunity to provide an even greater number of affordable units. The City's conclusions with respect to significant adverse impacts, and its discussion of mitigation strategies, reflects the level of information that is best suited to this programmatic non-project EIS. The comment's two quotations of SMC 25.05.675.I, of policy background and policy statement portions of the SEPA policies and procedures for Housing as an environmental element, are

acknowledged. This information is accurate, but it does not generate additional analytic obligations for this programmatic EIS. Impacts on particular population groups, such as the African American community mentioned, are primarily addressed in the separate draft Growth and Equity Analysis.

4. **Assessment of Displacement Impacts.** The Draft EIS recognizes that displacement will occur and that it is a challenge associated with affordability impacts. Discussion of displacement is found in the separate draft Growth and Equity Analysis, which has the specific intent of analyzing impacts on displacement and opportunities that will come as a result of Seattle's 2035 growth strategy. See Final EIS Section 4.3.2 for updated information about the separate draft Growth and Equity Analysis.

5. **Transportation Impacts of Displacement.** The discussion of vehicle ownership and displacement effects on the environment is noted.

   The comment's specification that the Draft EIS should be revised to reflect displacement effects on residential patterns is noted. This analysis, however, is located in the separate draft Growth and Equity Analysis, which has the specific intent of analyzing impacts on displacement and opportunities that will come as a result of Seattle's 2035 growth strategy.

   The commenter's finding that high-income residents in the same neighborhood as low-income residents are more likely to own and use vehicles despite proximity to an equal amount of transit is noted. The opinion that this will result in a net negative off-set of environmental gains of growth as more low-income residents are displaced and forced to buy cars is also noted. More analysis would be needed in order to make this determination on an alternative-by-alternative basis, especially given the upcoming changes to transit availability. However, the alternatives analyzed in the Draft EIS are intended to help compare these impacts, relatively. For example, alternatives 3 and 4 are highly transit-focused, and concentrate development in areas where the most people have access to multi-modal transportation opportunities. While this does create some concerns about displacement and affordability, access to transit and expanded transit systems will have a probable net positive effect on the region's commute patterns and environmental conditions.

   The point about neighborhoods with good transit having the greatest growth in vehicle registration is noted; however, this could be a result of various factors. For example, in Capitol Hill and South Lake Union, vehicle registrations are growing rapidly because housing units are coming onto the market that never existed before. Some of these owners will choose to keep cars at their homes, whether they're using them to commute or not. This change is different than an existing number of households now owning more cars than before. The article that is referenced in the comment also states that for every 100 adults, there has been a consistent number of vehicles over the last decade or so. However, car ownership in these transit rich areas, as mentioned in the comment, cannot be directly related to single-person vehicle commuting. In fact, Table 1 shows increases in carpool, public transit, and bike commuting.

6. **GHG Impacts of Displacement.** See response to Letter No. 17, Comment No. 7.

7. **Additional Alternative.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative. The Preferred Alternative builds on Draft EIS Alternative 4 while addressing the equity issues raised in this and other public comments.

8. **Growth Assumptions.** As described in the Draft EIS, the forecasts of 70,000 housing units and 115,000 jobs were prepared by the Washington Office of Financial Management and allocated to Seattle through a regional decision-making process. As established in the GMA, the Countywide Planning Policies (CPPs) must guide the allocation of population between cities and counties. In King County, this allocation is accomplished through a collaborative planning process led by the Growth Management Planning Council (GMPC), which consists of elected officials from King County, Seattle, Bellevue, other cities and towns in King County, special purpose districts, and the Port of Seattle. The allocation process and adopted allocations are documented in the King County Countywide Planning Policies. Please see this link for more information about the CPPs and GMPC: http://www.kingcounty.gov/property/permits/codes/growth.aspx.

9. **Family-sized Housing Strategies.** The Seattle Planning Commission's findings and action agenda regarding preservation of family-size housing are noted. The purpose of the EIS is to review and disclose potential significant adverse impacts of the alternatives related to the City's proposal to update the Comprehensive Plan. The EIS also identifies possible mitigation strategies to address significant adverse impacts, but does not otherwise propose strategies to achieve any particular policy direction. See the draft Housing Element of the Comprehensive Plan for policies that support housing opportunities for families.

10. **Job Impacts.** The EIS provides information about citywide employment by sector and distribution of employment by sector in the urban centers and villages. The impact analysis describes the potential distribution of employment by sector and the potential for displacement of existing businesses. The purpose of the EIS is to review and disclose potential significant adverse impacts of the alternatives related to the City's proposal to update the Comprehensive Plan. The EIS also identifies possible mitigation strategies to address significant adverse impacts of the proposed action, but does not otherwise propose strategies to achieve any particular policy direction. See the draft Economic Development Element of the Comprehensive Plan for policies related to employment.

11. **Air Impacts.** The finding of a less than significant adverse air quality impact in the Draft EIS is based on the potential impacts of the proposed alternative actions. As the commenter states, the existing effects of toxic air pollutant emissions are geographically disproportionate within the Seattle area as indicated in Figure 3.2-2 and Figure 3.2-3 of the Draft EIS. This disproportionality is consistent with the 2013 University of Washington study in the communities of South Park and Georgetown cited

by the commenter, which concluded that "Results generally indicated a wide degree of variation in pollution levels across the study area."

The Draft Comprehensive Plan provides policy guidance to guide local land use development within specific areas. The Draft Comprehensive Plan alternatives considered in the Draft EIS would not result in development of new freeways or specific stationary sources of air pollution. Consequently, impact assessment has centered on the appropriateness of land use development for each alternative and predominantly on the location of residential development and other sensitive land uses. While the Draft Comprehensive Plan alternatives include policies addressing growth of industrial in existing areas zoned for such uses, the alternatives would not expand areas designated for industrial use. The risks from siting of new or intensified industrial sources are within the purview of the Puget Sound Clean Air Agency, which requires screening risk analysis of such sources through its Regulation III Article 2, Review of Toxic Air Contaminants.

12. **Graham Street Station and Urban Village.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

13. **Closing Comments.** The comments are noted, see responses to comments in the letter.

Letter No. 23 Seattle Chinatown International District

1. **Open House Comment Summary.** The comments from the open house held by the Seattle Chinatown International District on June 4 about the Draft EIS and Comprehensive Plan are noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 24 Seattle Green Spaces Coalition

1. **Mitigation Measures.** Mitigation measures identified in the Draft EIS are appropriate for a citywide programmatic EIS and to the applicable element of the environment. Mitigation measures are identified in the EIS for situations where a significant adverse impact is identified. The mitigation measures include a mix of specific actions, potential policy or program recommendations or, where appropriate, identification of the existing regulatory and policy framework that would serve to mitigate impacts. For example, to address potential business displacement impacts, use of existing tools and programs, including Community Development Block grants, New Market Tax Credits, Section 108 leads, and contracts with community organizations, such as Washington CASH and Community Capital Development, is identified as likely aiding mitigation outcomes. As an example of a recommended new action the City could take, a noise mitigation strategy suggests that the Noise Ordinance could be updated to require best practices for noise control such as "quiet" pile-driving technologies and use of cushion blocks.

With respect to Earth and Water, Section 3.1.3 indicates that none of the identified impacts are deemed to be significant adverse impacts. And it accurately concludes that the continued application of existing policies, review practices and regulations

is expected to lead to avoidance or reduction of impacts to environmentally critical areas such that significant adverse impacts are not probable. Specific elements of the city's policies and regulations include the Seattle Municipal Code Title 22 (Building and Construction Codes), Title 23 (Land Use Code), Title 25 (Environmental Protection and Historic Preservation), Chapter 25.09 (Regulations for Environmentally Critical Areas), Chapter 23.60A (Shoreline Master Program Regulations), and others. Because of the substantive findings, there is not a need to define other mitigation strategies in this programmatic EIS.

2. **Parks Impacts.** See response to Letter No. 8, Comment No. 23. Also, see Section 3.2 of this Final EIS for revisions and clarifications that are pertinent to parks and recreation topics, including your comments. This clarifies that the findings are concluded to represent adverse environmental impacts but not significant adverse impacts. Also, the Final EIS (Chapter 2) clarifies the intent to discontinue the quantitative standards cited in this comment, and for new guidance to be developed through updates to the *Park Development Plan*. The *Park Development Plan* will include more analysis and indications of City strategies for addressing future needs and possibly topics such as potential uses for surplus land.

3. **Parks Impacts.** See response to Letter No. 8, Comment No. 23, and the response to Comment No. 2, this letter. Further, the City recognizes the public health and other benefits of parks and open space. These benefits underlie the City's efforts to provide more and better space where possible.

4. **Parks Mitigation.** See response to Letter No. 8, Comment No. 23, the response to Comment No. 2, this letter, and Section 3.2 of this Final EIS for description of revisions and clarifications to the parks and recreation impact analysis. This EIS acknowledges the identified findings as adverse impacts but not significant adverse impacts. It is not necessary to indicate proposed mitigation strategies for impacts that are adverse but not significant adverse impacts.

5. **Parks Mitigation.** The purpose of an EIS is to disclose information about significant adverse impacts to the environment and to identify a range of mitigation measures that could address identified significant adverse impacts. Please refer to WAC 197-11-400. The information in the EIS is intended to be used by decision makers when they consider taking an action, which in this case is text and map amendments to the Seattle Comprehensive Plan. If taken, this is a legislative decision that will be made by the City Council, and the City Council has the discretion to commit to particular mitigation measures. The Seattle Department of Construction and Inspections (SDCI), the lead agency for the EIS, can recommend that the City Council adopt a particular course of action and/or mitigation measures, but does not have the authority to commit the City Council to take a specific action, such as adopting legislation. For these reasons, mitigation is presented as a range of measures that the City Council may consider.

Additionally, the City has a process for disposal of surplus property that is designed to take into account many possible City priorities, including open space and recreation, housing, and other City service needs.

6. **Storm Water Impacts.** The comment references the summary of the Draft EIS. The discussion of drainage is found in Draft EIS Section 3.9 with respect to sewer and drainage utilities, and references to related topics are made in Section 3.1, Earth and Water Quality, particularly pages 3.1-6 through 3.1-9. Section 3.9 provides a description of the existing system, including maps of the separate and combined systems, drainage lines, ditch and culvert systems and capacity constrained areas. A description of existing management strategies, pertinent to future utility systems' conditions and performance, is provided on pages 3.9-12 through 3.9-14. As discussed in this section, existing management practices include requirements for developer-provided downstream improvements, capital improvements based on identified needs independent of development and stormwater code requirements, including on-site stormwater management, green infrastructure and other measures.

   Draft EIS Section 3.9 concludes that future development could result in increased flow and increased demand on drainage system capacity. However, due to existing management practices, no significant adverse impacts are identified. Also, refer to Final EIS Section 3.2, which includes revisions and clarifications to Draft EIS analyses on utility topics.

7. **Tree Canopy and GHG Emissions.** The City of Seattle has a two-for-one replacement policy with regard to tree removal that would be applicable to future development under the Comprehensive Plan, and has also implemented its 2013 *Urban Forest Stewardship Plan*. It should be noted that while newly planted smaller trees will take many years to replace the shade value of mature trees, the sequestration rate is highest over the initial 20 years of growth after which carbon in biomass slows with age, and is completely offset by losses associated with tree clipping, pruning and occasional death (IPCC, 2003).

   Also, refer to response to Letter No. 296, Comment No. 4 which addresses mitigation measures using buffer zones and filtration with respect to air quality exposures.

8. **Earth and Water Mitigation.** As the commenter notes, there is potential for adverse impacts related to disturbance of critical areas resulting from potential development. However, the continued application of the City's existing policies, review practices and regulations are concluded to avoid and minimize the potential for such impacts. Accordingly, the City is concluding that the overall potential future outcomes are not anticipated to be significant adverse impacts. See response to Comment No. 1, this letter.

9. **Shoreline Impacts.** The referenced Draft EIS section describes that the Shoreline Master Program (SMP) and applicable sections of the Land Use Code (SMC 23.60A) will apply to all future development that is proposed within waters of the state, adjacent shorelands and associated wetlands, and would mitigate the impacts of planned growth within

affected areas under any EIS alternative. In areal terms, the Draft EIS states that the largest extent of the City's shoreline resources are located adjacent to lower density residential areas and outside of designated urban villages and a relatively small portion of future growth would be planned for these areas. See Draft EIS pages 3.5-9 through 3.5-10 for the complete discussion and Final EIS Chapter 2 and Section 3.1 for a description of the Preferred Alternative and its relationship to designated shorelines.

10. **Risk Assessment.** As established in WAC 197-11-402, an EIS need only analyze the probable adverse impacts that are significant.

11. **Land Use Compatibility.** The development regulations contained in Title 23 of the Seattle Municipal Code were designed specifically to address the issues raised by this comment, including height limits, required setbacks, required landscaping, and buffers with surrounding uses. As a result, no additional mitigation measures are necessary.

12. **Tree Canopy.** See the response to Letter No. 5, Comment No. 3.

13. **Open Space.** "Development of usable open space within existing parks" refers to creating new facilities in areas of parks that are currently not developed for human use, such as has occurred at places like Magnuson Park, Discovery Park and others. Also, see the response to Letter No. 8, Comments No. 23 and 25.

14. **Expansion Areas for Urban Villages.** Urban Villages delineate areas where future development is planned to be concentrated. However, uses and development on individual properties are still regulated by zoning. While Urban Village boundaries would be expanded to include new territory, potentially including existing parks and open space, no changes in zoning are proposed for those properties as part of the Comprehensive Plan Update.

    If zoning changes were proposed in the future to allow private development on these properties, the City would be required to initiate a separate public process at that time.

15. **Climate-friendly City.** The EIS contains a review of potential GHG emissions associated with each alternative. This analysis is updated for the Preferred Alternative in Final EIS Section 3.1. In addition, the Draft Comprehensive Plan identifies the *Climate Action Plan* as an implementing plan that supports the Comprehensive Plan. Additional information about the *Climate Action Plan* may be found at this link: http://www.seattle.gov/environment/climate-change/climate-action-plan.

Letter No. 25 Seattle Nature Alliance (1)

1. **Support for Comments Submitted by Other Organizations.** The comment is noted.

2. **Tree Canopy.** See the response to Letter No. 5, Comment No. 3.

3. **Open Space Goals.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See the Draft Comprehensive Plan Open Space Element for information about proposed open space goals.

4. **Expansion Areas for Urban Villages.** See the response to Letter No. 24, Comment No. 14.

5. **Closing Comments.** The comment is noted.

Letter No. 26 Seattle Nature Alliance (2)

1. **Expansion Areas for Urban Villages.** See the response to Letter No. 24, Comment No. 14.

Letter No. 27 Seattle Neighborhood Greenways

1. **Multimodal Level of Service.** See the response to Letter No. 7, Comment No. 2.

2. **Commute Trips.** PSRC's final 2014 Household Travel Survey data was not released in time for inclusion in the Draft EIS. The new release of data and revised mode share estimates have been incorporated into the analysis of all alternatives, including the Preferred Alternative, in Final EIS Section 3.1. These estimates include mode share for all trip types, not just work trips.

3. **Alignment with Existing Plans.** See the response to Letter No. 7, Comment No. 5.

4. **Push the Envelope.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

5. **Visionary Alternative.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative in Final EIS Chapter 2.

Letter No. 28 South Communities Organizing for Racial/Regional Equity

1. **Unique Features of Southeast Seattle.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Growth and Equity Analysis.** See the response to Letter No. 17, Comment No. 2.

   As suggested by the comment, the Preferred Alternative was adjusted based on findings of the separate draft Growth and Equity Analysis. In addition, in recognition of the importance of this issue to citizens, this Final EIS includes updated information about the separate draft Growth and Equity Analysis, see Final EIS Section 4.3.2.

3. **Timing of Mitigation.** See response to Letter No. 24, Comments No. 1 and 5.

4. **Integrated Mitigation Strategies.** The comments are noted. The purpose of an EIS is to disclose information about significant impacts to the environment and to identify a range of mitigation measures that could address identified impacts. The

narrative of how to bring together affordable housing, transit, jobs and investment without displacement is part of the purpose of the Comprehensive Plan. See the Draft Comprehensive Plan for more information.

5. **Displacement Impacts.** The Draft EIS is a program-level analysis, and attempting to estimate precise levels of displacement for each alternative would be speculative, at best. The Draft EIS discloses information contained in the separate draft Growth and Equity Analysis and determines that displacement will differ by alternative and thus can only make a general determination of the location and general severity of the displacement. The alternatives analyzed are intended to help compare different courses of action and to identify approaches that could create the best outcomes, despite the anticipated growth.

6. **Environmental Impacts of Displacement.** See the response to Letter No. 17, Comment No. 5.

7. **Jobs.** See the response to Letter No. 22, Comment No. 10.

Letter No. 29 The Urbanist

1. **Opening Comments.** The comments are noted.

2. **Alternative 1.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

3. **Alternative 2.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

4. **Alternatives 3 and 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

5. **Proposed New Alternative.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 30 Transportation Choices Coalition, Feet First

1. **Updated Data.** The comments are noted. See the responses to specific data comments in responses to comments 2–6, this letter.

2. **Growth Projections.** The comment is noted. The Final EIS includes an analysis of a scenario derived from the Preferred Alternative that tests the sensitivity of impacts identified in the Draft EIS to increased growth levels, beyond what is proposed for the Comprehensive Plan. This sensitivity analysis assumes a growth estimate of 100,000 housing units, compared to the assumption of 70,000 housing units in the Draft EIS. Please see Final EIS Chapter 2 for a description of the Preferred Alternative and Section 3.1 for the sensitivity analysis.

3. **Mode Split Analysis.** PSRC's final 2014 Household Travel Survey data was not released in time for inclusion in the Draft EIS. The new release of data and revised mode share estimates have been incorporated into the analysis of all alternatives, including the Preferred Alternative, in Final EIS Section 3.1.

4. **PSRC Guidance.** With respect to the Draft EIS, the estimates of SOV mode share are from the project travel demand model which is based on PSRC's regional travel model with additional detail for Seattle's land use and transportation system. These results do not imply or reflect goals the City is setting.

   Final EIS Section 3.1 includes a new multimodal LOS metric using a mode share goal that targets a reduction in SOV travel. PSRC is undertaking a major effort to release a new type of transportation model that will be more sensitive to multimodal transportation options and the impacts on travel choices. This new model, SoundCast, is not yet ready for application. Additional information about SoundCast is available at: http://www.psrc.org/data/models/abmodel.

5. **Climate Action Plan.** See responses to Letter No. 7, Comment No. 5.

6. **Multimodal LOS.** See response to Letter No. 7, Comment No. 2.

7. **Bikeshed and Transitshed Graphics.** See response to Letter No. 7, Comment No. 11. Although "transitsheds" were not illustrated, access to transit service was considered in terms to walking distance to transit stations.

8. **Show Public Services Availability Within Walksheds, Bikesheds, and Transitsheds .** Please see the separate Growth and Equity analysis for more information about access to services, of which certain amenities and services are a part of two composite indices related to "access to opportunity" and displacement risks. The findings in maps illustrating those indices help portray varying degrees of mobility and accessibility to services and amenities.

9. **Traffic Safety Data.** This is a programmatic Draft EIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, it is speculative to forecast differences in future traffic safety.

10. **Pedestrian Master Plan.** Your comment is noted. The *Pedestrian Master Plan* is described on page 3.7-15 of the Draft EIS.

11. **Coordinated Planning With Schools.** Your comments about coordinating planning with the School District, including with respect to providing safe accessibility, is noted. For other information about school impacts, see the responses to Letter No. 8, Comments No. 27 through 32.

12. **Youth Engagement.** Your comment is noted.

13. **Graphic Formatting.** Your comment is noted.

14. **Alternative 4 Preferred but Doesn't Go Far Enough.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 31 Westwood-Highland Park Residential Urban Village Committee, and Westwood-Roxhill-Arbor Heights Community Council

1. **Community Needs: Prioritize This Neighborhood for Investment and Growth.** The Draft EIS is a citywide programmatic EIS that considers existing conditions, impacts and mitigation on a cumulative basis. As a citywide document, it is acknowledged that there is limited analysis of each specific urban center or village. See Final EIS Section 4.3.2, General Comments and Policy Considerations.

2. **Alternative 4: Include an Emphasis on this Neighborhood and Invest in Improvements More Equitably.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

3. **Community Profile.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

4. **Historically Inequitable Treatment, Community Needs, Capacity to Grow Residentially and Economically.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

5. **Need for Green, Usable Open Space, and Attention to Improving Schools Facilities and Academic Performance.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

6. **Transportation: Need More Pedestrian and Bicycle Improvements and Safety.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

7. **Water: Address Drainage Issues and Safety Issues in Roxhill Park.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

8. **Neighborhood Vision: More Ownership, Identity, Character, Cultural Diversity, Growth With Affordability.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

9. **Consider Neighborhood Needs in Comprehensive Plan and Through Focused City Efforts.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

10. **Prioritize Investment in the Neighborhood to Overcome Historic Inequities.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

11. **Specific Proposed Action Opportunities.** Your comments on specific strategic actions are noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 32 Abendroth, Terry

1. **Livable City.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Newcomers.** The comment is noted.

3. **Public Input.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

   The commenter's opinion is noted. The outreach for the Comprehensive Plan update process has included dozens of meetings over the last few years, as well as surveys and other online portals. Seattle's comprehensive planning team (now within the Office of Planning and Community Development) has received several thousand public comments from these various outreach modes. Plans for 2016 outreach on important citywide planning and growth topics will also include upcoming meetings relating to HALA-related implementation initiatives. For more information, see http://2035.seattle.gov/.

Letter No. 33 Abolins, Talis

1. **Density and Perspectives on the Alternatives.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Schools: City Should Facilitate Family-Friendly Housing Near Schools, and Collaborate With District to Preserve Land for School Expansion.** Your perspectives on encouraging the ability of families to live near schools and that the City should more actively coordinate to reserve land for future school expansions are noted.

3. **Advocates for Master Planning and City Cooperative Efforts with Schools.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The comment regarding engagement with the Seattle Public School District, specifically in relation to Franklin High School and the North Rainier urban village, is noted. As the City's comprehensive planning effort moves forward, it will continue to engage all City Departments and service providers including the Seattle Public Schools.

4. **Social Equity, Mobility and Education.** Your comments are noted. Draft Comprehensive Plan policies address access to education in several places, including policies GS2.6, T5.8, H5.1, and Goal CW4 and supporting policies. Also, the City is continuing to plan in the North Rainier urban village for long-term transit-oriented development and infrastructure improvements including transportation system and other utility improvements.

5. **Manage Displacement Risks and Promote Actions Toward Access to Opportunity.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Please also see Final EIS Section 4.3.2, Growth and Equity Analysis for an updated discussion.

6. **Affordable, Diverse Neighborhoods that Address Gaps in Provision of Amenities and Infrastructure.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. This letter's attachment referenced in the comment is included as Appendix B.6 to this Final EIS.

7. **Demographics of Growth.** The comments are noted. Demographic characteristics of Seattle's population, including recent in-migration trends, comparisons to King County trends, age, household size, income and poverty levels, domestic or foreign-born populations, and race/ethnicity, are discussed in Draft EIS Section 3.6, Population, Employment and Housing. This provides general perspective on the possible composition of future population growth, which will be used by decision-makers going forward in the Comprehensive Plan update process.

8. **Addressing Critical Problems and Deficits in Capital Planning to Promote Livability and Equity.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The attachments referenced in the comment are included Appendix B.6 of this Final EIS. Draft Comprehensive Plan goals and policies that address the adequate provision of capital facilities include goals and supporting policies TG10, CFG1, PG1, CWG7 and UG1.

Letter No. 34 Allen, Tim

1. **Affordable Housing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 35 Allen, Tom

1. **Need for a New Alternative.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 36 Allred, Jonathan

1. **Prefer Alternative 4.** See Final EIS Section 4.3.2, Alternatives.

Letter No. 37 Anonymous (1)

1. **Apodments.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 38 Anonymous (2)

1. **Displacement.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Draft EIS Section 3.6 acknowledges the risk of displacement in

urban villages in South Seattle and notes that additional discussion of equity and displacement can be found in the separate draft Growth and Equity Analysis.

See also Final EIS Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to help address displacement and Section 4.3.2, Growth and Equity Analysis for updated information.

Letter No. 39 Anonymous (3)

1. **Need for a New Alternative.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

2. **Recommended New Alternative.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 40 Anonymous (4)

1. **Displacement.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to help address displacement.

Letter No. 41 Anonymous (5)

1. **Desire to be a Seattleite is Diminishing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 42 Anonymous (6)

1. **Upzone Light Rail Station Areas and Abolish Parking Minimums.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Chapter 2 for a description of the Preferred Alternative.

2. **Enable More Attached Dwelling Units.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Set Higher Priority on Multimodal Transportation Improvements.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The Draft EIS Transportation Element describes the City's recommended priorities for transit and walking/biking and provides recommended policy guidance for transit and walking/biking infrastructure.

Letter No. 43 Anonymous (7)

1. **Less Politics and Less Expensive Programs.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 44 Anonymous (8)

1. **Woodland Park Zoo.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 45 Anonymous (9)

1. **Build More Housing for More Affordable Choices.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 46 Anonymous (10)

1. **Need for a New Alternative.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 47 Anonymous (11)

1. **Tree Preservation.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 48 Anonymous (12)

1. **Lack of Confidence in City Planning; Support Equity, Diversity, Affordability, Mobility Choice, Pedestrian Safety.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 49 Anonymous (13)

1. **Rezone Preference for Beacon Hill near the VA Hospital.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See Final EIS Chapter 2 for a description of the Preferred Alternative.

Letter No. 50 Anonymous (14)

1. **Timing.** Your comment is noted. As you may know, voter-approved Proposition 1 has already added back more than 220,000 hours of bus service to the city's bus routes.
2. **Developers Should Pay for Infrastructure.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 51 Anonymous (15)

1. **Distribute Density and Preserve Single Family Homes.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 52 Anonymous (16)

1. **Walkable School Siting and School Choice Policies.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 53 Anonymous (17)

1. **Strategies for Growth: Prefer Alternative 2 for Growth Until Transportation and Infrastructure Catch Up.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Alternatives, and Chapter 2 for a description of the Preferred Alternative.

Letter No. 54 Anonymous (18)

1. **Traffic Controls.** It is acknowledged that there may be a need for additional traffic controls at some intersections as travel demand increases. However, the programmatic Draft EIS addresses area-wide land use zoning changes from a cumulative perspective. Since the actual location and size of future development is unknown at this time, additional location-specific detail of future traffic control improvements would be overly speculative. The Seattle Department of Transportation will monitor traffic operations through their existing programs and implement changes as needed.

Letter No. 55 Anonymous (19)

1. **West Seattle Future Growth Underestimated and Same in All Alternatives.** Draft EIS Figures 2-8 through 2-13 show that there are no proposed changes to the urban village boundaries in West Seattle under alternatives 1, 2 and 3. However, for Alternative 4, EIS Figures 2-14 and 2-16 show potential expansion of the West Seattle Junction Urban Village, shaded in dark orange. Also, the Preferred Alternative in this Final EIS includes the same urban village boundary change. The City's planners are aware of zoning conditions in the West Seattle Junction vicinity. Varying growth assumptions are evaluated for this urban village – ranging from 1,200 up to 3,000 dwelling units, and between 600 and 2,500 additional jobs (Alternative 4); see Final EIS Table 2–3 and Table 2–4 for housing and employment growth assumptions, respectively, in the urban villages. See also Final EIS Chapter 2 for a description of the Preferred Alternative.

Letter No. 56 Anonymous (20)

1. **South Seattle: Too Much Density and Displacement, and Request to Curb Gentrification.** For discussion of equity and displacement, see the separate draft Growth and Equity Analysis. See also Final EIS Section 4.3.2 for updates to the separate draft Growth and Equity Analysis and Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to help address displacement.

Letter No. 57 Anonymous (21)

1. **Diversity.** The term diversity is used in a variety of contexts in the Draft Comprehensive Plan, including demographics and cultural characteristics, employment opportunities, built character of neighborhoods, households and housing types, and others.

Letter No. 58 Anonymous (22)

1. **Prefer Alternative 3.** The comments are noted. See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 59 Anonymous (23)

1. **All alternatives objectionable.** The comments are noted. See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 60 Anonymous (24)

1. **Support Small-Scale Infill Ground-Oriented Housing Options.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the Draft Comprehensive Plan Housing Element recommended policy guidance related to infill housing.

Letter No. 61 Anonymous (25)

1. **Locate Growth in Core of Seattle per Alternative 2.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Chapter 2 for a description of the Preferred Alternative.
2. **Avoid Displacement and Loss of Diversity.** See Final EIS Chapter 2 for a description of the Preferred Alternative and Section 4.3.2 for a discussion of updates to the separate draft Growth and Equity Analysis.
3. **Low-Density Housing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 62 Anonymous (26)

1. **Planning Recommendations.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 63 Anonymous (27)

1. **Neighborhood Growth and Density: Allocate Growth to High-Income Neighborhoods Too.** As shown in EIS tables 2-2 and 2-3, the EIS includes housing and employment growth assumptions for all urban centers and villages in Seattle. Please see also Final EIS Chapter 2, which describes the Preferred Alternative and identifies future growth assumptions for Seattle's urban villages and centers.
2. **2nd Ave Bike Lane.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Separated Transit.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
4. **Parking Requirements.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
5. **Priorities.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
6. **West Seattle Bridge.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
7. **Rent Increase.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
8. **Create a Planning Department.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The City has newly designated an Office of Planning and Community Development in 2016.

Letter No. 64 Anonymous (28)

1. **Tall Buildings, Light and Shadow** Impacts. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
2. **Development Review.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 65 Anonymous (29)

1. **Housing Costs.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 66 Anonymous (30)

1. **Better Integrate with Region, and Favor Alternative 2.** The comments are noted. Regarding regional integration, consideration of the larger region is incorporated into

the methodology of the EIS, including use of the Puget Sound Regional Council (PSRC) growth forecasts, regional guidance established through PSRC Vision 2040 and the King County Countywide Planning Policies (CPPs) and the PSRC regional transportation model. Draft EIS Section 3.7 discusses Vision 2040 and the King County CPPs.

Regarding the alternatives, see Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 67 Anonymous (31)

1. **Indoor Climbing Gym.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 68 Anonymous (32)

1. **Tree Preservation.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 69 Anonymous (33)

1. **Gentrification and Displacement.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See Final EIS Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to help address displacement. See also Draft Comprehensive Plan Growth Strategy, Land Use and Housing element policies that address displacement.

Letter No. 70 Anonymous (34)

1. **Discourage Families to Live in Seattle.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
2. **Parklets.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Location of Density in Core Neighborhoods.** See FEIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative, including the future growth estimates for all urban centers and villages in the City.

Letter No. 71 Anonymous (35)

1. **Recommendations for Equality and Mobility: Progressive Zoning and Transportation Policies.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
2. **Housing Affordability—See Houston's Example.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

3. **Like Houston Example, Enable More Rapid Housing Production.** Your comment is noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 72 Anonymous (36)

1. **Prefer Alternative 2.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.
2. **Planning Recommendations.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Homelessness.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 73 Anonymous (37)

1. **Survey Format.** The comments are noted.

Letter No. 74 Anonymous (38)

1. **Mitigate Displacement.** See Final EIS Chapter 2 for a description of the Preferred Alternative, which incorporates measure to minimize displacement. Displacement is also addressed in the Draft Comprehensive Plan Growth Strategy, Land Use and Housing element policies and the separate draft Growth and Equity Analysis.

Letter No. 75 Anonymous (39)

1. **Growth Near Light Rail Transit.** Draft EIS alternatives 3 and 4 are specifically focused around transit service. See also Final EIS Chapter 2, which describes the Preferred Alternative.
2. **Single Family Residential Neighborhoods.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 76 Anonymous (40)

1. **Illustrate or Explain the Alternatives Better.** The comments are noted.
2. **City Should Work with the School District.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Survey Content Could Be Explained Better.** The comments are noted.

Letter No. 77 Anonymous (41)

1. **Public Education is Critical.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 78 Anonymous (42)

1. **Planning Recommendations.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
2. **Corporation-Free Urban Villages.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **High-Rises and Birds.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
4. **Political Preferences.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 79 Anonymous (43)

1. **Downtown Density.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 80 Anonymous (44)

1. **Plan Deadline and Housing.** Regarding the plan deadline, the Comprehensive Plan may be amended annually as needed. Regarding housing, See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 81 Anonymous (45)

1. **Prefer Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 82 Anonymous (46)

1. **Seattle Schools Blog Comments.** The commenter's support for the statements on the Seattle Schools blog is noted.

Letter No. 83 Anonymous (47)

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 84 Anonymous (48)

1. **Alternative 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 85 Anonymous (49)

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 86 Anonymous (50)

1. **Highland Park.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 87 Anonymous (51)

1. **Social Justice.** The commenter's opinion is noted.

Letter No. 88 Anonymous (52)

1. **Public Outreach.** Regarding public outreach, see Final EIS Section 4.3.2, Public Outreach.

Letter No. 89 Anonymous (53)

1. **Displacement.** See the response to Letter No. 17, Comment No. 5.

   For a discussion of updated information in the separate draft Growth and Equity Analysis, see Final EIS Section 4.3.2.

Letter No. 90 Anonymous (54)

1. **Industrial Zoning.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 91 Anonymous (55)

1. **Rezone Beacon Hill by the VA to Multifamily.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 92 Anonymous (56)

1. **Equitable Growth in Southeast Seattle: Need Livable, Equitable Pay and Workable Transit.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 93 Anonymous (57)

1. **Equitable Growth in Southeast Seattle: More Jobs, Wages, Housing, Transportation, Cultural Center and Health Care.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 94 Anonymous (58)

1. **Equitable Growth in Southeast Seattle: Transit-Oriented Development and Jobs Near Transit, and More Housing Variety in Lower Density Areas.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 95 Anonymous (59)

1. **Equitable Growth in Southeast Seattle: Address Criminalization of Youth and Reintegration of Felons.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 96 Anonymous (60)

1. **Equitable Growth in Southeast Seattle: Better Government Support of Local-Hire Programs.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 97 Anonymous (61)

1. **Equitable Growth in Southeast Seattle: Affordable Housing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Regarding affordable housing and displacement, see Final EIS Section 4.3.2, Housing Affordability.

Letter No. 98 Anonymous (62)

1. **Equitable Growth in Southeast Seattle: More Schools Funding.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 99 Anonymous (63)

1. **Equitable Growth in Southeast Seattle: Develop Job Opportunities, Empower Cultural Communities, Housing to Encourage Balance in Resident Population Demographics.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 100 Anonymous (64)

1. **Equitable Growth in Southeast Seattle: Encourage World Without Racism, Sexism and Capitalism.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 101 Anonymous (65)

1. **Retain 40% Tree Canopy Goal.** See the response to Letter No. 5, Comment No. 3.

Letter No. 102 Anonymous (66)

1. **Solve the Homelessness Problem.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 103 Anonymous (67)

1. **Need More Land for Attached Housing, and to Reduce Displacement and Segregated Neighborhoods.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 104 Anonymous (68)

1. **Growth and Equity Analysis.** See the response to Letter No. 17, Comment No. 2.
2. **Displacement.** See response to Letter No. 17, Comment No. 5.
3. **Historic inequities.** The issue of historic inequities is a focus of the separate draft Growth and Equity Analysis. Although a fundamental policy issue considered in the Comprehensive Plan, equity is not identified as an element of the environment for consideration in an EIS, either in the SEPA Rules (WAC 197-11-444) or in Seattle's SEPA policies and procedures (SMC 25.05.675) The EIS environmental analysis is intended to be used by decision-makers in conjunction with other policy considerations and documents, such as the separate draft Growth and Equity Analysis, in making final decisions on proposals.
4. **Environmental impacts of displacement.** See the response to Letter No. 17, Comment No. 7.

Letter No. 105 Anonymous (69)

1. **Neighborhood Character.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Rail in West Seattle.** The EIS assumes only existing and planned transportation improvements in the transportation analysis. Because there are no plans for rail service to West Seattle during the planning period, the EIS does not include it as an assumption in the analysis. Draft EIS Figure 3.7.6 shows the priority bus routes assumed to serve West Seattle.

Letter No. 106 Anonymous (70)

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 107 Anonymous (71)

1. **Change Lowrise 1 Development Standards.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Build More Centers for Social Services and the Homeless.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability. See also the Draft Comprehensive Plan Community Well-Being Element for policy recommendations that address service needs and access to food and shelter.

3. **Improve Quality in Light Industrial Districts.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 108 Anonymous (72)

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 109 Anonymous (73)

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 110 Arnold, Connie

1. **Affordable Activities for Kids.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Improve Transit Access.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Closing Comments.** Your comments are noted.

Letter No. 111 Ausink, Donald

1. **Municipal Rail/Streetcar.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 112 B., D.

1. **Light Rail to Ballard and West Seattle.** Your comments are noted. The Sound Transit ST3 funding package arriving soon for a public vote will address rail service to Ballard and West Seattle.

2. **Transportation and Parking.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 113 Bachhuber, Eric

1. **Add Parking in Ballard.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 114 Bailey, Sally

1. **Free Transit Service to Work.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 115 Barber, John

1. **Seattle Urban Forestry Commission.** The comment supporting the Seattle Urban Forestry Commission is noted. See responses to comments in Letter No. 5 in this Final EIS.

Letter No. 116 Bennett, John

1. **Georgetown.** Georgetown is part of the designated Greater Duwamish Manufacturing Industrial Center and none of the alternatives include any proposed changes to this designation. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 117 Best, Brooke

1. **Historic Preservation.** See response to Letter No. 15, Comment No. 2.

2. **Preservation and GHG Emissions.** See response to Letter No. 15, Comment No. 4.

3. **Preservation and Community Character.** See response to Letter No. 15, Comment No. 5.

4. **Preservation and Social Sustainability.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Please see the Draft Comprehensive Plan Land Use, Housing, Transportation and Neighborhood Planning elements for policy guidance related to walkable compact areas.

5. **Land Use Element.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Historic preservation is included in the draft Comprehensive Plan's Land Use Element. The City's existing preservation policies and regulations will continue to be supported in the updated Comprehensive Plan.

6. **Preserve Historic and Cultural Resources.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 118 Bond, Charles

1. **Housing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

   As described in the EIS, the proposal anticipates an additional 70,000 housing units by 2035. Residential growth would be focused on the City's urban centers and villages, but is expected to occur in all areas of the city. Alternatives 3 and 4 emphasize housing near light rail and major transit stations. See also the description of the Preferred Alternative in Final EIS Chapter 2, which carries forward the emphasis on focused growth around transit stations.

Letter No. 119 Bonjukian, Scott

1. **Alternative 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

2. **Consider Parking Maximums and Other Mobility and Safety Improvements.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See the Draft Comprehensive Plan for transportation policy guidance related to parking, safety and pedestrian routes.

3. **Affordable Housing Strategies.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

4. **Business Preservation.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Draft EIS Section 3.6 discusses the risk of business displacement under each alternative.

5. **Climate Change.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Potential greenhouse gas impacts associated with the Plan are discussed in Draft EIS Section 3.2 and in Final EIS Section 3.1 for the Preferred Alternative. The Environment Element of the Draft Comprehensive Plan contains proposed policy guidance for reduction in greenhouse gas emissions and preparing for likely impacts of climate change.

6. **Closing Comments.** The comments are noted.

Letter No. 120 Boroughs, Joslin

1. **High Displacement Risk.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

   Proposed mitigation to address affordability and displacement can be found in Draft EIS Section 3.6 and the separate draft Growth and Equity Analysis, Attachment B Equitable Development Measures. See also Final EIS Section 4.3.2, Updates to the Growth and Equity Analysis and Chapter 2 for a description of the Preferred Alternative.

Letter No. 121 Bostock, Janine

1. **West Seattle and Ballard Traffic.** The traffic analysis in the EIS is based on existing traffic conditions compared to projected conditions in 2035. The specific transportation analysis method is described in Draft EIS Section 3.7.

Letter No. 122 Bouse, Judy

1. **Public Transportation.** Your comments are noted.

Letter No. 123 Boyle, Mike

1. **New Development and Parking.** Your comments are noted.

Letter No. 124 Boyle, Susan

1. **Neighborhood Character and Historic Preservation in the Comprehensive Plan.** Your comments on preserving neighborhood character elements are noted. Also, see the response to Letter No. 15, Comment No. 7.

2. **Environmental Analysis.** The scope (range of topics studied) of the EIS was defined during a scoping process in 2013-2014 that included a lengthy opportunity for public comment. The lead agency (Seattle DPD, now SDCI) determined that historic preservation was not included in the EIS due to a lack of probable significant adverse historic preservation impacts to be generated by the Comprehensive Plan update. There will be a continuation of the protective policies of historic preservation rules and policies in the City's codes today, with no expected decrease in the probable level of protectiveness of existing buildings. Also see the responses to Letter No. 15, Comments 2 and 5.

3. **Closing Comments.** The comments are noted.

Letter No. 125 Brailey, Jenny

1. **Introductory Comments.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
2. **Affordable Housing and Neighborhood Character.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.
3. **Empty Storefronts in New Development.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
4. **Transit.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The EIS assumes transit service consistent with City of Seattle, King County Metro, Community Transit, and Sound Transit plans.

Letter No. 126 Brick, Andrew

1. **Limitations on Development in Single-Family Zones.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Alternatives 3 and 4 and the Preferred Alternative include the possibility of changes to existing single family land use designations in certain places outside of the urban centers and villages.
2. **Housing Affordability.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 127 Brown, Koffee

1. **Displacement and Equity.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Draft EIS Section 3.6 acknowledges the risk of displacement in urban villages in South Seattle and notes that additional discussion of equity and displacement can be found in the separate draft Growth and Equity Analysis. See also Final EIS Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to help address displacement and Section 4.3.2 for updated information related to the separate draft Growth and Equity Analysis.

Letter No. 128 Brushwood, Christine

1. **Want Variety in Urban Village Character.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The Draft EIS alternatives assume different levels of development in each urban center and village, and differing functions, roles and character among them.

Letter No. 129 Bryan, Amanda

1. **Density and Growth.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The Proposed Action plans for 70,000 new households through 2035 and provides development capacity to meet this need. See Final EIS Chapter 2 for a description of the Preferred Alternative and Chapter 3.1 for a sensitivity analysis that evaluates potential impacts if 100,000 new households were to be added to Seattle through 2035. The Draft EIS and separate draft Growth and Equity Analysis discuss potential risk for displacement and measures to mitigate displacement. The draft Comprehensive Plan Land Use and Housing elements provide recommended policy guidance for managing future growth.

2. **Benefits of Density.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Draft Comprehensive Plan Capital Facilities Element includes recommended policy guidance for location of public services, and the Transportation Element for transit investments.

3. **Design Review and Density Done Right.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 130 Bryant, Jasmine

1. **Transit Service.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The Draft EIS transportation analysis identifies transportation impacts of each of the alternatives, assuming multiple modes of transportation, including single-occupant vehicle, transit and bicycle and pedestrian travel. The Draft Comprehensive Plan Transportation Element provides policy guidance for meeting mobility needs through multiple transportation options.

Letter No. 131 Busch, Brandon

1. **Affordable Housing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 132 Canamar, Robert

1. **Enforce Developer Agreements for Affordable Housing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 133 Caspar, Dianne

1. **Support for Building New Schools.** Your comments are noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Small Grocery Stores.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 134 Celt, Stephanie

1. **Equity and Displacement.** See Final EIS Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to help address displacement. Displacement is also addressed in the Draft Comprehensive Plan Growth Strategy, Land Use and Housing element policies and the separate draft Growth and Equity Analysis.

   Regarding displacement, see the response to Letter No. 17, Comment No. 5. For a discussion of updated information in the separate draft Growth and Equity Analysis, see Final EIS Section 4.3.2.

Letter No. 135 Chang, Albert

1. **Land Use Impacts.** The comments disagreeing with the conclusions in Draft EIS Section 3.4 are noted. See the responses to Comments No. 2 and 3, this letter.

2. **Downtown Development Standards.** This comment selectively cites Draft EIS text in a manner that misrepresents the extent of applicable Land Use Code regulation on future development in Downtown. The intent is to reinforce the commenters' arguments about, and objections to, the level of building bulk that is possible, primarily in the Downtown Office Core 2 zone (and possibly other zones), and in particular a lack of tower separation controls or similar strategies that might achieve greater building separation across alleys than the width of the alley itself. This is reflected by the property examples cited in the comments and the attached photos. The commenters' opinions and preferences with respect to desiring changes in established City Land Use Code regulations are acknowledged. However, this response rebuts a number of inaccuracies in argumentative points in the comment.
   a. ***Downtown height limits are unlimited in the commercial core:*** The description of existing zoning on Draft EIS page 3.4-12 disclosed this fact that is more accurately understood as applying only to the Downtown Office Core 1 (DOC1) zone that is present in the main commercial office core of Downtown, and not in the Downtown Office Core 2 (DOC2) zone or other zones in the Downtown Urban Center. It is accompanied by a density limit of 20 Floor Area Ratio (FAR) as also disclosed.
   b. ***No density limits in Pioneer Square:*** As was disclosed on Draft EIS page 3.4-12, the Pioneer Square neighborhood has comparatively low height limits and no FAR density limit. It should be understood that the City's zoning and policy choices in Pioneer Square are intended to allow for and encourage new building bulk character to be generally compatible with the blocky and lot-line-to-lot-line character of many of Pioneer Square's historic buildings. This strategy thus prescribes height limits as one of the primary defining factors of the buildable "envelope" of a property. Also, it is understood that other practices to receive permit approval include gaining an affirmative recommendation for approval from the Pioneer

Square Preservation Board, which reviews applications and advises applicants on how development may be accomplished in a fashion compatible with the historic neighborhood.

c. ***Residential density exempt from density limit in Downtown, resulting in "few of the restrictions intended to mitigate the adverse impacts identified:***" In most Downtown zones such as DOC2, the definition of the building envelope as well as density limits reflects an understanding that residential density is exempt from a density limit, and that residential use may fill the building envelope as long as it meets other regulatory controls. Such controls include upper-level development standards (see SMC 23.49.058, for DOC1, DOC2 and Downtown Mixed Commercial zones, for example), which include different maximum lengths of unmodulated facades when they are within 15 feet of a street lot line (ranging from 80 feet to 155 feet, smaller for higher portions of buildings), upper-level façade width limits (145 feet in certain circumstances), and an average residential growth floor area limit per story (12,700 square feet for taller towers in DOC2) paired with a maximum residential floor area of any particular story (16,500 square feet in DOC2). In addition, there is an access requirement that development usually must provide two extra feet on either side of an alley (which are typically platted at 16 feet) to widen a typical alley at ground level to 20 feet width. These are only brief explanations of DOC2 land use regulations or other rules that define what is possible in the design of buildings (e.g., defining the "building envelope" and other factors that address the building form), and to illustrate that the exemption of residential use density from a density limit does not equate to a lack of land use controls on what can be built. Also, it should be noted that current "tower spacing" rules for certain DMC zones and buildings above 160 feet are described in the Land Use Code (SMC 23.49.058.F) as well as other code text that indicates the potential for view corridors, green street setbacks, mid-block corridor setbacks, and setbacks if in proximity to the Pike Place Market Historical District. Such details are a limited portrayal of Land Use Code rules that are the City's regulatory prescriptions pertaining to height, bulk and scale controls.

d. ***Cosmopolitan and Olive 8 photo examples:*** The photos indicate two examples of proximity of buildings across alleys in the DOC2 zone, with primarily residential buildings next to primarily commercial buildings. It should be noted that the Olive 8 building was built after the other adjacent building, e.g., designers and developers explicitly understood that residential uses would be adjacent across an alley to a non-residential building. This is not a case of a newer commercial building creating a perceived adverse land use impact upon an older residential building.

To sum up, this comment's suggestion about a lack of effective regulatory controls misconstrues factual information about Downtown zoning presented in the Draft EIS.

3. **Downtown Development Standards.** Given the content in the response to Comment No. 2, this letter, the comment's assertions of significant adverse impacts and a lack of sufficient mitigation or lack of "mitigating regulations" in the Land Use Code are not credible as factual findings for this EIS. The comment inaccurately seeks to justify EIS

findings to be made to create an obligation for the City to make zoning amendments in selected zones in the Downtown Urban Center. Instead, the EIS record sufficiently demonstrates that it has disclosed types of adverse impacts that are expected to occur with future growth, and that it has concluded the disclosed impacts are not likely to be significant adverse impacts due to the ameliorating effects of the City's current regulations and practices. The City's regulations themselves are expressions of City policy and thus express the public interest about what forms of development may occur in zones across the city, including in the Downtown Office Core 2 zone that intentionally accommodates amongst the highest levels of height, bulk, and scale of buildings, and mixing of land uses of any location in the city. In that land use context, it is not surprising that properties are developed in a dense fashion, constrained to the extent defined by current Land Use Code regulations. Nor is it surprising that residential uses in buildings would be in relatively close proximity to other buildings that either exist or could be built in the future.

4. **Closing Comments: Downtown Residential Density.** The commenters' lack of opposition to residential density Downtown, a preference for "density done well," and a request to identify significant adverse impacts and mitigation, are noted.

Letter No. 136 Cito, Brian

1. **Local Economy.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Draft EIS Section 3.6 describes employment, income and poverty trends in Seattle.

2. **Preserve Industrial Areas.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. All of the alternatives considered in the EIS would preserve the Greater Duwamish and Ballard-Interbay-Northend Manufacturing Industrial Center designations.

3. **Homelessness.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability. See the Draft Comprehensive Plan Community Well-Being Element that addresses service needs and access to food and shelter.

4. **Affordability for Artists.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See the Draft Comprehensive Plan Arts and Culture Element for recommended policy guidance relating to support for artists and creative professionals.

Letter No. 137 Cochrane, Ric

1. **Support for Alternatives 3 and 4.** The comment is noted. See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 138 Cohen, Jackie

1. **Neighborhood Improvements.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 139 Cohn, Steven

1. **Alternative 4.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and responses to Comments No. 2–6, this letter, below.

2. **Specific Concerns.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and responses to Comments No. 3–5, this letter, below.

3. **Boundary Changes.** As shown in Draft EIS Table 2-1, existing development capacity is the Ballard Hub Urban Village is 5,314 housing units and 5,606 jobs. In the Crown Hill Residential Urban Village, existing development capacity is for 1,556 housing units and 175 jobs. Because specific boundaries and specific intensities of land use changes are not yet determined for the possible expansion areas, capacity information in the potential expansion areas is not available. However, there is a City policy preference for gradual transitions in zoned intensity, which means zone changes potentially approved near low-density zones would predominantly consist of denser residentially-oriented zone categories such as Lowrise 1, 2 or 3. Height limit changes are possible in relation to those zone changes. The EIS analysis, such as in DEIS section 3.4.2, discloses the kinds of impacts anticipated.

4. **Zoning Changes in Expansion Areas.** A change to boundaries in an urban village would likely be accompanied by a change in zoning to allow higher density and intensity of development, consistent with the intent of the urban villages (also see the response to Comment No. 3, this letter). In these areas, the Draft EIS describes potential land use impacts as follows:

   …areas where the urban villages would be expanded, or where new urban villages would be created, are predominantly single-family residential in character, making them more sensitive to changes in development intensity and scale. For example, these areas may experience more occurrences of slightly sharper transitions in urban form as new, more intensive forms, such as townhomes and multi-family apartments, could be built alongside existing single family homes and properties. (Draft EIS page 3.4-33)

   Draft EIS Figures 3.4-20 and 3.4-22 show potential expansion areas for the Ballard and Crown Hill urban villages compared to existing height limits inside and outside of the urban village and describes potential impacts to height, bulk and scale as follows:

   As these figures show, the areas to be added to the existing urban villages are characterized by relatively low building heights and low FAR limits. Over time, height and bulk in these areas would increase with additional development, and localized conflicts

could occur as the area transitions to a more intense development pattern. (Draft EIS page 3.4-35)

5. **Impacts on Infrastructure.** The impacts of growth on infrastructure and public services are discussed in Draft EIS Sections 3.7 Transportation, 3.8 Public Services and 3.9 Utilities.

6. **Increased Capacity and Funding for Infrastructure and Services.** Your request for a policy supporting more infrastructure and services for urban villages subject to expansion is noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations. It should be noted that, as described in Draft EIS Chapter 2, development capacity is a theoretical estimate of how much new development could occur over an unlimited time period. Capacity represents the difference between existing development and the estimated amount that could be developed under current zoning standards. This contrasts from the planning estimates for growth, which are shown in Draft EIS and Final EIS Table 2–3 and Table 2–4. Planning estimates for growth represent an estimate for future growth through 2035 based on historical trends, market forces and capacity.

Letter No. 140 Coltrane, Mary

1. **EIS Analysis.** See response to Letter No. 15, Comment No. 1. Regarding public outreach, see Final EIS Section 4.3.2, Public Outreach.

2. **Historic Preservation: Arts & Culture Element? The topic of historic preservation is now included in the draft Comprehensive Plan's Land Use Element.** See response to Letter No. 15, Comment No. 7. Regarding community review and other elements of the Draft Comprehensive Plan, see the response to Comment No. 1, this letter.

3. **Environmental Analysis.** See response to Letter No. 15, Comment No. 4.

4. **Closing Comments.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 141 Colvin, Ansel

1. **Transit Frequency.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. As noted in the Draft EIS, the City of Seattle *Transit Master Plan* identifies as a goal to expand the Frequent Transit Network, which is composed of transit corridors that have, or are recommended for, frequent transit service. This level of service is currently defined to encompass routes with average service frequency of four trips per hour or better for at least 12 hours six days per week, and an average service frequency of at least two trips per hour or better for 18 hours per day on each day of the week.

Letter No. 142 Connell, Anne and Tim

1. **Seattle Urban Forestry Commission Letter.** The comments are noted. See the comments and responses to Letter No. 5, Seattle Urban Forestry Commission.

Letter No. 143 Connolley, Lisa

1. **City History and Heritage.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Regarding housing affordability and displacement, see Final EIS Section 4.3.2, Housing Affordability. Historic preservation is included in the Comprehensive Plan as part of the draft Land Use Element. Draft Comprehensive policy language is interpreted to maintain or enhance the strength of the City's commitment toward historic preservation purposes

Letter No. 144 Cook, Jeffrey

1. **Land Use Patterns.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 145 Cox, Connie

1. **Public Outreach.** Regarding public outreach, see Final EIS Section 4.3.2, Public Outreach.
2. **Alternatives 3 and 4.** The comments are noted. See Final EIS Section 4.3.2, Alternatives and updates to the Growth and Equity Analysis and Chapter 2 for a description of the Preferred Alternative.
3. **Alternative 5.** See Final EIS Section 4.3.2, Alternatives.

Letter No. 146 Cracolici, Jonathan

1. **Alternative 5 and Urban Village Strategy.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 147 Crane, Paul

1. **Density and Transportation Planning.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 148 Cutler, David

1. **Carbon Reduction Target.** See response to Letter No. 7, Comment No. 5.
2. **GHG Mitigation.** See response to Letter No. 7, Comment No. 5.

3. **Leadership in Climate Justice.** See response to Letter No. 7, Comment No. 5. Additionally, the draft Comprehensive Plan provides some direction for the City in meeting its goal of being climate neutral by the year 2050, such as Goal EG3 and supporting policies.

Letter No. 149 Dailey, James

1. **Integration of Transportation Modes.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The Draft Comprehensive Plan Transportation Element contains recommended policy guidance for integration of bicycle, pedestrian and transit modes.

2. **Affordable Housing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

3. **Vision 2020.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 150 Darnell, Joel

1. **EIS Analysis.** The lead agency considers the level of EIS analysis to be appropriate for a programmatic area-wide legislative proposal, consistent with the level of detail defined for the alternatives. It also includes possible mitigation strategies defined for identified significant adverse impacts, which decision-makers can use in evaluating their choices.

2. **EIS Alternatives Needed More Public Engagement.** Your comment is noted. The EIS documents public engagement in Chapter 2. See Final EIS Section 4.3.2, Public Outreach.

3. **Gap Analysis.** For applicable elements of the environment, the EIS discusses existing and future conditions that may generate environmental impacts, which is consistent with the purposes of EISs, per State law. Other types of "gaps" analysis sought by this comment may fall outside the scope of this EIS. This does not prevent the EIS from evaluating the implications of the alternatives' projected growth amounts and distributions.

4. **Vagueness of Possible Actions.** Your comments regarding possible strategies in Draft EIS Table 2-4 are noted. This information discloses the possibility that regulatory changes, as yet not defined, could be a complementary step to encourage more growth in certain areas under Alternative 2.

5. **Alternatives.** The commenter's opinion is noted. The EIS analysis, conclusions and recommended mitigation measures are intended to provide the public and decision-makers with environmental information to help inform choices and decisions.

6. **Alternative 1.** Alternative 1 represents the "No Action Alternative" and is based on current land use and zoning designations and development trends over the past 20 years. It is acknowledged that Alternative 1 does not incorporate emerging trends. The SEPA Rules requires all EISs include a no action alternative.

7. **East-West Travel.** The screenline volume-to-capacity evaluation addresses congestion impacts on arterial roadways. For this particular case, screenlines 7.11 and 7.12 include east-west arterials in the vicinity of Greenwood-Phinney Ridge: N 50th Street and N 65th Street across Screenline 7.11 and N 80th Street, N 85th Street, and N 105th Street across Screenline 7.12. So, the projected growth pattern is in fact recognized in the analysis. Auto volume forecasts for the individual arterials may be found in Table A.4-17 in the Draft EIS Transportation Appendix.

Letter No. 151 Dexheimer, Derek

1. **Support Alternatives 2 and 3.** See Final EIS Section 4.3.2, Alternatives.

Letter No. 152 Dockery, Janet

1. **Public Involvement.** Regarding public involvement, see Final EIS Section 4.3.2, Public Outreach.

2. **Mitigation Strategies.** See responses to Letter No. 150, Comment No. 4.

3. **Comprehensive Plan.** The formal comment period on the Draft Comprehensive Plan closed on November 20, 2015. However, there will continue to be opportunities for public comment on key issues and a public hearing in front of the City Council. See http://2035.seattle.gov/ for information on opportunities for public comment.

Letter No. 153 Dodge, Adam

1. **Change Approach to Zoning.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 154 Doom, C.

1. **Over-Accelerated Growth.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 155 Dorais, David

1. **Dark Sky Standards.** Your comment is noted.

2. **Finish Sidewalks and Sewers Where Not Present.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the Draft Comprehensive Plan Element for priorities for capital expenditure.

3. **One Building Cities.** Your comment is noted.

4. **East-West Bus Route Priority as Light Rail Feeders.** Your comment is noted.

Letter No. 156 Dowell, Chris

1. **EIS Open House.** While no additional EIS public hearings were held, additional public meetings to review the Draft Comprehensive Plan will occur in 2016. See Final EIS Section 4.3.2, Public Outreach.

Letter No. 157 Down, Adrian

1. **Homelessness.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability. The Draft Comprehensive Plan Housing and Community Well-Being elements contain policy guidance addressing homelessness, service needs and access to food and shelter.

Letter No. 158 Duthweiler, Diane

1. **Quality of Construction.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 159 Eddy, Lee

1. **History, Housing Affordability and Diversity.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 160 Eide, Christopher

1. **Displacement.** Draft EIS Section 3.6 acknowledges the risk of displacement in urban villages in South Seattle and notes that additional discussion of equity and displacement can be found in the separate draft Growth and Equity Analysis. See also Final EIS Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to help address displacement and Section 4.3.2 for updated information related to the separate draft Growth and Equity Analysis.

Letter No. 161 Ellis, Brian

1. **Alternatives 3 and 4 and Housing Affordability.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 162 Enns, Lisa

1. **Infill, and Single Family Neighborhoods.** Your preference for denser infill development in and near single-family neighborhoods is noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 163 Fenno, Greg

1. **Dense Development and Schools.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Impacts and mitigation strategies for schools under each alternative are discussed in Draft EIS Section 3.8 Public Services.

Letter No. 164 Fesler, Stephen

1. **Manage Growth Well.** Your comments are noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives.

Letter No. 165 Fillius, Jenny (1)

1. **Bus Parking and Inadequate Loading Zones.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 166 Fillius, Jenny (2)

1. **Housing and Bus Access.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 167 Flatt, Art

1. **Urban Villages and Excessive Growth.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Growth.** The Washington Growth Management Act requires cities, including Seattle, to demonstrate adequate capacity to meet projected growth over a 20-year period, in this case through 2035. As described in the Draft EIS, the forecasts of 70,000 housing units and 115,000 jobs planned for by the Proposed Action were prepared by the Washington Office of Financial Management and allocated to Seattle through a regional decision-making process.

Letter No. 168 Fleming Jr., Robert M.

1. **Monorail.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 169 Fleming, Bob

1. **Monorail.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 170 Foedisch, Robert

1. **Growth.** See response to Letter No. 167, Comment No. 2. Your comments are noted. The City's overall growth strategy, which focuses growth in urban centers and villages, would continue to guide growth, even if it occurs at a reduced rate.

Letter No. 171 Foltz, Mark

1. **Support Transit-Oriented Development and Minimize Displacement.** See Final EIS sections 4.3.2, General Comments and Policy Recommendations and updates to the separate draft Growth and Equity Analysis. See also Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to help address displacement risk. Draft Comprehensive Plan Growth Strategy, Land Use and Housing elements provide recommended policy guidance to reduce and minimize displacement.

Letter No. 172 Folweiler, David

1. **Open Space.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Draft EIS Section 3.8 considers open space impacts under each of the alternatives. See also the Draft Comprehensive Plan's Parks and Open Space Element for recommended policy guidance.

Letter No. 173 Fragada, Tony

1. **Focus on Existing Urban Village Plans and Shared Infrastructure Costs.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 174 Franzen, Carol

1. **Development Near Green Lake.** Your comments regarding past comments to the City on individual development projects are noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 175 Friedman, Gus

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives.

Letter No. 176 Friesen, Jeremy

1. **Preference for More New Residential Urban Villages.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. In the alternatives considered in the Draft EIS, alternatives 3 and 4 analyze one potential new residential urban village that could be located at N 130th/I-5, related to a new potential light rail station. This potential new residential urban village is also included as part of a future possible outcome in the Preferred Alternative, see Final EIS Chapter 2.

Letter No. 177 Gale, Kristy

1. **Affordable Housing.** See Final EIS Section 4.3.2, Housing Affordability.

Letter No. 178 Gautreau, Gary

1. **Green Rooftops.** Regulatory guidance such as Green Factor requirements encourages green rooftops. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Alternatives 3 and 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

3. **Seattle Subway West Tunnel.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 179 Gebert, Matt

1. **Survey Format.** The comment addresses map shading and formatting that are not part of the EIS. Neither Alternative 1 nor 2 propose any changes to boundaries of any urban center or village, so the maps are identical. The Draft Comprehensive Plan proposes to continue forward the urban village strategy and the Draft EIS considers four different approaches for carrying forward this strategy, including differing growth distributions.

2. **Survey Questions.** For an overview of the tools used to execute the plan, see Draft EIS Chapter 2, which includes a description of potential policy and regulatory tools for each alternative and the Draft Comprehensive Plan Introduction, which describes example plans, programs and regulations to implement the plan (Draft Comprehensive Plan pages 15–16).

Letter No. 180 Gebremicael, Yemane

1. **Equitable Growth, Engaging the Public, and Thinking About Sustainability for Social, Cultural, Economic, Community Life and Governance.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 181 Glass, Gabrielle

1. **Alternative 4.** See Final EIS Section 4.3.2, Alternatives.

Letter No. 182 Glickstein, Don (1)

1. **Cumulative Analysis.** This programmatic EIS analysis considers potential impacts for all elements of the environment from a citywide cumulative perspective. The analysis of the impact of existing policies on anticipated growth and the urban villages is partly reflected by the findings of Alternative 1, Continue Current Trends (No Action).

2. **EIS Analysis of Adverse Livability and Density Implications.** The comment makes assertions and assumptions that represent the commenter's opinions, most of which are only slightly relatable to EIS elements of the environment. Population demographics are discussed in Draft EIS Section 3.6 and in the separate draft Growth and Equity Analysis. Impacts of the alternatives on public services, including parks/open space and public safety are discussed in Draft EIS Section 3.8 (see also Final EIS Section 3.2 for revisions and clarifications). Potential transportation impacts are discussed in Draft EIS Section 3.7. Regarding cumulative impacts, see the response to Comment No. 1.

3. **Alternative 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, description of the Preferred Alternative.

Letter No. 183 Glickstein, Don (2)

1. **Cumulative Impacts.** Regarding cumulative impacts, see the response to Letter No. 182, Comment No. 1.

   Regarding crime, see the response to Letter No. 8, Comment No. 15. As noted, the Seattle Police Department is engaged in an ongoing effort to deploy its resources in the most efficient manner possible and to adapt to changing patterns of use and crime.

2. **Alternative 4.** See the response to Letter No. 182, Comments No. 2 and 3.

Letter No. 184 Glickstein, Don (3)

1. **Manufacturing Industrial Centers.** As described in the Draft EIS, no changes to the boundaries or uses in the Manufacturing Industrial Centers (MIC) are proposed under any of the alternatives. Employment growth assumptions vary between alternatives, but are all well within the capacity estimates, see Draft EIS tables 2-1 and 2-3. Potential land use compatibility impacts that may result from future employment growth are discussed in Draft EIS Land Use Element Section 3.4. Employment growth under each alternative is also discussed in Draft EIS Population and Housing Element Section 3.6. With respect to internal Comprehensive Plan consistency, Draft EIS Section 3.5 notes that all alternatives would maintain consistency with the broad objectives of

the Comprehensive Plan by continuing and reinforcing the City's urban village growth strategy. No changes are proposed for the designation and uses in the adopted MICs and it is reasonable to conclude that they will continue to be consistent with plan direction. This includes the Container Port Element, for which no changes are proposed in the Draft Comprehensive Plan.

2. **Family Wage Jobs.** Your concerns regarding protecting family wage jobs are noted. The Draft EIS Section 3.6 Population, Housing and Employment describe existing household income and employment patterns by sector. The impact analysis identifies that there is sufficient capacity to accommodate assumed employment growth in the City's urban centers, villages and MICs and notes that transit access, demographic trends and market factors are likely to influence which industry sectors located in various locations. This is an appropriate level of analysis for a citywide programmatic EIS.

3. **Transit and Transportation Analysis.** At the time of the Draft EIS, the City's designated level of service policy consisted of the screenline methodology to evaluate level of service for autos and transit. The Final EIS also includes discussion of proposed updated metrics. The Draft EIS uses the City's designated screenline thresholds, which include a threshold benchmark of 1.2 at some locations. The commenter states that the Draft EIS shows volume-to-capacity ratios of 1.2 in select corridors, but does not identify an impact. This is incorrect; none of the screenlines are forecast to operate at 1.2 or above under the EIS alternatives. None of the screenlines are forecast to exceed their designated thresholds; therefore, no significant adverse screenline-related impacts are identified.

   Transit routing assumptions were made based on the City's *Transit Master Plan* to study how the planned transit network would affect travel patterns. It is true that the current funding picture for King County Metro and Sound Transit is in question. However, the Draft EIS is a forward-looking document, and assumes the regionally accepted levels of future transit as directed by the Seattle Department of Transportation. It should be noted what while transit funding fluctuates in the short term, transit funding and service over the last 20 years has expanded substantially in the Puget Sound Region.

4. **Freight Mobility.** Because freight operates on the same roadways as general purpose traffic, the screenline analysis speaks to freight mobility. In addition, the travel time forecasts provided as supplementary data provide information regarding future traffic delay, a key factor for freight. The Draft EIS notes that traffic congestion is more difficult for freight to navigate and that trucks typically travel at slower speeds than general auto traffic. Potential speed and reliability improvements targeted at freight are discussed in the mitigation section.

5. **Land Use and Housing.** See Final EIS Section 4.3.2, Alternatives and General Comments and Policy Recommendations. The Draft Comprehensive Plan addresses housing diversity in the Housing Element. The Draft Capital Facilities, Parks and Open Space and Community Well-Being elements address many of the public facilities and services mentioned in the comment.

6. **Urbanist Alternative 5.** Your comments are noted. See Final EIS Section 4.3.2, Alternatives.

Letter No. 185 Glickstein, Don, (4)

1. **Urbanist Alternative 5.** Your comments are noted. See Final EIS Section 4.3.2, Alternatives.

Letter No. 186 Goodman, Jeremy

1. **Comments on Urban Village Approach and Aurora-Licton Urban Village.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Draft EIS Section 3.5 briefly describes existing Comprehensive Plan policy guidance for urban villages. Draft Comprehensive Plan Goal GSG2 and supporting policies described recommended policy guidance for urban villages. Briefly, the policies address public investment, boundaries, coordinated planning for services, infill development, density and intensity of development and directing the majority of future growth to center and villages.

2. **Development Proposal at N 95th Street.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Urban Villages and Less-Walkable Areas.** See response to Comment No. 1, this letter, above.

4. **Land Use and Transportation.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

5. **King County Right Size Parking.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

6. **Proposed Development.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

7. **Parking Standards.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

8. **Seeking Development That Helps the Neighborhood.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 187 Grembowski, Megan

1. **Affordable Housing and Displacement.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and updated information on the separate draft Growth and Equity Analysis. See also Final EIS Chapter 2 for a description of the Preferred Alternative. The issues of affordable housing and displacement are addressed Final EIS Section 4.3.2, Housing Affordability.

Letter No. 188 Gruen, Deric

1. **GHG Impacts of Displacement.** See response to Letter No.17, Comment No. 7.

Letter No. 189 Guerin, Keith

1. **Future Technology.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The Draft Comprehensive Plan addresses new technologies and their impact on transportation, energy and employment in the Transportation, Utilities and Economic Development elements, respectively.

Letter No. 190 Gulden, Don

1. **Observations on Growth Planning.** Your comments are noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
2. **Observations on Growth Planning.** Your comments are noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.
4. **Commentary on Alternatives 1–4.** Your comments are noted. See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 191 Gyncild, Brie (1)

1. **Distribute More Growth Outside of Urban Villages and Loosen Single-Family Zoning.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative. It is acknowledged that the urban village strategy, which focuses the majority of future development in centers and villages, is fundamental to the City's approach to the Comprehensive Plan. However, within these centers and villages, development character and density/intensity vary greatly. See Draft EIS Figure 3.4-3 for examples of the different building typologies in each designated center and village.

Letter No. 192 Gyncild, Brie (2)

1. **Pedestrian Master Plan.** The *Pedestrian Master Plan* was considered in the EIS transportation analysis.

Letter No. 193 H., Amy

1. **Diverse Transportation Needs.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the Draft Comprehensive Plan Transportation Element for policy guidance related to transportation options.

Letter No. 194 Hall, Andra

1. **Bikes, Buses and Pedestrian Transportation Modes.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the Draft Comprehensive Plan Transportation Element for more information on proposed policy guidance.

Letter No. 195 Hall, Steve

1. **Protect Belltown Community Character.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 196 Hallstrom, Eileen

1. **Survey Responsiveness.** The comment is noted.

2. **Downtown Traffic.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The Draft EIS transportation analysis considers potential transportation impacts on a cumulative citywide basis based on future growth to accommodate 115,000 jobs and 70,000 housing units, but does not include an analysis of specific development proposals or projects.

3. **Open Space.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The Draft EIS identifies open space needs and impacts associated with future growth to accommodate 115,000 jobs and 70,000 housing units on a cumulative citywide basis, but does not include consideration of specific development or open space projects.

Letter No. 197 Harris, Nancy K.

1. **Alternative 2.** See Final EIS Section 4.3.2, Alternatives.

2. **Opposed to Alternatives 3 and 4, McMansions and Multiplexes.** See Final EIS Section 4.3.2, Alternatives.

Letter No. 198 Heidner, Liz

1. **Would be Foolish to Overly Restrict Growth.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Use Development Standards to Prevent Harm.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Need More Affordable Housing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 199 Helm, Nancy

1. **Support Alternative 4.** See Final EIS Section 4.3.2, Alternatives.

2. **Enable More Accessory Dwelling Units.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **On-street Parking Should Not Always Be Free.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 200 Henrikson, Lars

1. **Alternatives are Too Similar.** See Final EIS Section 4.3.2, Alternatives. The four alternatives analyzed in the Draft EIS assume the same level of growth, but consider different patterns of density and intensity in the city's urban centers and villages. It is acknowledged that the Proposed Action would maintain consistency with the broad objectives of the current Comprehensive Plan, continuing and reinforcing the city's urban village strategy.

Letter No. 201 Herman, G.

1. **School District Planning.** See the response to Letter No. 8, Comment No. 27. Seattle Public Schools forecasts and plans for enrollment through five-year estimates with annual updates. Seattle Public Schools is working toward funding identified needs through several methods. While the City will continue to coordinate with Seattle Public Schools as the Comprehensive Planning Process moves forward, it does not have the responsibility of building new schools. If the School District determines that impact fees are an appropriate way to fund new schools, the City could work with them to link those fees to permit applications.

2. **School Capacity.** See responses to Letter No. 8, Comment No. 27 and Comment No. 1, this letter.

3. **Impacts of Growth and Effects Relating to Lack of School Capacity.** Your perspectives on what might happen after a shortfall in school capacity are noted. As described in the response to Letter No. 8, Comment No. 27, the District is engaged in an ongoing effort to anticipate future enrollment and plan facilities for it.

4. **Impacts of Growth.** See the response to Letter No. 8, Comment No. 27.

5. **Plan for Growth.** See responses to Letter No. 8, Comment No. 27 and Comment No. 3, this letter.

Letter No. 202 Hill, Gregory

1. **Existing Policies LU 59 and LU 60.** Please see the response to Letter No. 8, Comment No. 4.

2. **Single Family Zoning.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. As described in this Final EIS Chapter 2, alternatives 1 and 2 would not alter the existing urban village boundaries and alternatives 3 and 4 and the Preferred Alternative could result in an expansion of some boundaries as well as a possible new urban village at N 130th St/I-5.

3. **Single Family Zoning.** Please see the response to Comment No. 2, this letter. Probable effects relating to housing supply and affordability are addressed in Draft EIS Section 3.6 at a level of analysis appropriate for a citywide programmatic review. Population demographics are addressed in Draft EIS Section 3.5 at a level of analysis appropriate for a citywide programmatic review. Regarding potential impacts to tree canopy, see the response to Letter No. 5, Comment No. 1. The commenter's perspectives on adverse effects relative to loss of single-family homes are noted, but analysis to deeper levels of detail, as requested, is not required in this programmatic EIS.

4. **Alternative 1.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. This Comprehensive Plan update proposes to delete policies LU-59 and LU-60. However, because the same language from those policies remains in the Land Use Code, future rezone requests will still be subject to review with the standards included in these policies. Therefore, removal of these policies is not expected to produce any impacts.

5. **Urban Village Boundaries.** See Final EIS Chapter 2 for a description of the Preferred Alternative, including potential urban village expansion areas (the same as Alternative 4, except with the Fremont expansion area omitted) and the new potential urban village. Public outreach related to defining specific boundaries for urban villages proposed for expansion is planned for 2016. See http://2035.seattle.gov/ for more information.

6. **Existing Policies LU 59 and LU 60.** Please see the response to Letter No. 8, Comment No. 4.

Letter No. 203 Hittman, Suzanne

1. **Shuttle Bus Service.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Downtown Public School.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The City of Seattle works in partnership with the Seattle School District, the agency with the direct responsibility and authority for planning for school facilities.

Letter No. 204 Ho, Aric

1. **Commenter's Background.** The comment is noted.
2. **Alternatives 3 and 4 Preferred.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.
3. **Public Engagement.** The comment is noted. Please see http://2035.seattle.gov/ for more information.

Letter No. 205 Holland, Mark

1. **Support the Seattle Urban Forestry Commission Comments.** See the comments and responses to Letter No. 5, Seattle Urban Forestry Commission.

Letter No. 206 Holt, Sharon

1. **Amenities and Sidewalks in the Aurora-Licton Springs Urban Village.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
2. **Neighborhood Planning.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Development Moratorium for Microhousing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 207 Hurley, Donald

1. **Light Rail Transit to West Seattle.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The transportation analysis in the EIS is based on adopted plans and policies for future transportation improvements, which do not include light rail service to West Seattle during the planning period (although the ST3 funding package to be voted on will have this rail project included in it).

Letter No. 208 James, Nathan

1. **Alternatives 3 and 4.** Your comments supporting several housing strategies are noted. As described in the EIS, all of the alternatives assume residential and employment growth outside of the designated centers and villages. See Draft EIS Figure 2-7 for information about growth inside and outside the designated centers and villages. For

additional information about housing and displacement, see the Draft EIS Section 3.6 Population, Housing, Employment, the Draft Comprehensive Plan Housing Element, and the separate draft Growth and Equity Analysis.

Letter No. 209 Jarem, Clarissa

1. **Favor Equitable Housing Strategies, for Low-Income Households and Families.** As described in the Draft EIS, the City of Seattle has identified equity as a high priority issue and launched an Equitable Development Initiative specifically focused on clear policy guidance for equitable growth and development that will be incorporated throughout the Comprehensive Plan. This Final EIS includes updated information about the separate draft Growth and Equity Analysis, see Final EIS Section 4.3.2.

Letter No. 210 Jenkins, Devon

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

2. **Support Elements of Alternative 4, Growth Near Transit.** See Final EIS Section 4.3.2, Alternatives.

Letter No. 211 John, Esther

1. **Don't Understand the Plans.** The comment is noted. See http://2035.seattle.gov/ for additional information.

Letter No. 212 Johnc12

1. **Support Plans.** The comment is noted.

Letter No. 213 Johnc936

1. **Likes Blog Posts.** The comment is noted.

Letter No. 214 Johnson, Darrin

1. **Regional Perspective.** See response to Letter No. 66, Comment No. 1.

2. **Twelve Ways Transport.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Application for Seattle.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 215 Johnson, Julie

1. **Remove 22nd Ave NE from the Urban Center.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. None of the alternatives propose to change the boundaries of the urban centers.
2. **Keep the Existing Tree Canopy.** See response to Letter No. 5, Comment No. 3.
3. **22nd Ave NE Development.** The comments are noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 216 Johnston, Terri

1. **Tree Canopy.** See comments and response to Letter No. 5, Seattle Urban Forestry Commission.

Letter No. 217 Jones, Norma and Mike

1. **Infrastructure and Growth.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The Draft Comprehensive Plan provides recommended policy guidance for linking infrastructure, including transportation and growth in the Land Use, Capital Facilities and Transportation elements.
2. **Parks and Open Space.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See the Draft Comprehensive Plan Parks and Open Space Element for recommended policy guidance.
3. **Alternatives for Fremont are Unacceptable.** See Final EIS Section 4.3.2, Alternatives.
4. **Rail Service and Growth Patterns.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. EIS alternatives 3 and 4 emphasize new development near existing and planned light rail and very good bus service. See also Final EIS Chapter 2 for a description of the Preferred Alternative, which similarly focuses growth around light rail and bus transit stations.
5. **EIS Analysis.** The proposed action and alternatives considered in the EIS are for an update of the Comprehensive Plan, a programmatic citywide policy action. The EIS analysis is appropriate for a programmatic area-wide legislative proposal.

Letter No. 218 Jonson, Richard

1. **Building Code Amendment for Green Roofs.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 219 Kaku, Brian

1. **Urban Village Boundaries.** The Draft EIS and Draft Comprehensive Plan identify potential urban village expansion areas and have not finalized the size or boundaries for these potential expansion areas. Public outreach related to defining specific boundaries for urban villages proposed for expansion is planned for 2016. See http://2035.seattle.gov/ for more information.

Letter No. 220 Kasperzyk, Davidya

1. **Historic Resources.** See response to Letter No. 15, Comments No. 2, 5, and 7.

Letter No. 221 Keller, Kathryn

1. **Want to Understand More About EIS Mitigation.** The proposed action and alternatives considered in the EIS are for an update of the Comprehensive Plan, a programmatic citywide policy action rather than a specific regulation. Mitigation measures identified in the Draft EIS are appropriate for a citywide programmatic EIS and to the applicable element of the environment. Mitigation measures identified in the EIS include a mix of specific actions, potential policy or program recommendations or, where appropriate, identification of the existing regulatory and policy framework that would serve to mitigate impacts. An evaluation of the balance of costs and benefits are a policy decision that would occur through a public decision-making process by the City Council. See also the response to Comment No. 1, Letter No. 24.

2. **Gentle Growth, Investment Toward a Healthy Community, For Existing Residents as First Priority.** The EIS identifies existing gaps in infrastructure capacity and services in sections 3.7 Transportation, 3.8 Public Services, and 3.9 Utilities. The EIS Is forward-looking and identified impacts and mitigation are based on future growth, rather than existing conditions.

3. **Stop Displacement, With Jobs and Education Aimed to Help Existing Residents.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also responses to comments 1 and 2, this letter.

4. **More Funding and Improvements in Neighborhoods.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

5. **Natural Environment: Tree Canopy and Runoff Control.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See the Draft Comprehensive Plan Environment Element for recommended policy guidance on these topics.

6. **Managed Queue Approach.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 222 Kelley, Debra

1. **Safe Access to Transit.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 223 Kelly, Thomas

1. **Open Space.** The EIS uses the Seattle Parks and Recreation's definition of parks and open space. The commenter's preference for a different definition is noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
2. **Seattle Urban Forestry Commission Letter.** See the comments and response to Letter No. 5, Seattle Urban Forestry Commission.
3. **Environmentally Critical Areas.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also Draft EIS Section 3.1 Earth and Water Quality for a discussion of the impacts of the alternatives on environmentally critical areas.

Letter No. 224 Kiley, Barbara

1. **Enforce Regulations.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 225 Kirschner, Bryan (1)

1. **Online Open House.** The comment is noted.
2. **Too Much Single Family Residential Zoning to Accomplish Actual Affordability.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Plan is Overly Optimistic.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Please see also the Draft Comprehensive Plan for recommended policies to manage growth.

Letter No. 226 Kirschner, Bryan (1)

1. **Support Alternative 4.** See Final EIS Section 4.3.2, Alternatives.
2. **Oppose Alternative 2.** See Final EIS Section 4.3.2, Alternatives. The separate draft Growth and Equity Analysis provides an assessment of the potential impacts of each alternative on displacement.
3. **Favor Broader Range of Housing types, for Affordability.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

4. **Alternative 4: Don't Cater to the Single Family Homeowner Lobbying.** See Final EIS Section 4.3.2, Alternatives.

Letter No. 227 Kirsh, Andrew

1. **Environmental Analysis.** See response to Letter No. 15, Comments No. 2 and 7.
2. **Historic Preservation: Arts & Culture Element?** Historic preservation is now addressed in the draft Comprehensive Plan's Land Use Element. See response to Letter No. 15, Comment No. 7.
3. **Environmental Analysis.** See responses to Letter No. 15, Comments No. 3 and 4.
4. **Preservation and Adaptive Reuse.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
5. **Historic Preservation and Community Character.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
6. **Value of Older Buildings.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
7. **Tree Canopy.** See response to Letter No. 5, Comment No. 3.
8. **Street Setbacks.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 228 Kirsis, Lori

1. **Alternatives.** See Final EIS Section 4.3.2, Alternatives. In the EIS, Alternative 1 is considered a "No Action Alternative." As such it serves as a baseline for comparison with the action alternatives. A no action alternative is required by the State Environmental Policy Act in EISs. Alternative 1 also represents a continuation of strategies toward growth management used in the past twenty years.

Letter No. 229 Klemisch, Stephen

1. **Transportation.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Draft EIS Section 3.7 describes existing conditions and impacts of the alternatives on mobility and travel time. Recommended policy guidance for the transportation system can be found in the Draft Comprehensive Plan Transportation Element.

Letter No. 230 Klingele, Rick

1. **Environmental Analysis.** The EIS addresses potential citywide land use and policy amendments, and its content is appropriate for a programmatic area-wide proposal, per SEPA. The EIS analysis is cumulative in nature, considering impacts and identifying potential mitigation from a citywide perspective.

   Mitigation measures identified in the Draft EIS are appropriate for a citywide programmatic EIS and to the applicable element of the environment. Mitigation measures identified in the EIS include a mix of specific actions, potential policy or program recommendations or, where appropriate, identification of the existing regulatory and policy framework that would serve to mitigate impacts.

2. **Impact Analysis.** The comment seeks to quantify likelihoods and risks or error factors for a variety of different scenarios under each alternative. The EIS quantifies information where reliable data is available, such as the analysis of transportation impacts based on the City's transportation model. In other cases, reliable data is not available, or there is not necessarily a strictly quantitative basis for evaluations, and use of quantitative estimates would be speculative and potentially misleading. In those cases, the EIS relies on qualitative and comparative discussion to highlight the differences between alternatives. While the mathematics in the comment are an interesting but unproven construct, the purpose of the EIS is not to explore mathematical predictions of risk or potential variations in relation to future growth outcomes. Rather it is to assess and disclose the potential SEPA environmental impacts pertaining to broad policy guidance and choices in the Comprehensive Plan that could influence future growth patterns. These are analyzed according to defined alternatives for which an assumed, probable pattern of future growth is postulated. Final EIS Section 3.1 also includes a sensitivity analysis that considers potential impacts of a scenario derived from the Preferred Alternative, which studies possible consequences if 100,000 new housing units are assumed, instead of the 70,000 units of growth assumed in the Proposed Action.

3. **Plan Administration.** The comment is noted. Plan administration and implementation are discussed in the introduction to the Draft Comprehensive Plan. This discussion includes implementation, defining and measuring success, and updating the plan. In addition, Draft Comprehensive Plan Growth Strategy Goal 1 (GSG1) and supporting policies provide recommended policy guidance for public engagement.

4. **Public Engagement and Growth Forecasts.** Your comments are noted. Regarding public engagement, see Final EIS Section 4.3.2, Public Outreach. Regarding growth forecasts, the EIS analyzes the 20-year cumulative impact of the city's established 2035 growth target. The analysis does not make assumptions about whether the growth occurs at a constant rate or through periods of slower and faster growth. The cumulative EIS analysis is not affected by the rate of growth and, because reliable data is not available, such an assumption would be speculative. The comment does

not substantiate a clear link between a shortfall in public accountability and possible economic instability that would lead to boom and bust cycles.

5. **Public Engagement and Infrastructure Investment Patterns.** Regarding public engagement, see Final EIS Section 4.3.2, Public Outreach. Regarding mitigation, see response to Comment No. 1, this letter. An evaluation of the balance of costs and benefits of mitigation, and similar weighing of policy completeness and effectiveness, are policy evaluation matters that would be considered by the City Council in its public decision-making process on the Comprehensive Plan update.

6. **Fees and Transaction Taxes for Revenue and Economic Stability.** Your comments are noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

7. **Urban Centers and Villages.** The comment suggests setting growth allotments according to available development capacity. Draft EIS Table 2-1 identifies the housing and employment capacity for each urban center and village. Development capacity represents the difference between the amount of development on the land today and the estimated amount that could be built under current zoning. The differing development patterns in the urban centers and villages are discussed in Draft EIS Section 3.6 Land Use; see Draft EIS Figure 3.4-3 and accompanying discussion.

8. **Noise.** The comment references Draft EIS Section 3.5 (Relationship to Plans and Policies), but appears to be addressing text in Draft EIS Section 3.3 (Noise). The comment is an excerpt of a sentence. The complete sentence reads as follows:

   However, while the impacts of additional noise would not be discernible from background noise levels, all of the alternatives would worsen noise levels that in some areas are already above noise levels considered healthy for residents and other sensitive uses." (Draft EIS page 3.3-14)

   The intent of the statement is to say that all of the alternatives would impact noise levels, although to a degree that would not be discernible from background noise levels. This, together with the fact that mitigation is identified to address impacts, is the rationale for the conclusion that the alternatives would not result in a significant unavoidable adverse impact. Noise levels are elevated in some areas in the city for a variety of reasons unrelated to Comprehensive Plan policies, including historic development patterns pre-dating city comprehensive planning and decisions by other agencies that impact Seattle, such as decisions related to airports.

9. **Growth Outside of Urban Centers.** The referenced statement is based on the growth assumptions for each alternative, as described in Draft EIS Chapter 2. Based on the growth assumptions and compared to the other alternatives, Alternative 2 designates the greatest amount of growth to the urban centers and villages and the least amount of growth to the areas outside of the urban centers and villages.

10. **Police.** The referenced comment is based on an statement earlier in the discussion of impacts to police services, which reads as follows:

Population and job growth are not automatically presumed to cause a citywide increase in reported crime. Past trends show an overall decline in violent and property crime even when Seattle's population was growing. A myriad of other factors are known to affect the volume and type of crime (Federal Bureau of Investigation 2013):

- *Population density and degree of urbanization*
- *Variations in composition of the population, particularly youth concentration*
- *Stability of the population, especially mobility, commuting patterns and transience*
- *Modes of transportation and highway system*
- *Economic conditions, including median income, poverty level and job availability*
- *Cultural factors, including education, recreation and religion*
- *Family conditions, especially divorce and family cohesiveness*
- *Climate*
- *Effective strength of law enforcement agencies*
- *Administrative and investigative emphases of law enforcement*
- *Policies of other components of the criminal justice system (i.e., prosecutorial, judicial, correctional and probational)*
- *Prevalent attitudes toward crime*
- *Crime reporting practices of the local population (Draft EIS pages 3.8-25–26)*

The citation for this discussion is shown as the Federal Bureau of Investigation, *FBI Releases 2012 Crime Statistics*, September 16, 2013.

11. **Fire Protection.** The Fire Department is equipped to address fires in high-rise buildings as well as lower scale buildings. The Building Code includes requirements that address all types of buildings to protect life and safety of occupants. Changes in building type within the range that could result from comprehensive plan changes are therefore not expected to result in significantly different risks or to significantly affect Fire Department operations.

12. **Parks LOS.** The citywide Parks Level of Service goals provide a broad framework for the amount of open space the City would like to provide for its citizens. These goals and the gap analysis that was performed based on them, allows a finer grained understanding of which neighborhoods have good distributions of open space and which have gaps in service. It is noted that the proposed Comprehensive Plan would discontinue the quantitative goals discussed in the Draft EIS analysis, and that the Seattle Parks Department will develop new goals and/or standards in its Parks Development Plan to be updated starting in 2016.

13. **Schools.** Regarding school capacity, see responses to Letter No. 8, Comment No. 27 and Letter No. 8, Comment No. 31.

    Regarding displacement, see response to Letter No. 17, Comment No. 5.

14. **Draft Growth and Equity Analysis.** The comment addresses possible accessibility barriers to area businesses, for both customers and employees. The comment does not substantiate why or how the City's policies have contributed to such barriers. It

is agreed that maintaining and improving accessibility in an equitable fashion is a preferred objective of the City's policies.

15. **EIS Analysis.** The EIS analyzes defined alternatives for which assumed, probable patterns of future growth are postulated, which in total represent an analysis of a range of possible environmental impacts that could occur in differing levels across the city. This helps to fulfill the requirements of SEPA environmental review. See http://2035.seattle.gov/ for more information on the contents of the Draft Comprehensive Plan. Also, see the responses to Comments No. 2-14, this letter.

    Mitigation measures identified in the Draft EIS are appropriate for a citywide programmatic EIS and to the applicable elements of the environment. Mitigation measures identified in the EIS include a mix of specific actions, potential policy or program recommendations or, where appropriate, identification of the existing regulatory and policy framework that would serve to mitigate significant adverse impacts to the extent identified in this EIS.

Letter No. 231 Koch, Mary

1. **Traffic and Bicycles.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Parking Standards and Transit.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Enforce Building Codes.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 232 Kwok, Dave

1. **Equity Analysis.** See Final EIS Section 4.3.2 for updates related to the separate draft Growth and Equity Analysis. See also Final EIS Chapter 2 for a description of the Preferred Alternative, which is informed by findings of the separate draft Growth and Equity Analysis.

Letter No. 233 Lamb, Peter

1. **Bicycles and Development Regulations.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 234 Langhans, Aileen

1. **Introductory Comments.** The comments are noted.

2. **Single Family Neighborhoods.** The Draft Comprehensive Plan (see http://2035.seattle.gov/) contains goals and policies that address single-family residential areas (goal

LU8 and twelve associated policies), indicating the degree of protectiveness afforded to single-family areas. The status of conceptual neighborhood conservation district legislation is unknown. The potential consistency of such a strategy would depend on details that are not known to be defined at this time.

3. **Development Capacity.** The citation does not suggest that future development projects will all reach their full capacity. Rather, it suggests that underdeveloped properties would be places where infill development is likely to occur in the future. "Full capacity" refers to the maximum amount of development allowed in a given area under the density limits established by zoning. Many areas of Seattle, including portions of the urban centers discussed in the EIS, are not developed to the maximum height or density allowed by current zoning. While such development is not considered temporary, the owners of these properties are legally allowed to develop to the full capacity under zoning. The EIS assumes that many of these property owners will eventually decide to redevelop their properties due to economic forces and rising property values. However, it is not anticipated or assumed that all buildings will eventually reach maximum height and bulk.

4. **Definitions.**
    - ***"Compatibility" and "Incompatibility"*** refer to issues of potential land use-related conflicts or spillover effects that can arise when land uses of different types are located near each other. The location of industrial uses immediately next to single-family residential uses, as a hypothetical example, could create impacts of odor or noise that could suggest adverse effect on a neighboring property that contributes to findings of incompatibility between such uses.
    - ***"Transitions"*** refer to how permissible land uses, building height levels, and densities change across and between areas. For example, a zoning map may define layers of zones with gradual stepdowns in permissible height and density in order to achieve transitions in land use intensity between an area that allows high-rise office development and a nearby single-family neighborhood.
    - ***"Use restrictions"*** refer to the practice of specifying what land use is allowed or prohibited in a particular zone.
    - ***"Proximity"*** refers to the distance between things.
    - ***"Adverse impact"*** refers to a possible negative effect as a result of a particular action. Whether something is a significant adverse impact depends on locational context and intensity. To be significant, SEPA Rules define that there needs to be a reasonable likelihood of more than a moderate adverse impact on environmental quality.
    - ***"Intensity"*** of land use refers to its density or degree of use.
    - ***"Potential"*** refers to something considered possible to occur, as opposed to something that is known or guaranteed to occur.

    The excerpted text describes a possible land use impact. The text further states that the city's existing land use regulations would address and reduce many of the impacts.

5. **Building Height.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Regarding the bolded text in the comment quotation, it should be noted that the purpose of the EIS is to identify adverse (negative) impacts and applicable mitigation. The bolded sentence in the comment quotation is intended to disclose a possible adverse impact and is not intended to imply that the impact cannot be addressed or controlled.

6. **Views.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Draft EIS Section 3.4.2 describes the specific policies and regulations that protect public views.

7. **Historic Preservation.** The topic of historic preservation is included in the Draft Comprehensive Plan Land Use Element. Draft Comprehensive policy language is intended to maintain or enhance the strength of the City's commitment toward historic preservation purposes. The City's existing preservation policies and regulations will continue to be supported in the updated Comprehensive Plan. See also the responses to comments in Letter No. 15, Historic Seattle.

8. **SEPA Infill Exemption.** The commenter's opinion about the proposed SEPA Infill Exemption is noted. Development review processes afford opportunity for public comment other than the SEPA review process.

9. **SEPA Infill Exemption.** See response to Comment No. 8, this letter. The commenter's opinion that the Comprehensive Plan should make reference to specific codes and regulations is noted. Page 16 of the Draft Comprehensive Plan provides examples of implementing plans, codes, programs and initiatives. While not exhaustive, this list is representative of the major implementing tools for the Comprehensive Plan.

10. **Alternative 1.** See Final EIS Section 4.3.2, Alternatives. The referenced statement from the EIS is a disclosure of possible adverse impacts of Alternative 1, not a statement of the City's policy preference.

11. **LU 59 and LU 60.** Your comments are noted. The citation is self-explanatory. See the response to Letter No. 8, Comment No. 4.

12. **Alternative 3.** The intention of the referenced text is that each type of urban village (centers, hub, residential) would be designated by a different color on the Future Land Use Map. Accompanying land use policies would be tailored to describe the type and intensity of development allowed in each type of urban village.

13. **Alternative 4.** Draft EIS Section 3.4 Land Use describes the potential impacts of growth in the expanded urban village areas identified in Alternative 4. Current strategies such as neighborhood-specific design guidelines aid in achieving variety in future development.

14. **Mitigation Strategies.** The referenced mitigation strategy addresses the existing low density areas that are located in potential urban village expansion areas and would be

impacted should there be a decision to expand the boundaries to include these areas. The commenter's opinions about this potential impact are noted.

15. **Significant Unavoidable Adverse Impacts.** This section of the EIS discloses that additional growth will unavoidably lead to a generalized increase in building height, bulk and development intensity over time. However, because existing regulations and other related strategies can mitigate these impacts, no significant unavoidable adverse impacts are expected.

16. **Seattle Public Schools.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

17. **Design Standards.** See Draft Comprehensive Plan Neighborhood Element recommended policy guidance. In general, this element seeks to support and continue neighborhood planning, such as occurred in the University District. The Draft Comprehensive Plan does not require that identical zoning and design standards apply citywide. The alternatives in the U District EIS were developed to be consistent with the citywide Comprehensive Plan Update assumptions about the University District. For this reason, future actions based on the EIS are expected to be consistent with the updated Comprehensive Plan.

18. **Policies H18 and H19.** The excerpted policies are taken from the existing Comprehensive Plan. For the Draft Comprehensive Plan (see http://2035.seattle.gov/), these policy objectives are captured, in revised wording, in Housing Goal 4 and related policies including Policy HG4.8.

19. **Key Directions: Art and Culture.** The commenter's opinion about the text describing Arts and Culture goals is noted.

20. **Closing Comments: Eleven Comprehensive Plan Recommendations.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 235 LaRose, Philip

1. **Alternatives Maps.** The referenced maps show the urban center and village boundaries for each alternative. The maps are the same because no changes to urban center or village boundaries are proposed under alternatives 1 and 2.

Letter No. 236 Larsen, Tom

1. **EIS Commenting.** The comment does not identify what necessary information is not provided in the EIS. The EIS comment period ran from May 4 2015 to June 17 2015. This exceeded the 30-day minimum standard established by the SEPA Rules.

Letter No. 237 Lau, Betty

1. **Chinatown International District.** It is acknowledged that the official name is the Chinatown International District.

2. **Affordable Housing.** See Final EIS Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to help address displacement risk.

Letter No. 238 Lavassar, Dan

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to help address displacement.

Letter No. 239 Leighty, Carl

1. **Environmental Stewardship and Race and Social Equity.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Prefer Alternative 2, or Alternative 1.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 240 Leon, Carl

1. **Interstate 5 (I-5).** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Existing conditions on I-5 are summarized in Draft EIS Table 3.7-5 and future conditions are summarized in Draft EIS Table 3.7-7.

2. **Parking Requirements.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Interstate 5.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 241 Letourneau, Peter

1. **Population Size.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 242 Lewis, Melinda

1. **Favor Alternative 2.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 243 Littlefield, Ron

1. **Interested in Civic Engagement.** Your comments are noted. Please see http://2035.seattle.gov/resources for more information on our processes.

Letter No. 244 Louis, Mary

1. **Development Capacity.** It is not the City's stated goal that all development in the urban centers or villages will reach the maximum height and bulk allowed. As described in Draft EIS Chapter 2, development capacity is a theoretical estimate of how much new development could occur over an unlimited time period. It represents a comparison between the amount of development that is on the land today and the likely amount that could be built under current zoning. It is used as a measure to determine whether anticipated growth levels under each alternative are feasible to accommodate.
2. **Historic Preservation.** See the response to Letter No. 15, Comment No. 7.
3. **Housing and Development Character.** See the response to Letter No. 234, Comment No. 18.
4. **Neighborhood Conservation Districts.** See the response to Letter No. 234, Comment No. 2
5. **Policies LU 59 and LU 60.** See the response to Letter No. 8, Comment No. 4.
6. **Land Use Mitigation Strategies.** Your comment objecting to the cited land use mitigation strategies and significant unavoidable adverse impact findings is noted.

Letter No. 245 Lubarsky, Zachary

1. **Urbanist Alternative 5, Add More Urban Villages, and Protect Vulnerable Populations.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 246 Lucio, Jessica

1. **Pioneer Square.** Note that Pioneer Square is part of the Downtown Urban Center. The comment refers to existing zoning, for which no changes are proposed. Zoning in Pioneer Square mostly has maximum heights of 120 feet or 100 feet; new development is subject to Pioneer Square Preservation Board review. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 247 Lund, Garry

1. **Locational Preferences.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 248 M., F.

1. **Objections to a Range of Environmental Impacts.** The comment, which cites concern about environmentally critical areas, but also comments on a wide variety of other potential livability impacts, is noted.

2. **Marginalized Populations and City Services.** See the response to Comment No. 1, this letter.

Letter No. 249 Mack, Eden

1. **School Impacts.** See the response to Letter No. 8, Comment No. 27.

2. **Cooperative Planning For School Facilities.** See the response to Letter No. 8, Comment No. 28.

3. **Building Excellence Program (BEX) IV Capacity.** See the response to Letter No. 8, Comment No. 27.

4. **School Locational Needs.** See the response to Letter No. 8, Comment No. 27.

5. **Universal Preschool Program.** See the response to Letter No. 8, Comment No. 32.

Letter No. 250 MacKinnon, Roberta

1. **EIS Analysis.** Some of the comments refer to the "plan" but appear to be addressing the EIS. The Draft Comprehensive Plan Land Use Element, Future Land Use Map, and other content in the Plan establish land use designations and goals and policies. Land use designations are implemented by zoning designations.

   Regarding public outreach, see Final EIS Section 4.3.2, Public Outreach, and http://2035.seattle.gov/resources for more information about public outreach, including public engagement efforts during the period when EIS alternatives were being developed.

   Regarding the adoption date, note that the public review process for the Draft Comprehensive Plan will continue into 2016, with a final City action on the Plan anticipated in late 2016.

   Regarding the commenter's assertion that the Draft EIS is vague, no information is provided identifying specific concerns or questions. The EIS analysis is appropriate for a programmatic area-wide legislative proposal.

2. **Alternatives Development.** See the response to Comment No. 1, this letter.

3. **Gaps Analysis.** For applicable elements of the environment, the Draft EIS evaluated existing conditions and disclosed pertinent information.

4. **Vague Action Statements.** Although the comment does not identify where the referenced terms are used, they appear in slightly different wording in Draft EIS Chapter 2, Description of the Proposal and Alternatives. Draft EIS Table 2-4 provides examples of possible implementing actions for the alternatives, which include "tools for zoning flexibility" and "other growth incentive tools or program to attract new buildings" and "public investments to aid livability and attract development." Because the details of these specific types of implementing measures have not yet been identified and could be developed through further planning processes, these terms are used to generally describe how supplemental supporting strategies could be adopted to encourage growth patterns advocated by the alternatives. As appropriate, they would be subject to further SEPA review, and public review and decision making processes.

5. **Alternatives Comparison.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The EIS provides an analysis that compares alternatives on a variety of measures and discloses their similarities and differences in probable effects.

Letter No. 251 Marshall, Kate

1. **Sidewalks in Neighborhoods.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Building Setbacks and Landscaping Like in Portland's Pearl District.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Retain Neighborhood Character With Growth.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 252 Martin, Dottie

1. **Seattle is Losing Its Character, and Impacts of Amazon.** Your comments are noted.

2. **Gentrification.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Draft EIS Section 3.6 Population, Employment, Housing and the separate draft Growth and Equity Analysis address displacement. See also Final EIS Chapter 2, Description of the Preferred Alternative, which adjusts growth estimates to help address displacement.

3. **Amazon Not Being Supportive to Community.** Your comments are noted.

Letter No. 253 Mas, Charles

1. **City Should Collect Impact Fees for Schools, Build Sidewalks, Add Police Patrols for Childrens' Safety.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 254 McDougall, Connie

1. **Transit Service from Ballard is Too Full.** In the past year, over 220,000 hours of bus service within the city has been added by King County Metro. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 255 Melvin, Linda

1. **Possible Ballard Transit Station Location at 14th/Market.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The specific location of a future transit station in Ballard will be determined through a separate public process.

Letter No. 256 Miller, Robin

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 257 Mitchell, Ben

1. **Draft EIS Outreach.** The comment is noted.
2. **Support Alternative 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.
3. **Support Race and Social Equity Findings.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The assessment of Alternative 4 with respect to the risk for displacement was prepared through the separate draft Growth and Equity Analysis. See Final EIS Chapter 2, Description of the Preferred Alternative, which adjusts growth estimates to help address displacement risk.
4. **Growth and Equity, Alternative 4, and Unlocking Swaths of Single Family Land for Densification.** Your comments are noted. See response to Comment No. 2, this letter.

Letter No. 258 Mitchell, Daniel

1. **Alternatives 3 and 4 Preferred Given Importance of Transit-Oriented Development.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 259 Moore, Julia

1. **Include Equity Analysis in EIS.** See response to Letter No. 17, Comment No. 2.
2. **Economic Displacement.** See response to Letter No. 89, Comment No. 1
3. **New Growth Alternative: Increase Growth to Use 100% of Capacity in High Opportunity/Low Displacement Risk Neighborhoods.** The comment is noted. See Final EIS Chapter 2 for a description of the Preferred Alternative, which incorporates findings of the separate draft Growth and Equity Analysis in determining future growth allocations to the urban centers and villages.
4. **Displacement and GHG Emissions.** See response to Letter No. 17, Comment No. 7.

Letter No. 260 Moreau, Paul

1. **Improve Mass Transit and Other Transportation Systems.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 261 Morrill, Richard

1. **Growth Assumptions.** Professor Morrill's comments describe a number of reasonable assumptions or estimations of potential population growth amounts and possible (although speculative) magnitudes of effects relating to displacement of housing or businesses with future growth.
2. **Alternatives: Slightly Prefer Alternative 1 to Alternative 3.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.
3. **Affordable Housing.** The comments about prospects for successfully addressing affordable housing needs are noted. Efforts associated with the Housing Affordability and Livability Agenda could address these concerns. See also Final EIS Section 4.3.2, Housing Affordability.

Letter No. 262 Morris, Arvia

1. **GHG Emissions.** This topic has been addressed in this EIS. See responses to Letter No. 24, Comment No. 15 and to Letter No. 7, Comment No. 5.

Letter No. 263 Morrison, Patrick

1. **Growth Patterns: Ruin the Entire City.** See response to Letter No. 63, Comment No. 1.
2. **2nd Ave Bike Lane and Auto Traffic.** See response to Letter No. 63, Comment No. 2.
3. **Prefer Separated Transit.** See response to Letter No. 63, Comment No. 3.

4. **Parking Requirements.** See response to Letter No. 63, Comment No. 4.
5. **Priorities Other than Bicycles.** See response to Letter No. 63, Comment No. 5.
6. **Need Another West Seattle Bridge.** See response to Letter No. 63, Comment No. 6.
7. **Create a Planning Department.** See response to Letter No. 63, Comment No. 8.
8. **Rent Increase.** See response to Letter No. 63, Comment No. 7.

Letter No. 264 Mucik, Rhys

1. **Housing Affordability.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.
2. **Light Rail.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Eliminate Metered Merging.** These comments relate to issues that are not under the City's jurisdiction, but are noted for consideration.

Letter No. 265 Nelson, Shannon

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 266 Nicolae, Roxana

1. **Tree Canopy.** See the comments and responses to Letter No. 5.

Letter No. 267 Nissen, Anna

1. **Ideology.** The EIS conducts a programmatic environmental analysis of the Proposed Action and four alternatives intended to achieve the objectives identified in Draft EIS Chapter 2. No specific ideology is assumed.

   Regarding the reference to LU 59 and LU 60, see response to Letter No. 8, Comment No. 4.
2. **Housing Preservation and Affordability.** The Draft EIS analyzes the impact of each of the four alternatives on housing affordability and mitigation to help address the identified impacts. Housing preservation is identified as a possible mitigation strategy. Regarding the reference to the separate draft Growth and Equity Analysis, see Final EIS Section 4.3.2, Growth and Equity Analysis.
3. **Land Use Impacts.** The commenter's opinion is noted. The city's adopted regulations are intended to address the potential land use compatibility impacts identified in the

EIS and it is reasonable to conclude that these regulations would adequately mitigate impacts.

4. **Housing Growth Target.** The residential growth target is established through a process mandated by the Washington Growth Management Act. See response to Letter No. 9, Comment No. 1.

5. **Environmental Objectives.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Regarding the deadline for comments, additional public meetings to review the Draft Comprehensive Plan will occur in 2016. See Final EIS Section 4.3.2, Public Outreach.

6. **Policy Recommendations.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 268 Noone, I.M.

1. **Housing Affordability.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 269 Oldfin, Thomas

1. **Growth Distribution and Displacement.** See the Final EIS Chapter 2 for a description of the Preferred Alternative, which incorporates findings of the separate draft Growth and Equity Analysis.

   The comment asserts that the displacement risk maps in the separate draft Growth and Equity Analysis are flawed. However, no additional information is provided. See Final EIS Section 4.3.2 for information about updates to the separate draft Growth and Equity Analysis.

2. **Transportation.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Alternatives.** The commenter asserts that the alternatives are inadequate, but does not provide any additional information. See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 270 Olds, Jonathan (1)

1. **Address Shortage of Commercial Services in Multifamily Areas.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and the Draft Comprehensive Plan Land Use Element for recommended policies related to commercial uses in multifamily areas.

Letter No. 271 Olds, Jonathan (2)

1. **GHG Emissions: Address With More Pedestrian, Bicycle and Transit Improvements.** Your comments are noted. See response to Letter No. 27, Comment No. 3 and to Letter No. 7, Comment No. 5.

2. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 272 Oliver, Pike

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 273 Olson, Leanne

1. **Support Historic Seattle Comments.** See the comments and response in Letter No. 15, Historic Seattle.

2. **Livable City.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 274 Onesty, Dawn

1. **Housing, Transportation, and Homelessness Policy Recommendations.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 275 Osaki, David

1. **Questionable Viability of the Aurora-Licton Springs Neighborhood as Urban Village.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Neighborhood Development Toward More Mixed Uses and Sufficient Pedestrian Connections is Lacking.** The commenter's assessment of economic and community development qualities of the Aurora-Licton Springs neighborhood is noted.

3. **Lack of Growth of Neighborhood-Serving Commercial Services and Provision of Safer Pedestrian Linkages.** The commenter's assessment that these commercial services are essential for a well-functioning urban village, as well as safe pedestrian facilities along and across Aurora Avenue, is noted.

4. **Self-Storage Development Proposal Not Supportive of Urban Village Strategy, and Land Use Codes Shouldn't Allow This Use in This Urban Village.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

5. **Pedestrians and Economic Development Deterred by Frequent Illegal Activities.** The commenter's assessment of detrimental conditions in the neighborhood is noted.

6. **Lack of Pedestrian Character Perpetuates an Automobile-Oriented Character; Real Estate Market Has Not Responded With Supportive Development.** The commenter's assessment of pedestrian character and real estate conditions in the Aurora-Licton neighborhood is noted.

7. **Parking Requirements.** The commenter's perspective on low parking requirements and lack of pedestrian accessibility to services is noted.

8. **Lack of Neighborhood-Specific Design Guidelines Leads to Lack of Progress Toward Neighborhood Plan Vision.** The commenter's perspective on design review shortcomings and likely failure to achieve the neighborhood vision is noted.

9. **Analysis of Individual Residential Urban Villages.** The proposed action and alternatives considered in the EIS are for an update of the Comprehensive Plan, a programmatic citywide policy action. The EIS makes no assumptions about similarities or differences in character of individual urban villages, nor do the conclusions rely on a presumption that urban villages are the same. The commenter's perspectives on seeking analysis of individual neighborhoods' prospects for future growth supportive of an urban village vision are noted. This type of analysis is beyond the scope of this EIS. Further, if an EIS analysis was undertaken as requested, it would not automatically need to assume that supportive development would fail to occur, although the commenter's perspective is understood. Another kind of future study outside this EIS, if undertaken, could diagnose why the neighborhood is experiencing challenges and prescribe proactive strategies for solutions.

10. **Alternatives 1 and 2 are Problematic, Because They Don't Recognize Issues Such as Those About Aurora-Licton's Viability as an Urban Village; and Alternative 1 Proposes Greater Amount of Residential Growth.** See Final EIS Section 4.3,2, Alternatives and Chapter 2, Description of the Preferred Alternative.

11. **Aurora Licton Springs Recommendations: Conduct a Broad Array of Additional Studies With Respect to Neighborhood Plan, Zoning, Development Prospects, Design Guidelines, and Capital Investment Priorities.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The Draft Comprehensive Plan Neighborhood Planning Element provides proposed policy guidance for future neighborhood planning.

Letter No. 276 Owens, Robert

1. **Creative Spirit.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **In Future, Still a Need for Parking.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Seattle's Future Character.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 277 Oxman, Michael

1. **Continue the 40% Tree Canopy Goal.** See Letter No. 5, Comment No. 3.

Letter No. 278 Parda, Don

1. **Residential Development Will Need Parking.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 279 Patterson, Merle

1. **Floating Development.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 280 Pearsall, Matthew

1. **Growth Outside of Urban Villages: Lack of Change in Single Family Areas Will Further Stratify Residential Patterns.** All of the alternatives identify a portion of growth that would be guided toward the areas outside of the urban villages. Depending on Draft EIS alternative, residential growth outside of the urban villages could range from 6% to 23%. The area outside of the urban villages has adequate capacity to absorb growth under any alternative. See also Final EIS Chapter 2 for a description of the Preferred Alternative.

2. **Consider Land Use Changes for Non-Industrial Uses in Georgetown and South Park.** Your comments are noted. The Proposed Action does not include any changes to the designated Greater Duwamish Manufacturing Industrial Center.

Letter No. 281 Pederson, Marvin

1. **Future Policy Direction is Not Workable.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 282 Perkins, John and Weaver, Julene

1. **Spread Development to Single Family Areas.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Preserve Affordable Rents and Avoid Displacement.** Note that the EIS and the Draft Comprehensive Plan are two different documents. The Draft Comprehensive Plan identifies recommended policy guidance for the City in the areas of land use, housing, public services and other topics. The EIS evaluates potential adverse impacts of the four growth alternatives on the built and natural environment and recommends mitigation strategies for City Council decision making. See Draft EIS Chapter 2 for a discussion of the respective roles of the EIS and Comprehensive Plan. Regarding housing affordability, see Final EIS Section 4.3.2, Housing Affordability.

3. **Modernize the Landlord/Tenant/City Relationship.** Your comments are noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

4. **Project-Level SEPA Checklist for a Ravenna Project Illustrates a Conflict of Interest.** For individual development reviews, it is the reviewing planner's responsibility to review, edit and seek more information if necessary from the applicant with respect to the contents of the SEPA Checklist. The planner also subsequently evaluates the proposal for its environmental impacts in a SEPA Determination that is part of a development decision. This process enables the City to exercise its discretion and identify development impacts and mitigation for impacts independently of the applicant. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 283 Persak, John

1. **Deficiencies of Alternatives.** The comment identifies several concerns related to the EIS alternatives and their relationship to future execution of City policies in light of perceived current problems. Responses to selected topics are noted below:
    - ***Commercial Impacts.*** The EIS analysis reflects consideration of future commercial and employment uses, including in land use, transportation, demand for public services and air and noise analyses. The Manufacturing Industrial Centers (MICs) are included in the analysis, although it is acknowledged that no changes to the MIC boundaries are proposed.
    - ***Impact Analysis.*** The analyses of impacts are based on a comparison for forecast conditions under each alternative, compared to existing conditions. Where available, quantitative data is used, such as in the transportation and GHG analyses. In other cases, the analysis is qualitative and comparative.

Letter No. 284 Letter 284 Portzer, John

1. **Future Policy Directions: Need More Parking and More Infrastructure, Moratorium on Development.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 285 Prinz, Pat

1. **Ravenna Woods.** Although this area near University of Washington might in some fashion be identified as part of the University District Urban Center in the EIS or other document, the City has no known intention to affect development capabilities on the identified "Ravenna Woods" parcels near the Burke-Gilman Trail.

Letter No. 286 Quinn, Ken

1. **Compliments for the Modern Outreach Communication Channels.** The comment is noted.

Letter No. 287 Quirindongo, Rico

1. **Reinforce Goals of the Climate Action Plan.** See responses to Letter No. 7, Comment No. 5.

2. **Creative Ideas for Affordable Housing Funding.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

3. **Need for Access to Public Services.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also Draft EIS Chapter 3.8 for an evaluation of the impacts of the four alternatives on public service delivery.

4. **Adjust Efforts to Address Homelessness.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

5. **Incentivize Equitable Housing in "Downtown Feeder Neighborhoods."** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability. See also the separate draft Growth and Equity Analysis.

6. **Green Infrastructure Loop on Western Avenue and Alaskan Way.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

7. **Support Alternative 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

8. **Task Force of Non-Profits to Advance the Race and Social Justice Initiative Aims.** See Final EIS Section 4.3.2, Growth and Equity Analysis.

9. **Downtown School, and Improve Quality of Education Services in Urban Schools.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 288 Randels, Robin

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 289 Ravanpay, Ali

1. **Introductory Comments.** The commenter's opinions are noted.
2. **Learn from Other Large Cities.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Address Transportation Better.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 290 Reichlin, Kanani

1. **Affordable Housing for Low-Income and Moderate-Income Workforce Households.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 291 Reuter, Rebecca

1. **Alternative 3, Focusing Growth in Transit Areas and Urban Villages.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 292 Robinson, Chris

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 293 Rodda, Bryce

1. **Affordable Housing, Change Zoning in Single-Family Areas.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 294 Roehr, Christian

1. **Reply to Comments.** This Final EIS provides a reply to all comments provided in the Draft EIS.
2. **Alternative Review, Prefer Alternative 3.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.
3. **Harmonize Residential and Employment Growth With Urban Villages, Not Just Boutiques and Restaurants.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative. The Proposed Action considered in the EIS assumes growth targets of 70,000 housing units and 115,000 jobs. See Draft EIS Chapter 2 for description of growth assumptions and Section 3.6 for a discussion of population, employment and housing.

4. **Big-Picture Advice on Addressing Growth and Sustainability.** Your comments are noted. See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

5. **Closing Comments.** The comments are noted. See http://2035.seattle.gov/ for additional public outreach opportunities related to Seattle 2035.

Letter No. 295 Roth, Arlene

1. **Seattle Nature Alliance Comments.** See comments and responses to Letter No. 25, Seattle Nature Alliance.

2. **Open Space.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. For recommended open space policy guidance, see the Parks and Open Space Element in the Draft Comprehensive Plan.

3. **Expansion Areas.** See response to Letter No. 24, Comment No. 14. It is not the intention of the City to direct growth to Ravenna Park, despite the shading of a potential expansion area defined for Roosevelt Urban Village in Draft EIS Figure 3.4-16.

4. **Nature Friendly Plan.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 296 Ruby, Mike

1. **Introductory Comments.** Section 2.3 of the Draft EIS, as cited, does include description of the alternative actions that are evaluated in the EIS. So does Section 2.1 of the Draft EIS, most notably text on pages 2-1 through 2-5. From the overview:

   "The City is considering text and map amendments to the Seattle Comprehensive Plan that would influence the manner and distribution of projected growth of 70,000 housing units and 115,000 jobs in Seattle through 2035, and that would influence the manner in which the City conducts its operations to promote and achieve other goals such as those related to public health, safety, welfare, service delivery, environmental sustainability and equity."

   This is followed by other summarized descriptions of changes. Given its interest in identifying potential impacts upon the environment, much of the EIS was oriented to evaluating the effects of growth distributions that vary among the alternatives, but which also included discussion about how certain proposed land use policy changes could affect the contents of the Future Land Use Map, or could affect potential for rezones, or could affect how growth estimates are defined and implemented. These and other possible changes are also discussed in Section 3.5 of the Draft EIS, Relationship to Plans, Policies and Regulations. Regarding mitigation strategies, per SEPA Rules, they are defined to pertain to identified *significant adverse* impacts and not for any or all non-significant adverse impacts. See Letter No. 24, Comments 1 and 5 regarding mitigation, and the responses to Comments No. 4 and 11, this letter.

2. **Timing of Draft EIS and Draft Comprehensive Plan.** The commenter's difficulty in understanding the nature of the proposed action is noted. Preliminary draft versions of all policy edits were not included in the Draft EIS. However, as noted in the response to Comment No. 1, this letter, the Draft EIS did include a substantive and accurate range of information throughout Chapter 2 that characterized the nature of the Comprehensive Plan update, including the alternatives for growth distribution and the span of other changes that were proposed. This included reference to and analysis of the policy changes that could have the most substantive potential to lead to adverse impacts upon the natural and built environments, such as key aspects relating to land use and urban village policies. The commenter may review the entire Draft Comprehensive Plan at http://2035.seattle.gov/, for which a separate review period, comment period, and public outreach was conducted in the second half of 2015. Please also see response to Letter No. 2, Comment No. 1, and other updates to the EIS analysis in earlier chapters of this Final EIS.

3. **Climate Change.** See response to Letter No. 7, Comment No. 5.

4. **Air Quality.** The commenter references the WAC 170-460 standard of 10 in one million excess cancer risks. While this standard is appropriate for assessment of individual sources of TAPs, it is not a useful or realistic standard for cumulative exposures. The 10 in one million excess cancer risk in the WAC 170-460 applies to a single stationary source seeking an air quality permit through the appropriate regional air quality agency. The permitting process has no authority over localized mobile source emissions such as diesel vehicles. Further, within industrial areas, it is likely that multiple stationary sources may exist near each other and result in cumulative risks exceeding 10 in one million. Air quality districts that have developed a 100 in one million cumulative criterion have done so as reflective of air quality in a "pristine" National Seashore environment, reflecting the air quality that the U.S. Park Service identifies as a Class I Park and wilderness area. Consequently, even such pristine areas as National Seashores can have a sizeable background cancer risk, largely due to cumulative global atmospheric transport.

   With regard to the efficiency rating of filtration systems identified as mitigation, a range of filtration efficiencies was identified in acknowledgments that the degree of reduction required will vary by location and to avoid a one-size-fits-all approach. The buffer zone identified in the Draft EIS to address Toxic Air Pollutant exposure impacts is explicitly cited by the Washington State Department of Health as the areas of greatest impact from major highways. The mitigation measure has been revised to include MERV 13 efficiencies within the range. It should be noted that recent research (LBL, 2013) has indicated that installation of MERV 16 filters in residential applications can result in increased flow resistance, lower system airflows and increase duct pressure that leads to increased air leakage for ducts. These filtration levels are only recommended for design-build situations for hospitals and schools. The text on page 3.2-5 has been revised to state that "all areas of Washington State are in attainment with the federal 2012 $PM_{2.5}$ standards." Additionally, Draft EIS Table 3.2-2 has been updated to include

the most recently available monitoring data. See Final EIS Section 3.2, Revisions and Clarifications.

5. **Noise.** Variances from the requirements of the Noise Control Ordinance are evaluated on an individual basis, are generally granted only for short durations, and are subject to other limits to avoid significant impacts. Noise variances for major projects are allowed for longer periods and are subject to project level SEPA review. The review process for evaluating and setting conditions for those projects includes assessing cumulative effects, project duration, conditions that require night work, and other factors. Therefore, cumulative impacts from noise variances can be avoided or limited through individual project review such that significant impacts are not expected.

6. **Urban Village Land Use Designations.** The commenter's skepticism about land use impact findings is noted. Regarding the simplification of the urban village land use designations, see response to Letter No. 8, Comment No. 11. Regarding the use of the SEPA Infill Exemption, see response to Letter No. 8, Comment No. 3. Regarding the identification of significant unavoidable adverse impacts and mitigation strategies, see Letter No. 8, Comment No. 7.

7. **Single Family Rezone Process.** See response to Letter No. 8, Comment No. 4.

8. **Tree Canopy.** See response to all comments in Letter No. 5.

9. **Transportation Analysis.** The commenter notes that there are only minimal differences in screenline results among the four alternatives, which is an overly broad generalization. The vast majority of future travel demand is dictated by the "background traffic," i.e. traffic generated by existing development, both locally and regionally. Moreover, the screenline methodology aggregates volumes across multiple arterials, which can obscure variation among individual roadways.

   The commenter cites travel time findings but states that no travel time impacts are found, based on Draft EIS Table 3.7-8 which broadly summarizes magnitudes of impacts but does not actually state anything about travel time impacts. Table 3.7-8 is clarified to indicate that the findings relate to whether "significant adverse impacts" are found in the DEIS analysis, but still does not discuss travel time impacts. To clarify, travel times are not used to determine impacts; they are provided for informational purposes only, and the City has no standards for travel time between locations.

   The City is in the process of developing a proposal for an impact fee program for transportation, but there is no obligation for this EIS to estimate the amounts of revenue that could be generated.

10. **Sidewalks.** The pedestrian network is described on Page 3.7-1 to 3.7-2 on the DEIS, and highlights the lack of sidewalks north of NE 85th Street. The section also notes that the *Pedestrian Master Plan* identifies many areas north of NE 85th Street with high priority "along the roadway" (i.e. sidewalk) improvements needed. SDOT will continue to pursue these improvements through their Sidewalk Development Program, which currently relies on the City's transportation levy for funding.

11. **Parks and Open Space Mitigation.** The commenter requests detailed analysis of park acquisition costs and possible impact fee programs. Such analyses are being conducted by the Parks Department as part of its planning and implementation duties such as updating the *Park Development Plan* in 2016, but that type of analysis is outside the scope of this EIS. Mitigation measures identified in the Draft EIS are appropriate for a citywide programmatic EIS and to the applicable element of the environment. Mitigation measures identified in the EIS include a mix of specific actions, potential policy or program recommendations or, where appropriate, identification of the existing regulatory and policy framework that would serve to mitigate impacts. See Section 3.2 of this Final EIS for revisions and clarifications to the impact analysis for parks, recreation and open space.

12. **Container Port Element.** Chapter 2 of the Draft EIS notes that the Container Port Element is part of the Comprehensive Plan. As shown in the Draft Comprehensive Plan, no changes to the Container Port Element are proposed. See http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2294968.pdf.

13. **Aesthetics: Push Design Review Processes to More Effectively Reject Bad Design.** Your comment is noted.

14. **Favor Alternative 3.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

15. **Implementation: Impact Fees, Moratoria, or Other Effective Carrots and Sticks to Influence Growth Where Preferred.** Your comments are noted.

Letter No. 297 Sandercock, Maria

1. **Prefer Alternative 3.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 298 Schwartz, Dick

1. **Endless Growth is Not a Good Policy.** The alternatives considered in the Draft EIS are based on a 20-year planning horizon for future housing and employment growth. As described in the Draft EIS, these population forecasts were prepared by the Washington Office of Financial Management and allocated to individual cities through a regional decision-making process. The growth assumptions considered in the EIS are consistent with guidance provided by the Growth Management Act, the Puget Sound Regional Council Vision 2040, and the King County Countywide Planning Policies.

Letter No. 299 Letter 299 Schweinberger, Sylvia

1. **Need Adequate Parking.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Charge Development Fees to Fund Amenities.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 300 Shapiro, JP

1. **Prefer Alternative 4 or the Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

2. **Planning Principles for Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 301 Sharp, Nicholas

1. **Land Use and Transportation Growth Pressures.** Alternatives 3, 4, and the Preferred Alternative in particular seek to focus highest densities close to existing and planned transportation improvements. See Draft EIS Chapter 2 for a description of the alternatives and Final EIS Chapter 2 for a description of the Preferred Alternative.

2. **Impacts of Bicycles on Bus Lanes.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **A Need for Parking.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

4. **Planned Parenthood.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

5. **Policy Response Times.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Police services are discussed in Draft EIS Section 3.8.

Letter No. 302 Shaw, Russell

1. **Favor Alternative 2.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 303 Shera, Sydney

1. **Support for Density, Especially Near Rail Stations.** See the response to Letter No. 301, Comment No. 1.

2. **Need a Conversation about Density.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Encourage Small Houses, More Efficient Housing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 304 Sheridan, Mimi

1. **Historic Preservation in the Comprehensive Plan.** Historic preservation has not been abandoned by the proposed Comprehensive Plan. See the response to Letter No. 15, Comment No. 7.

2. **EIS Analysis.** This EIS does not conclude that only SEPA policies provide sufficient historic resource protection. As noted in the response to Comment No. 1, this letter, the City is not proposing any change to policy or regulatory support for historic preservation. As part of the scoping process for the EIS, the City considered the potential for significant adverse impacts to historic resources resulting from the Proposed Action and concluded that the existing regulatory framework provides and will continue to provide sufficient processes and protections for evaluating landmarks and providing protection for historic resources. For this reason, historic preservation was not included in the Scope for this EIS.

3. **Historic Preservation in the Comprehensive Plan.** See response to Comments No. 1 and 2, this letter.

Letter No. 305 Siegelbaum, Heidi

1. **Growth Targets.** Seattle 2035 is planning for an additional 70,000 housing units by 2035. The purpose of the EIS is to compare alternative growth scenarios that meet this target, identify impacts and support informed decision-making to manage anticipated growth.

2. **Development and Adverse Effects on Tree Retention, Water, Fish and Livability.** Your comments are noted. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Seattle Urban Forestry Commission Letter.** See comments and responses to Letter No. 5, Seattle Urban Forestry Commission.

Letter No. 306 Singler, Joan

1. **Historic Preservation.** See response to Letter No. 15, Comment No. 7.

Letter No. 307 Skaftun, Emily

1. **What Happens if We Are Wrong About Growth Impacts? Your comments are noted.** The City will continue to monitor growth and its effects to gauge whether future actions to adjust strategies may be needed.

Letter No. 308 Smith, Clayton

1. **Support Alternative 4 With Anti-Displacement and Pro-Housing Affordability Strategies.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 309 Smith, David

1. **Advancing Transportation Technology.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The Draft Comprehensive Plan addresses new technologies and their impact on transportation, energy and employment in the Transportation, Utilities and Economic Development elements, respectively.

Letter No. 310 Smith609

1. **Blog.** The comment is noted.

Letter No. 311 Smolar, Dee

1. **Transportation and Housing Policy Recommendations.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 312 Stacishin, Liza (1)

1. **Promoting Othello Light Rail Station Area as Excellent Neighborhood Center.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 313 Stacishin, Liza (2)

1. **Promoting Thoughtful Neighborhood Planning and Transportation Planning to Enhance Vibrancy and Healthy Community in the Othello Neighborhood.** Your comments are noted.

2. **Planning Goals for 2035.** Your comments promoting beneficial land use and transportation planning actions for Othello are noted.

Letter No. 314 Staeheli, Margaret

1. **Need a Finer-Grain Alternative With Increased Housing in Low Density Areas.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

2. **Mitigation is Too Vague.** See responses to Letter No. 24, Comments No. 1 and 5.

3. **Any Better Approach to Effectively Directing Growth?.** Your comments seeking better planning frameworks to evaluate and direct growth more effectively are noted.

4. **Urban Forest Stewardship Plan.** See response to Letter No. 5, Comment No. 3.

5. **Draft EIS Table 2-4.** The potential use of rezones, zoning flexibility, growth incentive tools or program, or other kinds of public investments to aid livability and attract development are strategies that are generally applicable to alternatives 2, 3 and 4. Of course, depending on the particular location's size, condition or characteristics, the exact nature of such tools' applications could vary.

6. **Scope of EIS Review: Consider Trees.** A scoping period was conducted prior to the writing of this EIS. See response to Letter No. 5, Comment No. 1.

7. **Transportation.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. The EIS transportation analysis addresses all modes of transportation and is considered to have more than sufficient detail for a citywide cumulative programmatic action.

8. **Tree and Vegetation Protection and Canopy Effects Not Addressed in Earth & Water Quality Section.** Page 3.1-5 discloses the potential for improper tree cutting or other illegal vegetation management as potential impacts post-construction that could contribute to adverse impacts on earth and water quality.

9. **Mitigation.** The EIS discloses the potential for adverse spillover effects that generally relate to land use compatibility. The use of adopted regulations, processes and practices to mitigate impacts such as addressing noise complaints or other nuisances, is appropriate mitigation. These measures have been adopted by the city to address potential impacts of development and are therefore documented as applicable mitigation in the EIS.

10. **Invest More Time in Understanding Impacts and Planning the Details.** Consideration of the updated Comprehensive Plan began in 2013 and is expected to conclude in 2016. There has been a continued public conversation of comprehensive plan issues over the course of this time period. See http://2035.seattle.gov/ for more information.

Letter No. 315 Stahl, Mike

1. **No Variances From Rules in Future Development Review; Avoid Seattle as a Haven for the Wealthy.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Support Transit and Automobile Drivers as Well.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Strong City.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

4. **Loss of Character.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 316 Stern, Robby

1. **Introductory Comments: Housing, Transportation, Social Services.** The comments are noted.

2. **Draft Comprehensive Plan Comments: Affordable Housing, Good Transportation, Open Spaces, Development Fees.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 317 Stetkiewicz, Chris

1. **Transportation and Air Quality.** As described in the analysis in the Draft EIS, stricter automobile fuel economy, emission control, and fuel composition regulations that will be implemented by the US EPA over the life of the Comprehensive Plan are expected to result in lower overall emissions despite growth in vehicle miles traveled and other increases in emissions from development within the city.

2. **Public Schools.** See the response to Letter No. 19, Comment No. 8.

3. **Parks and Open Space.** See the response to Letter No. 8, Comment No. 23.

Letter No. 318 Stevens, Don

1. **Yogi Berra.** The comment is noted.

Letter No. 319 Stevens, Odessa

1. **Regional Coordination.** Your comments are noted. Coordination among cities in the Puget Sound region occurs primarily through the Puget Sound Regional Council (PSRC), an agency with the mission of providing for coordinated regional planning for transportation, growth management and economic development. The PSRC's Vision 2040 is the regional growth strategy and Transportation 2040 is the regional long-range transportation plan.

2. **Housing Costs.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 320 Stewart, Jackie

1. **Survey Question.** The comment about survey question 8 is noted.

Letter No. 321 Suni, Eric

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for description of the Preferred Alternative.

Letter No. 322 Sutherland, Loretta

1. **Urban Village Transportation Connections.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
2. **Affordable Housing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.
3. **Family-Friendly Housing and Urban Villages.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
4. **Definition of Walkable.** In the Draft EIS, a walkshed is identified as the distance that can be walked in 20 minutes. It is acknowledged that a comfortable walking distance varies between individuals.

Letter No. 323 Taylor, Holly

1. **Historic Preservation.** See response to Letter No. 15, Comment No. 7.

Letter No. 324 Taylor, Patrick

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 325 Thompson, Thor

1. **Policy Preferences: Parking, Police, Broadband, Rent-Equity.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 326 Thorp, Daniel

1. **Light Rail Service North-South.** Light rail service is planned to reach Northgate by 2021, and Lynnwood by 2023. See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 327 Tobin, Carol

1. **Comprehensive Plan Does Not Address Neighborhood Planning, Economic Development, Urban Design, Cultural Resources, or Historic Preservation.** See response to Letter No. 15, Comments No. 1 and 7.

2. **Historic Preservation.** See response to Comment No. 1, this letter.

3. **Historic Preservation as Environmental Stewardship.** See the responses to Letter No. 15, Comments No. 3 and 4.

4. **Historic Preservation.** See response to Comment No. 1, this letter.

Letter No. 328 Turnbull, Cass

1. **Objectivity.** The EIS has been prepared in a manner consistent with state and local SEPA rules and procedures. Although the commenter asserts a general lack of objectivity, no specific information is provided. Based on its review, the City concludes that the EIS is an objective analysis, consistent with all SEPA requirements.

2. **Lack of Specificity and Conflicts in Goals Versus Actions.** The purpose of the EIS is to disclose impacts of the proposed action and alternatives on elements of the natural and built environment, rather than to propose goals or implementation measure to achieve goals. It is noted here that the cited proposal to reduce the tree canopy goal has been deleted from the Draft Comprehensive Plan, thereby eliminating one potential conflict in goals versus actions.

   As described in the Draft Comprehensive Plan, "The plan is a framework with a strong purpose. Yet since it provides guidance for a 20-year timespan, it does not prescribe specific solutions for the most part." (Draft Comprehensive Plan, page 15). The Draft Comprehensive Plan describes that the City will implement the Plan through development regulations and functional plans (which do include more goals and more specific action strategies). It also provides examples of implementing actions and information about the relationship between city plans and implementing measures.

3. **Tree Canopy and Open Space Goals.** See responses to Letter No. 5, comments 2 and 3.

4. **EIS Analysis.** See the response to Comment No. 1, this letter. This email has been included as part of the record of comments on the Draft EIS and is used by the City as part of the decision-making process in the Comprehensive Plan update process.

Letter No. 329 Turnbull, John

1. **Focus Growth in Transit Centers, Avoid Displacement, Provide for Economic and Social Justice.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 330 Van Cleve, Janice

1. **Assumptions.** The commenter's assumptions about the future are noted.

2. **Future Vision.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 331 Vanderpool, Scott

1. **Cars and Bicycles.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
2. **Taxes and Fees.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Motorcycles, Scooters and Mopeds.** See response to Comment No. 1, this letter.
4. **Eastside HOV Lanes.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
5. **Problems in Ways of Achieving Reduced SOV Use.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 332 Vayda, Genevieve

1. **Light Pollution.** The City of Seattle contains light levels consistent with an urbanized environment and the proposed action does not propose any new uses or development types that are likely to result in significantly increased light levels. In addition, the City's development regulations provide buffers and other standards intended to ensure that light and glare impacts on sensitive uses, such as residential development, are minimized. For these reasons, an analysis of light impacts was not included in the EIS.
2. **Barbecues and Lighter Fluid.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Tree Protection.** See response to Letter No. 5, Comment No. 2.
4. **Bonfires.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
5. **Tree Canopy.** See response to Letter No. 5, Comment No. 3.
6. **Implementation Actions.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
7. **Climate Change.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 333 Wadsworth, Benj

1. **Loosen Restrictions on Accessory Dwelling Units.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 334 Warner, Richard

1. **Tree Canopy.** See response to Letter No. 5, Comment No. 3.

Letter No. 335 Watras, Alicia

1. **More Separated Bicycle Lanes.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Technological Developments of the Car.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Night Life.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. Regarding light pollution, see Letter No. 332, Comment No. 1.

Letter No. 336 Way, Thaisa

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 337 Weatbrook, Catherine

1. **Lack of Variety in Alternatives, Displacement Will Occur.** The alternatives represent a range of alternative approaches to accommodating anticipated growth of 70,000 housing units and 115,000 jobs by 2035. Draft EIS Section 3.6 acknowledges the risk of displacement in certain urban villages and notes that additional discussion of equity and displacement can be found in the separate draft Growth and Equity Analysis. See also Final EIS Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to help address displacement and Section 4.3.2 for updated information related to the separate draft Growth and Equity Analysis.

2. **Need Commitment to Livability Features With Growth.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Incomplete Work.** The Final EIS includes responses to all comments, a description of the Preferred Alternative, analysis of the Preferred Alternative and a sensitivity analysis of the potential impacts of increased residential growth and corrections/revisions to the analysis.

Letter No. 338 Weissman, Jeffrey

1. **Density Near Light Rail.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 339 Welch, Sarah

1. **Acquire New Open Space, Don't Use Sleight of Hand in Counting.** See response to Letter No. 8, Comments No. 23 and 25 regarding open space LOS standards and conversions of space for other recreational uses. The commenter is correct in pointing out that reprogramming existing City owned park or open space lands does not increase the overall quantity of park land. The mitigation measure was intended to indicate that where specific types of open space are lacking, such conversions could help to meet specific neighborhood recreational needs. It is also important to acknowledge that Seattle Park and Recreation has a mission that includes providing for multiple uses of City-owned parks and open space. In planning for parks the City has to determine what its priorities are in a specific location. Comprehensive Plan goals do not imply that natural areas should all be considered for conversion, but that in some cases, conversions may help alleviate a deficiency in a specific type of recreational use in a specific urban village.

2. **Tree Canopy.** Your comments are noted. See comments and responses to Letter No. 5.

Letter No. 340 Whalen, David

1. **Prefer Alternatives 3 and 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

2. **Prevent Displacement.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

3. **Growth and Affordability.** See Final EIS Section 3.1, which contains a sensitivity analysis that considers impacts of a scenario derived from the Preferred Alternative if 100,000 new housing units of growth occurs instead of 70,000 units.

4. **Neighborhood Character and Building Aesthetics.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 341 Wheeler, Charles

1. **Schedule for Plan Implementation.** See http://2035.seattle.gov/resources for more information about implementation timelines for this Plan and other efforts such as actions for the Housing Affordability and Livability Agenda.

Letter No. 342 Whisner, Jack

1. **Development Market Needs to Respond to Realize Development.** Your comments are noted.

2. **Prefer More Growth: In Nodes, Linear Patterns, in Lower Density Areas, to Aid Housing Affordability.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See Final EIS Section 3.1, which contains a sensitivity analysis that considers impacts of a scenario derived from the Preferred Alternative if 100,000 new housing units of growth occurs instead of 70,000 units.

Letter No. 343 Williams, Ruth

1. **Seattle Urban Forestry Commission Letter.** See comments and response to Letter No. 5, Seattle Urban Forestry Commission.

Letter No. 344 Wilson, John Arthur (1)

1. **Comprehensive Plan Amendment.** This commenter has proposed the described actions in this letter to be part of the annual Comprehensive Plan amendment process, and it is being considered in that process, not in this particular Comprehensive Plan update action.

Letter No. 345 Wilson, John Arthur (2)

1. **Comprehensive Plan Amendment Application.** See response to Letter No. 344, Comment No. 1.

Letter No. 346 Wong, Michael

1. **Alternatives 3 and 4 Would Lead to Displacement Impacts.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

2. **Prefer Alternatives 1 and 2, and Investing in Infrastructure for Underserved Residents.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 347 Zeng, Lu

1. **Should Not be Like San Francisco: Rezone for More Housing, and Provide Transit for Better Road Efficiencies.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 348 (No Last Name), Andrew

1. **Zone Changes All Over the City for Different Housing Types.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 349 (No Last Name), Annie

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 350 (No Last Name), Betsy

1. **Website Version of Draft EIS.** The comment is noted.
2. **More Open Space in Multi-Family Areas.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Transit Service to Large Parks.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
4. **Plans and Codes for More Usable Open Spaces for All People.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 351 (No Last Name), Cary

1. **More ADUs and Row Houses Are Favored.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
2. **More Transit Service Via Rail.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 352 (No Last Name), Charles

1. **Schedule.** See response to Letter No. 341, Comment No. 1.

Letter No. 353 (No Last Name), Chris

1. **Affordable Housing and Favor Transit Oriented Development.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 354 (No Last Name), Connie

1. **Favor Transit Oriented Development But Avoid Displacement of Marginalized Populations.** See Final EIS Chapter 2, Description of the Preferred Alternative, which adjusts growth estimates to help reduce displacement.

Letter No. 355 (No Last Name), Daniel

1. **Density and Affordability.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 356 (No Last Name), Gary

1. **Green Roofs.** See the response to Letter No. 178, Comment No. 1.
2. **Favor Alternatives 3 and 4.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.
3. **Seattle Subway West Tunnel.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 357 (No Last Name), Jeff

1. **South Seattle Low Income Housing.** See Final EIS Chapter 2, Description of the Preferred Alternative, which adjust growth estimates to help reduce displacement.

Letter No. 358 (No Last Name), Jenny

1. **Speeding Cars.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 359 (No Last Name), Laura

1. **City Service Standard.** The Draft EIS describes the City's adopted level of service standards for transportation in Section 3.7, pages 3.7-17 through -20. The Draft Comprehensive Plan describes level of service standards and recommended policy guidance on page 91.

Letter No. 360 (No Last Name), M.

1. **Single Family Neighborhood Preservation.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
2. **Job Growth Priorities.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
3. **Reducing Reliance on Cars.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
4. **Increase School Capacity.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
5. **Open Space Amenities.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.
6. **Race and Social Equity.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

7. **Core Values.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

8. **Alternatives.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 361 (No Last Name), Peter

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2, Description of the Preferred Alternative.

Letter No. 362 (No Last Name), Rita

1. **Strongly Encourage Housing Ownership.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the Draft EIS Housing Element for recommended policy guidance related to home ownership and housing diversity.

Letter No. 363 (No Last Name), Roxana

1. **Tree Canopy.** See comments and responses to Letter No. 5.

Letter No. 364 (No Last Name), Sharon

1. **West Seattle Transit.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 365 (No Last Name),Shipra

1. **Need Transportation Improvements in Central Area.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 366 (No Last Name), Trevor

1. **Transit Oriented Development.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

2. **Zoning and Transportation Improvements for Social Equity and Mobility.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also the Draft Comprehensive Plan Transportation Element for recommended policy guidance addressing transportation mobility.

3. **Tax Code.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Note: Letters No. 367 through No. 438 were provided through social media. They include letters containing multiple comments from different persons as part of online discussions. For this reason, the letters are provided in chronological order rather than alphabetical order.

Letter No. 367 @SEAsouthern

1. **Population Numbers.** The King County Countywide Planning Policies (CPPs) set growth targets for all jurisdictions in the county, based on state growth projections. The city's Draft Comprehensive Plan is consistent with state and regional guidance and uses the CPP growth targets.

Letter No. 368 @MikeLindblom

1. **Lack of Excitement.** The comments are noted.

Letter No. 369 Zach Lubarsky

1. **Bad Job on Options.** The comments are noted.

Letter No. 370 @djterasaki

1. **Graham Street Station not Pictured.** The comments are noted.

Letter No. 371 @OverlakeAlumni

1. **Sustainable Growth.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 372 Billy King

1. **Too Late.** The comments are noted.

Letter No. 373 Brian Stewart

1. **Crappies in Lakes.** The comments are noted.

Letter No. 374 David Whalen (1)

1. **Allow Upzoning to Prevent Displacement.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 375 @davidcutler_sea

1. **Alternative 4.** The comments are noted.

Letter No. 376 *Note: Online discussion with multiple commenters.*

Letter No. 376.1 Noah Miname

1. **Don't Yuppify Pike Place Market.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 376.2 David Whalen (2)

1. **Meaning of Yuppify.** The comments are noted.

Letter No. 376.3 Gary Theo Schultz (1)

1. **Yuppification Example.** The comments are noted.

Letter No. 376.4 Jeff Nissen (1)

1. **Seattle will be Underwater by 2035.** The comments are noted.

Letter No. 376.5 Hugo Hamerlinck

1. **Chase Bank vs.** Greek Restaurant in Fremont. The comments are noted.

Letter No. 376.6 Gary Theo Schultz (2)

1. **Old World Charm.** The comments are noted.

Letter No. 377 David Sucher

1. **All Alternatives Are the Same.** As described in the Draft EIS, each alternative emphasizes different patterns of projected future growth and intensity of development among the urban centers, urban villages and transit-related areas. Some of the alternatives would result in reduced impacts, compared to the No Action Alternative.

Letter No. 378 @bruteforceblog (1)

1. **Open Up the Single Family Zones.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 379 @ bruteforceblog (2)

1. **Best Way to Address Affordability.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 380 @ MaishaBarnett

1. **People First Design.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 381 John Paul DeGennaro

1. **Keep the Culture Alive.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

   Proposed mitigation to address affordability and displacement can be found in Draft EIS Section 3.6. Also, see the separate draft Growth and Equity Analysis, Attachment B about Equitable Development Measures. See also Final EIS Section 4.3.2, Updates to the Growth and Equity Analysis and Chapter 2 for a description of the Preferred Alternative.

Letter No. 382 Up and Coming

1. **Stop Complaining and Do Something.** The comments are noted.

Letter No. 383 Kyrtin

1. **Scenarios for Controlling Housing Market Rates.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 384 MF1986

1. **More Density, More Retail, More Public Transit.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 385 bif

1. **Artists Moving Out of Seattle.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 386 Wallingfordian

1. **You are Destroying Seattle.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 387 Maple Leafer

1. **Tax Real Estate Developers and Owners.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 388 Greenwood neighbor

1. **Housing and Traffic.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 389 How Much is Enough

1. **Stabilize our Population.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 390 UR

1. **City is a Job and Transportation Snob.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 391 malinda lewis

1. **Clean Earth and Compassionate State.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 392 Mileg67

1. **Traffic and Housing Affordability.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

Letter No. 393 Cass Turnbull

1. **Green Space and Trees are Public Infrastructure.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 394 @jgoold13

1. **NHL.** The comments are noted.

Letter No. 395 @HERNANDOstax

1. **Like Blade Runner.** The comments are noted.

Letter No. 396 @SHJ_Kamishibai

1. **About 20 Pounds Heavier.** The comments are noted.

Letter No. 397 Allison Agostinelli

1. **Loss of Neighborhood Identities and Culture.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 398 John Bannion

1. **Develop Progressive and Effective Problem-Solving Policies.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 399 prudentequity

1. **Investing in the Stock Market.** The comments are noted.

Letter No. 400 Letter 400 @bruteforceblog (3)

1. **Opposite Track City Needs to Take.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 401 Don Perera

1. **U.S. Population Increases.** The comments are noted.

Letter No. 402 John Barber

1. **Parks and Open Space Element.** The Draft Comprehensive Plan contains a Parks and Open Space Element.

Letter No. 403 Sovann Nem

1. **I Love Seattle.** The comments are noted.

Letter No. 404 Ken Thomas

1. **We Must Raise our Voices.** The comments are noted.

Letter No. 405 @WillSeattle (1)

1. **Plan for 2.5 Times the Current Population.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 406 @WillSeattle (2)

1. **Upzone Wallingford Along Arterial Blocks.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 407 Lisa Connolley

1. **Jean Darsie.** The comments are noted.

Letter No. 408 Jeff Nissen (2)

1. **Seattle Will be Underwater in 2035.** The comments are noted.

Letter No. 409 *Note: Online discussion with multiple commenters.*

Letter No. 409.1 @SNGreenways (1)

1. **Transportation Level of Service and Parking.** The comments are noted.

Letter No. 409.2 @SNGreenways (2)

1. **Walksheds.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 409.3 @GlenBikes

1. **90 Minute Neighborhoods.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 410 @bruteforceblog (4)

1. **Upzone Single Family Neighborhoods.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 411 @Nick_Etheredge (1)

1. **Attitude of this Plan.** The comments are noted.

Letter No. 412 @Nick_Etheredge (2)

1. **Decrease Car Use.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 413 @Nick_Etheredge (3)

1. **Improve Walksheds.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 414 @NEGreenways

1. **Miles of Bicycle Facilities.** The number of miles of bicycle facilities listed in the DEIS is based on city data on transportation facilities. Figure 3.7-4 in the Draft EIS shows a recent map of existing bicycle facilities.

Letter No. 415 Tom Mullen

1. **Build Outside Seattle.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 416 Hillary Pittard

1. **Boredom.** The comments are noted.

Letter No. 417 Susan Renee Mason Laskowska

1. **Freedom Act.** The comments are noted.

Letter No. 418 @AngelaKBoyd

1. **Make Room for Affordable Homes.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 419 Donna Hartmann-Miller

1. **Costs to Quality of Life Amenities.** The comments are noted.

Letter No. 420 @bruteforceblog (5)

1. **Plan Enriches Homeowners/Landlords.** The comments are noted.

Letter No. 421 @GordonOfSeattle (1)

1. **Plan for the Missing Middle.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 422 @seabikeblog

1. **We Need More than Just Townhouses.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 423 @Seattle_Tourism

1. **Love to Read the Results.** The comments are noted.

Letter No. 424 *Note: Online discussion with multiple commenters.*

Letter No. 424.1 @asclepiusgal

1. **Outdoor Fitness Equipment.** See City of Seattle Parks Department response in Letter No. 425.2.

Letter No. 424.2 @SeattleParks

1. **Response to @asclepiusgal.** The comments are noted.

Letter No. 425 @andrewgmac (1)

1. **Benefits of Restoring Ecosystem Services.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 426 Denise Dahn

1. **Comment Box.** The comments are noted. The survey for the Draft EIS is closed.

Letter No. 427 *Note: Online discussion with multiple commenters.*

Letter No. 427.1 @bruteforceblog (6)

1. **Plans are Inadequate.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 427.2 @cruickshank (1)

1. **Agreement with @bruteforceblog.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 427.3 @bruteforceblog (7)

1. **80 Percent of City Closed Off from Development.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 427.4 @cruickshank (2)

1. **Plan Allows Too Much Growth.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 428 @andrewgmac (2)

1. **Start Building Communities.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 429 @GordonOfSeattle

1. **Car Emissions.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 430 Mark Olinger

1. **Smellscape.** The comments are noted.

Letter No. 431 Jack Whisner

1. **Zoning and Electric Transit.** The comments are noted.

Letter No. 432 Dave Duwel

1. **Agree.** The comments are noted.

Letter No. 433 @andrewgmac (2)

1. **Start Building Communities.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 434 *Note: Online discussion with multiple commenters.*

Letter No. 434.1 @Nick_Etheredge (4)

1. **Seattle 2035 and HALA.** The work that comes out of HALA is consistent with the intent of the proposed Comprehensive Plan and will be implemented as appropriate. The City Council has created the Council Work Plan for HALA Recommendations, which can be found on the City's website at: http://www.seattle.gov/council/committees/HousingAffordability/attachments/Reso.-31609---HALA-Work-Plan-Attachment-A.pdf.

Letter No. 434.2 @Nick_Etheredge (5)

1. **Seattle 2035 and HALA.** The comments are noted. See response to Letter No. 434.1.

Letter No. 434.3 @UrbanistOrg (2)

1. **Response to @Nick_Etheredge.** The comments are noted. See response to Letter No. 434.1.

Letter No. 434.4 @UrbanistOrg (3)

1. **Response to @Nick_Etheredge.** The comments are noted. See response to Letter No. 434.1.

Letter No. 434.5 @UrbanistOrg (4)

1. **Response to @Nick_Etheredge.** The comments are noted. See response to Letter No. 434.1.

Letter No. 434.6 @UrbanistOrg (5)

1. **Response to @Nick_Etheredge.** The comments are noted. See response to Letter No. 434.1.

Letter No. 434.7 @UrbanistOrg (6)

1. **Outdoor Response to @Nick_Etheredge.** The comments are noted. See response to Letter No. 434.1.

Letter No. 435 @SNGreenways (3)

1. **Strong Towns.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Letter No. 436 *Note: Online discussion with multiple commenters.*

Letter No. 436.1 @UrbanistOrg (7)

1. **Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 436.2 @UrbanistOrg (8)

1. **Let the City Know How you Feel.** The comments are noted.

Letter No. 436.3 @mjgiarlo

1. **Prefer Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 436.4 @eldang

1. **Prefer Urbanist Alternative 5.** See Final EIS Section 4.3.2, Alternatives and Chapter 2 for a description of the Preferred Alternative.

Letter No. 437 @bruteforceblog (8)

1. **Berlin's Single Family Zone.** The comments are noted.

Letter No. 438 Letter 438 @feetfirst_wa

1. **Partnering to Bring City Stories.** The comments are noted.

4.3.2 Responses to Comments on Commonly Raised Issues

Many of the public comments touched upon common themes or issues. Rather than repeating the response to each of these comments, responses to these frequently raised issues have been grouped according to the headings, below.

GENERAL COMMENTS AND POLICY RECOMMENDATIONS

Many comments suggest proposed possible policy directions, express opinions about city operations and administration and share thoughts on the city's overall character and direction. While these comments raise policy issues for consideration as part of the comprehensive plan update, they do not put forward questions or comments about the EIS analysis that warrant additional detailed responses.

Some comments also describe zoning and development preferences or regulatory concerns city wide and for specific neighborhoods and locations. The proposed action and alternatives considered in the EIS are for an update of the Comprehensive Plan, a programmatic citywide policy action that does not include specific development projects or regulations.

Unless noted in the specific response, these comments do not substantially question or address the EIS alternatives or analysis. All general comments and policy recommendations are noted for city consideration and are not further evaluated or discussed in this EIS.

ALTERNATIVES

Some comments express support or opposition to the alternatives described in the Draft EIS. Some comments also state their support for an alternative known as "Alternative 5." The term "Alternative 5" was coined in a June 16, 2015 article in The Urbanist.[1] The Urbanist's Alternative 5 is generally described as seeking to spread growth to a wide swath of the city in order to prevent large-scale displacement and pairing high density development with high quality transit. However, no formal description of Alternative 5 has been prepared. All comments received on the alternatives, including Alternative 5, are noted for city consideration. See Final EIS Chapter 2, which describes the Preferred Alternative.

GROWTH AND EQUITY ANALYSIS

Since publication of the Draft EIS, City staff have worked to refine the draft Equity and Growth Analysis. Results are available in an updated report that is linked at http://www.2035.seattle.gov/resources. Minor adjustments were made to several indicators and in some cases, newer data was used. Examples included more refined ways of measuring distance to employment opportunities, updated transportation system (new light rail access to University of Washington for example), updated median rent data, and a measure of linguistic isolation (relating to English-speaking abilities that may vary between members of the

1 https://www.theurbanist.org/2015/06/16/support-alternative-5-for-seattle-2035/#

same family). Also, a measure of sidewalk system completeness was added. These slight changes in methodologies provide for a more accurate level of findings, but they do not result in major adjustments to the findings presented at the time of Draft EIS publication.

The additional work has also led to the development of a proposed Equitable Development Implementation Plan (EDIP), which identifies near-term investments in anti-displacement strategies that the City can use to ensure equitable growth in neighborhoods with high displacement risk and low access to opportunity.

The Comprehensive Plan's 20-year vision for an equitable Seattle will require a meaningful and early commitment to equity, not waiting until 2035. This EDIP is part of that commitment. Its objectives are to:

- Support the Mayor's vision to create an equitable city and to eliminate institutionalized racism.
- Clearly articulate the race and social equity position of the Mayor's Comprehensive Plan and 20 year Growth Strategy and to coordinate and integrate this significant body of work.
- Create a road map to race and social equity through new systems within the City to address inequities and translating the Equity and Growth Analysis into action that can be advanced concurrently with the Comprehensive Plan.
- Identify targeted strategies including programs, policies and public investments for areas of the city with high-risk of displacement, and increase access to high opportunity areas for marginalized populations.
- Create systemic change that coordinates policy, planning, programs, budgeting and public investments around an equitable development framework that goes beyond individual transactions and focuses on transformational action to change the systems that disadvantage marginalized communities.
- Propose an implementation structure that includes race and social equity fully incorporated in all four components: leadership, staff capacity, internal accountability, and external accountability.
- Resource the leadership of marginalized communities so that their race and social equity expertise can inform, implement and steward the City's equitable development.
- Identify financial resources to implement the strategies.

PUBLIC OUTREACH

Some comments express concern for limited or inadequate public outreach conducted during the Comprehensive Plan update process. For the Draft EIS, one public hearing was held at City Hall and live-streamed on-line on May 27. In addition, an online-open house for the Draft EIS was held over a 45-day period. Public comment was invited during this same

45-day period via the online open house, email, US postal mail, social media, and verbal comment at the public hearing on May 27.

In addition, public outreach for the Draft Comprehensive Plan has included a wide variety of events. Outreach to the community for the Draft Comprehensive Plan release occurred in multiple sectors of the city in fall 2015. The outreach for the Comprehensive Plan update process has included dozens of meetings over the last few years, and has solicited input through surveys and other online portals. OPCD has received several thousand public comments from these various outreach modes. Plans for 2016 outreach on important citywide planning and growth topics will also include upcoming meetings relating to HALA-related implementation initiatives, see http://2035.seattle.gov/.

HOUSING AFFORDABILITY

The issues of affordable housing and displacement are addressed in Draft EIS Section 3.6 (and clarifications in Section 3.2 of this Final EIS), in the analysis for the Preferred Alternative (FEIS Section 3.1), and the Draft Comprehensive Plan Housing Element. Draft EIS Section 3.6 includes a discussion of affordable housing, existing conditions, potential impacts of the alternatives, and possible mitigating measures. The Draft Comprehensive Plan Housing Element contains recommended policy guidance for affordable housing. Other discussion on these topics occurs in the separate Growth and Equity Analysis.

Displacement can be a result of increasing affordability challenges as new and more expensive housing is developed. Although strategies to avoid affordability challenges of all types will be considered and implemented, the Draft EIS concludes that some impacts on affordability will be unavoidable, regardless of alternative as a result of the significant growth that Seattle anticipates over the next 20 years. The Preferred Alternative has been shaped in response to the concerns identified on displacement potential and housing affordability concerns. Mitigations that are put in place will also contribute to alleviating the impacts of affordability issues (including displacement) but will not be able to reduce them completely.

Several comments express concern over housing affordability and how effective the existing mitigation strategies will be in addressing the affordability challenges, as well as concern about whether HALA and the Race and Social Justice Initiative will be able to achieve goals for tenant protection and low-income housing preservation. The Draft Comprehensive Plan lays out goals and policies that address these issues through creating a framework for action. Although the Draft Comprehensive Plan does not contain regulations or programs specifically, its intent is to support those strategies that will accomplish Seattle's goals for a city that does have a "robust housing agenda" and can achieve those goals by 2035. While some comments call for identification of specific strategies to create inclusive and affordable housing, the Draft Comprehensive Plan is the policy document that guides specific actions (such as those identified by HALA). The Draft Comprehensive Plan will specifically address concerns of housing affordability through draft Goal HG5, which is to "advance the opportunity for households of all income levels to live affordably in Seattle and reduce over

time the unmet housing needs of extremely low-, very low- and low- income households in Seattle." Draft policies H5.1–H5.23 support the stated goal of HG5. Draft goals HG1 through HG3, together with the implementation of proposed supporting policies, will also contribute to mitigating the impacts of growth and affordability challenges.

In conjunction with those strategies that already exist, the City is actively working on strategies that will help mitigate those adverse impacts on housing affordability that are of concern. Some of the potential strategies already identified by the HALA committee would:

- Increase the number of rent and income restricted units for households at or below 60 percent of Area Median Income while increasing the supply and diversity of housing options;
- Implement programs and policies to preserve existing affordable housing, focusing on neighborhoods with those most at risk of displacement;
- Consider programs and policies that will reduce barriers for those with insufficient or inconsistent incomes, or those with criminal records, to seek housing;
- Consider programs that would assist homeowners in remaining in their homes or programs to help residents buy when they cannot access conventional mortgages; and
- Streamline existing project review programs and permitting (HALA Recommendations, 2015).

The work that comes out of the City's Housing Affordability and Livability Agenda (HALA) is likely to be consistent with the intent of the proposed Comprehensive Plan and will be implemented as appropriate after future decision-making actions. The City Council has created the Council Work Plan for HALA Recommendations, which can be found on the City's website at: http://www.seattle.gov/council/committees/HousingAffordability/attachments/Reso.-31609---HALA-Work-Plan-Attachment-A.pdf.

4.3.3 Public Hearing Responses

Section 4.3.3 of this Final EIS contains responses to public comments provided on the Draft EIS during the May 27, 2015 public hearing. Each comment provided at the public hearing is provided a response.

Distinct comments are numbered in the margin of the hearing transcript in Section 4.2 on page 4–383. Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted. Comments that address substantive EIS issues are responded to with an explanation of the issue, a correction or other applicable reply.

Responses to Public Hearing — MAY 27, 2015

1. **Greenhouse Gas Emissions.** The comments are noted. Please see the response to Letter No. 119, Comment No. 5.

2. **Open Space.** See the response to Letter No. 8, Comment No. 23.

3. **Environmental Stewardship.** With respect to environmental stewardship, Section 3.1.3 of the Draft EIS indicates that none of the identified impacts of the proposal on earth and water resources are deemed to be significant adverse impacts. It concludes that the continued application of existing policies, review practices and regulations is expected to lead to avoidance or reduction of impacts to environmentally critical areas such that significant adverse impacts are not probable. Specific elements of the city's policies and regulations include the Seattle Municipal Code Title 22 (Building and Construction Codes), Title 23 (Land Use Code), Title 25 (Environmental Protection and Historic Preservation), Chapter 25.09 (Regulations for Environmentally Critical Areas), Chapter 23.60A (Shoreline Master Program Regulations), and others. Because of the substantive findings, there is not a need to define other mitigation strategies in this programmatic EIS. Additionally, the draft Comprehensive Plan Environment Element provides recommended policy guidance for environmental stewardship.

4. **EIS Should Consider Development Capacity.** The comments are noted. Please see the response to Letter No. 8, Comment No. 1.

5. **Incorporate Equity Analysis into EIS.** The comments are noted. Please see the response to Letter No. 17, Comment No. 5.

6. **Environmental Impacts of Displacement.** The comments are noted. Please see the response to Letter No. 17, Comment No. 7.

7. **Timing of Mitigation for Displacement.** The comments are noted. Please see the response to Letter No. 24, Comments No. 1 and 5.

8. **Cumulative Impacts of Displacement.** See response to Letter No. 17, Comment No. 7. See also Final EIS Chapter 2 for a description of the Preferred Alternative and Section 4.3.2 for information on the updated separate draft Growth and Equity Analysis.

9. **Public Transit.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

10. **Discovery Park.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

11. **Bus Service.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

12. **Places that have Already Exceeded their Growth Targets.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations. See also Draft Comprehensive

Plan Goal GSG3, supporting policies and Growth Strategy figures 2 and 3 for the City's recommended approach to growth estimates for urban centers, villages and manufacturing/industrial centers.

13. **Public Meeting Materials.** The comments are noted.

14. **Aging in Place.** The comments are noted. The separate draft Growth and Equity Analysis considers displacement holistically and does not distinguish between residents of different ages in assessing potential for displacement. For a discussion of updates to the separate draft Growth and Equity Analysis, see Final EIS Section 4.3.2. For recommended policies addressing housing and vulnerable populations, see the Draft Housing Element in the Draft Comprehensive Plan policies.

15. **Public Meeting Materials.** The comments are noted.

16. **Transportation Services.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

17. **Let the Youth Know.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

18. **Limit on How Much Rent Should Be.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

19. **Sensitivity Analysis.** The comments are noted. Please see Final EIS Section 3.1.2 for a discussion of the sensitivity analysis.

20. **Less Dependence on Transit.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

21. **Open Space.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

22. **Unmitigatible Impacts.** The commenter incorrectly states that the summary to the Draft EIS does not identify any unmitigable impacts. See page 1-21 of the Draft EIS.

    The commenter also questions whether existing regulations can mitigate for growth. If any additional growth is to be allowed at all beyond current conditions, localized increases in density and building intensity are inevitable. As a result, the City has adopted development regulations, design standards and a design review process that assist in avoiding or mitigating the effects associated with future new growth. Though the commenter may not agree that these measures have been properly applied by the City in the past, they have been adopted for that purpose and are therefore documented as relevant mitigation strategies in the EIS.

    The EIS is a citywide programmatic document that considers impacts and mitigation on a cumulative basis. As a citywide document, it is acknowledged that analysis of neighborhood-level impacts is limited.

23. **Vehicle Miles Traveled Per Capita.** Using vehicle miles traveled per capita as a measure of transportation conditions is an established practice in the field of transportation planning and is one of multiple metrics used to evaluate transportation conclusions. These include the City's adopted level of service standards, travel time, mode share and average trip length. See Draft EIS Section 3.7 for additional discussion of metrics.

24. **Better Explanation of Level of Service and Screenlines.** At the time of the Draft EIS, the City's designated level of service policy consisted of the screenline methodology to evaluate level of service for autos and transit. The Final EIS includes updated metrics, see Appendix B.3 and Final EIS Section 3.1, Preferred Alternative and Sensitivity Analysis.

25. **Pike Place Preservation and Development Authority Market Front Project Committee.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

26. **Ensure that there is Affordable Housing.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations and Housing Affordability.

    Proposed mitigation to address affordability and displacement can be found in Draft EIS Section 3.6 and the separate draft Growth and Equity Analysis, Attachment B Equitable Development Measures. See also Final EIS Section 4.3.2 for updates to the separate draft Growth and Equity Analysis and Chapter 2 for a description of the Preferred Alternative.

27. **Land Use Code.** The Draft EIS states that the City will continue to utilize its existing land use code, design review process and guidelines, and Urban Design Frameworks to regulate new development. The Draft EIS also lists potential additional mitigation, such as zoning code amendments to address transitions between urban villages and surrounding areas (page 3.4-36).

28. **Overlay District for the Waterfront.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

29. **School Facilities.** See the responses to Letter No. 8, Comment No. 27 and Letter No. 8, Comment No. 31.

30. **Student Growth Outside Urban Centers.** See the response to Letter No. 8, Comment No. 27.

31. **Requirement for City and District Cooperative Planning.** See the response to Letter No. 8, Comment No. 28.

32. **Impact of Removing Trees.** See the responses to comments in Letter No. 5.

33. **Tree Impact Analysis.** See the responses to comments in Letter No. 5.

34. **Include the Equity Analysis in the Draft EIS.** The comments are noted. Please see the response to Letter No. 17, Comment No. 2.

35. **Support for Comments made by Ubax Gardheere at Public Meeting.** The comments are noted, see the responses to Public Hearing Comments 5 through 8.

36. **Social, Cultural and Political Ramifications of Displacement.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

37. **Land Degradation Due to Tree Cutting.** The comments are noted.

38. **Tree Impact Analysis.** See the responses to comments in Letter No. 5.

39. **Tree Canopy is Part of our Infrastructure.** See the responses to comments in Letter No. 5.

40. **Best Placement and Type of Tree Canopy.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

41. **Support for Comments made by Cindy Barker at Public Meeting.** The comments are noted, see the response to Public Hearing Comment 4.

42. **Growth, Affordable Housing and Displacement.** For discussion of displacement, see the separate draft Growth and Equity Analysis. See also Final EIS Section 4.3.2 for updates to the separate draft Growth and Equity Analysis and Chapter 2 for a description of the Preferred Alternative, which adjusts growth estimates to help address displacement. Regarding affordable housing, see Final EIS Section 4.3.2, Housing Affordability.

43. **Consider Students in EIS and 2035 Plan.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

44. **Edible Trees.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

45. **Rent Prices.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

46. **Climate and City Environmental Management.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

47. **Challenges Facing a Long-term Plan for Seattle are Enormous.** The comments are noted.

48. **Support for High Density and Natural Gas in the Bus System.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

49. **Development of Good Environments for Families.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

50. **Regional Growth and Affordability Coordination.** See Final EIS Section 4.3.2, General Comments and Policy Recommendations.

Seattle 2035

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City of Seattle
Office of Planning & Community Development

APPENDICES FOR THE

FINAL ENVIRONMENTAL IMPACT STATEMENT FOR THE SEATTLE COMPREHENSIVE PLAN UPDATE

MAY 5, 2016

B.1 Transportation Greenhouse Gas Emissions Appendix

Table B.1–1 GHG emissions summary

GHG Emissions	2015*	2035 Alt. 1	2035 Alt. 2	2035 Alt. 3	2035 Alt. 4	2035 Preferred Alt. 5	2035 Sensitivity Analysis
Cars & Light Duty Trucks							
2015 to 2035 VMT Annual Growth Rate		0.47%	0.44%	0.46%	0.47%	0.46%	0.55%
Interim GHG Emissions (no improved fuel economy)		1,970,000	1,956,000	1,965,000	1,970,000	1,965,000	2,003,000
2015 to 2035 Emissions Reduction Factor		30%	30%	30%	30%	30%	30%
2015 to 2035 Congestion Factor		1.12	1.12	1.12	1.12	1.12	1.12
Final GHG Emissions Estimate	*1,603,000*	*1,379,000*	*1,369,000*	*1,375,000*	*1,379,000*	*1,376,000*	*1,402,000*
Truck							
2015 to 2035 VMT Annual Growth Rate		1.28%	1.28%	1.28%	1.28%	1.28%	1.28%
Interim GHG Emissions (no improved fuel economy)		1,031,000	1,031,000	1,030,000	1,030,000	1,030,000	1,030,000
2015 to 2035 Emissions Reduction Factor		4%	4%	4%	4%	4%	4%
2015 to 2035 Congestion Factor		1.11	1.11	1.11	1.11	1.11	1.11
Final GHG Emissions Estimate	*720,000*	*990,000*	*990,000*	*989,000*	*989,000*	*989,000*	*989,000*
Bus							
2015 to 2035 VMT Annual Growth Rate		0.39%	0.39%	0.39%	0.39%	0.39%	0.39%
Interim GHG Emissions (no improved fuel economy)		70,000	70,000	70,000	70,000	70,000	70,000
2015 to 2035 Emissions Reduction Factor		35%	35%	35%	35%	35%	35%
2015 to 2035 Congestion Factor		1.02	1.02	1.02	1.02	1.02	1.02
Final GHG Emissions Estimate	*64,000*	*42,000*	*42,000*	*42,000*	*42,000*	*42,000*	*42,000*
Vanpool							
2015 to 2035 VMT Annual Growth Rate		0.47%	0.44%	0.46%	0.47%	0.46%	0.55%
Interim GHG Emissions (no improved fuel economy)		2,000	2,000	2,000	2,000	2,000	2,000
2015 to 2035 Emissions Reduction Factor		30%	30%	30%	30%	30%	30%
2015 to 2035 Congestion Factor		1.12	1.12	1.12	1.12	1.12	1.12
Final GHG Emissions Estimate	*2,000*	*2,000*	*2,000*	*2,000*	*2,000*	*2,000*	*2,000*
Interim Total (no improved fuel economy)		***3,073,000***	***3,059,000***	***3,067,000***	***3,072,000***	***3,067,000***	***3,105,000***
Final Total	**2,389,000**	**2,413,000**	**2,403,000**	**2,408,000**	**2,412,000**	**2,409,000**	**2,435,000**

1. 2015 data assumed to be equal to 2012 inventory from Seattle Community Greenhouse Gas Emissions Inventory
2. Congestion factor based on the US Environmental Protection Agency Motor Vehicle Emission Simulator (MOVES) Model

Table B.1–2 Auto and light duty truck VMT

Trip Type	2015	2035 Alt. 1	2035 Alt. 2	2035 Alt. 3	2035 Alt. 4	2035 Preferred Alt. 5	2035 Sensitivity Analysis
II	932,108	1,032,308	1,009,709	1,027,709	1,024,805	1,023,873	1,060,952
IX/XI	3,481,841	3,809,819	3,812,472	3,801,808	3,822,751	3,811,754	3,849,130
XX	15,441,729	18,070,080	18,050,993	18,079,784	18,052,289	18,071,846	18,072,022
Total	19,855,678	22,912,208	22,873,174	22,909,301	22,899,845	22,907,474	22,982,104
Seattle VMT	2,673,029	2,937,218	2,915,945	2,928,613	2,936,181	2,929,750	2,985,517
External VMT	17,182,649	19,974,990	19,957,229	19,980,688	19,963,665	19,977,723	19,996,587
Seattle Annual Growth Rate		0.47%	0.44%	0.46%	0.47%	0.46%	0.55%

Table B.1–3 Medium and heavy truck VMT

Trip Type	2015	2035 Alt. 1	2035 Alt. 2	2035 Alt. 3	2035 Alt. 4	2035 Preferred Alt. 5	2035 Sensitivity Analysis
II	14,974	20,025	19,926	20,081	19,990	19,932	19,953
IX/XI	244,149	313,678	313,872	313,376	313,495	313,581	313,451
XX	624,124	877,338	878,742	877,203	877,959	878,292	878,581
Total	883,247	1,211,041	1,212,541	1,210,660	1,211,444	1,211,805	1,211,985
Seattle VMT	137,049	176,864	176,863	176,769	176,737	176,722	176,679
External VMT	746,199	1,034,177	1,035,678	1,033,891	1,034,707	1,035,082	1,035,306
Seattle Annual Growth Rate		1.28%	1.28%	1.28%	1.28%	1.28%	1.28%

Table B.1–4 Regional comparison

	2015	2035 Alt. 1	2035 Alt. 2	2035 Alt. 3	2035 Alt. 4	2035 Preferred Alt. 5	2035 Sensitivity Analysis
City of Seattle							
Households	302,220	368,464	368,473	368,480	368,475	368,494	396,992
Jobs	534,392	649,394	649,386	649,404	649,394	649,391	649,391
VMT	2,673,029	2,937,218	2,915,945	2,928,613	2,936,181	2,929,750	2,985,517
VMT per Pop+Job	2.3	2.1	2.1	2.1	2.1	2.1	2.0
Notes	*Includes 100% of trips with at least one end in Seattle* *Assumes 2.06 average household size*						
Outside Seattle							
Households	1,232,266	1,640,356	1,640,356	1,640,356	1,640,356	1,640,356	1,640,356
Jobs	1,410,406	2,034,792	2,034,792	2,034,792	2,034,792	2,034,792	2,034,792
VMT	17,182,649	19,974,990	19,957,229	19,980,688	19,963,665	19,977,723	19,996,587
VMT per Pop+Job	3.7	3.2	3.2	3.2	3.2	3.2	3.2
Notes	*Includes 100% of trips with at least one end outside Seattle* *Assumes 2.57 average household size*						

Table B.1–5 Road transportation pollutant emissions

	Emissions in Tons per Year				
Pollutant	**2015**	**2035 Alt. 1**	**2035 Alt. 2**	**2035 Alt. 3**	**2035 Alt. 4**
VOC	465.7	204.3	203.7	203.9	204.1
NO_x	4,945.6	1,688.4	1,685.5	1,685.9	1,687.1
CO	10,992.5	4,778.4	4,746.3	4,765.2	4,778.0
$PM_{2.5}$	58.5	43.7	43.6	43.6	43.7

Source: Fehr & Peers, 2016.

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B.2 Transportation Appendix

Table B.2–1 Screenline results for Preferred Alternative 5 and Sensitivity Analysis

LOS Screen Line #	Location	Intersection Crossing Screenline	2035 Capacity		2035 Alt. 5 Forecast		2035 Sensitivity Forecast	
			EB/NB	*WB/SB*	*EB/NB*	*WB/SB*	*EB/NB*	*WB/SB*
	North City Limit - 3rd Ave NW to Aurora Ave N	3rd Ave NW, s/o NW 145th St	770	770	780	670	780	690
		Greenwood Ave N, s/o N 145th St	1940	1940	1770	1220	1770	1250
		Aurora Ave N, s/o N 145th St	2100	2000	2430	1880	2430	1930
1.11	**Total Screenline Volumes**		**4810**	**4710**	**1.04**	**0.8**	**1.04**	**0.82**
	North City Limit - Meridian Ave N to 15th Ave NE	Meridian Ave N, s/o NE 145th ST	770	770	590	430	590	460
		1st Ave NE, s/o 145th St	770	770	510	600	510	640
		5th Ave NE, s/o I-5 145th St offramp	770	770	550	360	590	380
		15th Ave NE, s/o 145th St	1010	1010	890	730	890	750
1.12	**Total Screenline Volumes**		**3320**	**3320**	**0.77**	**0.64**	**0.78**	**0.67**
	North City Limit - 3rd Ave NW to Aurora Ave N	30th Ave NE, s/o 145th St	770	770	590	560	590	570
		Lake City Way NE, s/o NE 145th St	2150	2040	2230	1790	2230	1790
1.13	**Total Screenline Volumes**		**2920**	**2810**	**0.97**	**0.84**	**0.97**	**0.84**
	Magnolia	Magnolia Br, w/o garfield st offramp	770	1540	450	900	470	920
		W Dravus St, e/o 20th Ave W	1540	1540	850	930	880	930
		W Emerson Pl, se/o 21st Ave W	1540	1540	860	760	880	760
2	**Total Screenline Volumes**		**3850**	**4620**	**0.56**	**0.56**	**0.58**	**0.56**
	Duwamish River - W Seattle Fwy and Spokane St	SW Spokane Br, w/o SW Spokane E st	770	770	750	1010	770	1020
		EB West Seattle Bridge, w/o Alaskan Wa Viaduct NB on ramp	6380		4220	NA	4300	NA
		WB W. Seattle Br., w/o Alaskan Wa Viaduct NB on ramp		5380	NA	6050	NA	6100
3.11	**Total Screenline Volumes**		**7150**	**6150**	**0.69**	**1.15**	**0.71**	**1.16**
	Duwamish River - 1st Ave S and 16th Ave S	1st Ave S Br, S/O Point A	8220	8220	2930	4320	2930	4320
		16th Ave S, N/O 16th Ave S BR	1540	1540	810	1030	830	1050
3.12	**Total Screenline Volumes**		**9760**	**9760**	**0.38**	**0.55**	**0.38**	**0.55**
	South City Limit - M L King Jr Wy to Rainier Ave S	Martin Luther King Jr Way S, s/o Norfolk	2040	2040	1080	1650	1080	1650
		51st Ave S, s/o Bangor St	770	770	270	690	280	690
		Renton Ave S, se/o Bangor St	770	770	500	940	520	940
		Rainier Ave S, se/o 75th Ave SE	1460	1460	990	1410	1020	1410
4.11	**Total Screenline Volumes**		**5040**	**5040**	**0.56**	**0.93**	**0.57**	**0.93**

Table B.2–1 Screenline results for Preferred Alternative 5 and Sensitivity Analysis (cont.)

LOS Screen Line #	Location	Intersection Crossing Screenline	2035 Capacity		2035 Alt. 5 Forecast		2035 Sensitivity Forecast	
			EB/NB	*WB/SB*	*EB/NB*	*WB/SB*	*EB/NB*	*WB/SB*
	South City Limit - Marine Dr SW to Meyers Wy S	Marine View Drive SW, N/O 46th Ave SW	770	770	390	240	400	250
		35th Ave SW, N/O SW Roxbury St	1010	1010	790	920	830	920
		26th Ave SW, N/O SW Roxbury St	770	770	380	520	390	520
		Delridge Wy, NW/o SW cambridge st	770	770	690	420	710	430
		16th Ave SW, n/o SW cambridge st	770	770	250	540	250	540
		8th Ave SW, N/O SW Roxbury St	770	770	350	580	370	580
		Olson Pl SW, SW/o 1st Ave S	1010	1010	1070	1440	1070	1440
		Myers Way S, S/O Olson Pl SW	1540	1540	210	670	210	670
4.12	**Total Screenline Volumes**		**7410**	**7410**	**0.56**	**0.72**	**0.57**	**0.72**
	South City Limit - SR 99 to Airport Wy S	SR 99(W Marginal Way S, SE/O Cloverdale St on ramp for NW flow; W Marginal Way S, SE/O Kenyon on ramp for SE flow)	2000	2000	1980	2260	2010	2260
		8th Ave S, s/o Director St	770	770	100	220	100	230
		East Marginal Way S, SE/O Boeing Dr, S 81st	2040	2040	780	1020	780	1020
		14th Ave S, n/o Director St	1540	1540	590	830	610	840
		Airport Way S, N/O S Norfolk St	1000	1000	820	1120	840	1120
4.13	**Total Screenline Volumes**		**7350**	**7350**	**0.58**	**0.74**	**0.59**	**0.74**
	Ship Canal Ballard Bridge	Ballard Br	2870	3410	3390	2460	3470	2550
5.11	**Total Screenline Volumes**		**2870**	**3410**	**1.18**	**0.72**	**1.21**	**0.75**
	Ship Canal Fremont Bridge	Fremont Bridge	2210	2210	1740	1560	1770	1610
5.12	**Total Screenline Volumes**		**2210**	**2210**	**0.79**	**0.71**	**0.8**	**0.73**
	Ship Canal Aurora Ave N	Aurora Br	5380	5380	4950	4440	5060	4530
5.13	**Total Screenline Volumes**		**5380**	**5380**	**0.92**	**0.82**	**0.94**	**0.84**
	Ship Canal University and Montlake Bridges	University Bridge, SW/O Point A	2210	2210	1610	2140	1640	2190
		Montlake Bridge, S/O Point A	2210	2210	2600	2520	2650	2570
5.16	**Total Screenline Volumes**		**4420**	**4420**	**0.95**	**1.05**	**0.97**	**1.08**
	South of NW 80th St - Seaview Ave NW to 15th Ave NW	Seaview Ave NW, N/O NW 67th St	1010	1010	290	130	300	130
		32nd Ave NW, S/O NW 80th St	770	770	100	360	110	370
		24th Ave NW, S/O NW 80th St	1010	1010	700	520	700	540
		15th Ave NW, S/O NW 80th St	3070	2040	2000	1380	2030	1410
6.11	**Total Screenline Volumes**		**5860**	**4830**	**0.53**	**0.5**	**0.53**	**0.51**
	South of NW 80th St - 8th Ave NW to Greenwood Ave N	8th Ave NW, S/O NW 80th St	1010	1010	1050	890	1080	930
		3rd Ave NW, S/O NW 80th St	770	770	660	570	680	590
		Greenwood Ave N, S/O N 80th St	1010	1010	720	710	740	720
6.12	**Total Screenline Volumes**		**2790**	**2790**	**0.87**	**0.78**	**0.89**	**0.8**

Table B.2–1 Screenline results for Preferred Alternative 5 and Sensitivity Analysis (cont.)

LOS Screen Line #	Location	Intersection Crossing Screenline	2035 Capacity		2035 Alt. 5 Forecast		2035 Sensitivity Forecast	
			EB/NB	*WB/SB*	*EB/NB*	*WB/SB*	*EB/NB*	*WB/SB*
	South of NE 80th St - Linden Ave N to 1st Ave NE	Linden Ave N, S/O N 80th St	770	770	340	290	360	300
		Aurora Ave N, S/O N 80th St	2150	2150	1900	1300	1930	1330
		Green Lake Drive N, SE/O N 80th St	1010	1010	310	170	310	170
		Wallingford Ave N, S/O N 80th St	770	770	330	350	350	370
		Stroud Ave N, SW/O N 80th St	770	770	300	200	300	200
		1st Ave NE, S/O NE 80th St	770	770	200	290	230	320
6.13	**Total Screenline Volumes**		**6240**	**6240**	**0.54**	**0.41**	**0.56**	**0.43**
	South of NE 80th St - 5th Ave NE to 15th Ave NE	5th Ave NE, S/O NE 78th St	770	770	540	500	550	510
		Roosevelt Way NE (one-way), N/O NE 73rd St		1840	NA	1370	NA	1400
		Lake City Way NE, SW/O NE 80th St	2040	2040	2030	1160	2040	1180
		15th Ave NE, S/O NE 75th St	1540	770	650	610	650	620
6.14	**Total Screenline Volumes**		**4350**	**5420**	**0.74**	**0.67**	**0.74**	**0.68**
	South of NE 80th ST - 20th Ave NE to Sand Point Way NE	20th Ave NE, S/O NE 75th St	770	770	420	210	460	240
		25th Ave NE, S/O NE 75th St	1540	770	950	610	960	610
		35th Ave NE, S/O NE 75th St	1540	770	860	740	870	760
		40th Ave NE, S/O NE 75th St	770	770	490	290	500	290
		Sand Point Way NE, S/O NE 74th St	1540	1540	1130	830	1140	850
6.15	**Total Screenline Volumes**		**6160**	**4620**	**0.63**	**0.58**	**0.64**	**0.6**
	West of Aurora Ave - Fremont Pl N to N 65th St	Fremont Pl N, NW/O Fremont Ave N	1940	1940	860	1050	880	1060
		N 39th St, W/O Fremont Ave N	770	770	610	730	620	740
		N 46th St, W/O Phinney Ave N.	1540	1540	940	980	960	1010
		N 50th St, W/O Fremont Ave N	770	770	610	730	630	750
		N 65th St, W/O Linden Ave N	770	770	240	270	240	290
7.11	**Total Screenline Volumes**		**5790**	**5790**	**0.56**	**0.65**	**0.58**	**0.67**
	West of Aurora Ave - N 80th St to N 145th St	N 80th St, W/O Linden Ave N	960	960	750	770	780	790
		N 85th St, W/O Linden Ave N	1540	1540	880	1120	910	1160
		N 105th St w/o Evanston	1540	1540	760	1060	780	1080
		N 125th St, W/O Aurora Ave N	1010	1010	450	400	470	420
		N 130th St, W/O Linden Ave N	960	960	690	820	700	840
		N 145th St, W/O Linden Ave	1540	1540	740	880	740	880
7.12	**Total Screenline Volumes**		**7550**	**7550**	**0.57**	**0.67**	**0.58**	**0.68**
	South of Lake Union	Valley St, W/O Fairview Ave N Mercer St, W/O Fairview Ave N for E flow; E/O Boren Ave N for W flow Republican St, w/o Eastlake Ave Denny Way, E/O Minor Ave	6150	6150	5570	5070	5650	5150
8	**Total Screenline Volumes**		**6150**	**6150**	**0.91**	**0.82**	**0.92**	**0.84**

Table B.2–1 Screenline results for Preferred Alternative 5 and Sensitivity Analysis (cont.)

LOS Screen Line #	Location	Intersection Crossing Screenline	2035 Capacity		2035 Alt. 5 Forecast		2035 Sensitivity Forecast	
			EB/NB	*WB/SB*	*EB/NB*	*WB/SB*	*EB/NB*	*WB/SB*
	South of Spokane St - Beach Dr SW to W Marginal Way SW	Beach Dr SW, SE/O 61st Ave SW	770	770	190	250	200	260
		55th Ave SW, S/O SW Charlestown St	770	770	170	80	170	80
		California Ave SW, S/O SW Charlestown St	1010	1010	660	980	670	1000
		Fauntleroy Wy SW (West Seattle Br, NE/O Fauntleroy Wy SW for NE flow; NE/O 35th Ave SW for SW flow)	3590	3590	2800	3250	2870	3290
		SW Avalon Wy, N/O 30th Ave SW	1010	1010	630	960	640	980
		Delridge Wy, S/O SW Andover St	1010	1010	730	940	730	950
		W Marginal Way SW	2000	2000	850	840	870	840
9.11	**Total Screenline Volumes**		**10160**	**10160**	**0.59**	**0.72**	**0.6**	**0.73**
	South of Spokane St - E Marginal Way S to Airport Way S	E Marginal Way SW, N/O Alaskan Wy Vi SB	1150	1150	510	1130	510	1130
		Alaskan Wy, N/O East Marginal Way S	3590	3590	2350	2530	2420	2530
		1st Ave S, S/O S Spokane SR St	2040	2040	1070	1440	1100	1450
		4th Ave S, S/O S Spokane SR St	2040	2040	1910	2060	1960	2080
		6th Ave S, S/O S Forest St	1540	1940	880	1120	890	1130
		Airport Way S, N/O S Spokane St for SB flow; S/O S Spokane St for NB flow	2040	2040	680	740	680	740
9.12	**Total Screenline Volumes**		**12400**	**12800**	**0.6**	**0.7**	**0.61**	**0.71**
	South of Spokane St - 15th Ave S to Rainier Ave S	15th Ave S, S/O S Bradford St	2920	1540	1220	790	1220	810
		Beacon Ave S, S/O S Spokane St	1010	1010	1000	1030	1030	1040
		Martin Luther King Jr Way S, N/O S Andover St	1010	1010	770	1020	770	1020
		Rainier Ave S, SE/O M LK	2040	2040	1590	2150	1630	2160
9.13	**Total Screenline Volumes**		**6980**	**5600**	**0.66**	**0.89**	**0.67**	**0.9**
	South of S Jackson St - Alaskan Way S to 4th Ave S	Alaskan Wy S, N of S King St	2140	2040	720	1720	740	1730
		SR 99 Tunnel	3940	3940	3960	3960	3960	3960
		1st Ave S, N/O S King St	2040	2040	1240	1710	1260	1730
		2nd Ave S, N/O S King St	1540	1540	820	510	850	510
		4th Ave S, S/O 2nd Ave ET S	2920	1940	1350	1790	1350	1790
10.11	**Total Screenline Volumes**		**12580**	**11500**	**0.64**	**0.84**	**0.65**	**0.84**
	South of S Jackson St - 12th Ave S to Lakeside Ave S	12th Ave S, S/O S Weller St	1010	1010	1160	1310	1190	1320
		Rainier Ave S, SE/O Boren Ave S	1010	1010	1330	1250	1330	1290
		23rd Ave S, S/O S Jackson St	1540	1540	690	870	730	870
		Martin Luther King Jr Way S, S/O S Jackson St	1010	1010	970	1100	1000	1100
		31st Ave S, S/O S Jackson St	960	960	310	570	320	580
		Lakeside Ave S	770	770	270	630	270	650
10.12	**Total Screenline Volumes**		**6300**	**6300**	**0.75**	**0.91**	**0.77**	**0.92**

Table B.2–1 Screenline results for Preferred Alternative 5 and Sensitivity Analysis (cont.)

LOS Screen Line #	Location	Intersection Crossing Screenline	2035 Capacity		2035 Alt. 5 Forecast		2035 Sensitivity Forecast	
			EB/NB	*WB/SB*	*EB/NB*	*WB/SB*	*EB/NB*	*WB/SB*
	East of CBD	S Jackson St, E/O 5th Ave S	1010	1010	950	590	990	590
		Yesler Way, W/O 6th Ave	770	770	180	350	180	360
		James St, NE/O 6th Ave	2040	2040	640	1930	640	1940
		Cherry St, NE/O 6th Ave	1150		730	NA	780	NA
		Madison St, SW/O 7th Ave	1540	1630	180	1840	180	1870
		Spring St, SW/O 6th Ave	2760		1430	NA	1450	NA
		Seneca St, NE/O 6th Ave		2760	NA	980	NA	1000
		University, sw/o 6th	2330		820	NA	830	NA
		Union St, NE of 7th Ave		3500	NA	710	NA	710
		Pike St, SW/O Terry Ave	1540	1540	990	330	1020	360
		Pine St, NE/O 9th Ave	770	960	190	630	210	660
		Olive Way, NE/0 9th Ave	3500		1280	NA	1310	NA
		Howell St, ne/o 9th ave	3940		960	NA	960	NA
12.12	**Total Screenline Volumes**		**21350**	**14210**	**0.39**	**0.52**	**0.4**	**0.53**
	East of I-5 NE Northgate Way to NE 145th St	NE Northgate Way, E/O 5th Ave NE	2040	2040	1610	1260	1650	1290
		NE 125th St (Roosevelt Way NE, SE/O NE 130th St N)	1010	1010	750	1110	760	1110
		NE 145th St, E/O 5th Ave NE	1540	1540	1600	1270	1600	1290
13.11	**Total Screenline Volumes**		**4590**	**4590**	**0.86**	**0.79**	**0.88**	**0.8**
	East of I-5 NE 65th St to NE 80th St	NE 80th St, E/O 5th Ave NE	770	770	720	490	720	500
		NE 75th St, W/O Roosevelt Way NE	2040	2040	800	1080	810	1090
		NE 70th St, W/O Roosevelt Way NE	770	770	540	450	550	480
		NE 65th St, W/O Roosevelt Way NE	1540	1540	540	700	540	720
13.12	**Total Screenline Volumes**		**5120**	**5120**	**0.51**	**0.53**	**0.51**	**0.55**
	East of I-5 NE Pacific St to NE Ravenna Blvd	NE Pacific St, NW/O NE Boat St	1010	1010	1190	1040	1200	1070
		NE 40th St, E/O 7th Ave NE	770	770	650	410	670	430
		NE 42nd St, E/O 7th Ave NE	770	770	330	210	330	210
		NE 45th St W/O Roosevelt Way NE	2040	2040	1310	1370	1320	1390
		NE 50th St W/O Roosevelt Way NE	1540	1540	540	1140	560	1170
		NE Ravenna Blvd, W/O Roosevelt Way	1010	1010	490	500	490	510
13.13	**Total Screenline Volumes**		**7140**	**7140**	**0.63**	**0.65**	**0.64**	**0.67**

Table B.2–2 2035 mode share by sector

	Mode Share (%)				
Sector (Urban Village)	**SOV**	**HOV**	**Transit**	**Walk**	**Bike**
Northwest Seattle (Ballard)					
2015 Existing	39	31	11	14	5
2035 Alternative 1	37	30	13	14	6
2035 Alternative 2	37	30	13	14	6
2035 Alternative 3	37	30	13	14	6
2035 Alternative 4	37	30	13	15	6
2035 Preferred Alternative	37	30	13	15	6
2035 Sensitivity Analysis	36	30	13	15	6
Northeast Seattle (Northgate)					
2015 Existing	37	29	14	16	4
2035 Alternative 1	35	28	16	16	5
2035 Alternative 2	35	28	16	16	5
2035 Alternative 3	35	28	16	16	5
2035 Alternative 4	35	28	16	16	5
2035 Preferred Alternative	35	28	16	16	5
2035 Sensitivity Analysis	34	27	17	16	5
Queen Anne/Magnolia (Upper Queen Anne)					
2015 Existing	38	26	12	18	7
2035 Alternative 1	34	24	14	20	8
2035 Alternative 2	34	24	14	20	8
2035 Alternative 3	35	25	14	19	8
2035 Alternative 4	35	25	14	19	8
2035 Preferred Alternative	34	25	14	19	8
2035 Sensitivity Analysis	34	24	15	19	8
Downtown/Lake Union (Downtown)					
2015 Existing	23	15	37	20	4
2035 Alternative 1	17	12	42	23	6
2035 Alternative 2	17	12	41	24	6
2035 Alternative 3	17	12	42	23	6
2035 Alternative 4	17	12	43	23	6
2035 Preferred Alternative	17	12	42	23	6
2035 Sensitivity Analysis	16	12	44	23	5
Capitol Hill/Central District (Capitol Hill)					
2015 Existing	33	21	19	24	3
2035 Alternative 1	28	18	23	27	4
2035 Alternative 2	28	18	23	27	4
2035 Alternative 3	29	18	23	26	4
2035 Alternative 4	28	18	23	27	4
2035 Preferred Alternative	28	18	23	27	4
2035 Sensitivity Analysis	27	18	24	27	4
West Seattle (West Seattle Junction)					
2015 Existing	37	44	11	6	2
2035 Alternative 1	35	43	12	6	3
2035 Alternative 2	35	43	12	6	3
2035 Alternative 3	35	44	12	6	3
2035 Alternative 4	35	43	12	7	3
2035 Preferred Alternative	35	43	12	7	3
2035 Sensitivity Analysis	35	43	12	7	3

Table B.2–2 2035 mode share by sector (cont).

	Mode Share (%)				
Sector (Urban Village)	**SOV**	**HOV**	**Transit**	**Walk**	**Bike**
Duwamish (South Park)					
2015 Existing	54	27	13	5	2
2035 Alternative 1	52	26	14	5	3
2035 Alternative 2	51	26	15	5	3
2035 Alternative 3	51	26	14	5	3
2035 Alternative 4	52	26	14	5	3
2035 Preferred Alternative	51	26	14	5	3
2035 Sensitivity Analysis	51	26	15	5	3
Southeast Seattle (Othello)					
2015 Existing	40	31	14	9	6
2035 Alternative 1	38	30	16	10	7
2035 Alternative 2	38	30	16	9	7
2035 Alternative 3	37	30	16	10	7
2035 Alternative 4	37	29	16	10	7
2035 Preferred Alternative	38	30	16	10	7
2035 Sensitivity Analysis	37	29	16	10	7

Source: Project travel demand model, 2016.

Table B.2–3 State facilities: level of service D capacity ratios

Facility		**Existing**	**2035 Alt. 1**	**2035 Alt. 2**	**2035 Alt. 3**	**2035 Alt. 4**	**2035 Preferred Alternative**	**2035 Sensitivity Analysis**
I-5	N of NE Northgate Way	1.01	1.18	1.19	1.18	1.19	1.19	1.19
I-5	Ship Canal Bridge	1.25	1.37	1.37	1.37	1.37	1.37	1.38
I-5	N of W Seattle Bridge	1.17	1.26	1.27	1.26	1.26	1.26	1.28
I-5	N of Boeign Access Rd	1.00	1.18	1.18	1.18	1.18	1.18	1.19
I-90	E of Rainier Ave S	1.13	1.33	1.34	1.34	1.34	1.33	1.35
SR 509	Btw S 112th St & Cloverdale St	0.57	0.77	0.78	0.77	0.77	0.79	0.81
SR 519	W of 4th Ave	0.83	0.90	0.93	0.90	0.90	0.90	0.93
SR 520	Lake Washington Bridge	0.80	1.04	1.04	1.04	1.04	1.04	1.05

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B.3 Proposed Change to Level-of-Service Standards

Introduction

The City's Comprehensive Plan proposes a change in the way that transportation level of service (LOS) is measured. The City will measure LOS based on single occupant vehicle (SOV) mode share, as it focuses on increasing people-moving capacity by reducing travel that is occurring via the least space-efficient mode during the most congested period of the day. By shifting travel from SOVs to more efficient modes operating on less-congested transportation networks, Seattle will allow more people to travel in the same amount of space. Because buses are the primary form of transit ridership in the city and buses must mix with private vehicles on the arterial system, SOV mode share is a reasonable measure of the level of service for arterials and transit.

The Comprehensive Plan EIS evaluated all of the land use alternatives with the existing LOS metric, based on the volume/capacity (v/c) ratio along the City's adopted screenlines, as well as with the new SOV mode standard. Results of the citywide modeling are expressed in Figure B.3–1 on the next page. Existing mode share levels by sector of the city are shown next to the recommended target SOV rate for 2035. The new standard, its policy basis, the process used to develop the standard, and the City's commitment to implementing this new standard is described in this section.

Comparison to Existing LOS Standard

The existing screenline v/c ratio is a commonly applied LOS measure, but using it to measure system performance does not help achieve the Comprehensive Plan's goal "…to safely and efficiently connect and move people and goods to their destinations".[1] It is also inconsistent with the reality that Seattle has limited ability to increase the capacity of the street system, and it effectively means there are few practical remedies for a situation where the ratio is exceeded except through significant capital investment or changing the standard. Establishing a target SOV mode share for every project comes with a definable remedy since the City can actually reduce the volume of traffic entering the roadway system for each new unit of development. Mode share also leverages the available and future capacity of the transit, bicycle, and pedestrian systems (which the City has the ability to expand and, in the case of bike and pedestrian networks, leverages substantial underutilized capacity).

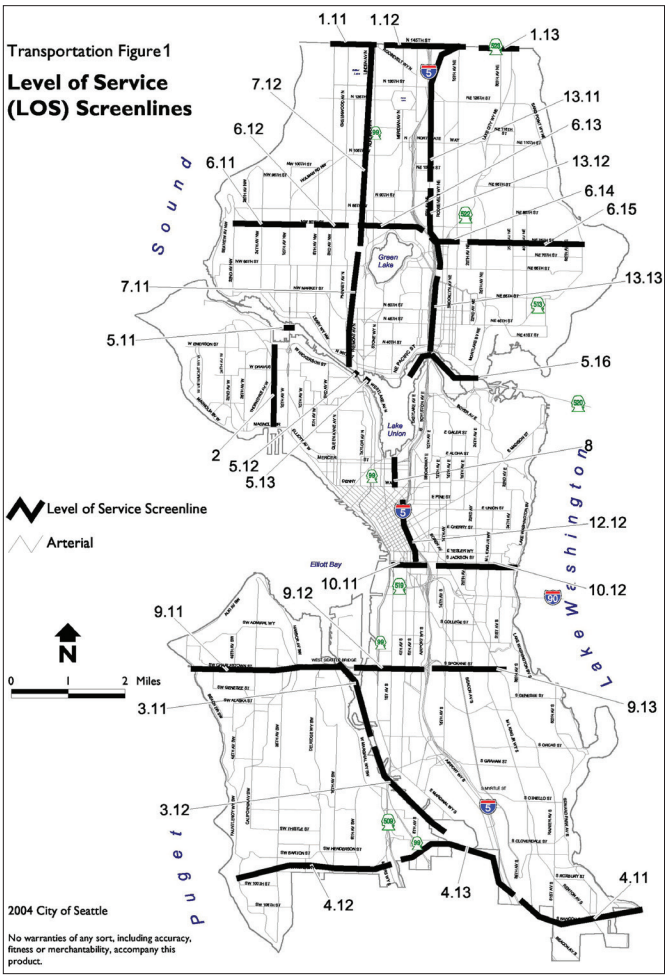
1 The capacity of the v/c ratio is measured using the number of vehicle lanes. It does not consider the additional capacity available from transit, bicycle, or pedestrian modes. Mode share explicitly captures this additional capacity.

The existing standard deals directly with arterials (combined at screenlines) and because bus transit operates on arterials, those routes are captured in the v/c measurement. The proposed mode share approach pre-identifies SOVs as the primary current and future source of congestion on arterials and major bus transit routes during the most congested time of the day, and measures performance of the system by the amount SOV travel is reduced. Reducing SOV use on major arterial corridors will also enhance the delivery of freight.

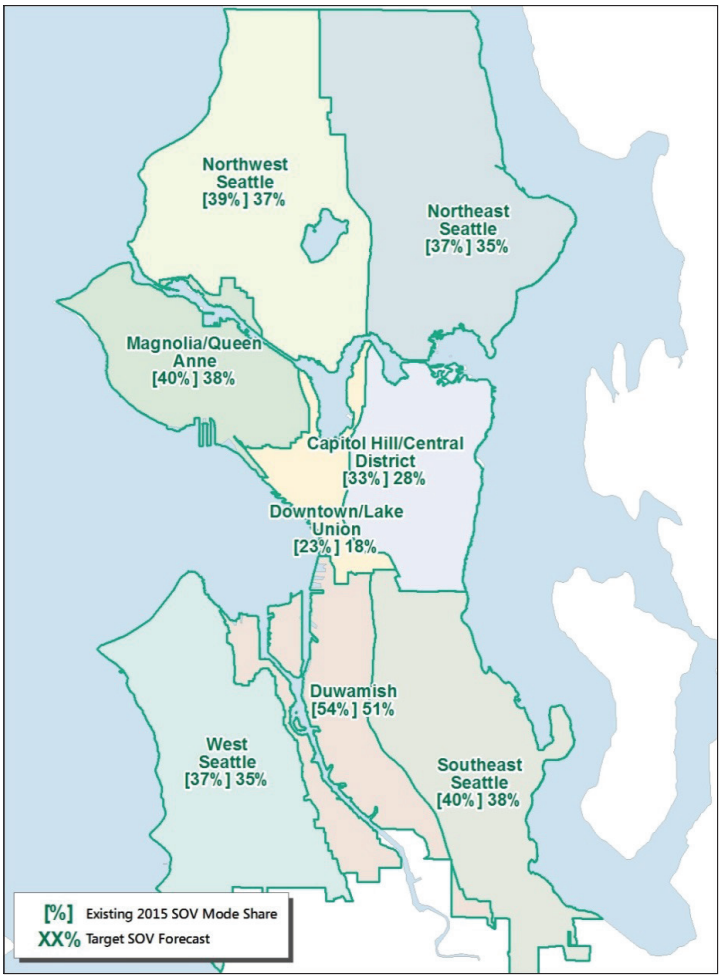
While the measurement is different, the basic foundation of the new system is similar to what exists today. Figure B.3–1 below illustrates the current LOS system based on v/c ratios at screenlines and the proposed mode share system at the Comprehensive Plan sector level. Both systems define different performance standards for different parts of the city in recognition of the diverse land use patterns and transportation contexts that exist.

Figure B.3–1 Current versus proposed LOS system

CURRENT
v/c Ratios at Screenlines



PROPOSED
Mode Share at Comprehensive Plan Sector Level



Policy Rationale

The City's Comprehensive Plan recognizes that Seattle will continue to grow between now and 2035. To accommodate this growth and the increased demands on the transportation system, the Plan emphasizes that strategies other than adding new vehicle lanes and general purpose vehicle capacity should be applied, particularly since adding new lanes to existing arterials in a built-out urban area such as Seattle would in many cases lead to significant financial costs, and/or environmental impacts and community disruption. Strategies that would enable development projects to meet the mode share goal include concentrating development in transit-served urban villages, completing the City's networks for transit, bicycles, pedestrians, and freight, and making it easier for tenants of those buildings to use other means of travel, such as by providing bus passes or on-site bicycle facilities. Since widening arterials can often not be a practical or feasible way of accommodating growth in a mature, developed urban environment and is not consistent with the overall goals of the Comprehensive Plan, using the current street right-of-way as efficiently as possible by encouraging forms of travel other than SOV, particularly in the peak hour, is a major emphasis of this proposal.

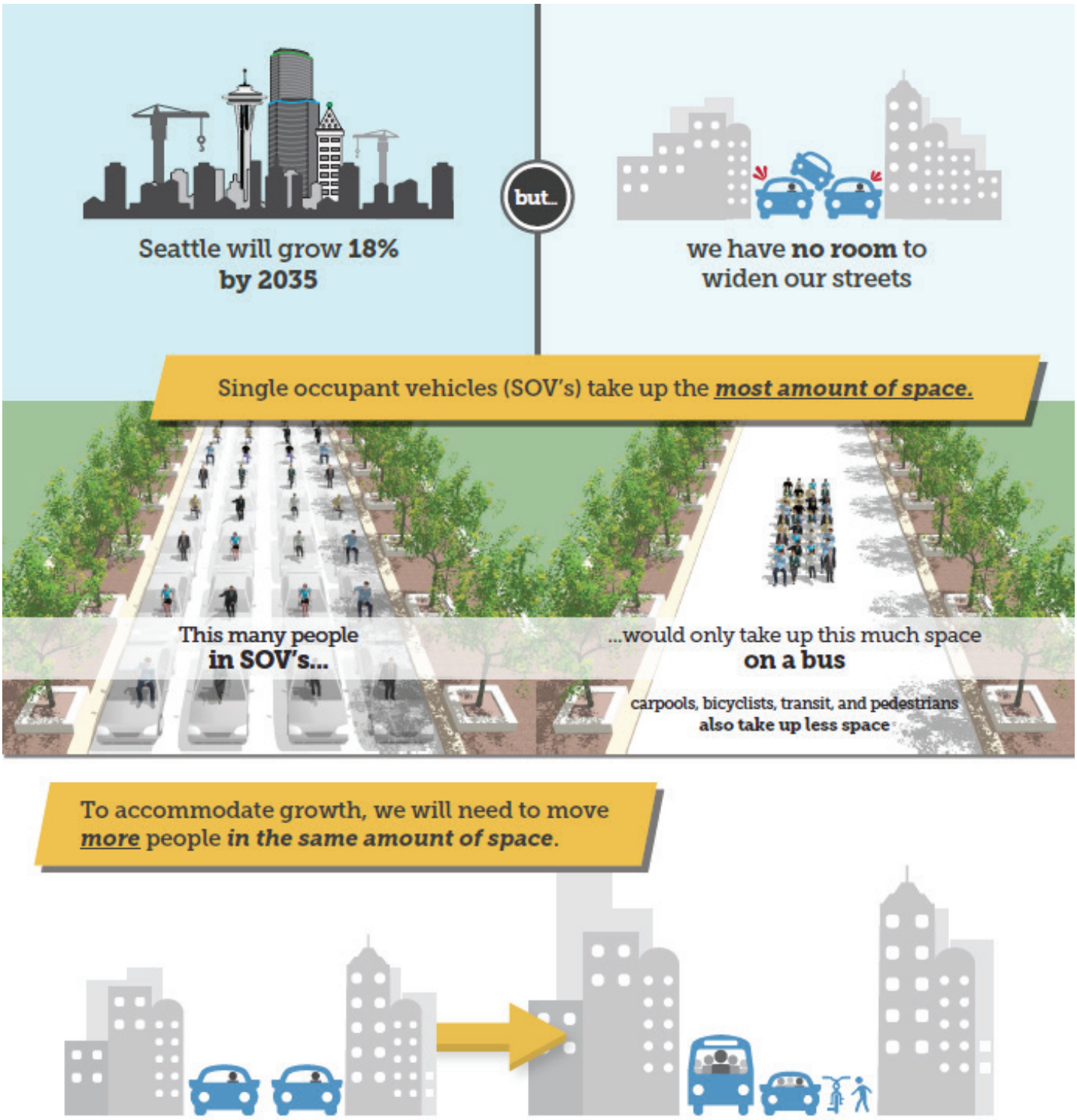
The recommended Comprehensive Plan's proposal to use mode share as a new way of measuring LOS directly ties to this policy goal, as it focuses on reducing travel that is occurring via the least space-efficient mode, SOV. By shifting travel from SOVs to more efficient modes operating on less-congested transportation networks, Seattle would allow more people to travel in the same amount of space. Figure B.3–2 on the following page articulates this approach.

Compliance with State Requirements

The Growth Management Act requires that LOS evaluate the performance of "locally owned arterials and transit routes." The mode share standard addresses this requirement since the majority of vehicle travel occurs on city arterial streets. Thus, by shifting travel away from SOVs, capacity on these streets is increased. The Frequent Transit Network (FTN) also operates on arterial streets, thus transit route performance would also improve with fewer SOV trips.

The overall argument made by setting future mode share targets is that Seattle has a relatively finite practical capacity to accommodate growth in SOV travel. This is due to the limitations on abilities to expand many arterials, given physical dimensions and the nature of other adjoining buildings, land uses and sidewalks. In some cases, substantive road expansions would not be physically feasible, and in some cases expansions would be technically feasible but would too greatly compromise other qualities of their environment (such as overly narrowing sidewalk widths or creating needs for excessive building demolition). The City's system can accommodate the number of SOV trips occurring today, but this recommended change in standard argues that future growth in SOV travel must be limited to help maintain reasonable citywide mobility.

Figure B.3–2 Mode share LOS approach



The proposed Seattle 2035 policy would establish a standard for allowable SOV trips in the City by setting SOV mode share targets by Comprehensive Plan sector. These mode share target-based SOV trip caps would serve as a quantitative basis to measure whether the city is meeting its LOS standard, much as the v/c thresholds do currently.

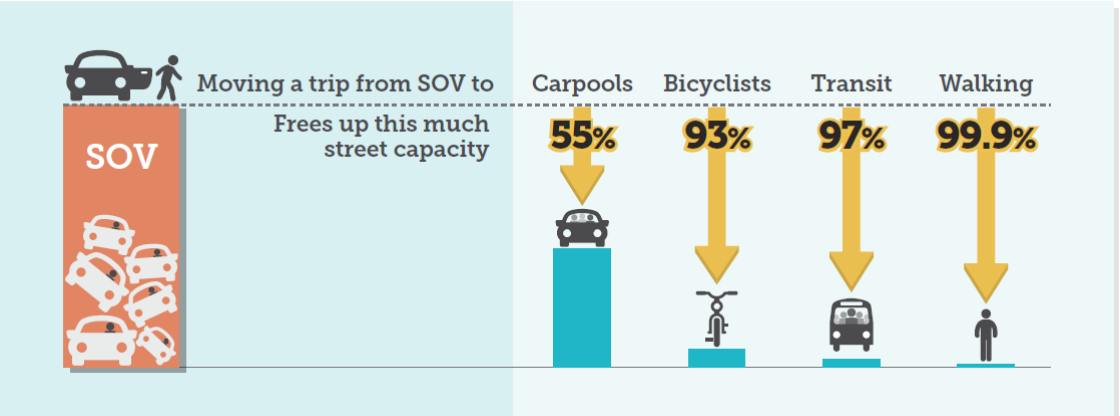
Washington Administrative Code 365-196-210 (19) defines LOS as "an established minimum capacity of public facilities or services that must be provided per unit of demand or other appropriate measure of need." Recognizing the underlying proposed policy guidance in Seattle 2035, the new LOS measure suggests providing additional capacity to meet future demand without solely relying on physical capacity expansions of the street network. Shifting travel from SOVs to more space-efficient modes would recover a degree of capacity in the current road system to help maintain its functioning for current and future needs. To quantify this capacity increase, each of the following modes were compared to an SOV in terms of how much less space would be required:

- ***Carpools***—Using PSRC's estimate that the average carpool carries 2.2 people, it was estimated that carpools take up 55% less space than an SOV per person trip.
- ***Bicyclists***—Using a very conservative assumption that bicycles are roughly ¼ the size of a car and only ¼ of cyclists are using arterial travel lanes (the remaining cyclists are using existing exclusive facilities, including trails, cycle tracks, and bike lanes or quiet residential streets and greenways), a bicyclist uses an estimated 93% less space per person trip.
- ***Transit***—Based on an estimate that an SOV requires approximately 180 square feet per person, and each bus requires 5 square feet of space per passenger,[2] it was estimated that transit requires roughly 97% less space per person trip than an SOV.
- ***Walking***—Since most pedestrian travel occurs outside of arterial travel lanes in existing sidewalks, it is assumed that pedestrian travel takes 99.9% less space per person trip. (It is acknowledged that additional pedestrian travel may result in lower capacity for turning vehicles or slightly narrower travel lanes where sidewalks are widened—spread across the entire City, most additional pedestrian travel would have no discernable reduction in street capacity).

The figure on the following page summarizes the assumptions and illustrates how lowering the SOV mode share provides "an established minimum capacity of public facilities or services that must be provided per unit of demand or other appropriate measure of need."

2 The Transit Capacity and Quality of Service Manual identifies a range of 4.5-5.3 sq. ft / passenger as "comfortable".

Figure B.3–3 Mode share LOS approach



Process to Arrive at New Standard

In mid-2013, the City kicked off its process to develop Seattle 2035. This process included identification of major policy priorities, which included identification of the Urban Village strategy, implementation of the modal plans, and the reduction of travel by SOVs. Central to the implementation of these priorities was updating the way the City measures LOS for transportation.

In mid-2014, the City hired a consultant, Fehr & Peers, to assist in the evaluation of alternative LOS frameworks. City staff and Fehr & Peers conducted a literature review of LOS approaches by other cities and reported these findings in a series of staff workshops that spanned early 2015. Staff also considered the policy direction in the regional Vision 2040 plan to establish a multi-modal LOS measure. These workshops included representatives from SDOT, OPCD, and the Mayor's Office and evaluated approaches ranging from maintaining the City's existing screenline-based LOS metric to approaches measuring mode share, vehicle miles traveled (VMT) per capita and system completeness. Upon evaluation of these approaches, staff expressed support for SOV mode share as the best metric for Seattle, given its alignment with the City's transportation priorities.

During the public comment period for the Comprehensive Plan DEIS, several comment letters questioned the appropriateness of the current screenline LOS measures, and expressed support for a more multi-modal LOS standard. Comments on the public review draft of the Seattle 2035 Plan in the summer/fall of 2015 also expressed support for a more multi-modal LOS standard. In particular, some reviewers noted that changing from a vehicle-based LOS to one that is based on mode share would be better for the city because it would focus on moving people and goods. In addition, SDOT staff briefed the City's advisory boards for pedestrians, bicycles, transit and freight, and the Planning Commission and received supportive feedback for a mode share-based approach. In the second half of 2015 and early 2016, the consultant has reported on technical data showing how the new standard would perform and could be applied to development review.

Commitment to Meeting the New Standard

As a part of implementing Seattle 2035, the City is committed to shifting the way it measures LOS to a mode share based system. A proposed update of the City's concurrency code and related City processes are being aligned to measure the SOV mode share of individual development applications and ensure that mitigations are put in place, when necessary, to ensure that future development meets the standards stated in the Plan.

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B.4 Letters Received Late

Introduction

Appendix B.4 contains late letters received after the close of the comment period for the Draft EIS. Late letters are not responded to in the Final EIS and are not part of the formal record.

Many of the issues raised in the late letters are addressed in Chapter 4 of the Final EIS. Section 4.3.2 provides responses to commonly raised issues including the alternatives, the growth and equity analysis, schools, public outreach and housing affordability. Section 4.3.2 also responds to general comments and policy recommendations that do not comment on the EIS analysis or alternatives. Additionally, Section 4.3.1 provides responses to individual letters submitted during the comment period for the Draft EIS. These responses cover a wide range of issues including some raised in the late letters such as historic preservation (Letter No. 15), the urban forest (Letter No. 5), policies LU 59 and LU 60 from the City's current Comprehensive Plan (Letter No. 8, Comment No. 4) and transportation analysis (multiple letters).

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June 19, 2015

City of Seattle Department of Planning and Development
Attn: Gordon Clowers
PO Box 34019
Seattle, WA 98104

Dear Department of Planning and Development,

AIA Seattle appreciates the opportunity to review the draft DEIS for the Comprehensive Plan and the companion document addressing Growth and Equity. We are encouraged by the general action the city is taking to manage the anticipated 70,000 additional housing units and 115,000 new jobs yet there are many areas of concern as we plan for the next twenty years. We believe the Seattle 2035 Plan requires more detail particularly in how this growth is handled through appropriate urban design guidance and a transparent proactive approach to social equity.

Add Urban Design Guidance

The Comprehensive Plan should have an Urban Design Element that is more than a collection of policy statements. Each of the alternatives should include locale specific physical recommendations for our public realm in both verbal and graphic form, including plans and illustrations so that the recommendations and capacity can be visualized and understood by all city residents.
A *physical* urban design element is important because an urban design framework plan will identify opportunities that may not be readily apparent and without plan guidance will not be creative. By identifying a collection of common, unifying goals, objectives and projects regarding physical improvements and benefits to our city, the urban design framework will provide focus and direction for many singular public and private actions toward achieving those goals and objectives. Concern for our public realm is critical because from 25% to 30% of our land area is in the form of streets and sidewalks and public space. It provides for critical movement and connections between destinations as well as a potential system of open spaces. In many ways, those "connectors" stitch our public and private spaces together creating the interaction so important for a healthy community. The plan relies on current policies that are inherent with conflicts in how public realm space is allocated and transitioned to private parcels. A synergy results where the resultant whole can far exceed the sum of the individual acts.

Such a visionary plan would assure that our public realm be safe and comfortable for pedestrian travel encouraging more activity and increased interaction of people. A visual plan would minimize uncertainty by illustrating holistic environments that embrace the pattern and form of our urban surroundings, that incentivize amenities and conveniences resulting in pedestrian environments and circulation networks that are safe and comfortable, that offer opportunities for making connections and interacting socially with friends and neighbors, and that contribute to the life and vitality of our city.

Connect Growth and Equity

This verbal and visual representation through illustrative physical plans is critical if we hold to our "core value" of social equity and Mayor Murray's Executive Order 2014-02 committing to equitable development. It is not apparent that the alternatives have been tested and the policy based plan does not communicate to the general public. Relying on current or future policies and "complaints" is not appropriate for land use decisions. Seattle 2035 should guide our city welcoming growth and concurrent vibrant public realm investments that are shared throughout the city not directed by market forces to direct development resulting in unbalanced public investment.
We encourage you to step back and provide more detail for each alternative so that we can work together to grow our city and provide for an interactive social life.

Sincerely,

Eric Anderson, AIA
Chair
AIA Seattle Public Policy Board

Name (Last, First)	Date Received	Comment
Beck, Brian	06/19/2015	June 18, 2015 Honorable Edward B. Murray City of Seattle PO Box 94749 Seattle, WA 98124 Dear Mayor Murray, I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land. These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands – areas that feature a unique mix of land uses and should not be painted with the same broad brush. Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers. In Georgetown, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

Name (Last, First)	Date Received	Comment
		I'm equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in Georgetown for the foreseeable future. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses down the road. When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a comprehensive review of Georgetown, as well as number of studies and other actions. In the intervening years, much of that promised work (via Resolution 31026) was never completed or implemented only in partial form, raising major concerns about the implications of the proposed amendments for Georgetown. I am also concerned about the lack of outreach associated with the Department of Planning and Development Studies that led up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to residents of Georgetown, as prescribed by Resolution 31026. Recommendations from this plan were then advanced without discussion from residents and other stakeholders into the 2035 Comprehensive Plan Amendment process as a fait accompli. Georgetown residents are consistently left out of the discussion when it comes to the direction of industrial land in our community. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground perspective from residents, property owners, businesses and landholders – and instead only reflects the interests of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Name (Last, First)	Date Received	Comment
		Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction. As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan. Sincerely, Georgetown Resident Mailing address and/or email address cc: 2035@seattle.gov Kate Joncas, Deputy Mayor, City of Seattle Diane Sugimura, Director, Seattle Department of Planning & Development Tim Burgess, Seattle City Council Bruce Harrell, Seattle City Council Mike O'Brien, Seattle City Council Tom Rasmussen, Seattle City Council Kathy Nyland, Acting Director, Department of Neighborhoods
Bleakney, Ross	06/19/2015	Please consider the suggestions made here for growth in Seattle: http://www.theurbanist.org/2015/06/16/support-alternative-5-for-seattle-2035/ I support all of these suggestions. I believe the first is the most important one. Our Accessory Dwelling Unit regulations are extremely prohibitive, and this contributes to very high housing costs. If we liberalize the rules (make them more like Vancouver BC or Portland OR) then it will go a long way towards making the city more vibrant and affordable. Sincerely, Ross Bleakney

Name (Last, First)	Date Received	Comment
Burnstein, Daniel	6/24/2015	Dear Gordon Clowers: As part of the city's Comprehensive Plan update, please consider preservation of the built environment as an important civic asset. Most people are particularly attracted to neighborhoods that maintain a significant amount of building stock built prior to World War II. Please help keep Seattle beautiful and livable by enhancing zoning or other regulations that will ensure that these properties will be saved from demolition. Thank you, Daniel Burnstein Professor Emeritus of History, Seattle University home address: 2106 48th Ave. SW, Seattle 98116 --
Cullen, Joanna	06/19/2015	I am adding to my comments in hope that they will count as having been delivered on 6/18" On Fri, Jun 19, 2015 at 12:00 AM, Joanna Cullen - jfoxcullen@gmail.com- wrote: The City's Comprehensive Plan is a critical opportunity to address the issues and move forward with a vision for the City that plans for a growing region while creating opportunity for all. Plan for schools. Ensure that the District and the City work together to ensure that the neighborhood school facilities that exist are being used in a way that ensures maximum opportunity for children and families to walk to and have access to schools. Then plan for new buildings if necessary. Plan for parks and open space. Ensure that all have a very walkable public park and especially add to those as development is added. Plan for parks in areas that are deficit of parks such as 23rd and E, Union, Plan for families. Do not take away the space for single

Name (Last, First)	Date Received	Comment
		family housing for apartments, Ensure that development lowrise and highrise include family units providing for mixed income communities. Distribute density so that perhaps it is around the light rail stations for instance but with single family home yards and canopy as you move away from that. Do not become concrete everywhere. Ensure adequate transitions from 65 to 40 to single family, Townhouses in lowrise areas provide an opportunity for family housing. More family housing for all income levels is needed, http://www.seattle.gov/Documents/Departments/SeattlePlanningCommission/AffordableHousingAgenda/FamSizePC_dig_final1.pdf http://www.seattletimes.com/seattle-news/data/seattle-no-1-for-techies-looking-to-flee-california/ Plan for mixed income communities. Do not destroy existing low income housing but then distribute new low income and affordable housing to areas where it does not currently exist. Plan for transit and transportation. Be realistic in the planning for needs. Do not underestimate the automobile needs, Do studies of each area during planning. Maintain a great distributed system of neighborhood connections while adding to it. Encourage more use of transit making easily accessible with few complications, The fewer transfers the better for people of all ages, Do not put bicycle and walking paths near the most congested streets where the air is dirty. Exercise is good. Breathing bad air is not good. 10 minute walking is not the same for all. Transit should exist within a block of major grocery stores. Small children and disabilities change this for many, This is rather disingenuous measure. When measuring travel time add my walk. It is much preferable for students to not have to transfer. Distribute density in a way that makes it so all neighborhoods have areas of density and single family homes. This will also efficiently feed a good distributed transit network that works for everyone, Perhaps work with schools and families to ensure that all students have an

Name (Last, First)	Date Received	Comment
		Orca pass. Plan for clean air and water. Ban as many pesticides and toxic substances as possible, Educate the public about how to prevent such substances including those in prescription drugs and cosmetics from entering the environment. Good solid environmental practices including retaining our trees will help reduce climate change. Demolition of buildings is not good for the air or for the environment. Add incentives to the codes which discourage demolition of structures. Encourage the inclusion of the existing structures where new development is allowed, Plan for some beauty. I know that Seattle architects must be more talented than many of the new structures demonstrate, The new structure at 12th and Madison where the Under Arms once existed is an example of a tall unattractive building, Plan for the view of the city to and from a building, The plan should look at the street experience and the distant view of a building, The appearance of the city as one approaches from our waterways should also be taken into account. We do not want or need wall to wall concrete, We have to be careful not to ruin our beautiful city and the many attributes that make Seattle a desireable place to live, Design and reflecting the most beautiful parts of a neighborhood should be the goal of new buildings. We need to retain some of our character and have a sense of place and history. -- Joanna Cullen 975 21st Avenue, Seattle, WA 206-329-8514 jfoxcullen@gmail.com
Cullen, Joanna	06/19/2015	The City's Comprehensive Plan is a critical opportunity to address the issues and move forward with a vision for the City that plans for a growing region while creating opportunity for all.

Name (Last, First)	Date Received	Comment
		Plan for schools. Ensure that the District and the City work together to ensure that the neighborhood school facilities that exist are being used in a way that ensures maximum opportunity for children and families to walk to and have access to schools. Then plan for new buildings if necessary. Plan for parks and open space. Ensure that all have a very walkable public park and especially add to those as development is added. Plan for parks in areas that are deficit of parks such as 23rd and E, Union, Plan for families. Do not take away the space for single family housing for apartments, Ensure that development lowrise and highrise include family units providing for mixed income communities. Distribute density so that perhaps it is around the light rail stations for instance but with single family home yards and canopy as you move away from that. Do not become concrete everywhere. Ensure adequate transitions from 65 to 40 to single family, Townhouses in lowrise areas provide an opportunity for family housing. http://www.seattle.gov/Documents/Departments/SeattlePlanningCommission/AffordableHousingAgenda/FamSizePC_dig_final1.pdf http://www.seattletimes.com/seattle-news/data/seattle-no-1-for-techies-looking-to-flee-california/ Plan for mixed income communities. Do not destroy existing low income housing but then distribute new low income and affordable housing to areas where it does not currently exist. Plan for transit and transportation. Be realistic in the planning for needs. Do not underestimate the automobile needs, Do studies of each area during planning. Maintain a great distributed system of neighborhood connections while adding to it. Encourage more use bu making easily accessible with few complications, The fewer transfers the better for people of all ages, Do not put biclycles and --

Name (Last, First)	Date Received	Comment
		Joanna Cullen 206-329-8514 jfoxcullen@gmail.com

June 17th, 2015
Gordon Clowers,
City of Seattle Department of Planning and Development
PO Box 34019
Seattle WA, 98124
RE: City of Seattle Comprehensive Plan Draft Environmental Impact Statement (DEIS)

Note: submitted by Rachel Eagan 06/19/2015

Dear Mr. Clowers,

On Board Othello is a coalition of 25+ Southeast Seattle community leaders working to create, coordinate, and implement a shared vision of equitable growth for the Othello neighborhood. On Board Othello's vision and priorities are grounded in the goals the community developed through the Othello Neighborhood Plan Update in 2009. Together, On Board Othello and community partners are working to foster a strong sense of place, thoughtfully designed development, and equitable growth opportunities at Othello.

We are pleased to participate in Seattle's growth strategy and applaud the City for including racial and social equity in its visioning of the future. We strongly encourage the inclusion of the Equity Analysis in the Environmental Impact Statement, either incorporated in to the text or as an appendix.

We support equitable growth at Othello and prefer Alternative 4, guided growth to urban villages near transit. We do not agree with alternatives that would prevent growth from happening in our community. We believe that equitable growth can bring community amenities and access to opportunities for historically underserved communities. For example, we want more people to live at Othello because we believe that will generate new customers and increased revenues for the numerous small businesses, many of them that operate here.

Preventing growth at Othello and Southeast Seattle will not prevent displacement. Displacement is already happening due to the strong regional economy. We support equitable growth strategies that make critical public investments to mitigate displacement and help people, businesses, and cultural communities prosper in place. We urge you to approve an alternative that brings equitable growth to Othello and includes critical public investments, such as:

1. **Façade Improvements:** On Board Othello and the City of Seattle Office of Economic Development recently completed a façade improvement project to a strip of 8 businesses on the NW corner of Othello and MLK Jr Way, adjacent to the Othello Light Rail station. Bright colored paint, new visible signage, and the removal of safety bars from windows and installation of protective window film provide a cohesive look, a clean, safe, and walkable shopping environment, and added visibility from the Light Rail station. The project was completed with the support and guidance of the business owners and investment from the property owner, which was unprecedented. The new look and feel of this entry way to Othello will spur additional economic investment in the community by increasing foot traffic throughout the business district and attracting new customers who previously felt unsafe. Investment in additional façade improvements will support business and job retention, increase investment in local business districts, and serve to mitigate displacement.

2. **Technical Assistance for Local Businesses:** Southeast Seattle, and the Othello neighborhood in particular, have historically been an incubator for small, immigrant and refugee owned businesses. They provide a vast array of retail and services that are culturally appropriate for our

diverse population. Through the advocacy of the MLK Business Association and in collaboration with community partners, the Othello business district is gaining popularity as Seattle's local global market. Yet many of these small businesses are facing displacement as rents continue to climb and gentrification of the area increases. TA and expansion support for local businesses provide opportunities that create a continuum for business growth. Business classes, conducted with a cultural lens, provide much needed know how on managing books, updating software, managing a website, and marketing to help our local businesses remain competitive in a quickly changing environment. Public investment in Technical Assistance programming, the Business Associations that advocate for small/local business owners, and expansion of Business Improvement Areas will help our businesses and the people that depend on them for goods and services remain in our neighborhoods.

3. **Anchoring community, cultural, and faith based institutions:** Currently, community, cultural, and faith based institutions are centrally located in the City of Seattle and act as first-stop and one-stop shops providing a broad range of vital services to diverse constituents from a variety of backgrounds, cultures, languages, and faiths. They also help connect clients to additional neighboring services in Seattle. As pillars of their various communities, these institutions also provide a sense of place and belonging to individuals relocating from around the world and across the United States. A major concern in Southeast Seattle is the very real potential that these institutions will soon disappear, forced out by rising rents. Investing in community ownership and looking at creative ways to create ownership opportunities to prevent community, cultural, and faith based institutions from being displaced will provide stability and predictability not only for these institutions but also for the constituents who depend on them. The Multi-Cultural Community Center is a coalition that resulted from the City of Seattle's Community Cornerstones program that is exploring community ownership options, despite funding for the coalition being cut.
   (NOTE: Should these institutions be displaced, and the services they offer with them, constituents would have to travel further—potentially driving if not relocated by public transit—or be displaced themselves to access necessary services. This would decentralize the vast service offerings currently in Seattle and could add strain to public transportation and/or place additional vehicles on the road, impacting traffic and climate. The DEIS fails to assess the environmental consequences of displacement.)

4. **Jobs:** While the DEIS does not detail what kinds of jobs the 115,000 will be, we support investment in jobs that complement the unique fabric of our community and that are accessible to communities with barriers to good jobs. Development is already underway at Othello, expanding employment opportunities is necessary for the stabilization of the neighborhood. On Board Othello is currently focused on business attraction and retention in the Othello neighborhood. Beyond bolstering our service industry, potential employment growth in health has been a subject of much community discussion, especially around culturally competent health care. Encouraging more office jobs in Othello will in turn support our business district by having customers to patronize the businesses during the day.

5. **An Economic Opportunity Center:** Southeast Seattle is ripe with potential for economic growth but we are held back due to a sore lack of accessible, culturally appropriate access to education, good jobs, and business services. We support investment in an Opportunity Center in Southeast Seattle that is a one-stop location where residents can access post-secondary education that is job- and skill-specific, get a job, or develop a business and where services and programs are

delivered by culturally competent staff in a variety of the area's prominent languages. Need for an Opportunity Center has been identified by the community and a feasibility assessment was completed and published in partnership with Community Cornerstones, Grow Seattle, Impact Capital, SEED, and SkillUp Washington.

6. **A Graham Street Light Rail Station:** A top priority for Southeast Seattle communities, Rainier Valley in particular, is a new light rail station at Graham Street. Reinvigorating a business and cultural district cut off by light rail construction and isolated now by lack of access to transit, a Graham Street Light Rail station could be an anchor for equitable development. By investing in the locally owned businesses and cultural institutions surrounding the Graham Street node with a Light Rail station, Seattle residents—throughout the city, not just in Southeast—will invigorate the local economy, retain jobs, and preserve the unique, multicultural fabric of the community.

7. **Housing:** Rent prices in Seattle have been steadily increasing and will continue to do so throughout the city with or without direct development in a particular Urban Village. Public investment in preserving and expanding homeownership opportunities—looking at residential and commercial land trusts, rehab programs for existing owners, and exploring creative solutions for breaking barriers to ownership—in Southeast Seattle and beyond will help stifle the displacement that is already taking place. We support the Mayor's Housing Affordability and Livability Agenda's committee in exploring solutions to increase density while preserving neighborhood character through detached dwelling units, "mother-in-law" units that don't require driveways/parking, and the ability to create duplexes out of single family homes. In addition, we support multi-family housing—including workforce housing, expanding zoning for moderate density as opposed to exacerbating density only around TOD sites, advance rezoning of redeployment sites, and a linkage fee that directs housing dollars to targeted areas of risk to prevent displacement and encourages an equitable approach in supporting investment—especially job creating commercial development—in underinvested areas.

Regardless of what alternative is chosen, the thriving economy throughout the city is going to impact Southeast Seattle. We need public investment to mitigate the displacement that is currently happening and to ensure equitable growth throughout all of Seattle. On Board Othello is committed to working with the City to create equitable development in Southeast Seattle and a prosperous city for all.

Sincerely,

HomeSight
MLK Business Association
Othello Park Alliance (OPA)
Puget Sound Sage
Rainier Beach Action Coalition (RBAC)
Rainier Valley Food Bank
Somali Community Services of Seattle
Van Gogh Development Corporation
HopeCentral
Huarachitos
Filipino Community of Seattle
Penniless Projects
Union Gospel Mission
East African Community Services (EACS)
Othello Neighborhood Alliance (ONA)
Othello Station Community Action Team (OSCAT)
Rainier Beach Merchants Association
Rainier Chamber of Commerce
Rainier Valley Community Development Fund (RVCDF)
SouthEast Effective Development (SEED)
Vietnamese Friendship Association (VFA)
Olympic Express
Artspace
Rainier Restaurant
Puget Sound Sage
West Coast Commercial Realty

Name (Last, First)	Date Received	Comment
Eals, Clay	6/23/2015	Gordon: I realize that I am sending in a comment one week late, but it has been a hectic season for us, and I am just now digesting the DEIS of the Seattle 2035 comp plan. I hope that you can include our organizational voice in the comments, even though this missive is tardy. Our organization's comment is short and straightforward. The DEIS, if I am reading it correctly, seems to omit any significant reference to preservation and its role in community diversity and character, economic vitality and environmental stewardship. This would seem to be a big (and potentially inadvertent) error, given the city's strong landmarks preservation program and its long and deep track record in this arena -- all the way up to and including countless decisions of the city council over the decades. We ask that preservation be inserted as a key value during the next stages of consideration of the Seattle 2035 comp plan. Our organizational mission chimes in with that of many others in Seattle: to preserve local heritage through education, preservation and advocacy. No one can reasonably argue that our city's long-range plan should not include preservation as a key value. Thank you for considering this sentiment. I would be happy to answer any questions you may have. Clay Eals executive director Southwest Seattle Historical Society c/o "Birthplace of Seattle" Log House Museum 3003 61st Ave. S.W. Seattle, WA 98116-2810 206-938-5293 (museum: noon-4 p.m. Thursday-Sunday) 206-484-8008 (cell) clay.eals@loghousemuseum.info http://www.loghousemuseum.info

Comments on the Draft EIS for the Seattle 2035 Comprehensive Plan **Note: received 06/19/2015**

From: Richard L. Ellison
8003 28th Ave NE, Seattle, WA 98115

To: Gordon Clowers
Department of Planning and Development, 700 5th Avenue, Suite 2000, Seattle, WA 98124

June 18, 2015.

Dear Mr. Clowers,

I have the following comments and concerns about the draft Environmental Impact Statement (DEIS) for the Seattle 2035 Comprehensive Plan.

1. Impacts on the Urban Forest due to Increased Density
Projections are that Seattle will see a significant increase of 120,000 new residents, 115,000 additional jobs and 70,000 new housing units. The dEIS fails to adequately plan for the impacts of projected growth to mature trees, tree groves, overall forest canopy, urban native wildlife (birds, amphibians and salmon habitats), toxic urban street runoff, aesthetics, and urban island heat effect. Plan Open Space needs for Seattle based on projected growth. Innovative habitat, corridor, watershed, or urban forest plans can assist in mitigation planning.

The DEIS concludes there is no problem because we have the Urban Forest Stewardship Plan and provisions in SMC 25.11, which are currently failing to significantly protect Seattle's magnificent mature trees and urban forest from losses due to development.

The draft EIS provides no direct or detailed evaluation of the yearly or cumulative loss of urban forest canopy due to development and growth and the associated impacts on air pollution and human health, noise, storm water runoff, wildlife habitat, open space, or heat island effects.

2. Impacts to Fish and Wildlife
What are the impacts to urban wildlife (particularly native birds) as a result of current growth and projected growth and development? Create plans to restore the position of an Urban Wildlife Biologist (lost decades ago in budget cuts) and update and implement the already created Urban Wildlife Program. Make special efforts to protect the six bird species of special status. Salmon are a special legacy- make special notes in the Comp Plan. Watershed ecology demands a look at land cover changes throughout the basin and not just streamside.

Do we need a Wildlife Biologist (we lost our City's only one recently in budget cuts? Do we need an office of the City Ecologist, with one person who can oversees all environmental activities and coordinates them? Or is it every City department making the best of the chaos. What is the 20 year vision?

The number and diversity of Seattle's native bird species is declining fast as neighborhoods lose big canopied trees, particularly native tree species. We knew this back in 1984 from Steve Penland's UW's Ph.D. thesis and in 1991 UW professor Dee Boersma's 1991 research confirmed this. Regional habitat fragmentation continues to add to this. "It is not surprising that birds are closely attuned to vegetation. They eat seeds, fruits, and nectar that the plants produce and the insects that feed on plants."

Natives include Downy Woodpecker, Red-breasted Nuthatch, Chestnut-backed Chickadees, and Cedar waxwings are losing ground because they nest and roost only in native trees. Many non-natives prefer nesting in building eaves and highway overpasses. These non-native birds are becoming dominant now, i.e. crows, english sparrows, rock doves (pigeons), and starlings, and they're driving native birds to local extinction.

But what about the special status species that live in Seattle: Pileated woodpeckers, great blue herons, bald eagles, green herons, hooded mergansers? What about wildlife corridors, open space issues, noise abatement problems, fish and amphibians as food, water quality, human ecology, and steep slope development issues?

Chief Seattle, the first City Ecologist? A myth exists that in being moved on to the reservation, Chief Seattle is purported to having asked the Great White Father to save the animals, to treat them as his brother. Now the animals are all gone, except for the birds, who live in the trees. Save Chief Seattle's dream.

3. Steep Slopes.
Much of Seattle's steep slope areas have trees being choked by invasive species such as English Ivy and Clematis. Should mitigation of development on or adjacent to steep slopes require invasive plant species control? What are the current impacts of failing to control invasives on the landslide potential of steep slopes?

Scientific literature repeatedly documents how slope stability is greatly enhanced by trees and other vegetation. Non-native vines such may choke and shade out trees throughout Seattle. Smaller trees and shrubs are simply pulled down and choked by masses of vines. Taller trees are shaded across main branches, become stressed and weak, producing fewer leaves and root hairs. These roots do not hold the soil as readily as fast growing roots from big healthy trees. This can lead to slope failure under saturated soil conditions.

4. Forest Canopy
The current City Comprehensive Plan calls for no net loss of canopy. The City does not require an evaluation of impacts to the canopy by each development. There is no accumulated accounting for trees lost with each development project, and so cumulative short and long impacts are not possible to evaluate. Additionally, projected growth of saplings to mitigate loss of mature trees may not accurately estimate future canopy size due to the historic low survival of newly planted trees in Seattle.

Sites undergoing development should include the following evaluations:

> Tree Species: speaks to size of canopy and amount of storm water benefit.
> DBH: speaks to age of tree and canopy coverage.
> Tree Height: speaks to canopy volume and amount of environmental benefit.
> Canopy Width (area): speaks to canopy volume and environmental benefit.
> Tree Condition: speaks to overall forest health and environmental impacts.
> Photographs of the trees on the parcel and adjacent properties.
> Canopy coverage as a percent of area pre- and post-project development.

5. Inadequate Tree Protection in Current Code
So called protection of exceptional trees under SMC 25.11 is based on a complaint system and is unfortunately not protecting exceptional trees. It is utterly failing to protect the majority of mature trees from being removed in development, particularly in urban growth areas and light rail transportation corridors.

Unless the remaining significant trees are preserved, how can the City hope to truly establish a network of green space connections? Significant trees on private property play a crucial role in connecting public greenspaces. And these connections are crucial in their habitat value, because they allow patches of habitat to connect.

6. Removal of the Current 40% Canopy Cover Long-Term Goal
The Draft EIS proposes eliminating the City's long-term goal of a 40% tree canopy in the current comprehensive plan and replace it with the Urban Forest Stewardship Plan goal of 30% by 2037.

Seattle should not reduce its long term canopy goals. The Urban Forest Commission canopy goals, adopted by the Seattle City Council, and in the current Comprehensive Plan under ENVIRONMENT ELEMENT H Seattle's trees E23 states:

> "Achieve no net loss of tree canopy coverage, and strive to increase tree canopy coverage to 40 percent, to reduce storm runoff, absorb air pollutants, reduce noise, stabilize soil, provide habitat, and mitigate the heat island effect of developed areas."

Note: received 06/19/2015

Robert E. Fellows

115 N. 84th Street
Seattle. WA. 98103
(206) 399-0482
Rob.Fellows@mac.com

June 18 2015

City of Seattle Department of Planning and Development
Attn: Gordon Clowers
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124

Dear Mr. Clowers:

Thank you for the opportunity to comment on the Seattle 2035 draft environmental impact statement (DEIS). This is a strange document, because it describes potential impacts of actions that are not specified. Without knowing what actions are proposed, it is meaningless to describe impacts of hypothetical population and employment distributions, and it is impossible to comment on whether the alternatives have been appropriately specified or impacts disclosed.

There is nothing aspirational in this document. There is no discussion about the characteristics and diversity of communities and housing we desire to create. There no stated objectives for the alternatives, and there is no rationale for selecting one alternative over another. It is left to the reader to reverse-engineer the intent of each alternative, providing no way to evaluate whether the intent would be achieved. I could not divine any "plan" hidden within the impacts assessed.

SEPA requires actions be specified.

While there are four "alternatives" considered in the DEIS, there are no "actions" associated with them. The intent of SEPA is to disclose the results of an action, not the impacts of hypothetical population and employment distributions that the city has no mechanism to achieve. The DEIS seems to be designed to provide environmental coverage for any carte blanche policy that might emerge through the unfinished process of developing the final plan.

With no stated current or proposed mechanism to direct growth beyond the zoning capacity shown in the future land use map (changes to which are not specified), this is a thought experiment describing impact of theoretical distributions of activity with no link to city regulatory actions or infrastructure investment that would cause them. Even changes to the urban village boundaries would have little practical effect without policy changes to the underlying zoning. This document has not disclosed those actions or their implications.

In my opinion, **controversial new elements to the comprehensive plan will still require SEPA disclosure.** This document cannot be construed to disclose the many impacts that could result from the types of action hinted at but not specified in the plan, such as wholesale changes to the future land use map (FLUM) or changing the meaning of zoning or urban village designations.

This is important not only for legal and environmental reasons, but to ensure a full and open discussion of the impacts controversial policies would have on specific neighborhoods to facilitat their informed participation and response. The current document provides no basis for this discussion, and little disclosure to most readers that significant policy changes are under consideration in the first place.

Urban billage boundaries and types must be reaffirmed.

Urban villages established under neighborhood planning in 1999 were the result of intensive outreach. At that time urban villages were described as places that would (by definition) accept the bulk of new development due to their zoning capacity. Designation as an urban village conveyed a commitment by Seattle to focus its infrastructure improvements toward creating high quality urban neighborhoods. Neighborhoods that affirmed urban village designation did so with the understanding it would bring city attention and infrastructure.

Over the past three years city policy has changed the meaning of the term urban village to signify locations where the city would encourage new development by lowering costs and standards facing developers. The most significant effect of an urban village today is elimination of minimum parking requirements for new development regardless of context, and without opportunity for public input. New policies hinted at but not specified in the EIS would go further, allowing higher density in the roughly 1/3 of urban village properties currently zoned for single family houses.

The change in focus for urban villages is disheartening. I have been a strong supporter of the urban village policy since it was adopted because city investment in infrastructure, urban planning and social services need to be focused on places that are becoming dense and accepting the lion's share of new development and its impacts. In the Aurora-Licton Springs urban village, for example, there has been a massive increase in development and density, but no complementary investment of public attention or investment to make it a walkable, thriving business district. Now that goal of public investment and attention seems to be discarded.

Given these existing and potential wholesale changes in the meaning of an urban village designation, the designation means something very different from when these boundaries were established and endorsed through neighborhood plans. In my opinion, **every neighborhood will need to re-assess the urban village boundaries they agreed to previously**.

Comprehensive planning should ensure that growth and infrastructure are synchronized.

The intent of growth management is to ensure that infrastructure and growth are in sync. While there is discussion about impacts of different alternatives, there is not a clear assessment of the infrastructure requirements and implications associated with each of the alternatives. If it's assumed that the capital program would be entirely unaffected by these different growth distributions (should they occur), then comprehensive planning would not be needed. **Without setting forth the alternative investment plans needed to support the alternatives, the impacts and costs cannot be properly understood** as growth management intended.

For example, the analysis does not lay out the costs needed to serve the significant new development in Northwest Seattle, rather it simply assumes that rail will be complete between downtown Seattle and Ballard. While we would love to see this occur, it does not seem appropriate simply to assume it will occur in an environmental document when there has been no commitment to either the plan or its funding.

Discussion is needed over causes of unaffordability and displacement.

There is significant discussion needed over the causes and mitigations for unaffordable housing to assess impacts appropriately. The development community and DPD seem to accept that only the supply and demand are factors, and that any added housing and increased density will improve affordability. But there are many other factors affecting affordability; among them are the market segments and housing types developers are choosing to target, aimed only at the highest income homeowners and lowest standard apartment.

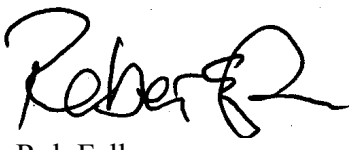
Rather than to "encourage" development and density in what is now a hot real estate market, DPD needs to understand that developers no longer need encouragement to develop in Seattle, and that the city now has more leverage to encourage the types of housing we desire. Rather than to boost developer margins for building mega-houses and micro-apartments, city policies should consider what tools are available to affect the relative profitability of building housing that serves people and families of more moderate means, and to build multi-family housing that is actually targeted to families.

Neighborhood aspirations need to be reflected in the plan.

The overall feeling one gets reading the DEIS and following recent land use debates is that advocates for density believe that the fate of the world depends on its urgent implementation regardless of what current residents desire for their neighborhoods. Many feel neighborhoods should be adapted to serve the needs of transportation (instead of the opposite), and many disagree about the value of rapid densification to affordable housing or neighborhoods.

I fervently believe that planning should be based around the aspirations of people. Community visions and participation is part of having a healthy urban neighborhoods. In almost every case I can think of, projects have been improved because of dialogue with neighborhoods. Most all of us working on neighborhood issues believe more density is coming and will be good for Seattle, but we also want it to occur in a way that fits and enhances our unique neighborhood forms and character. I hope the plan, when complete, will reflect the aspirations of neighborhoods and value of participation in its implementing.

Sincerely,



Rob Fellows

Name (Last, First)	Date Received	Comment
Flanigan, Bill	6/30/2015	Perhaps I missed it, but I don't see anything specifically addressing housing affordability. Affordability is a goal and implied in several discussions, but I'm referring to substantive measures to improve affordability. Has the city considered changing some of the policies it has that add cost, sometimes without adding value? 5 over 2 construction with a concrete podium and wooden framing above is particularly problematic in my eyes. To make the money work, developers are eager to put in retail regardless of a specific site's suitability for ground floor retail/office and a lot of the building's internal services need to be upgraded to commercial grade. That's separate from the cost of the steel & concrete and the environmental impact of said materials. Engineered wood has been shown to perform very well in BC and Europe and could be a locally sourced carbon sink. There is also a great deal of uncertainty and cost associated with the design review process that a move towards form based codes, where appropriate, could address. Instead of trying to achieve a specific result through massing and pages and pages of additional code, simply ask for it from the get go, you know? I think that we are seeing a cycle of displacement and gentrification in large part because it's difficult for developers to build cheaply in the current regulatory climate. South Seattle, for instance, could substantially benefit from reduced housing costs where apartments and flexible spaces make the most sense. Thank you. Bill Flanigan Graduate Intern | Market Development King County Metro Transit 201 South Jackson Street Bill.flanigan@kingcounty.gov
Hill, Gregory	06/19/2015	From: Liz Campbell [mailto:campbellhill1215@msn.com] Sent: Thursday, June 18, 2015 10:42 PM To: 'Gordon.Clowers@seattle.gov' Subject: Seattle 2035 Draft EIS

Name (Last, First)	Date Received	Comment
		City of Seattle Department of Planning and Development ATT: Gordon Clowers 700 5th Avenue, Suite 2000 P.O. Box 34109 Seattle, WA 98124 Via 2035@seattle.gov RE: Comments on Seattle 2035 Draft EIS Dear Mr. Clowers, One of the things that has made Seattle a most livable city is the ability to own a house on a small lot within the city. For most homeowners, there home represents their single largest investment. Single family home owners are disproportionate participants in all manner of public activities that benefit the city. Section 3.4 and 3.5 advocate removing policies LU 59 and LU 60 from the Comprehensive Plan. Because these policies preserve the Single Family zoning in Seattle, removing them will have far reaching effects. While Section 3.4 enumerates Alternatives 2, 3 & 4, that actively require the removal of single family zoning in specific areas, Section 3.5 suggests thinly fabricated reasons why the policies have no place in the Comprehensive Plan. First, I disagree with the notion that removing the policies would have no effect. The Mayor would not bother to advocate their removal if he did not have specific plans in the place to go further to eliminate the single family zones, for which the removal was not a critical element. The Comp Plan is full of policies that have virtually no enforceable related action other than to satisfy Seattle's urge to feel good about itself, and those policies are not planned for elimination. Please address the unidentified plan, for which removal of these policies is essential for the unidentified plan to be carries out. Second, I believe the reference to LU 59 and LU 60 in Section 3.5 is a Trojan horse to ease the rezoning of large areas of SF zoning. Please address how the removal of these policies will hasten the rezone of areas not identifies in Alts 2, 3 & 4.

Name (Last, First)	Date Received	Comment
		Third, I believe the Mayor has in mind removing multiple areas of SF zoning to facilitate the ability of so called "non-profit" developers to have access to a greater range of land parcels for development. Please address how removal of SF zoning will affect the following: 1. The supply of Family Housing. 2. The price of single family homes. 3. The affordability of housing for large families based on the value of property, and therefore the amount of property tax paid, for property in SF zones in single family use, when the underlying zoning is changed to multifamily. 4. The likely change to family size, based on the loss of single family homes. 5. The likely change to the population of children living in the city. 6. The likely changes to the participation of citizens in public affairs as the population of home owners declines. 7. The likely change to the income profile of city residents as the number of single family homes declines. 8. The likely change to the number of trees and other plants in the city as the number of lots in single family use declines. Specifically identify the likely tree lose. Fourth, for the record, I favor Alt 1. When the urban village boundaries were drawn, many citizens objected to including areas of SF zoning within the villages. The city planners attached to each neighborhood planning group announced that the there was no plan to change zoning and that the present SF zoning criteria (LU59 and LU60) would prevent any change to the zoning. They further noted that the only reason the SF areas were included within the planning area was to make easier to draw simple lines identifying the zoning. Please clarify if there will be a process to redraw the boundaries of the villages.

Name (Last, First)	Date Received	Comment
		Please address how removal of SF zoning policies LU 59 and LU 60 are tied to the ability to rezone SF zoned areas going forward. Sincerely, Gregory Hill
Hill-Force, Alicia	06/19/2015	To whom it may concern, I am writing to express a community concern. Seattle is a city undergoing a great deal of growth and momentous change. However, in our haste to grow we often forget about the small businesses that have helped build our city. In the last last five years, I've watch three of my friends lose or come close to losing their businesses because of said growth. The latest businesses on the chopping block are in the U-district. Some that have been there for at least 20 years. The same length of time that some of my friends who have lost their businesses on capital hill had been there. Therefore, I oppose the upzone proposals suggested in the EIS studies, and I believe that the implementation of an increase in building heights will have a devastating impact on the adjacent businesses. The character will change so much that the businesses will not be able to survive in this environment. If you have any questions you may email me or call at (206)250-7884. Thank you. Sincerely, Alicia F. Hill-Force

Note: received 06/19/2015

16 June 2015

TO: Gordon Clowers
Sent via e-mail - 2035@seattle.gov

FR: Kate Krafft
Krafft & Krafft Architecture
2422 29th Avenue W.
Seattle, WA 98199

RE: SEATTLE 2035 DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
PUBLIC COMMENT

Please be aware that I along with many other Seattle residents am very seriously concerned about the following failures of the Draft EIS proposal.

1. The Draft EIS proposal states that *"All Comprehensive Plan elements will be reviewed and updated as part of the proposal."* However, the draft document ***does not address*** Economic Development, Neighborhood Planning, Cultural Resource, and Urban Design.

2. The current plan includes preservation under the "Cultural Resource" element (**CR**11-**CR**16). The new Comp Plan replaces "Cultural Resource" with an "Arts and Culture" element. This new element focuses on art (public art, cultural space, arts education, creative economy, creative placemaking) and ***appears to have eliminated historic preservation and protection of cultural resources.*** Please clarify:

   How will preservation be specifically addressed in the future Comp Plan?

   How are the city's existing preservation policies and regulations going to be addressed?

3. The "Environment" element addresses environmental stewardship, one of the plan's core values. Environmental stewardship is primarily defined within the context of the natural environment (air, land, and water resources) and not the ***built environment.*** The role of ***preservation vs demolition in terms of environmental stewardship*** must also receive analysis and be addressed.

Furthermore, I wish to reiterate several well-established facts regarding preservation that are broadly accepted and should be seriously considered in the preparation of any meaningful planning document.

Preservation Matters! Preserving historic places is important to community diversity and character, economic vitality, and environmental stewardship. Preservation and creative adaptive reuse of our existing building stock cuts across *all four core values of the Comp Plan—Community, Environmental Stewardship, Economic Opportunity, and Social Equity*.

Preservation enhances community vibrancy and cultural identity. Historic buildings in older neighborhoods lend vibrancy to communities and help define the sense of place or personality of cities. It's well documented: people are drawn to communities that retain their distinctive character and heritage. Restaurants, shops, and services follow preservation. *They are a vital part of promoting healthy, complete communities*.

Preservation is an economic driver. Investing in historic buildings sparks economic revitalization and acts as a linchpin in neighborhood development.

Preservation conserves resources. Rehab of existing structures reduces waste and saves energy. Approximately 25% of the material in landfills is demolition and construction waste. Building reuse almost always offers environmental savings over demolition and new construction. Recent research on the environmental impacts of new construction (in terms of energy, carbon, water, materials, toxicity, etc) shows that it takes decades for the greenest building to pay back these up-front costs. Additionally, life spans for new buildings are often **30-40 years** vs. more than **100 years** for most historic structures.

Preservation contributes to social equity. Rehab investment occurs in culturally and economically diverse communities. Reusing our historic building stock – whether it's an old warehouse, school, or former church – provides much-needed, creative spaces for housing, arts, offices, and community centers.

Thank you for your serious consideration of these concerns and comments.

Name (Last, First)	Date Received	Comment
Martin, Justin	06/19/2015	I am concerned about whether the Comprehensive Plan is doing enough to foster more sustainable transportation options than continued levels of use of single-occupancy vehicles. Vehicle traffic is a big danger in our communities, causes multiple types of pollution that impact our quality of life (noise, air, light, etc), creates health impacts that affect us all, and is a big contributor to climate change and our unsustainable fossil fuel based economy. I would request that you recommend options that would provide more aggressive reductions in single occupancy vehicle trips, and much greater shift in mode share to walking, biking and transit. I would further request that you: 1) Use a multi-modal, person-trip level of service standard rather than a vehicle level of service. 2) Count all trips, not just commute trips to work. 3) Make sure Seattle 2035 is in alignment with existing Seattle plans (e.g. Climate Action Plan, Bicycle, Pedestrian and Transit Master Plans, urban forestry plan, etc). 4) Build transportation models that push the envelope rather than following business as usual. Thank you for your consideration.
McKenna, Jessie	06/19/2015	Greetings, I am writing to express my concerns over the language in the current draft of the 2035 Environmental Impact Statement. My neighbors explained to me that the current language in the 2035 draft Environmental Impact Statement implies that the 40% tree canopy coverage goal currently in effect would be slashed by up to 25% over the next two decades. This concerns me greatly. The first thing that took my breath away when I came up the I-5 from Sea-Tac airport to visit Seattle in 1998 as a guest of this great city was the Gorgeous Seattle Skyline, Space Needle and all--the second thing, was all the trees! In front of me and to my left was all city-scape, planes taking

Name (Last, First)	Date Received	Comment
		off and landing from Boeing field, industrial Georgetown and SoDo, but to my right was Beacon Hill, my home now for nearly ten years, and the fall colors of leaves of hundreds of species of plants and trees overwhelmed my vision (and the car windows!). As a community leader and activist, as a homeowner of Seattle, I wish to convey my deep love for Seattle's trees. They are without a doubt one of the key features of our beautiful city and we have an obligation to protect them--obligation or not, we ought to! They took my breath on day one, but they've been supplying clean oxygen every day since, helping to filter out the pollutants us humans create inadvertently by living out our lives here among our native trees. Please ensure the wording in the 2035 draft Environmental Impact Statement does not put our trees in peril. This is not a tree-hugging hippy issue, this is a quality of life issue for Seattle residents, visitors, businesses, our resident wildlife--for us all. Thank you. -- Jessie McKenna Freelance writer, nanny, rockstar, etc.
Murphy, John	06/19/2015	I am writing in opposition for the consideration of height increase in the University District. Seattle is losing all of the quaint neighborhoods in the historic districts. As we have seen in South Lake Union the effect son livability and the Seattle Culture are not manifesting as the original planners had said they would. Development and developers have not been placed in check and the end result will have far reaching negative implications. The University District is already seeing prices of housing

Name (Last, First)	Date Received	Comment
		skyrocket completely out of control. I live 20 miles from he U-District and I house students who can not afford to live near the school. I see everyday how the commute harms their studies. Do the developers and the city have students interests in mind? This is the next generation, this is the lifeblood of Seattle. We need to do what is good for the city, mores than what is good for the corporate developers. Please do not allow upscale development in the University district. John Murphy ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~ John Murphy johnsmurphy@gmail.com
Royal, Sharon	6/27/2015	Hello, I am coming late to this conversation, only recently becoming aware of the four different plans and the comment period, now closed. I have lived in Seattle for 22 years and have lived-in and owned homes in several different neighborhoods while here. As a city, the most wonderful and unique aspect of Seattle is the 'small town' neighborhoods, each with their own character and commercial center. I am not someone who thinks bigger is better and that infinite unchecked growth should be the aim. That said, Seattle is growing. People want to live here. It seems to me that in this era of great change Seattle leaders have a real opportunity to create a thoughtfully considered, well-designed, genuinely progressive city. But that is not happening. Watching from the sidelines, I am angered by the purely economic decisions that overshadow livability and quality of life.

Name (Last, First)	Date Received	Comment
		It appears that we talk about balance in ideal terms, but fail to develop a politically difficult plan that truly builds-in real and balanced opportunity for different income levels, families and older-folks at every step. The current town homes replacing single family houses are primarily designed for one, young, able-bodied demographic. This creates a "college campus" atmosphere in the walkable neighborhoods (with all related problems) and severely restricts access to a walkable lifestyle for families and empty-nesters (with less-than-perfect knees and income). Until real public transportation is prioritized, along with car-alternative modes of commuting, densification will be a "more sustainable" alternative in theory only. From the description, I vote for alternative number 4 which appears to spread out opportunity in a more sensible way. But, none of these will make a good, strong and livable city if we do not consider the existing infrastructure and mandate balance for different cultures, ages and incomes in every sector. Along with that, if "green' is more than lip-service and city planners truly seek to create a progressive, game-changing city, mandating that developers design into every project things like permeable driveways and gray water collection, and at the very least, that all commercial buildings produce their own electricity from solar panels on the wasted flat roof-tops. Not to mention decreasing their carbon footprint by creating living greenspace on the roof. I cannot understand, given what we know now, how it is responsible to continue building as wastefully as we have been. A progressive city would address this in real terms. With the climate changing for real, all of us need to stop acting as if policies that admit and compensate for the impacts of density and building are excessive, affluent concepts. Thank you for the opportunity for this conversation about planned growth. I hope that it is not just to appease the

Name (Last, First)	Date Received	Comment
		public (as some other infamous city projects have been). There are a lot of good minds and good designers in this town whose voices are usually obscured by economic growth. Sharon Royal Fremont

Note: submitted by Martin Westerman
06/22/2015

West Seattle Transportation Coalition Comments, June 2015
Re: Environmental Impact Statement for
2035 Seattle Comprehensive Plan

Background

The West Seattle Transportation Coalition (WSTC) is a Peninsula-wide organization working to address transportation and mobility issues for Seattle's largest constituency – the 100,000 people living on the 10 square mile area between the Duwamish River and Puget Sound.

The WSTC formed in September 2013, as a local response to the 27% cuts King County Metro planned for West Seattle's bus services. The WSTC is now a unified voice for Peninsula transportation issues, providing anecdotal and data-driven research and lobbying efforts that public agencies, leaders and elected officials use to improve mobility options and service for West Seattle.

Transportation concerns Seattle citizens' more than affordable housing. When a June 2015 EMC Research poll asked Seattle voters to name "the most important problem facing the city today that the city needs to address," 40% named transportation (#1), 17% named housing (#2).

Summary

The City of Seattle is out of compliance with DPD and GMA levels of service (LOS) for West Seattle. This should trigger a moratorium on West Seattle building development, and must be noted in the 2035 Comprehensive Plan. But WSTC does not expect Seattle to stop development, as setting LOS is arbitrary.

WSTC does expect the City of Seattle to concurrently improve transportation and mobility options, and capacity management as residential and commercial developments proceed. These linkages must be made in the 2035 Comprehensive Plan.

Likewise, West Seattle ingress-egress issues must be addressed, particularly improvements in mobility and capacity management on the corridor between I-5 and the West Seattle Peninsula – home to 20% of Seattle's population.

Finally, negative impacts on productivity and efficiency; air quality, public health and carbon footprint must be priced, and incorporated into asset management calculations, to provide actual costs associated with these development issues. Failing to do so promotes false budgeting and poor decision-making.

Adding density can add commercial life and robust local feeling, but density without amenity is worse than sprawl.

Comments

1. The City of Seattle is out of compliance with DPD Director's Rule 5-2009, and with the Washington State Growth Management Act (GMA), RCW Sec. 36.70A.070, on transportation levels of service (LOS) from I-5 to West Seattle. The GMA requires counties and cities to include transportation LOS standards in their Comprehensive Plans. The city lists no LOS for the Spokane St. low (swing) bridge, which carries more than 13,000 vehicles per day: and the West Seattle high bridge appears to be out of LOS compliance at 93,000 vehicles per day. This failure should trigger a moratorium on West Seattle building development and Urban Village growth, until the city addresses capacity management and mobility options for this corridor between I-5 and the West Seattle Peninsula. As setting LOS is arbitrary, WSTC does not expect non-compliance to stop the growing City of Seattle from continuing development.

2. Therefore, the Proposed Comprehensive Plan (PCP) must directly link improvements in capacity management, public transportation and mobility options to housing and commercial development. The current PCP allows building development to outstrip the capacities of public transportation and other mobility options. Transportation infrastructure provides the means for Seattle residents, suppliers and enterprises to reach each other, and for residents to access places of work, entertainment and recreation. Public transportation is a preferred option for Peninsula residents, but out-of-scale development has overwhelmed limited bus service, and encouraged residents to increasingly rely on private vehicles. This results in congestion of limited road space within West Seattle and on its ingress-egress routes, and vast negative costs in productivity, efficiency, pollution, public health and carbon footprint.

3. Arterial capacity and travel time increases are significantly inaccurate in the Transportation Appendix (pp. 37 & 43). While PCP contends that West Seattle can handle 20% to 30% more growth, there's less per capita vehicle capacity and public transportation in West Seattle now than ten years ago, due to dramatic population growth (up to 300% in some areas). Travel times by car and bus range from 5-60 minutes longer within, and to and from the Peninsula, depending upon activities on and outside of it – including congestion or delayed accident clearing on the West Seattle Bridge, SR 99 and I-5, Port of Seattle freight activities, SODO railroad cross-traffic, and downtown tunnel construction.

4. The Transportation Section (3.7) of the PCP uses the words "West Seattle" primarily as map labels. This glaring oversight indicates how little consideration was accorded Seattle's largest contiguous area and population. Further, where the PCP mentions West Seattle public transportation options, it focuses primarily on two transit corridors – Delridge and Fauntleroy, and two Metro routes – the 120 and the Rapid Ride C. More mobility routes and options must be considered to cover a Peninsula that is five miles long and two miles wide.

5. The PCP does not mention light rail, dedicated bus lanes, signal coordination, or several other possibilities for relieving West Seattle traffic

congestion, improving Peninsula-related mobility, or bringing the City of Seattle into compliance with Director's Rule 5-2009, and the WA State GMA. The City of Seattle's 2012 Transit Master Plan pays no attention to addressing public transportation deserts, mobility restrictions and service time limits that Peninsula residents face and want solved. Peninsula residents are seeking a dedicated West Seattle Bridge (WSB) bus lane to SR 99, signal coordination from the WSB north-bound on 4th Avenue, a Lander Street Overpass and other options.

6. In transportation planning, PCP must apportion separate routes for separate transportation modes. For example, we suggest following Portland, Oregon's example, and put bicycles on separate, parallel streets designated as bicycle routes. Research indicates that cyclists are given false senses of security when they ride at-grade in separated lanes on multi-modal corridors. In West Seattle, we suggest using either (a) separate, safer streets running parallel to main roads as bicycle routes, or (b) on multi-modal corridors, using grade separated bicycle routes. We applaud the city for designating 9th Ave. as a bike lane north of downtown, running separately & parallel to the dangerous Westlake Ave., and want to see more use of this option, such as slotting a safer, less traffic-impactful bicycle lane on 3rd Ave., rather than removing a traffic lane on 2nd Ave. for bikes, which causes two–mile back-ups during evening rush hours.

7. The PCP does not address Increased freight activity planned for Port of Seattle Terminals 5 and 18. West Seattle's main ingress and egress routes cross these areas, and operate above capacity for more than six hours a day, during morning and evening peak drive times. Frequent back-ups, sometimes as long as two hours, occur due to container truck congestion or accidents in this area. West Seattle needs to see improvements addressed promptly for these areas.

8. The Comprehensive Plan must assign private and commercial vehicle parking costs to vehicle owners. Past City Councils excused building developers from providing adequate garage space, because they expected public transit growth to keep pace with building growth. This did not occur. Instead, residents without garage space now park their vehicles on public streets, burdening city taxpayers with congestion and parking costs. Portland, Oregon charges fees for overnight street parking; Seattle can approve more zone restrictions in high-density neighborhoods and other areas, and provide flexibility to modify them to meet specific needs.

9. To assess true costs of transportation and development, Seattle's Comprehensive Plan must incorporate externality pricing into its asset management and budgeting. Traffic congestion caused by over-capacity road use, and development without concurrent public transit and infrastructure upgrades, present huge opportunity costs, as noted above. Without this accounting, cost estimates will be inaccurate and false, and encourage poorly-informed decision-making.

10. No funding suggestions, mechanisms or priorities are outlined as means

to pay for the infrastructure improvements that anticipated growth will require. Development directly impacts transportation, mobility, utility, education and other infrastructure, yet PCP does not address covering their costs. There is no mention of long term bond vs. levy assessment. Nor does the PCP explore high leverage options – those that yield maximum public benefit for minimum public investment. West Seattle needs projects that improve egress and ingress for the peninsula, yet the Move Seattle initiative is proposing to fund the Fauntleroy Boulevard Project – primarily a beautification scheme. We strongly recommend spending scarce resources where they will create the most functional benefits.

B.5 Letters Regarding the University District Urban Design EIS

Introduction

Appendix B.5 contains letters regarding the University District Urban Design project that were received during the comment period for the Draft EIS for Seattle 2035.

These letters are not responded to in the Final EIS for Seattle 2035 because they do not put forward questions or comments on the EIS analysis or alternatives for Seattle 2035 and because the City conducted a separate EIS process for the University District Urban Design project. The Final EIS for the U District Urban Design project was issued on January 8, 2015. Additional information about the University District Urban Design project, including EIS documents, is available on the City's website at: http://www.seattle.gov/dpd/cityplanning/completeprojectslist/universitydistrict/whatwhy/default.htm.

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Comments Received on the Seattle Comprehensive Plan EIS regarding the University District EIS

Name (Last, First)	Date Received	Comment
Abraham, Cheryl	06/18/2015	I oppose the Upzone proposals made in the EIS studies and do not want the building heights on the Ave to change & especially oppose the building of 340ft towers on the Ave. Please don't let us lose another historic neighborhood & its diversity of affordable small business!!! Thank you, Cheryl Abraham
Aceves, Rene	06/18/2015	To who it may concern I feel very strongly about preserving the traditional, intimate character of Seattle's neighborhoods. I live in Wedgwood and bike to work in the U-District, where I've worked for 18 years. I look forward to the expansion of light rail in our region, but I do not think it is an excuse for ugly, impersonal apartments that displace something worthy that existed before. Too often, said development is the same old apartment or condo blocks alternating with the same old town houses. We're tired of that. The businesses that set up in the ground floors of these tiresome buildings consist largely of tanning salons, Quizno's, and other commercial flotsam and jetsam. We don't want that. How about some creativity? How about some vision? Those "single family dwellings" that are supposedly not conducive to future growth are, in many cases, in fact dense housing comprised of groups of singles, multi-generational families, immigrants and creative types. Please don't ruin that. Not only that, by being only one or two stories high they let in precious sunlight during our vitamin D starved winters. Same goes for businesses housed in low slung buildings like Flowers on the Ave and 43rd St. NE in the U-District. I don't want to lose that. Sincerely, Rene Aceves 206-979-2457
Byrne, Kevin	06/18/2015	I am adding my voice to the many who oppose the Upzone proposals made in the EIS studies and do not want the building heights on the Ave to change & especially oppose the building of 340ft towers on the Ave.

Name (Last, First)	Date Received	Comment
		The character, culture and heart of this city and its many unique neighborhoods thrive on small businesses and this proposal- and similar projects currently gutting the city of a soul- only hurts them.
Dunchak, Christine	6/18/2015	I am writing to voice that I oppose the Upzone proposals made in the EIS studies and do not want the building heights on the Ave to change & especially oppose the building of 340ft towers on the Ave. I am sad to have watched Fremont and Capitol Hill lose it's history, charm and personality. Please don't let us loose another historic neighborhood & its diversity of affordable small business. Thank you, Christine
Estes-Bolam, Heather	06/18/2015	U District is nearer and dearer to My heart then anywhere else. I lived there as a kid I got a job and rented a room for 400$ a month which included cable and toilet paper it was some of the best times of My life and the vibes WERE great festivals, dancing drum circles in My backyard My tattoo artist neighbor that wore a snake around His neck, acceptance and super awesome hole in the wall eateries that are there to this day. If it turned into what Capitol Hill has I would be devastated. We are taking away everything that makes Seattle the great place it used to be by constantly closing down great places owned by good people and building more high cost condos and apartments that no real people can afford it's sad that a city once built on artists,creativity,acceptance,music etc is no only powered by greed and money. Please don't let this happen please don't let U District become another place that the heart of the city does not even want to visit.
Estey, Chris	06/18/2015	Please: You just CAN'T allow this change of the nature of our classic Seattle neighborhood! It's filled with families, working and middle class people with hopes and shops, and our future leaders attending the University. It would be unthinkable to further deprive Seattle residents of yet another neighborhood reflecting the timeless core values and affordable pleasures of this area. If you scare off all the Seattle-owned, unique, profitable small businesses, you will lose the intrinsic character of the University District. There are so many tourist-drawing, student-serving shops and stores on University Avenue, and light rail could bring people to what may be left of the real, historical geography of

Name (Last, First)	Date Received	Comment
		this area. Please notice how many new buildings are going up everywhere else, and please don't take away what may be the last charming original Seattle business neighborhood, affordable to people just coming to the city and going to colleges, finding entry-level work and starting new small businesses, inviting immigrants and newcomers into our economies and companies. Not every area needs to be dominated by towering offices and generic corporate landscapes. If you take away all the diversity-friendly urban adventures of our city, by allowing these horrible buildings to be as ubiquitous here as well as every other area in Seattle, there simply isn't any way to encourage new traffic and markets and reasons to live here. There are so many other excellent neighborhoods catering to the upper middle classes — I love U. Village too! But the U. District is a wonderful place where our pioneering ideas keep spreading into further improvements on all levels. Don't force the rest of all of real Seattle away! Let's find some way to work with the developers to make more creative structures, but leave the diversity and beauty and history of the Seattle U. District to those who need to work and study here. Wee just can't lose all these old buildings and the families who pay the taxes and keep students and workers fed. It would be unconscionable. It would be unthinkable to drive the city completely out of the city for more office parks and half-filled high-rises and failing retail shops. Trust me, those developers would truly regret it — you still need to keep some Seattle in Seattle to keep bringing people to Seattle! Deep respect, Chris Chris Estey (206) 728-0457
Goode, Robert	06/18/2015	I oppose the Upzone proposals made in the EIS studies and do not want the building heights on the Ave to change & especially oppose the building of 340ft towers on the Ave. This sort of thing will drive the rent prices of small businesses like Gargoyles Statuary and The Pink Gorilla through the roof and force them to leave the area. It's a historical part of the city, with some

Name (Last, First)	Date Received	Comment
		businesses having been there 20 years or longer. Do not allow these people to destroy yet another part of Seattle, they've already claimed Capitol Hill, where a well-known bookstore has been in the same location for 23 years, had always paid their rent on time(never once late), and are now being kicked out in six weeks for the spot to be turned into yet another trendy clothing store, likely because 3 new apartment buildings are going up across the street. I am a Seattle voter and I support small business!
Hall, Rhias	06/10/2015	Please don't demolish the historical core of the Ave in order to install the kind of ugly, soulless, bank vault buildings that have blighted Broadway and Capitol hill. As a person who goes out of her way to support small businesses, I do not want to see them priced out in favor of more expensive, less interesting places. Boutique stores such as Gargoyles Statuary, Flowers restaurant, and Red Light Clothing provide the unique personality that makes the University District worth visiting. We don't want to lose landmarks like Bruce Lee's old dojo, and the amazing Grand Illusion Cinema. Thank you Rhias Hall
Higby, Megan	06/10/2015	I oppose the upzone proposals for The U-District and would Seattle to Maintain the "historic retail core" on the "Ave"by not allowing this to happen. If the U-district becomes prohibitively expensive, there will be no more unique and culturally significant businesses, there will be no place outside the University for students, and longtime residents will be displaced. Basically all of the vital elements that make the University district what it is currently will disappear. The homogenization of historic and culturally significant (non-corporate) districts in major cities has been happening all over this country, don't let it happen to the U district! Regards, Megan Higby
Honig, Doug	06/17/2015	As a resident of the Ravenna neighborhood, I often walk through and shop in the University District. I am concerned about redevelopment plans for the U District. Though I recognize that some changes will occur in the wake of transit projects, I do not want to see more large towers come to the area.

Name (Last, First)	Date Received	Comment
		I urge you to maintain the historic character of this special neighborhood and not approve any plans which would have the foreseeable results of forcing small businesses out of the area. Sincerely, Douglas Honig 6320 16th Ave. NE Seattle, WA 98115
Kovach, J.; Tarbuck, Aron	06/18/2015	Greetings! My partner and I own a small business in the University District. We would like to keep our business. We are a part of this community; we are important to the community. We have watched so many small businesses close in Seattle during the recession. Now that some of us have made it through that trial, please do not destroy any chance for us to add to our community and make a living. We want to stay. Thank you Aron Tarbuck and J Kovach The Dreaming Comics and Games
Kowalczyk, Brian	06/18/2015	To whom it may concern, As a resident of Seattle, I am against the push for greater development of the University District area, specifically the portion of University Avenue between 40th and 55th and its adjoining blocks. The natural turnover of businesses in that area provides more than enough opportunity without destroying the unique character of the neighborhood. Students from the university and, indeed, residents of the north end of Seattle rely on this neighborhood for low-cost shopping and dining. The area is one of Seattle's great treasures. Further development would only push out the small businesses and everyday patrons and residents that make it such a great place. Please put these plans back on the shelf. Sincerely,

Name (Last, First)	Date Received	Comment
		Brian Kowalczyk (Resident, zip code 98125)
Lee, Tara	06/18/2015	I live in Capitol Hill, and I am not happy with the changes in Seattle. I moved here from New York City 21 years ago after finishing college, because Seattle was affordable, comfortable, and had art, music, culture and character. Today, I don't recognize the city I moved to 21 years ago, and that is NOT a good thing. It seems that the developers we've entrusted to "improve" our city want to make it over completely, taking our history and identity away with every old building they tear down. This is not what I moved here for. I just returned from a tour of the great cities of Europe. You know what they all had in common? History. Old buildings existing with the new ones. Businesses that have existed for over 100 years. Neigborhoods with identities known internationally. Art. Culture. Community. These are values which don't seem to mean anything anymore in today's Seattle, or the Seattle of the future, which is why Seattle will never be included in the list of great cities if we continue to strip it of it's history and identity. I see the U District is next on the development chopping block. Capitol Hill and Ballard have already been ruined. Please don't let the same fate befall the U District. I personally have many friends who own businesses on "the Ave". They work hard, and deserve to keep their businesses. Please just leave them alone. We've lost enough of the city to greedy developers! Perhaps you should send your city planners to other (older) cities to see how they do things-get a fresh perspective. Maybe then they can give us an acceptable city plan for the future. Tara Lee Unhappy Citizen (In what's left of)Capitol Hill -- T Lee
Miller, Maxine	06/10/2015	To Whom It May Concern, I live in Portland and when I come to visit and spend my tourist dollars in Seattle, the U-District is my first destination. I appreciate progress, but if you squeeze the character out of a

Name (Last, First)	Date Received	Comment
		neighborhood then there's no reason to come there and pump my money into your city. I oppose your "upzone" proposals vehemently. Sincerely, Maxine Miller maxine_miller@comcast.net
Nowicki, Gayle	06/18/2015	Hello! I am writing in to comment on particular on the EIS for the University District. I own and run the Gargoyles Statuary a unique and established business on the Ave. in the U -District. We have been in business for 23 years now and have seen the Ave. & U-District go through many changes both bad and good. The U-District is a multicultural and diverse home to many small businesses and people that can afford to do business & live in this ever changing environment. I am worried about losing my space after all of these years building my business and working very hard and diligently in my community ~ if they upzone the U-District as to one of the proposals given in the EIS that allow developers to raise 340 foot towers on the Ave. it will radically change our community and displace many of its small businesses and residents~ it will make the U-District a cavernous, dark, and sterile place like so many parts of the new Seattle like South Lake Union which many people are unhappy with and avoid. I agree that with rapid transit coming to our area there is a need for more housing but please take it off of the Ave ~ and keep the historic flavor of the Ave. intact. Please maintain & preserve the Ave.'s retail core by not ripping it apart and allowing the developers to take away its rich character and history. I wake up every day worried and stressed that the home I have established for my business may be taken away. My business deals with history & art and people come from all over the world to visit us in the U-District and love our unique and vibrant neighborhood ~ I am hoping that the city and its planners will recognize the rich history of the U -District and not let that be permanently destroyed. We cannot go back when our beautiful buildings are knocked down ~ I plead that the Ave. Upzone not be approved & they take more time and study how the new development can work within our current architecture to keep our small businesses thriving and be a triumphant neighborhood that maintains its historical integrity unlike so much of the development happening in our beautiful city.

Name (Last, First)	Date Received	Comment
		Thank you very much!!! Gayle Nowicki Owner Gargoyles Statuary 206/632-4940
Nowicki, Trudy	06/18/2015	To City Planners, My wife Trudy and I are lifelong residents of the Detroit, Michigan area but proudly consider Seattle our 2nd home. It is the home of our daughter, a small business owner and our son, an elementary school teacher in the Seattle School District along with his family, including our 3 grandchildren. We visit Seattle several times a year and spend a great deal of time exploring the beautiful, historic and diverse neighborhoods that make Seattle so appealing. Our daughter's shop has been on the "Ave" in the U-District for over 20 years. "Gargoyle Statuary" has been a mecca for area artists to display and market their work. The "Ave" is the home to a mix of cultures and diversity with a uniqueness that brings visitors from far and near. The EIS proposal for Up Zoning to 340 foot towers or even the 65 foot buildings on the Ave will displace and destroy small businesses and irrevocably change the beautiful mix of cultures and the entrepreneurial and creative spirit that characterizes the "Ave". We urge you to reject these proposals to dismantle the creative small business atmosphere in the U-District, and help preserve the diversity and history that has made Seattle distinctively great. Sincerely, Mike & Trudy Nowicki 36124 Eaton Drive Clinton Twp., MI 48035 trudynowicki43@wowway.com
Perri, Joe	06/10/2015	I oppose the upzone proposals for The U-District and would like them to Maintain the "historic retail core" on the "Ave" by not allowing this to happen.

Name (Last, First)	Date Received	Comment
		Thank You A Small Business Owner in Seattle Joe Perri The Table Server info@thetableserver.com 360-516-3124
Pew, Nancy	06/18/2015	To whom it may concern: I oppose the Upzone proposals made in the EIS studies and do not want the building heights on the Ave to change & especially oppose the building of 340ft towers on the Ave. I hope you will help the U district retain it's small business, human scale environment! Nancy O'leary Pew
Sioux, Nikki	06/15/2015	I prefer to keep the historic retail core in the university district. Developers have already ruined the rental market in most parts of Seattle, and erected hideous, cheaply-built structures that erode the integrity of our neighborhoods. Don't allow them to exploit students who need to live near campus, and profit further from turning our city into a homogenous strip mall of vertical trash trailers. Sincerely, Nicole Bearden
Waters, Keith	06/18/2015	As much as I understand the need for some development, overdevelopment is quickly destroying the character of some areas, with Capital Hill being the latest casualty. With the pending loss of Charlie's on Broadway and Edge of the Circle Books, there are fewer and fewer reasons for me to take the time to go up there. This has not happened to the U-District--yet. But I fear that soon the unique flavor of the area will be lost forever and there won't be any reason for me to come into the main core of Seattle any more. I highly value the small businesses there, and I would strongly urge you to maintain the historic retail core. We need small businesses. We need places that aren't all shiny-new-

Name (Last, First)	Date Received	Comment
		expensive. Please don't allow these businesses to be forced out. They are not only businesses, but also people's livlihoods and community centers. Sincerely, Keith Waters claymonsterman@yahoo.com
Wilkins, Steve	06/17/2015	Please see the attached letter.with my comments from 4/21/14 regarding your request for 'last call for DEIS comments. The only change in fact in this letter is the FEIS for the University District has been published and contested before the hearing examiner. Despite years of community input regarding our neighborhood movement from Urban Center to Transit Center the FEIS chose to make no mitigation. Sincerely, Steve Wilkins 6/17/15 -- [no attachment. -NY]
Williams, Grayson	06/18/2015	Hello, I am writing to express my opposition to the Upzone proposals made in the EIS studies. I do not want the building heights to change on University Avenue, and especially oppose the building of 340ft towers. I feel that preservation of affordable small businesses is important for the character of the neighborhood, especially considering its student demographic. I also feel that Seattle can ill afford to lose another historic neighborhood. Thank you for your consideration. Grayson Williams Seattle, WA 98121
Winberry, Erica	06/18/2015	To whom it may concern: As a current Seattlite and UW grad, I oppose the Upzone proposals made in the EIS studies and do not want the building

Name (Last, First)	Date Received	Comment
		heights on the Ave to change. In particular, I oppose the building of 340ft towers on University Avenue. Please don't let us loose another historic neighborhood and its diversity--especially all of the small businesses that would be lost through these changes. Thank you, Erica L. Winberry
Wise, Christopher	06/18/2015	Please consider what would happen to the businesses and the shops that are there that have been there for a long time and established themselves as being part of the AVE. we don't need to force out any more small businesses from the city.
Wortmann-Cary, Karen	06/18/2015	I am writing to let you know that I am strongly opposed to the upzone proposal. The U district is a vital part of what makes the city of Seattle diverse and wonderful. Changing the building heights on the Ave will drastically take away from this beautiful little mecca. My favorite small businesses are located in this area and I feel that it is especially important to keep rent affordable for these places. These businesses are the heart and soul of this city. Sincerely, Karen C. Wortmann-Cary "The greatness of a nation and its moral progress can be judged by the way its animals are treated." -Mahatma Gandhi
(No Last Name), SpockCat	06/18/2015	I strongly oppose the Upzone proposals made in the EIS studies and do not want the building heights on the Ave to change. I especially oppose the building of 340ft towers on the Ave, which would ruin the historic character of the neighborhood. Please don't let us loose another historic neighborhood & its diversity of affordable small business! Sincerely, K. Waters

B.6 Letters Regarding Limitations on Industrial Lands

Introduction

Appendix B.6 contains letters received during the comment period for the Draft EIS regarding limitations on certain types of industrial land designation actions in Manufacturing and Industrial Centers. These are not further responded to in this Final EIS because the possible actions discussed in the letters were either not included in the draft Comprehensive Plan or had been subject to prior environmental review, or both. These possible actions are not contained in the Mayor's Recommended Comprehensive Plan.

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GARY MERLINO CONSTRUCTION COMPANY

June 18, 2015

Ms. Diane Sugimura
Director, Seattle Department of Planning & Development
700 5th Ave #2000
Seattle, WA 98104

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands, from the Duwamish Industrial Area, Georgetown, and SODO through Ballard and Interbay. Each of these areas features a unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

As strong supporters of Seattle's maritime, manufacturing and industrial heritage and future, we recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But on the edges there should be flexibility and a mix of uses. The city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses forever into the future. Imagine if the proposed restrictions had been applied to the South Lake Union area 100 years ago. At that time, who could have predicted the downfall of the logging industry, the advent of the internet and in turn the creation of thousands of jobs in this area from non-industrial uses? Why should we limit similar beneficial uses in the future?

In areas such as Georgetown, the Duwamish and the Stadium District, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in

9125 - 10th Avenue South, Seattle, Washington 98108
Phone (206) 762-9125 Fax (206) 763-4178
EQUAL OPPORTUNITY EMPLOYER

Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

Our own Pier 1 Property is a perfect example of where the IC zone could and should be allowed. It is a sliver of land surrounded by residential, commercial and industrial uses. It is on the "quiet" side of the Terminal 5 noise buffer and has been underutilized for more than 20 years. The site constraints and adjacent land uses preclude it from ever becoming a well utilized industrial property. Why not allow these types of properties to peruse developments that fit the nature of the property and give back to their communities through increased access and jobs? Each and every property is different, do not restrict uses solely based on location or historical zoning.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

Seattle is a land-locked urban city – ringed by mountains and water and restricted by 65 percent of its land preserved in single-family use. Unless the city is going to subsidize rents, land values are going to continue to climb and cheaper rents are going to be easily found in outlying markets like Kent, Auburn and Everett. This isn't anyone's fault – it's just economics.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

Some have argued that this work was predicated as part of the Arena Co. Memorandum of Understanding (MOU) with the City of Seattle and King County. This is not the case. That directive was limited to the Duwamish area and that study was completed. It in no way set the stage for sweeping legislation that impacts Ballard, Interbay, Fremont, SODO, and Georgetown.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these

9125 – 10th Avenue South, Seattle, Washington 98108
Phone (206) 762-9125 Fax (206) 763-4178

stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

As neighborhood property owners and neighborhood developers, we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground economics from owners, owner/operators and land holders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Jimmy Blais

Gary Merlino Construction Co. Inc.
9125 10th Avenue South
Seattle, WA 98108
Ofc 206-762-9125/ Fax 206-763-4178/ Cell 206-255-5153
JBlais@gmccinc.com

cc:
2035@seattle.gov

PANATTONI®

June 18, 2015

Hon. Edward B. Murray
Mayor, City of Seattle
600 4th Ave. 7th Floor
Seattle, WA 98104

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land. These "late" amendments from the Department of Planning and Development (DPD) have sweeping, unnecessary implications and should not be advanced.

Panattoni Development is proud to be one of the largest industrial developers in North America. Here in Seattle, we've been one of the most active developers in the Puget Sound Region for more than a decade. Since 2003, we've developed more than 9.7 million square feet of commercial space and have an estimated 1.8 million in the pipeline for 2016/2017.

We're strong supporters of Seattle's maritime, manufacturing and industrial heritage and we continue to build for its users, including Boeing, Whirlpool, Campbell's Soup and Food Lifeline.

Currently, more than 85% of Seattle's current industrial land base (IG1 and IG2 zoning) is forever protected with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits a majority of office and retail uses.

We support these protections, but do not support DPD's one-size-fits-all zoning amendments that have unnecessarily and permanently restrict flexibility in Industrial Commercial zones and in all Manufacturing / Industrial Centers. IC zones comprise only 6% of Seattle' industrial land base and are located where they we need zoning flexibility – along 15th Ave / Elliot Ave in Interbay, along Leary Way between Ballard and Fremont, near residential areas of Georgetown in northern areas of SODO.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC).

But perhaps most importantly, we're one of a large number of industrial developers, land owners, operators and existing businesses who continually feel left out of discussions around industrial lands. The DPD meeting that NAIOP (Washington State's Commercial Real Estate Association) requested was the first time we've been invited to a discussion like this. City studies, interviews, case studies and meetings revolve mostly around existing industrial tenants – not landowners, developers or owner/operators.

PANATTONI DEVELOPMENT COMPANY, INC
6840 Fort Dent Way, Suite 350 · Seattle, WA 98188 · Tel 206/248-0555 · Fax 206/248-0044

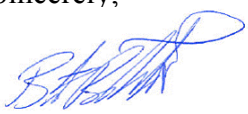
Seattle is a land-locked urban city – ringed by mountains and water and restricted by 75% of its land preserved in single-family use. Unless the city is going to subsidize rents, as the Port of Seattle does for its maritime and industrial tenants, land values are going to continue to climb and cheaper rents are going to be easily found in outlying markets like Kent, Auburn and Everett. This isn't anyone's fault – it's just economics.

The city is doing a great job protecting its working waterfronts throughout the city and shielding heavy industrial and maritime use from commercial activity. But on the edge – which is where Industrial Commercial land exists – there should be natural flexibility and a mix of non-residential uses.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that work was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

Nearly a decade later, the city has the opportunity to avoid a similar mistake. I urge you to remove the proposed restrictions on industrial development from the Comprehensive Plan – we're already rightly preserving 87% of our Industrial land base with extremely restrictive zoning. When thinking ahead to 2035, we should allow flexibility for the 6% of IC zoned areas – not further restrict what little land Seattle has for flexible urban use.

Sincerely,



Bart Brynestad
Seattle Partner
Panattoni Development

cc:
2035@seattle.gov
Kate Joncas, Deputy Mayor, City of Seattle
Diane Sugimura, Director, Seattle Department of Planning & Development
Kathy Nyland, Director, Department of Neighborhoods
Tim Burgess, Seattle City Council
Bruce Harrell, Seattle City Council
Mike O'Brien, Seattle City Council
Tom Rasmussen, Seattle City Council

NAIOP
COMMERCIAL REAL ESTATE
DEVELOPMENT ASSOCIATION
WASHINGTON STATE CHAPTER

June 17, 2015

Hon. Edward B. Murray
Mayor, City of Seattle
600 4th Ave. 7th Floor
Seattle, WA 98104

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Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

As strong supporters of Seattle's maritime, manufacturing and industrial heritage and future, we recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But on the edges—which is where Industrial Commercial land exists—there should be flexibility and a mix of non-residential uses. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses in the future.

In areas such as Georgetown and the Stadium District, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

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WASHINGTON STATE CHAPTER

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

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Some have argued that this work was predicated as part of the Arena Co. Memorandum of Understanding (MOU) with the City of Seattle and King County. This is not the case. That directive was limited to the Duwamish area and that study was completed. It in no way set the stage for sweeping legislation that impacts Ballard, Interbay, Fremont, SODO, and Georgetown.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

As neighborhood property owners and neighborhood developers, we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground economics from owners, owner/operators and landholders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

NAIOP
COMMERCIAL REAL ESTATE
DEVELOPMENT ASSOCIATION
WASHINGTON STATE CHAPTER

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Sharon Coleman
President, NAIOP Washington State

cc:
2035@seattle.gov
Kate Joncas, Deputy Mayor, City of Seattle
Diane Sugimura, Director, Seattle Department of Planning & Development
Kathy Nyland, Director, Department of Neighborhoods
Tim Burgess, Seattle City Council
Bruce Harrell, Seattle City Council
Mike O'Brien, Seattle City Council
Tom Rasmussen, Seattle City Council

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June 18, 2015

Honorable Edward B. Murray
City of Seattle
PO Box 94749
Seattle, WA 98124

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

Seattle is a city that is constantly evolving to meet the demands of growing businesses and the changing culture of our society. We can see this in the increased density in housing in downtown Seattle, the growing focus on bike lanes and in many other ways. Georgetown is a significant example of a city allowing a neighborhood to adapt to the needs of community. Since I purchased my first house in Georgetown in 2000, I have seen the neighborhood bloom. The needs of the community drove the change and the opportunity was provided by adaptive reuse of industrial buildings and support by the city for more retail and people friendly streets. It is a fantastic example of urban renewal and a city stretching to accommodate its citizens.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were already dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands – areas that feature a unique mix of land uses and should not be painted with the same broad brush. In any city, the use of industrial lands and the demand of in-city industry are going to evolve. Seattle is no exception despite the desire to "preserve" this land use.

87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is already protected in perpetuity with strict and rigid zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers. These plan amendments show the unrealistic desire to control land use in a rapidly growing city.

In Georgetown, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

Have you read the plan amendments? There is remarkably vague language in the proposed Comprehensive Plan Amendments that deliberately sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in Georgetown for the foreseeable future. Why would any growing city and especially Seattle, tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses down the road?

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a comprehensive review of Georgetown, as well as number of studies and other actions. In the intervening years, much of that promised work (via Resolution 31026) was never completed or implemented only in partial form, raising major concerns about the implications of the proposed amendments for Georgetown.

As a property owner in Georgetown I am stunned by the lack of outreach associated with the Department of Planning and Development Studies that led up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study **did not include outreach** to residents of Georgetown, as prescribed by Resolution 31026. Recommendations from this plan were then advanced without discussion from residents and other stakeholders into the 2035 Comprehensive Plan Amendment process as a fait accompli. **This lack of transparency must mean that special interest groups and lobbyists are driving these decisions. It is disappointing to see evidence of what drives the dysfunction of Congress in our own city.**

Georgetown residents are consistently left out of the discussion when it comes to the direction of industrial land in our community. As a result, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground perspective from residents, property owners, businesses and landholders – and instead only reflects the interests of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

It is long past time to bring balance and fair representation to industrial land policy direction so that any changes in land use regulation are made with the context of the needs of our growing city.

I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Shannon Donohue

Georgetown Property Owner
smdonohue@comcast.net

cc:
2035@seattle.gov
Kate Joncas, Deputy Mayor, City of Seattle
Diane Sugimura, Director, Seattle Department of Planning & Development
Tim Burgess, Seattle City Council
Bruce Harrell, Seattle City Council
Mike O'Brien, Seattle City Council
Tom Rasmussen, Seattle City Council
Kathy Nyland, Acting Director, Department of Neighborhoods

June 18, 2015

Honorable Edward B. Murray
City of Seattle
PO Box 94749
Seattle, WA 98124

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands – areas that feature a unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

In Georgetown, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

I'm equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in Georgetown for the foreseeable future. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses down the road.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a comprehensive review of Georgetown, as well as number of studies and other actions. In the intervening years, much of that promised work (via Resolution 31026) was never completed or implemented only in partial form, raising major concerns about the implications of the proposed amendments for Georgetown.

I am also concerned about the lack of outreach associated with the Department of Planning and Development Studies that led up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to residents of Georgetown, as prescribed by Resolution 31026. Recommendations from this plan were then advanced without discussion from

residents and other stakeholders into the 2035 Comprehensive Plan Amendment process as a fait accompli.

Georgetown residents are consistently left out of the discussion when it comes to the direction of industrial land in our community. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground perspective from residents, property owners, businesses and landholders – and instead only reflects the interests of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Jon Dove

Georgetown Resident
823 S. Orcas St., Seattle 98108 jonbdove@gmail.com

cc:
2035@seattle.gov
Kate Joncas, Deputy Mayor, City of Seattle
Diane Sugimura, Director, Seattle Department of Planning & Development
Tim Burgess, Seattle City Council
Bruce Harrell, Seattle City Council
Mike O'Brien, Seattle City Council
Tom Rasmussen, Seattle City Council
Kathy Nyland, Acting Director, Department of Neighborhoods

June XX, 2015

Hon. Edward B. Murray
Mayor, City of Seattle
600 4th Ave. 7th Floor
Seattle, WA 98104

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands, from the Duwamish Industrial Area, Georgetown, and SODO through Ballard and Interbay. Each of these areas features a unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

As strong supporters of Seattle's maritime, manufacturing and industrial heritage and future, we recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But on the edges—which is where Industrial Commercial land exists—there should be flexibility and a mix of non-residential uses. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses in the future.

In areas such as Georgetown and the Stadium District, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in

SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

Seattle is a land-locked urban city – ringed by mountains and water and restricted by 65 percent of its land preserved in single-family use. Unless the city is going to subsidize rents, land values are going to continue to climb and cheaper rents are going to be easily found in outlying markets like Kent, Auburn and Everett. This isn't anyone's fault – it's just economics.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

Some have argued that this work was predicated as part of the Arena Co. Memorandum of Understanding (MOU) with the City of Seattle and King County. This is not the case. That directive was limited to the Duwamish area and that study was completed. It in no way set the stage for sweeping legislation that impacts Ballard, Interbay, Fremont, SODO, and Georgetown.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

As neighborhood property owners and neighborhood developers, we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground economics from owners, owner/operators and landholders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Chad Johnstun
Dick's Restaurant Supply
Property owner:
2963 1st Ave South
Seattle, WA 98134

cc:
2035@seattle.gov
Kate Joncas, Deputy Mayor, City of Seattle
Diane Sugimura, Director, Seattle Department of Planning & Development
Kathy Nyland, Director, Department of Neighborhoods
Tim Burgess, Seattle City Council
Bruce Harrell, Seattle City Council
Mike O'Brien, Seattle City Council
Tom Rasmussen, Seattle City Council

Real Estate Development Company

June18, 2015

Hon. Edward B. Murray
Mayor, City of Seattle
600 4th Ave. 7th Floor
Seattle, WA 98104

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands, from the Duwamish Industrial Area, Georgetown, and SODO through Ballard and Interbay. Each of these areas features a unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

As strong supporters of Seattle's maritime, manufacturing and industrial heritage and future, we recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But on the edges—which is where Industrial Commercial land exists—there should be flexibility and a mix of non-residential uses. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses in the future.

In areas such as Georgetown and the Stadium District, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

270 South Hanford Street, Suite 100 | Seattle, Washington 98134
206-381-1690 T | 206-381-3927 F

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

Seattle is a land-locked urban city – ringed by mountains and water and restricted by 65 percent of its land preserved in single-family use. Unless the city is going to subsidize rents, land values are going to continue to climb and cheaper rents are going to be easily found in outlying markets like Kent, Auburn and Everett. This isn't anyone's fault – it's just economics.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

Some have argued that this work was predicated as part of the Arena Co. Memorandum of Understanding (MOU) with the City of Seattle and King County. This is not the case. That directive was limited to the Duwamish area and that study was completed. It in no way set the stage for sweeping legislation that impacts Ballard, Interbay, Fremont, SODO, and Georgetown.

As a long-time business owner and developer in the neighborhood, we are equally concerned about the lack of investment or prioritization by the city to put jobs and even affordable housing near the Sodo Sound Transit station. Taxpayers have put hundreds of millions into the creation of this station, yet it sits fallow. Advancing the slate of industrial Comprehensive Plan amendments would ensure it continues its state of neglect through 2035. This is simply the wrong direction for such a transit-focused city.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

As neighborhood property owners and neighborhood developers, we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground economics from owners, owner/operators and landholders – and instead only

reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, we urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,
American Life Inc.

Henry Liebman-CEO

Gregory L. Steinhauer-President

cc:
2035@seattle.gov
Kate Joncas, Deputy Mayor, City of Seattle
Diane Sugimura, Director, Seattle Department of Planning & Development
Kathy Nyland, Director, Department of Neighborhoods
Tim Burgess, Seattle City Council
Bruce Harrell, Seattle City Council
Mike O'Brien, Seattle City Council
Tom Rasmussen, Seattle City Council

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GULL INDUSTRIES, INC. • 3404 FOURTH AVENUE SOUTH • P.O. BOX 24687 • SEATTLE, WA 98124 • (206) 624-5900 • FAX (206) 624-5412

June 17, 2015

Hon. Edward B. Murray
Mayor, City of Seattle
600 4th Ave. 7th Floor
Seattle, WA 98104

Dear Mayor Murray,

I'm writing to express my concern regarding the proposed Seattle 2035 Comprehensive Plan Amendments that impact some 6,000 acres of industrial land in the City of Seattle.

The proposed amendments from the Department of Planning and Development (DPD) place unnecessary restrictions on land use in the city's industrial areas, where non-industrial uses were previously restricted/limited beginning in 2007. These changes impose a one-size-fits-all set of rules for all of Seattle's diverse industrial lands, from the Duwamish Industrial Area, Georgetown, and SODO through Ballard and Interbay. Each of these areas is unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is already protected into perpetuity with strict zoning regulations stemming from the 2007 "downzone", which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate threat to industrial areas that warrants the type of amendments that DPD is proposing.

We are strong advocates of Seattle's maritime and industrial users. We also recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But outside of those areas (that portion of SODO north of Spokane Street and east of Colorado) where the typical tenant or user is not industrial — there should be flexibility and a mix of non-residential uses. The city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses in the future. Think how South Lake Union has changed in the last twenty years. Historically, it was an industrial area similar to SODO in terms of users and building types. Obviously it has undergone mammoth changes. But the amendments proposed by DPD would prevent any type of evolution or changes to any of the industrial lands to accommodate future growth.

There are many areas or "pockets" of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and

preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

We're are equally concerned about the vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. Since that time, much of that promised work (via Resolution 31026) was never completed, or implemented only in partial form, which raises concerns about the implications of the proposed amendments for commercial and retail developers.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli. The one meeting where a representative from DPD came and spoke to the neighborhood was extremely frustrating since it was clear that DPD was not interested in feedback, but was rather contemptuous of the neighbor's comments and concerns.

As neighborhood business and property owners we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground economics from owners, owner/operators and landholders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction. As such, I urge you to not move ahead with the amendments to the Comprehensive Plan.

Sincerely,

William Low
SR VP Real Estate
Gull Industries, Inc.

MERLINO
PROPERTIES
5050 First Avenue South, Suite 102 • Seattle, Washington 98134 • (206) 762-9125 Office • (206) 766-9000 Fax

June 18, 2015

Ms. Diane Sugimura
Director, Seattle Department of Planning & Development
700 5th Ave #2000
Seattle, WA 98104

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands, from the Duwamish Industrial Area, Georgetown, and SODO through Ballard and Interbay. Each of these areas features a unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

As strong supporters of Seattle's maritime, manufacturing and industrial heritage and future, we recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But on the edges there should be flexibility and a mix of uses. The city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses forever into the future. Imagine if the proposed restrictions had been applied to the South Lake Union area 100 years ago. At that time, who could have predicted the downfall of the logging industry, the advent of the internet and in turn the creation of thousands of jobs in this area from non-industrial uses? Why should we limit similar beneficial uses in the future?

In areas such as Georgetown, the Duwamish and the Stadium District, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in

5050 First Avenue South, Suite 102 • Seattle, Washington 98134 • (206) 762-9125 Office • (206) 766-9000 Fax

Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

Our own Pier 1 Property is a perfect example of where the IC zone could and should be allowed. It is a sliver of land surrounded by residential, commercial and industrial uses. It is on the "quiet" side of the Terminal 5 noise buffer and has been underutilized for more than 20 years. The site constraints and adjacent land uses preclude it from ever becoming a well utilized industrial property. Why not allow these types of properties to peruse developments that fit the nature of the property and give back to their communities through increased access and jobs? Each and every property is different, do not restrict uses solely based on location or historical zoning.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

Seattle is a land-locked urban city – ringed by mountains and water and restricted by 65 percent of its land preserved in single-family use. Unless the city is going to subsidize rents, land values are going to continue to climb and cheaper rents are going to be easily found in outlying markets like Kent, Auburn and Everett. This isn't anyone's fault – it's just economics.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

Some have argued that this work was predicated as part of the Arena Co. Memorandum of Understanding (MOU) with the City of Seattle and King County. This is not the case. That directive was limited to the Duwamish area and that study was completed. It in no way set the stage for sweeping legislation that impacts Ballard, Interbay, Fremont, SODO, and Georgetown.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these

stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

As neighborhood property owners and neighborhood developers, we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground economics from owners, owner/operators and land holders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Brad Merlino
MERLINO PROPERTIES
5050 1st Avenue South, Suite 102
Seattle WA 98134
email: Brad@merlinoproperties.com | ph: 206.658.0950 | f: 206.766.9000

cc:
2035@seattle.gov

GEORGETOWN
•COMMUNITY COUNCIL•
PO Box 80021, Seattle, WA 98108

June 18, 2015

Honorable Edward B. Murray
City of Seattle
PO Box 94749
Seattle, WA 98124

Dear Mayor Murray,

We're writing to express our great concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands – areas that feature a unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

In Georgetown, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

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Georgetown residents are consistently left out of the discussion when it comes to the direction of industrial land in our community. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground perspective from residents, property owners, businesses and landholders – and instead only reflects the interests of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, we urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Matt Pearsall
Georgetown Community Council, Secretary

cc:
2035@seattle.gov
Kate Joncas, Deputy Mayor, City of Seattle
Diane Sugimura, Director, Seattle Department of Planning & Development
Tim Burgess, Seattle City Council
Bruce Harrell, Seattle City Council
Mike O'Brien, Seattle City Council
Tom Rasmussen, Seattle City Council
Kathy Nyland, Acting Director, Department of Neighborhoods

HRP Properties
P. O. BOX 700 • MERCER ISLAND, WA 98040
Phone: 206-232-7500 Fax: 206-232-1585

June 17, 2015

Hon. Edward B. Murray
Mayor, City of Seattle
600 4th Ave. 7th Floor
Seattle, WA 98104

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands, from the Duwamish Industrial Area, Georgetown, and SODO through Ballard and Interbay. Each of these areas features a unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

As strong supporters of Seattle's maritime, manufacturing and industrial heritage and future, we recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But on the edges—which is where Industrial Commercial land exists—there should be flexibility and a mix of non-residential uses. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses in the future.

In areas such as Georgetown and the Stadium District, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in

SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

Seattle is a land-locked urban city – ringed by mountains and water and restricted by 65 percent of its land preserved in single-family use. Unless the city is going to subsidize rents, land values are going to continue to climb and cheaper rents are going to be easily found in outlying markets like Kent, Auburn and Everett. This isn't anyone's fault – it's just economics.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

Some have argued that this work was predicated as part of the Arena Co. Memorandum of Understanding (MOU) with the City of Seattle and King County. This is not the case. That directive was limited to the Duwamish area and that study was completed. It in no way set the stage for sweeping legislation that impacts Ballard, Interbay, Fremont, SODO, and Georgetown.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

As neighborhood property owners and neighborhood developers, we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground economics from owners, owner/operators and landholders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

HRP Properties

John Pietromonaco
Owner

cc:
2035@seattle.gov
Kate Joncas, Deputy Mayor, City of Seattle
Diane Sugimura, Director, Seattle Department of Planning & Development
Kathy Nyland, Director, Department of Neighborhoods
Tim Burgess, Seattle City Council
Bruce Harrell, Seattle City Council
Mike O'Brien, Seattle City Council
Tom Rasmussen, Seattle City Council

SABEY

June 17, 2015

Hon. Edward B. Murray
Mayor, City of Seattle
600 4th Ave. 7th Floor
Seattle, WA 98104

Dear Mayor Murray,

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These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands, from the Duwamish Industrial Area, Georgetown, and SODO through Ballard and Interbay. Each of these areas features a unique mix of land uses and should not be painted with the same broad brush.

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In areas such as Georgetown and the Stadium District, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in

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Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

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SABEY

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Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Dave Sabey
President
Sabey Corporation

cc:
2035@seattle.gov
Kate Joncas, Deputy Mayor, City of Seattle
Diane Sugimura, Director, Seattle Department of Planning & Development
Tim Burgess, Seattle City Council
Bruce Harrell, Seattle City Council
Mike O'Brien, Seattle City Council
Tom Rasmussen, Seattle City Council

Rainier Pacific Company
2201 SIXTH AVENUE SOUTH , SEATTLE, WA 98134
(206) 622-6288 FAX (206) 622-6282

June 18, 2015

Hon. Edward B. Murray
Mayor, City of Seattle
600 4th Ave. 7th Floor
Seattle, WA. 98104

Dear Mayor Murray:

As the manager and owner of family real estate holdings in the heart of Sodo, I am most concerned about the proposed Comprehensive Plan Amendments affecting industrial lands under review. I believe it was with great reluctance that Mr. Tom Hauger of DPD came to Sodo stakeholders and revealed the plan earlier this year, and it was a most unsatisfying meeting. Without fair notice or input from all sectors, DPD has seemingly pre-destined the future of our Sodo District where I have worked for 37 years and have family history reaching back 100 years.

For background, our family owns 8 tax parcels totaling 5.5 acres adjacent to Sodo Light Rail Station and the E-3 Busway. Our former 100,000 S.F. Stack Steel industrial facility at 500 S. Lander was demolished to make way for Sodo Station almost a decade ago which, in the process, displaced a dozen industrial businesses no longer operating in Seattle.

The City's 2035 Comprehensive Plan poses a regressive land use policy even more restrictive than the 2007 Overlay downzone. Moreover, current station area design and land use restrictions thoroughly wastes the multi-million dollar light rail investment as evidenced by Sodo Station posting the lowest ridership among all stations. Ensuring a return of jobs near this transit site through flexible zoning seems like a wise return on the taxpayer's investment at Sodo Station – yet the proposed industrial Comprehensive Plan amendments would further isolate this station area through 2035.

The shrewdest move, and to be consistent with transportation oriented development (TOD) at other station areas, would be to encourage density via IC Zoning at Lander Street's Sodo Station. All station areas in Rainier Valley were up-zoned to encourage pedestrian traffic and use of mass transit, while the Sodo zoning moved in the opposite direction. That brief experiment so far, has not stemmed the outflow of industrial jobs. Modern market demand calls for the flexibility of IC zoning that will smartly capitalize upon our huge public investment in light rail. More jobs will come with the right type of space next to a mass transit stop. Currently, our 1.5 acres of graveled land next to Sodo Station creates yard space but no jobs and under current and contemplated restraints, the outlook is for more of the same.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. This work was also supposed to examine the outdated definition of industrial, which does not reflect modern, evolving industrial uses – such as programming, biotechnology, and CAD work. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

One of the city's promises stemming from the 2007 downzone was an earnest industrial jobs study, that included input from property owners and owner/operators – not just tenants...but this has not occurred.

Given that over 50 percent of Sodo lands are exempt from Comprehensive Planning, be it railroads, Port, Stadium, Metro, government functions etc., the remaining private lands are so seriously constrained, investment is not only dis-incentivized, but wholly cost prohibitive.

For instance, several of our properties are 60-year-old budget buildings that fill the tax lot wall to wall as was once allowed. Current Code restricts lot coverage to perhaps 50% thus you have less rentable floor space requiring higher rents than industrial users will find outside the City. Land values per KCA are 5+ times higher than any manufacturer of scale can justify, if you could find land to redevelop, and the fact is, governmental agencies have been responsible for the greatest loss of close-in industrial facilities, far more than the private sector.

This fact was advanced during our recent Sodo property owner meeting with DPD and it was clear this one of the first times this was heard and/or understood – another reason for the city to open better dialogue with Sodo property owners, developers and owner/operators.

The result of current land use planning will be for operators like us to withhold investment and instead band-aid ancient, dysfunctional properties renting to alternative fill-in or service uses, as are several of our tenants today. Modern industry is not attracted to constrained, expensive parcels in a congested neighborhood, which is what Sodo has to offer today. Economics of the land alone should be simple to understand and sad to say.....stagnation will be the destiny of Sodo under proposed amendments. If the City took to heart honest statistics, and worked in unbiased fashion with the stakeholders most impacted, they would conclude that restrictive zoning will only perpetuate a neighborhood of run-down, makeshift, relic facilities barely suitable for strip clubs, drug treatment centers, pot shops and transients in RVs. Given that I spend more than 50 hours a week in Sodo, I assure you this is the current state of Sodo today.

There has also been a distinct lack of outreach associated with the Department of Planning and Development Studies leading up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from vital stakeholder groups into the 2035 Comprehensive Plan Amendment process and assumed a fait accompli.

As neighborhood land owners, we have been undemocratically been left out of the discussion when it comes to the future of our own properties. As such, the direction advanced in the 2035 Comprehensive Plan does not include on-the-ground economics from owner/operators and landholders – and instead unfairly reflects the perspective of only industrial/manufacturing tenants, industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balanced and fair representation to industrial land policy.

Just as old growth timber once stood under City Hall; where we once had a working waterfront; where SLU once had a lumber mill and boat yards, things change and are thought to be for the betterment of all.

As such, I urge you to NOT move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Robert H. Stack

Robert H. Stack – Manager
Pacific Investment Co.
Rainier Pacific Co.
Stack Industrial Properties LLC
Lander at Sixth LLC
WES 2233 LLC
Prime NW LLC

cc:
2035@seattle.gov
Kate Joncas, Deputy Mayor, City of Seattle
Diane Sugimura, Director, Seattle Department of Planning & Development
Kathy Nyland, Director, Department of Neighborhoods
Tim Burgess, Seattle City Council
Bruce Harrell, Seattle City Council
Mike O'Brien, Seattle City Council
Tom Rasmussen, Seattle City Council

B.7 Letter 33 Attachments

Introduction

Appendix B.7 contains attachements 1–3 for Letter 33 from Talis Abolins.

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MOUNT BAKER TOWN CENTER:

THE 2014 REZONE AND TRANSIT ORIENTED DEVELOPMENT

By Talis Abolins

In 2014, the City of Seattle adopted Ordinance 124513, and created a transit oriented rezone over the area known as the Mount Baker Town Center. Exhibit 2 (Ordinance); Ex. 27, p. 4. The Ordinance expands the City's Station Area Overlay District (SAOD), imposing a series of supplemental development regulations designed for transit stations. Ex. 3, p. 5; Ex. 27, p. 6. The Ordinance rezoned 109 parcels on approximately 26 acres of land, with the aim of increasing growth and density in and around the Mount Baker transit center, within the North Rainier Hub Urban Village, with dense mixed use development reaching up to 125 feet high. Ex. 1; Ex. 27, p. 14.

Mount Baker Town Center. On its face, the rezone aims to create a vibrant walkable transit oriented development in an area that has long been recognized as suffering from major deficits in pedestrian oriented infrastructure. This blighted area is unwelcoming and unsafe to both pedestrians and residents. Even before the rezone, the area was in need of substantial investment to overcome serious deficits in infrastructure and public amenities. See Ex. 27, App. C at pp. 14 and 16-17 (North Rainier Neighborhood Plan Update); Ex. 27, pp. 15 and 20.

For example, for more than a decade, the City has documented the North Rainier Neighborhood as suffering from serious gaps in open space, worse than other areas of the Southeast Sector. See Ex. 59 (Mount Baker Station Area Open Space Nexus Analysis); Ex. 58, pp. 27-30 and App. B (Gap Report 2001); Ex. 58 (2011 Gap Report Update).

One major challenge to Town Center livability is the dominance of the automobile. The Town Center is divided by the intersection of two major traffic corridors: Rainier Avenue South and MLK Jr. Way. Each corridor carries over 30,000 vehicle trips per day. These traffic volumes presented challenges for the areas considerable pedestrian traffic, which included students from nearby Franklin High School, the transit center and light link station, and a surrounding residential population in which 30% of the residents do not have a car. Ex. 56a, p. 4. Suffice it to say that even before the rezone, the environment was "very uninviting" to pedestrians and residents, "as there are very few areas to rest or relax." Ex. 59, p. 3.

Neighborhood Planning. In the early 1990's, Seattle began a neighborhood planning effort that spanned 38 Seattle neighborhoods. Ex. 56g (North Rainier Neighborhood Plan, 1999). The plans provided the City with direction on a broad range of subjects important to the neighborhoods, which would be incorporated into the City's Comprehensive Plan. The North Rainier Neighborhood Plan was completed in 1999. Ex. 3, p. 10. The City recognized the North Rainier Neighborhood as one of the most diverse neighborhoods in the City. See Ex. 27, Appendix B (Resolution 31204); Ex. 56f, p. 2 (Demographic Summary).

In 2009, the North Rainier Neighborhood Plan was updated to take into account changed circumstances, including the new light link rail service. The update process engaged a broad cross section of the community. This update resulted in revisions to the Neighborhood Plan, which were reflected in Comprehensive Plan amendments adopted by the City Council. See Ex. 53, Neighborhood Planning Element, Section B-21; Ex. 27, App. C (North Rainier Neighborhood Plan Update); Ex. 56f (North Rainier Baseline Report); Ex. 3, p. 10; Ex. 27, p. 5. The City prepared a document explaining, in detail, how the North Rainier planning process was relied upon to update the Comprehensive Plan. Ex. 73.

A central theme of the Neighborhood Plan was the creation of a vital, pedestrian friendly, "transit oriented development" within the Town Center. Ex. 53, Sec. B-21 (including NR-P1). The Mount Baker Town Center was envisioned as a vibrant neighborhood core, with open space and parks, and development standards to accommodate a vibrant pedestrian environment for people of all ages and abilities. Ex. 53, NR-G1 and NR-P1, NR-G8, NR-G13 and G14, NR-P32 to P35, NR-P12, NR-P37 to NR-P40; Ex. 27, App. C at Goals 6 and 8 (Plan pp. 11 and 14-15); and Ex. 27, p. 5. These goals and policies were needed to help make the Town Center the "heart of the neighborhood" -- an inviting and livable place, where people could gather and engage in physical activity. Ex. 27, App. C Strategy 8.2; Ex. 56g, p. 57. The Town Center was to help the blighted area achieve qualities enjoyed by other more affluent Seattle neighborhoods, "where public places and open spaces help create a sense of identity and welcome." See Ex. 27, p. 5.

Planning Commission Guidance On "Transit Oriented Development". The Seattle Planning Commission, appointed by the Mayor and City Council, serves as "the steward of the Seattle Comprehensive Plan". In that capacity the Commission advises the Mayor, Council and City Departments in their efforts to plan for and manage growth in Seattle. Ex. 64, preface.

In 2010, the Seattle Planning Commission issued a report to guide the City in transit oriented development: "Seattle Transit Communities: Integrating Neighborhoods With Transit". Ex. 64. The Report was designed to guide the City in its mission to fulfill Comprehensive Plan goals related to the creation of livable and sustainable transit oriented communities. Ex. 64, Introduction. The Report emphasized the need for the City to support "essential transit infrastructure like parks", and prioritized transit communities "where timely investment is urgent and will create the most impact." Id. The Commission provided guidance on land use strategies needed to achieve the essential components for livability, "such as adequate open

space". Ex. 64, p. 13. These essential components were necessary to prevent urban life from becoming "unattractive and inhospitable". Ex. 64, p. 32.

The Mount Baker rezone area was identified as a "Mixed Use Center", with urgent near-term planning needs. Ex. 64, pp. 42, 45, 48. According to the Commission, the success of a Mixed Use Center depends upon a number of factors, including:

> Generous high quality shared public spaces which are critically important to livability and soften the effects of greater density and make urban living more attractive.
>
> Public open space typically includes large public plazas, semi-public plazas at the base of tall buildings, and smaller pocket parks. …

Ex. 64, pp. 14, 16-18. As a strategy to create public open space for livability, the Commission recommended "zoning incentives and density bonuses to allow taller buildings and higher densities". Ex. 64, p. 19. The Commission's report reinforced the City's commitments to transit oriented development within the Town Center, as set forth in the City's Comprehensive Plan. See Ex. 53, Sec. B-21. See also Josh Brower, Planning Commissioner, interview with KUOW: http://kuow.org/post/building-seattles-future-around-transit (April, 2014).

DPD's Urban Design Framework. In 2010, the City Council directed DPD to develop an urban design framework based on the North Rainier Neighborhood Plan, "to inform Council decisions related to land use and the built environment." The Framework was, at minimum, to include preferred use locations, proposed incentive structures for public benefits, open space concepts, and an analysis of transferable development rights. See Ex. 65. The Council planned to implement the framework plans through legislation. Ex. 27, App. B (Res. 31204).

In 2011, DPD issued the Mount Baker Town Center Urban Design Framework, intended to carry out key actions identified by the community during the recent update of the North Rainier Neighborhood Plan. Ex. 27; Ex. 3, p. 3 and 12. The Urban Design Framework was to

provide a blueprint for how the physical elements of the neighborhood plan update can be realized. "The Urban Design Framework's analysis and recommendations provide the basis for the proposed rezones and text amendments" proposed by DPD. Ex. 3, p. 12.

The Urban Design Framework included a section on "Open Space and Gateways". The Framework recognized the area suffers from one of the "largest gaps in Usable Open Space", and discussed the importance of "open spaces that invite people to gather and encourage physical activity". Ex. 27, pp. 20 and 23; accord Ex. 53, Sec. B-21 (Open Space Goals and Policies). To achieve this vision, the Framework called for creation of new open space in the Town Center core through future development and public infrastructure improvements. Ex. 27, pp. 20 and 22. To address the open space goals and policies, the Framework proposed designating the 13-acre Lowe's site for "an open space and pathways system". Ex. 27, p. 22. In Figure 5, "Proposed Open Space and Gateways", the Urban Design Framework marks the Lowe's building with a green tree to designate "Open Space within New Development". Ex. 27, p. 21 (Fig. 5). The Framework also calls for animation of an underutilized station plaza southeast of the light link station as additional open space, helpful for residents and for business development. Ex. 27, pp. 21-22. Open space was identified as important to the Neighborhood Plan commitment to an environmentally sustainable community. Ex. 27, p. 23. For implementation, the Framework called for a rezone to encourage redevelopment of parcels surrounding the light rail station in a manner that would incorporate the needed open space amenities, with "incentive structures for public benefits" where building heights approach 125 feet. Ex. 27, pp. 24 and 27. The Framework's matrix of action items and responsible parties for open space reiterated the need to "Establish new open space in the core of the Town Center", and "Animate and enhance the station plaza". Ex. 27, p. 30.

The City's consultants likewise assumed that the City's proposed changes would help bring urban vitality to the challenged Town Center through the creation of public open space. Ex. 56a, p. 4; Ex. 56b, p. 1.

DPD's Open Space Nexus Analysis. On December 5, 2012, DPD prepared an internal document entitled, "Mount Baker Station Area Open Space Nexus Analysis". Ex. 59. In the analysis, DPD recognized open space as a "priority amenity" for the Town Center's rezone. Ex. 59, p. 1. The Nexus Analysis notes that the City's "Comprehensive Plan affirms the importance of a variety of open space opportunities", and reviews the "overall need of the neighborhood" in light of standards established by Parks and Recreation. Ex. 59, p. 1.

The Nexus Analysis estimated "the level of existing open space needs in the Station Area and the likely open space need generated by new projects in order to evaluate the appropriateness of proposed open space incentives allowed through the incentive zoning program." Ex. 59, p. 1. The Nexus Analysis confirmed the high need for open space in and around the Town Center:

> [T]he North Rainier Hub Urban Village is very auto-oriented neighborhood with a substantial amount of parking lots and driveways. The environment is very uninviting to pedestrians as there are very few areas to rest or relax. In order to maximize the investment of the light rail station in this area, it will very important to develop more open space opportunities that can help to make this area a more pleasant place for pedestrians. Small, local open space opportunities will be especially important since the large roads and auto-oriented environment discourage walking.

Ex. 59, p. 3. The analysis notes "a substantial existing open space need within the Mount Baker Station Area" which justified the use of incentive zoning for public open space amenities. Ex. 59, p. 4. After confirming existing open space needs, the Nexus Analysis analyzed the additional open space demands created by the rezone itself, and the extent to which the currently proposed incentive zoning would address the open space gap. The analysis assumed the "maximum" open space provided by the proposed incentive zoning, assuming buildings achieved

125 feet or higher. Ex. 59, p. 4-5. The report determined that under each proposed zone, "the maximum open space provided through incentive zoning would be less than total estimated need generated by each project." Ex. 59, p. 5. In other words, DPD's proposed formulas for transit oriented incentive zoning would not bridge the open space gap at all – instead, DPD's rezone formula only served to worsen the Town Center's already blighted open space situation.

Another internal open space analysis by DPD proposed an incentive formula that sought to achieve comparable open space amenities found in the Pearl District, a successful transit oriented development. See Ex. 62 (DPD SM Additional Height Language). The author of this analysis proposed a formula that would address the open space needs in the Town Center, with creation of a civic square for Town Center residents. These analyses do not appear to have been shared with the community, or with the Council.

DPD's Director's Analysis. On June 14, 2013, DPD issued its Director's Analysis and Recommendation on the Rezone Proposal for an Ordinance with incentive formulas that actually worsened the open space blight. Ex. 3. DPD summarized the intent of the proposed Ordinance as "to provide for a pedestrian-oriented town center by concentrating commercial and residential growth in the Mount Baker Town Center." Ex. 3, p. 14. The proposed development standards were ostensibly intended to "create an environment that supports the vision of the neighborhood plan and update to create a town center that is pedestrian-oriented, vibrant and livable." Ex. 3, pp. 51 and 56; Ex. 63. In doing so, DPD noted that its ordinance sought to apply existing South Lake Union standards to North Rainier. Ex. 3, p. 51; Ex. 33, Attachment C.

The City's Analyses of Open Space and Incentive Zoning. On the subject of "Bonus floor are for open space amenities", the Director's Analysis noted that while the City's current code did not contain standards for areas outside of Downtown, the Downtown standards "are a

good fit for the proposed site." Ex. 3, p. 52. The Director's Analysis reported on the "Large Lot Opportunity" presented by the Lowe's parcels, and indicated that increasing the allowed development height to 125 feet would encourage "open space at the ground floor. … The higher heights would provide more flexibility for creating open spaces surrounding the buildings." Ex. 3, p. 14. DPD indicated it was implementing special standards that would "include a requirement for open space corridors interior" to two large parcels (the "Lowe's Parcels") which would be rezoned to allow development to reach 125 feet in height. The Director's Analysis further indicated that public benefits in the form of open space would be available through incentive zoning on these two parcels. See Ex. 3, p. 6. The Director's Analysis of "Incentive Zoning" posited that the proposed regulations would incentivize developers to provide public open space benefits for the residents and pedestrians of the dense high rise Town Center. Ex. 3, Part VII, pp. 54-55.

However, the DPD's Director's Analysis did not reveal that the proposed Ordinance actively defeats the open space policies which the neighborhood and City experts had deemed essential for the Comprehensive Plan's vision of transit oriented development in the Town Center. Ex. 3; see also Ex. 10. In fact, the Ordinance provides "zero" publicly usable open space unless development on the Lowe's parcels were to exceed the economically impractical height of 85 feet. To the extent that development exceeds 85 feet, the proposed DPD formula focused almost predominantly on the public benefit of "affordable housing". Rather than achieve the essential components of livability, DPD's formula for incentive zoning effectively marginalized Town Center residents to an unfriendly living environment of unmanaged density where the City's open space gaps are worsened.

Capital Planning. The Seattle Planning Commission stressed the City's obligation to coordinate the Comprehensive Plan Urban Village strategy with the Capital Improvement Plan and other City capital investments. Ex. 64, p. 38; Ex. 53, Capital Facilities Element. However, the City completely failed to plan for capital facility investment needed to overcome the worsening open space gaps created by its self-defeating and ineffective open space incentive formulas. On April 22, 2013, the City's Department of Planning issued a Fiscal Note for the rezone which concluded: "This legislation does not have any financial implications." Ex. 1 (Fiscal Note). In order to properly complete the Fiscal Note, DPD was required to specify whether the legislation affected any other departments besides DPD. DPD's answer was "No." Ex. 1, p. 2. Apparently Parks and Recreation would have no role to play in the Town Center.

The lack of capital facility planning is also reflected in the Department of Parks and Recreation's Adopted Capital Improvement Program (2014-2019), which sets forth a plan for expenditures on parks and open space throughout the City of Seattle between now and 2019. Ex. 74. The Parks CIP identifies budget sheets for each project. The voluminous Parks CIP includes only one project connected with the North Rainier Valley Neighborhood Plan / Urban Village. See Ex. 74 – Jimi Hendrix Park Improvements. The project lies distant from the rezone area, and adds no open space to offset the density targeted for the blighted Town Center, or to bridge any of the open space gaps recognized in the North Rainier Urban Village.

Adoption. On June 23, 2014, the Council approved the Ordinance by majority vote, and issued a Divided Report in favor of Council Bill 118111. Ex. 50. With respect to the controversy over 125 foot high development, the majority explained that the high rise development was important to advance the incentive zoning provisions, which were "important to help provide open space and resources for affordable housing". Ex. 50, p. 3.

CITY OF SEATTLE
office of economic development

Prepared for the Seattle Economic Development Commission
Infrastructure and Built Environment Work Group

North Rainier Urban Village Assessment

April 2015

Seattle Economic Development Commission

BERK

BERK Project Team:
Jeff Arango, AICP
Allegra Calder
Melanie Mayock

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INTRODUCTION

The City of Seattle Economic Development Commission (EDC) initiated this study as part of its role in shaping urban centers and villages. The EDC provides expertise from industry, labor, civic, and education leaders to inform the City's decision-making and help execute major initiatives to achieve a long-term economic development agenda. One of the Commission's action items identified in its 2014 inaugural year report is to "Envision and intentionally create great urban centers and neighborhoods." The report emphasizes the City's role in creating great urban centers and neighborhoods:

> *The City plays an essential role in facilitating and shaping how our urban centers and neighborhoods grow and maintain their authenticity. We must get better at how we imagine, plan, permit and execute on the visions for these unique neighborhoods so that we are responsive to the profound demographic, environmental, and technological changes shaping our future (Seattle EDC, 2014).*

This report uses lessons learned from the North Rainier Urban Village and is intended to guide the EDC and the City in future planning and implementation activities. The goal of this report and its recommendations is to create great urban neighborhoods.

SEATTLE'S URBAN VILLAGE STRATEGY

With the adoption of its Comprehensive Plan in 1994, the City of Seattle established a strategy to focus population and employment growth in urban centers and villages. The goal was to create thriving neighborhoods with a mix of housing, employment, and services within walking distance of public transit. This would enable Seattle to accommodate its share of the region's expected growth while largely preserving single-family neighborhoods. The Urban Village Strategy was further developed in Seattle's 2004 Comprehensive Plan Update, *Toward a Sustainable Seattle*, which included targets for population and job growth in urban centers and villages.

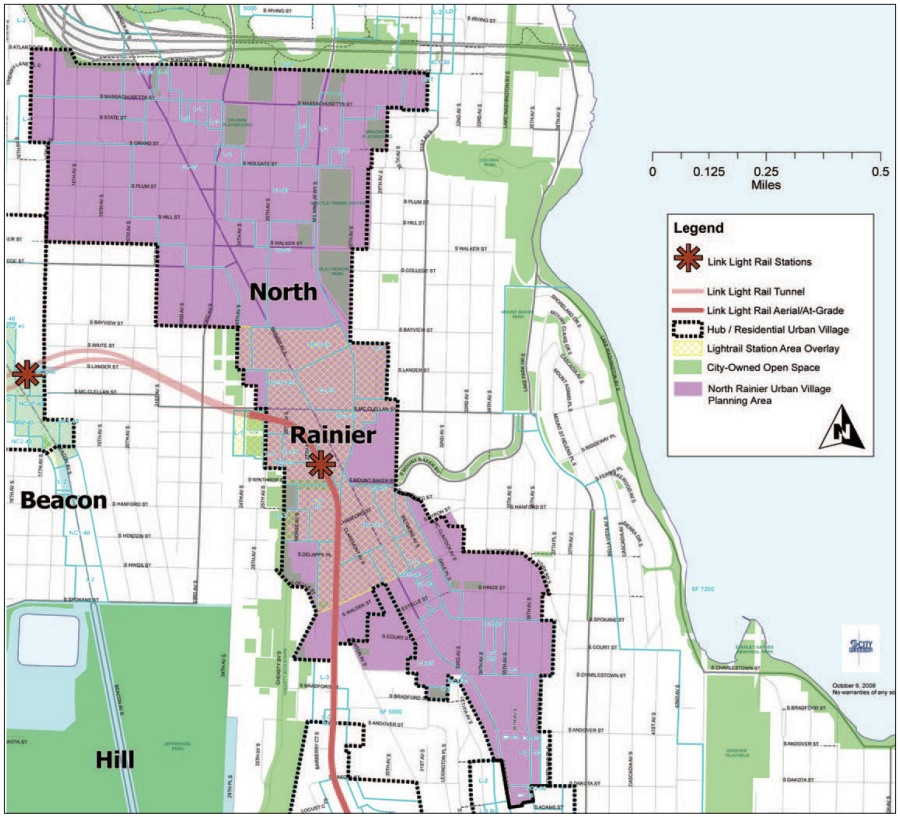
In the 20 years since the Urban Village Strategy was created, Seattle has boomed, with population growing 29% and employment by 17%. The majority of growth has been in urban centers and villages, including over 90% of housing growth over the past ten years. Between 2005 and 2013, over 40,000 jobs were added in urban centers and villages, while the number

Existing Context - North Rainier is currently defined by auto oriented development and a pedestrian environment that is inconsistent with the neighborhood plan

elsewhere in the city declined over the same period (City of Seattle, 2014).

But while some urban villages have grown far beyond targets (similar to the city as a whole), others have failed to see significant new growth. For example, the North Rainier Urban Village, particularly the area surrounding the Mt. Baker Light Rail Station, has not advanced towards the vision of the North Rainier Neighborhood Plan of 1999. Rather than a thriving town center, the station area is defined by vacant lots and auto-oriented uses and lacks a defined character and sense of place.

Streetscape Concept - Pedestrian oriented development envisioned for the area includes active first floor uses, high density housing, office space and taller building heights.



Study Area - The study area includes the North Rainier Urban Village and the Mt. Baker Station Overlay Area

Despite expectations that light rail would drive private investment, very little new development has occurred around the Mt. Baker Light Rail Station. The following excerpt from a 2005 Seattle Times article provides insight into the thinking of city leaders prior to the introduction of light rail:

> *Nickels and his top aides agree that gentrification is coming. Sound Transit's 14-mile, $2.4 billion light-rail line from Tukwila to downtown Seattle will run down Martin Luther King Jr. Way, through the heart of Rainier Valley. Nickels expects a transit system that is supposed to get people downtown in 12 minutes will attract heavy private investment and new residents to the area* (Seattle Times, 2005).

The 2014 report *Seattle Sustainable Neighborhoods Assessment Project* by Steinbrueck Urban Strategies provides an assessment of the overall Urban Village Strategy, which is described as mostly a success in terms of focusing housing and employment growth in urban villages. However, there are fundamental differences between the overall success and growth between urban villages that warrants a context sensitive approach specific to the each urban village.

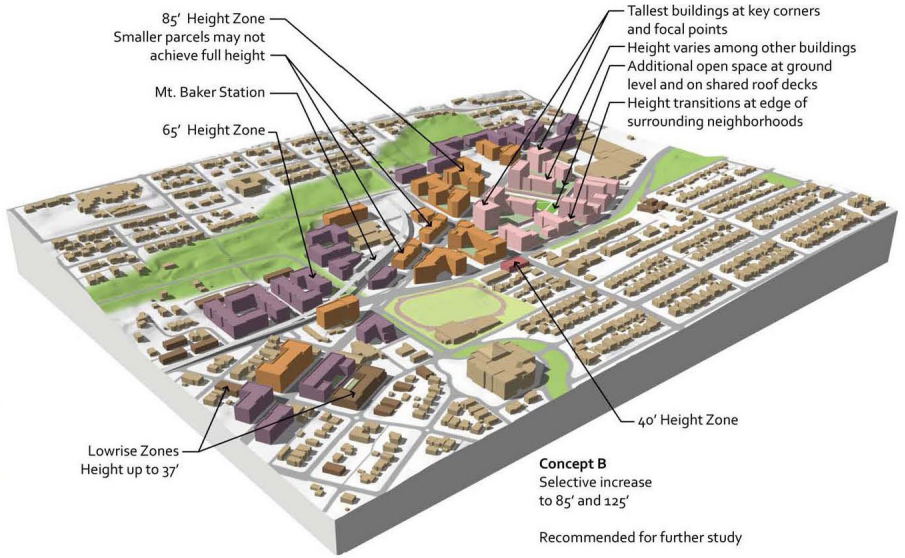
STUDY OBJECTIVES

Part of creating "great urban centers and neighborhoods" is bringing a walkable mix of housing, employment, and services to Seattle's urban villages, particularly those near light-rail stations. Light rail is a multi-billion dollar investment made by taxpayers in Seattle and neighboring jurisdictions. To leverage this investment, the City must attract development to the areas within walking distance of stations, so that more residents and workers can easily access this transportation option.

This study evaluates how the City of Seattle "imagines, plans, permits, and executes" its Urban Village Strategy, using the North Rainier Urban Village as a case study to identify lessons applicable to other urban villages. This study includes a history and analysis of the following key aspects for implementing the Urban Village Strategy in North Rainier:

- Planning process
- Timing and sequencing of planning and implementation actions
- Intra and Inter-agency coordination
- Progress towards addressing infrastructure improvements, including public investment
- Integration of a job growth strategy
- Other factors affecting plan implementation

Many studies have been produced to date on transit oriented development (TOD), urban villages, and transit communities in Seattle. This report seeks to build on past efforts by addressing the specific history, process, and actions in the North Rainier Urban Village and around the Mt. Baker Light Rail Station.

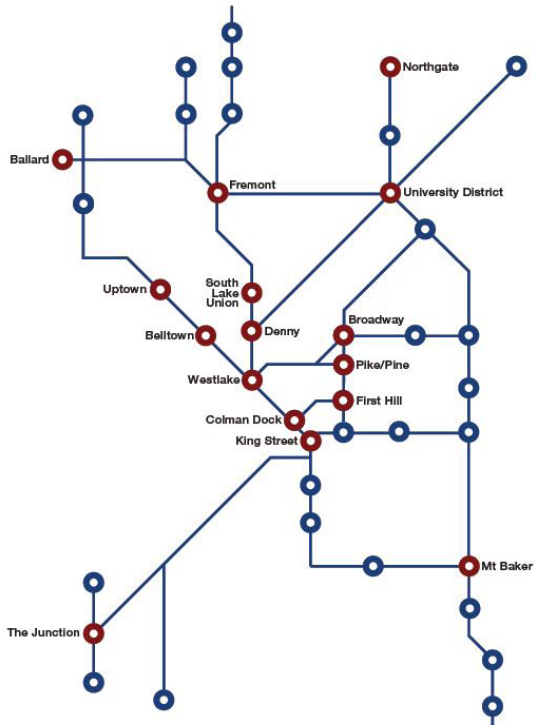


Proposed Neighborhood Build-Out - Likely build-out as proposed in the 2010 North Rainier Neighborhood Plan Update. The City Council upzoned the area in 2014 to allow for increased density and building heights.

TRANSIT COMMUNITY TYPOLOGIES

The Seattle Planning Commission's 2010 report *Seattle Transit Communities* identifies four distinct TOD typologies: Mixed Use Centers, Mixed Use Neighborhoods, Special Districts, and Industrial Jobs Centers. The North Rainier Urban Village and the Mt. Baker Light-Rail Station are both categorized as a Mixed Use Center, described as:

vibrant and eclectic local or regional hub where frequent, reliable transit supports jobs, residents and services. A variety of retail and commercial activities support a mix of housing types and civic and recreational amenities are easily accessible on foot, bike or transit (Seattle PC, 2010).



Seattle Mixed Use Centers - The support for TOD in the built environment character differs substantially between urban centers

MIXED USE CENTERS

The *Seattle Transit Communities* report lists the essential components for livability for mixed use centers and the importance of a high quality pedestrian and bicycle environment and street life. The essential components of livability include:

A. Breathing Room

B. Getting to Transit is Easy

C. Complete Streets

D. Transit is at the Center of the Community

E. Vibrant Street Life

F. A Community for All Ages

The essential components of livability are described in more detail in the assessment section of this report and are used to assess the City's approach to implementing the urban village strategy in the North Rainier Urban Village.

GROWTH TARGETS

The City of Seattle establishes growth targets for housing and jobs in Urban Centers and Villages over a twenty-year period. The tables identify the growth targets through 2024 for the City's Hub Urban Villages. Overall, the Hub Urban Villages are exceeding targets for both housing and employment. For housing, Hub Urban Villages as a whole have already exceeded the 2024 target by approximately 25%. Employment growth through 2013 is on pace to exceed the 2024 targets, having met approximately 81% of the 2024 target.

Some Hub Urban Villages, such as Ballard and Fremont, have far exceeded both growth targets while others have fallen behind. Through 2014, urban villages should have achieved 50% of the 2024 target to be on pace to meet the 2024 targets. The North Rainier Hub Urban Village is on pace to meet the housing target for 2024 having already reached 56.7% of the target through 2014. The area has experienced job losses in recent years and is behind the pace needed to meet the 2024 target (City of Seattle, 2014).

Meeting growth targets is only one measure of the success of an urban village. However, the differences highlight the importance of location and a need for context sensitive approaches to urban villages. The Urban Village Strategy is based on several interrelated goals for urban villages including a desire for compact, high-density, walkable, and mixed use development served by a high level of transit service.

Housing

Hub Urban Village	Housing Growth 2005-2014	2024 Target	% of 2024 Target Achieved	Surplus/ Deficit 2014
Ballard	2471	1000	247.1%	1971
Bitter Lake	1174	800	146.8%	774
Fremont	519	500	103.8%	269
Lake City	523	900	58.1%	73
North Rainier	510	900	56.7%	60
W Seattle Junction	787	700	112.4%	437

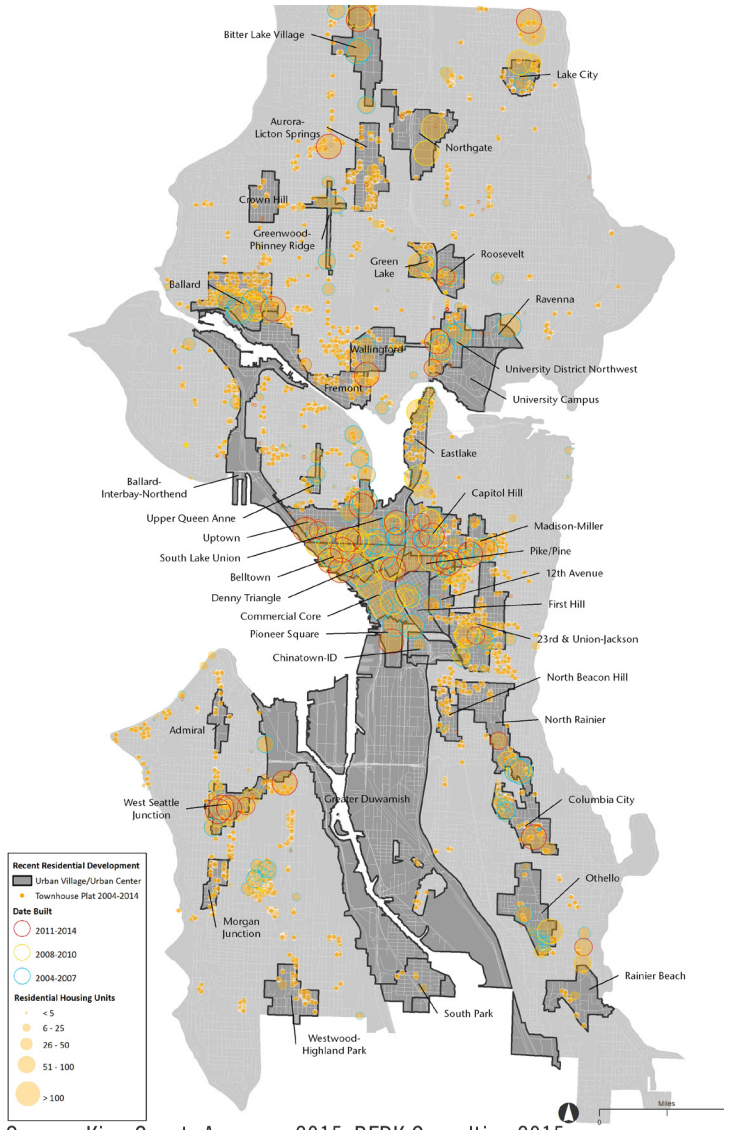
Employment

Hub Urban Village	Job Growth 2004-2013	2024 Target	% of 2024 Target Achieved	Surplus/ Deficit 2013
Ballard	1369	750	182.5%	994
Bitter Lake	-249	750	-33.2%	-624
Fremont	1786	800	223.3%	1386
Lake City	438	650	67.4%	113
North Rainier	218	750	29.1%	-157
W Seattle Junction	34	750	4.5%	-341

Source: City of Seattle 2014, BERK Consulting 2015

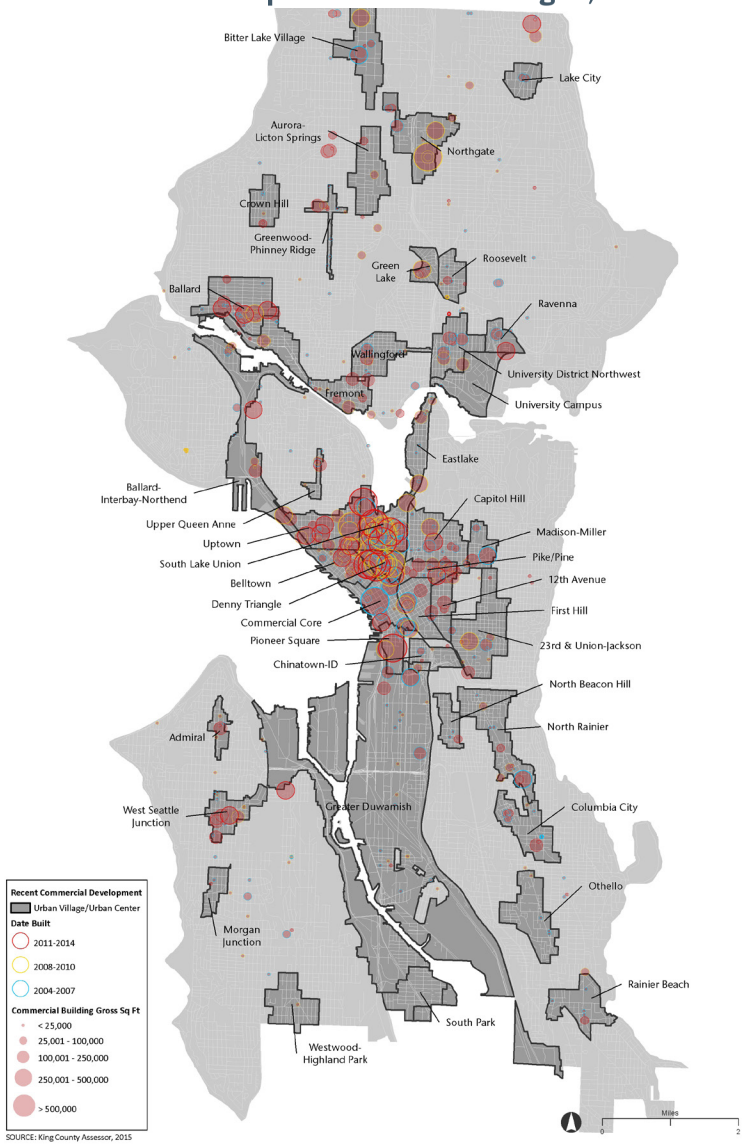
Background

Housing Development in Urban Villages, 2004-2014



Source: King County Assessor, 2015; BERK Consulting 2015

Commercial Development in Urban Villages, 2004-2014



PLANNING TIMELINE

1999

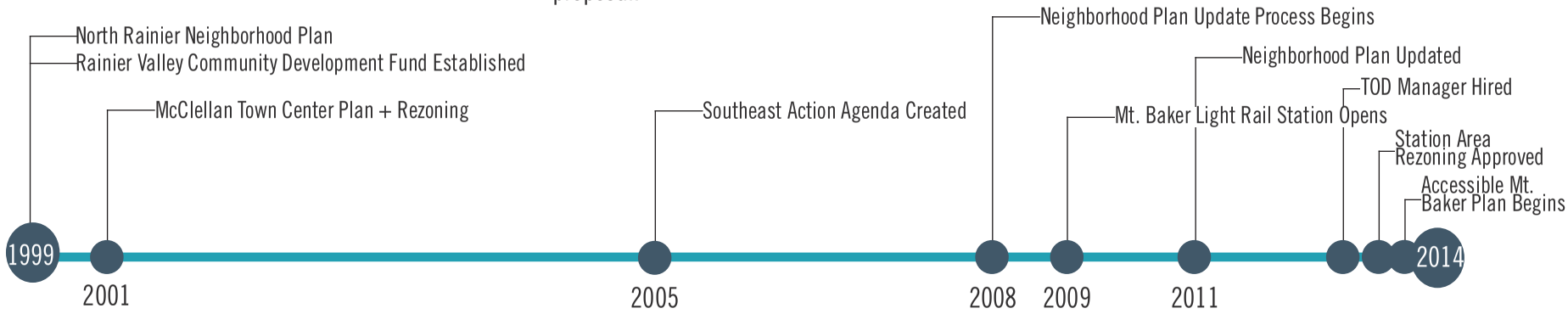
The North Rainier Neighborhood Plan is completed. The Rainier Valley Community Development Fund is established in anticipation of light rail coming to the Rainier Valley.

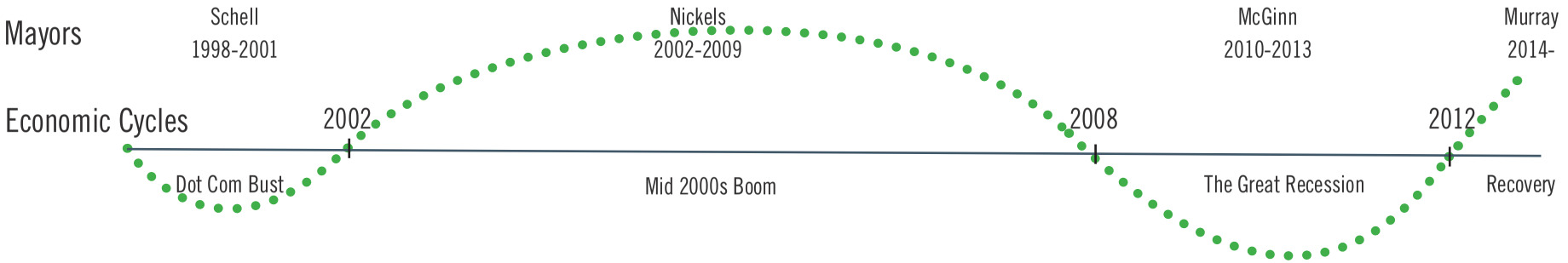
2001-2008

The McClellan Town Center Plan is developed for the area around the future Mt. Baker Light Rail Station. The City Council upzones the area by increasing building heights and density allowances. The Southeast Action Agenda is created under Mayor Nickels, including a Community Renewal proposal.

2009-2014

The Neighborhood Plan is updated to include an urban design framework, action plan, and upzone around the light rail station. In 2014, The Department of Planning and Development (DPD) hires a TOD Manager. The Department of Transportation (SDOT) kicks off a new transportation planning effort called "Accessible Mt. Baker."





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ORGANIZATIONS

Several organizations and City Departments have a role in planing and implementing transit oriented development (TOD) and the Urban Village Strategy. The following is a summary of each organization and department's role:

Mayor's Office - sets priorities for planning, development, and infrastructure investments. The Mayor's Office may oversee interdepartmental teams on key issues. Any major organizational changes to individual departments or department relationships will be implemented by the Mayor's Office.

Department of Planning and Development (DPD) - responsible for long-range planning including the City's Comprehensive Plan and neighborhood plans. The department also regulates private development and administers the city's land use and zoning codes. Implements any new rezoning strategies, which typically occur immediately following neighborhood plan development or updates.

Parks and Recreation - responsible for planning new parks and open spaces within Urban Villages.

Seattle Public Utilities (SPU) - responsible for any new utility or infrastructure needs to implement an Urban Village Plan such as stormwater, water, sewer, or electricity upgrades.

Department of Neighborhoods (DON) - maintains ongoing neighborhood service and public involvement programs that may be utilized in implementing an Urban Village Plan.

Office of Economic Development (OED) - works chiefly through partnerships with community-based organizations, community lending institutions, community colleges, individual businesses, and industry associations and business organizations. Staff provides program management, policy planning, and other technical assistance services to assist specific enterprises or groups of firms, neighborhoods, and individual Seattle residents.

Department of Transportation (SDOT) - responsible for transportation improvements in Urban Villages including street, pedestrian, bicycle, and freight improvements.

Seattle Police Department (SPD): responsible for law enforcement and public safety.

Seattle Public Schools (SPS) - responsible for delivery of a high-quality public education and planning and siting of new schools and associated facilities.

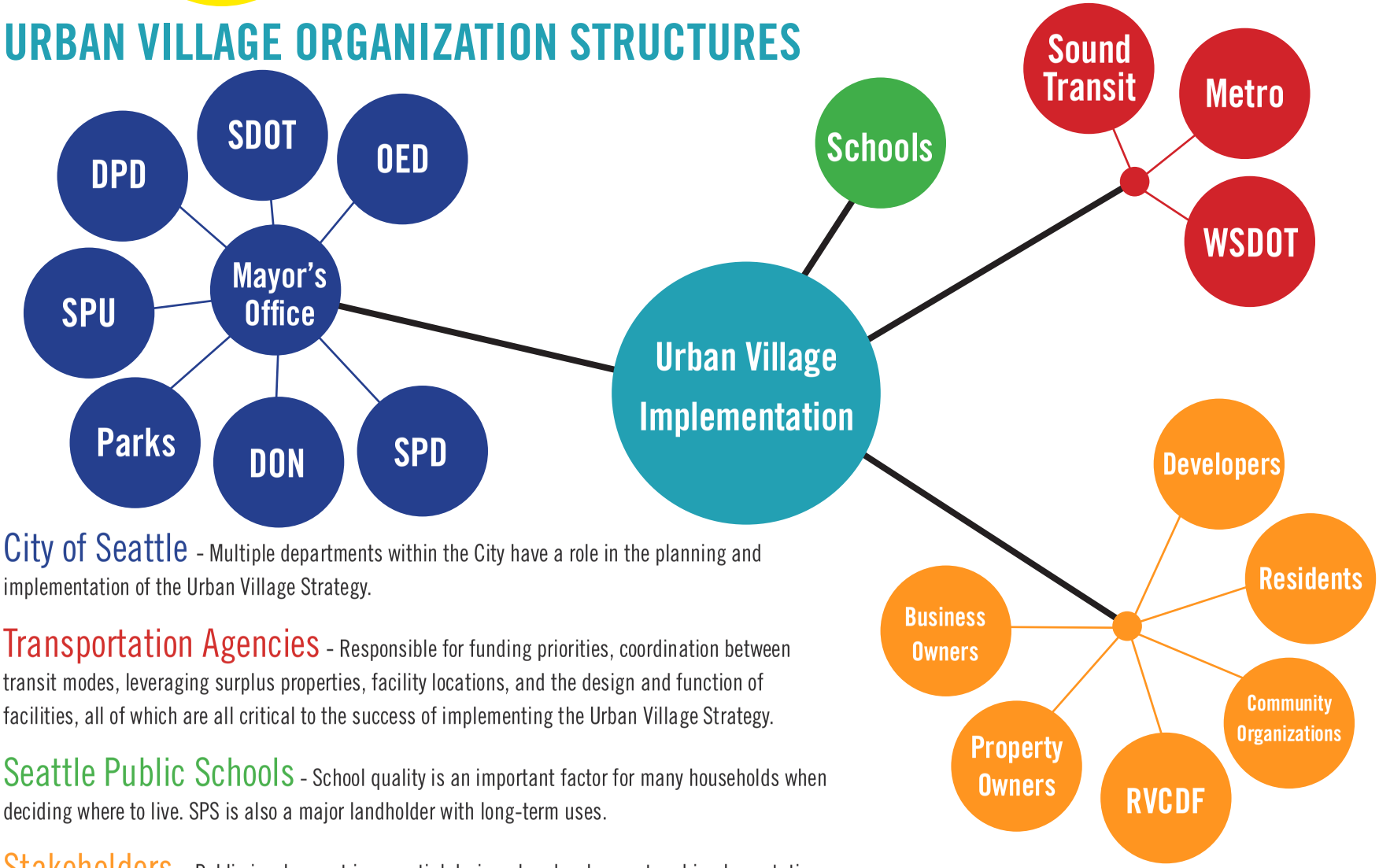
Sound Transit - responsible for regional transportation planning and implementation including light rail station area location and bus services. Sound Transit also has a role in private development through the organization's surplus properties around transit stations.

King County Metro - responsible for providing bus service in urban villages. Planning for connections to light rail stations in urban villages is a key factor in implementing the Urban Village Strategy.

Washington State Department of Transportation (WSDOT) - has a role in funding major transportation projects such as street improvements, light rail investments and bicycle and pedestrian infrastructure projects if they are on a state-owned facility, done as mitigation for a state-owned facility, or using federal funds.

Rainier Valley Community Development Fund (RVCDF) - responsible for administering $50 million in community development funds to minimize impacts to businesses in the Rainier Valley from light-rail construction.

URBAN VILLAGE ORGANIZATION STRUCTURES



City of Seattle - Multiple departments within the City have a role in the planning and implementation of the Urban Village Strategy.

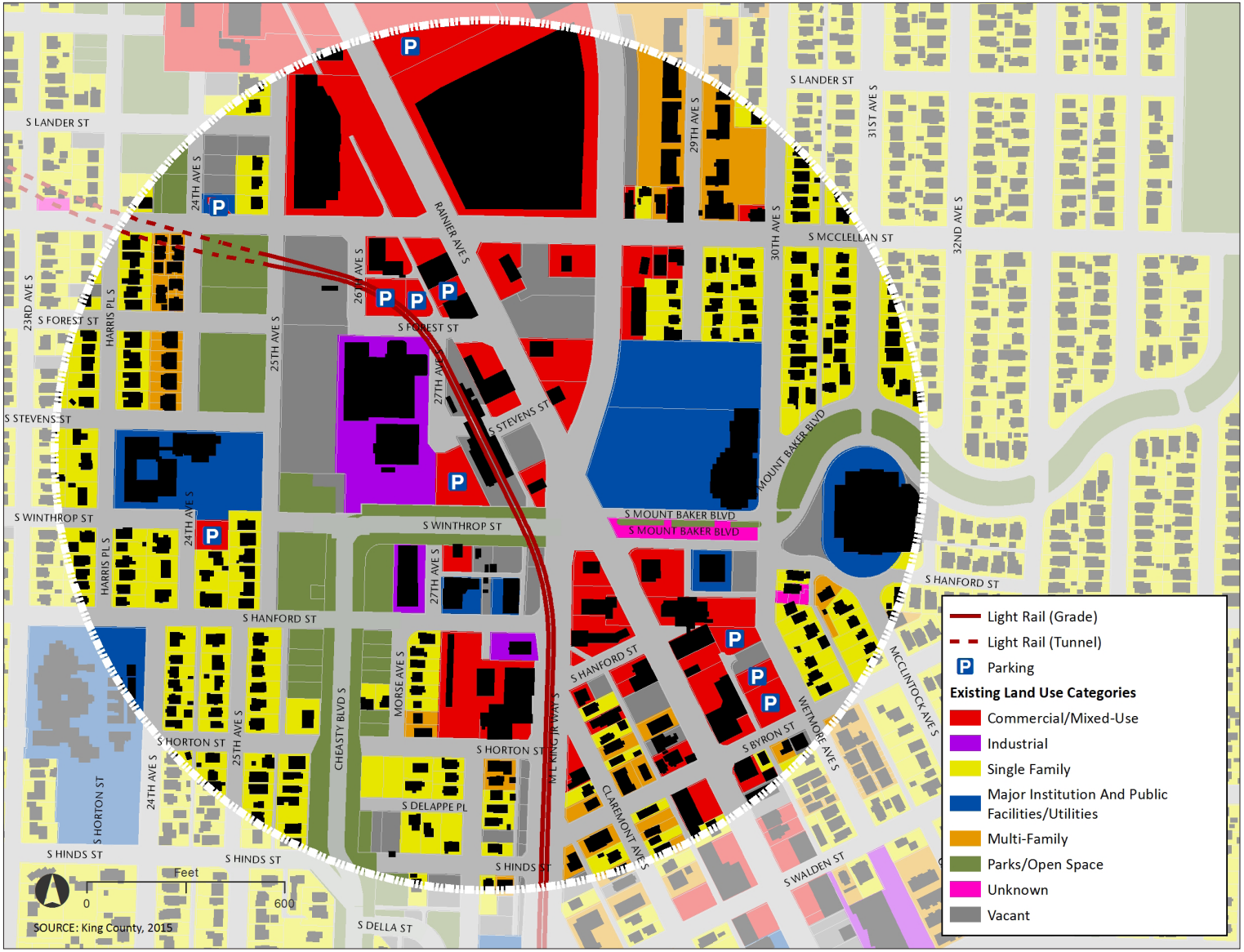
Transportation Agencies - Responsible for funding priorities, coordination between transit modes, leveraging surplus properties, facility locations, and the design and function of facilities, all of which are all critical to the success of implementing the Urban Village Strategy.

Seattle Public Schools - School quality is an important factor for many households when deciding where to live. SPS is also a major landholder with long-term uses.

Stakeholders - Public involvement is essential during plan development and implementation. Finding opportunities for public/public and public/private partnerships, addressing infrastructure needs, and facilitating new development is critical to implementing the Urban Village Strategy.

SITE CONTEXT

Today, 15 years after the North Rainier Neighborhood Plan was completed and five years after light rail opened, the area within one-quarter of a mile of the Mt. Baker station is characterized by auto-oriented uses, parking, and vacant lots.



Source: King County Assessor 2015; BERK Consulting, 2015

SITE PHOTOS

Rainier Ave. at the Mt. Baker Station

Under utilized spaces exist adjacent to the transit station that could be programmed for community uses to add vitality to the area and attract further investment.

Rainier Ave. and MLK Way Intersection

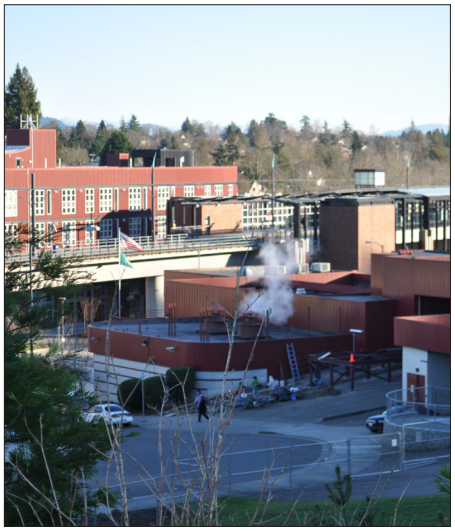
The intersection of Rainier and MLK is auto-dominated and lacks the multi-modal infrastructure necessary to support an urban village environment.

Below Mt. Baker Light Rail Station

Originally designed for a transit connection, the public space beneath the light rail station lacks active community uses. The space could be used to host events, pop-up retail, food trucks, or other tactical urbanism interventions.

Sidewalk Network

Narrow sidewalks, blank walls, lack of on-street parking, and poor infrastructure all contribute to an auto-dominated environment.



Major Employer

The UW Laundry Facility is located in the area because of its proximity to I-5 and other major transportation routes. The facility workforce comes from the Rainier Valley.

Artspace

The new Artspace project incorporates artists residences, first-floor retail, and pedestrian improvements. It is the first major project adjacent to the station area.

New Development

A few development projects have been proposed consistent with the vision for the Urban Village. However, the projects have not been constructed, indicating that conditions may not be ripe for development.

Side Streets

Pedestrian connections from adjacent neighborhoods are lacking. The poor condition of the infrastructure is likely deterring investment in TOD.

INTERVIEWS

The consultant team spoke with 17 individuals who have either been directly involved in planning in the North Rainier Urban Village or have knowledge of development issues in the city. A list of interviewees is provided in Appendix B. The following themes were identified:

A. Site Challenges
B. Strategic Outreach
C. Plan Updates and Rezoning
D. Interagency Coordination
E. Investment in Infrastructure
F. Political Leadership
G. Diverse Opinions

A. Site Challenges

Several people interviewed acknowledged the many challenges associated with development in the study area, including:

- Fragmented parcel ownership
- Poor soils
- Auto-dominated environment
- Lack of identity and neighborhood cohesiveness
- Lack of market demand

B. Strategic Outreach

Many interviewees stated that the City did not do sufficient outreach to property and business owners and potential developers. Other comments included:

- The hiring of the TOD Manager is key to establishing partnerships with property owners and developers
- The plan update should have focused on strategic outreach to property owners and implementing the concepts in the 2001 McClellan Town Center Plan

C. Plan Updates and Rezoning

Several people questioned the plan update process and timing of the rezoning.

- Development agreements should be favored over area wide upzoning in areas that lack demand for new development
- Upzoning creates an inflated sense of property value, which may further decrease the likelihood of development
- Permit streamlining, waiving fees or deferring payments, or Local Improvement Districts (LID) should be the focus rather than plan updates

D. Interagency Coordination

The lack of effective interagency coordination is a consistent theme identified during the interviews.

- Not enough coordination between city departments, too many silos
- Follow the model used in South Lake Union with an interdepartmental team, annual work program, and oversight from the Mayor's Office
- Strike teams should become part of the organizational culture
- Transit agencies are not involved enough in planning process

E. Investment in Infrastructure

A lack of investment in infrastructure to support development was raised repeatedly.

- Poor infrastructure is preventing development. No one wants to be the first to develop in the area. City needs to make the area more attractive for development by investing in infrastructure first
- City is relying on a major property owner to do a catalyst project to spur development in the area and address infrastructure issues
- The area needs major infrastructure changes, not just traffic, but the City stepping up to make urban design work
- The area needs community investments similar to the library and community center in Northgate
- Major stormwater issue is preventing development on a private site and needs to be addressed
- Following the initial investment in light rail there is a sense that further infrastructure investment in the Rainier is not a high priority
- If the City had purchased property in the area, it would have had more tools to work with

F. Political Leadership

Some interviewees described the role that political leadership, or lack thereof, plays in getting things done.

- Big concerns regarding the many plans that have been produced, but nothing has been implemented
- Three mayors in the last six years is a major factor for the lack of progress
- All three of the previous mayors were aligned on promoting increased density in urban villages
- A decision on transportation improvements was not made earlier because the area is complicated and involves lots of diverse stakeholders

G. Diverse Opinions

Interviewees had differing opinions on both what is desired and what is feasible in terms of development.

- The City should focus more on recruiting employers than on housing in the study area. Office space should be a key part of the strategy
- It is not feasible to do an office development in the middle of nowhere. If there is no track record of office development in an area then financing it will be difficult
- The City needs fewer requirements and more flexibility
- First floor retail uses are not viable in the area and should not be required
- If jobs are what is needed, who will make that happen

NORTH RAINIER LIVABILITY ASSESSMENT

Before assessing the City's actions in North Rainier, an assessment of current conditions and a comparison with city livability goals are presented.

As described above, a 2010 report by the Seattle Planning Commission, *Seattle Transit Communities: Integrating Neighborhoods with Transit*, provides "recommendations on what it takes to create and support successful transit communities." The report identifies the Mt. Baker area as a "Mixed Use Center," which has six essential livability components. Each component is described below, followed by an assessment of North Rainier. While the Commission's work is a strong base for livability, other factors such as social equity and public safety should also be considered.

Essential Livability Components

Breathing Room: Parks, open spaces, and other facilities to improve quality of life, as well as Green Streets and landscaping to provide environmental benefits.

While there are some parks and open spaces in North Rainier, they are not very accessible due to poor pedestrian and bicycle connections and the auto-dominated environment; in addition, many of the open spaces are not within a quarter-mile of the Mt. Baker station. Additional parks and open spaces are needed along with small urban public spaces to support the transition to a mixed use center.

Friends of Mt. Baker Town Center has proposed a "land bridge" to increase connectivity across Rainier Avenue South and Martin Luther King Jr. Way South. The North Rainier Urban Village is also in close proximity to several larger regional parks just outside of the study area.

The lack of park and open space is an issue in North Rainier, but other urban villages that are thriving and attracting new growth, such as Ballard, Fremont and Downtown, also have unmet park and open space needs. There is need for additional "breathing room" in North Rainier, particularly near the light rail station, but it is not the largest obstacle to creating a thriving urban village.

Getting to Transit is Easy: Safe and clean transit stops and stations, wide sidewalks with pedestrian lighting, bicycle lanes and parking; and wayfinding.

The light rail station provides high-quality transit service north to Downtown and south to SeaTac Airport. However, connections to the station from adjacent residential areas and connections to bus service need improvement as light rail is not yet a full system. The location of the bus layover facility on the opposite side of Rainier Ave. does not provide a seamless transition between transit modes.

Complete Streets: Safe and accessible to all users, well lit, with healthy trees and landscaping.

Rainier Ave. South and Martin Luther King Jr Way South are not complete streets; the current design favors automobile capacity. Bicycle lanes, wider sidewalks, lighting, and pedestrian amenities are all needed to support the mixed use center vision.

Complete streets are particularly important in the study area because existing development is not pedestrian oriented. To promote private investment that supports an enhanced pedestrian environment, significant changes in the street system are required. The SDOT Accessible Mt. Baker project is assessing short and long term options for improving the pedestrian environment.

Transit at the Center of the Community: Areas surrounding the transit station include public art, plazas, open spaces, businesses open 16-18 hours/day, uses such as day care, restaurants, and coffee shops, and the tallest buildings.

Although development of the station area did include some investment in public space such as the public plaza along Rainier Ave. S, transit is not the center of this community. The area surrounding the light rail station is defined by linear, auto-oriented development, making it a place to drive through rather than a transit community. The abundance of parking lots and dispersed commercial uses with poor pedestrian connections do not support a transit community. Today, the new Artspace project adjacent to the station has brought new residents and shops to the area, but on its own will not transform the area into a transit community. Ensuring that transit is at the center of the community will require both proactive and sustained City actions as well as willing partners in Sound Transit and King County Metro.

Vibrant Street life: Wide sidewalks, bicycle facilities, landscaping, street furniture, public art, and café tables.

Vibrant street life cannot exist without people. While the station area includes some public art, bicycle parking, landscaping, and street furniture, lively streets require pedestrian-oriented development with active ground-floor uses - whether retail, institutional, or community spaces. Investment in streets and public spaces may serve as a catalyst to new development, which may increase the population and pedestrian flow.

A Community for All Ages: Schools, play areas, senior centers, libraries, and public spaces where people of all ages can thrive, along with a broad mix of housing sizes and affordability levels.

The station area lacks a residential population and neighborhood identity. While the area does include assets like the Franklin High School and affordable housing developments like the Claremont, it does not have sufficient public services and amenities to meet this criteria.

The investment in the library, community center and park in Northgate is an example of how investments in public buildings, services and open spaces can serve as a catalyst to transform an area to a mixed use center serving people of all ages.

Comparison with Other Mixed Use Centers

Fremont and Ballard, also described as mixed use centers in the Planning Commission's report, have seen significant growth even while lacking some in livability components. For example, according to the *Seattle Sustainable Neighborhoods Assessment Project*, Ballard lacks sufficient park space and proximity to parks (Steinbrueck Urban Strategies, 2015). Does this mean a neighborhood does not require livability components to attract new development? More likely it indicates that some of the livability components may be larger drivers of growth than others.

A key difference is that Fremont and Ballard have a history of housing and commercial development that have commanded higher rents than North Rainier. For example, Ballard and Fremont have always had a walkable, pedestrian-oriented commercial and mixed use district with vibrant street life. The public schools in these two centers also have stronger academic performance (based on test scores) than the schools in North Rainier.

Parks and open spaces can be accessed in other parts of the city to meet demand in underserved areas. However, being able to walk to a pedestrian oriented commercial area from a home is a significant asset that North Rainier lacks.

New parks are often more challenging to fund than investments in city-owned streets. The Bell Street Project is intended to increase park space in an underserved area using existing street right of way, largely because purchasing new park space is prohibitively expensive.

In rapidly growing neighborhoods, demand for new parks, open spaces, street improvements, and community facilities will grow, increasing competition for limited city resources.

Neighborhoods that are not "market ready" may continue to languish without new city resources. Investments in parks and open spaces alone will not likely drive future growth without addressing the need for complete streets and vibrant street life.

While the City of Seattle may have traditionally invested in areas after private investments have been made a different approach is needed in North Rainier and other urban villages that are not market ready and lack the necessary infrastructure, community facilities, and high-quality public realm necessary to support development consistent with neighborhood plans.

- **FINDING:** The North Rainier Urban Village lacks the essential components of livability for Mixed Use Centers.
- **FINDING:** Of the Planning Commission's essential components of livability, the City should focus on complete streets, vibrant street life, and a community for all ages to implement the North Rainier Neighborhood Plan.

Profiles of Successful City Leadership

Northgate

In the early 2000s, development at Northgate was at a standstill, largely due to a contentious neighborhood process. When Mayor Nickels took office in 2002, he declared that solving the Northgate development logjam was a top priority. Several strategies moved development forward:

- The City made substantial public investments, changing the character of the area to improve livability and attract private investment. This included a library, community center, a park, and street improvements.
- A structured interdepartmental team led by the Mayor's Office with a high degree of accountability was critical to success.
- The City had a relatively high level of engagement with property owners and developers, including a Development Agreement with Simons Property Group.
- The Mayor made executive decisions about siting the library and community center, developing the south lot, and reforming development regulations.
- The Northgate Stakeholders group was able to reach consensus on design and development issues, resolving the "Northgate logjam" which had stalled redevelopment efforts for years. The stakeholder process took significant work by the Mayor, City Council, and the community, and required significant city resources over several years.

Today, Northgate has taken significant steps towards a major transformation with new residential buildings, a new park, office and commercial development, a new community center and library, and street improvements. The urban center has grown by over 1,000 housing units between 2005 and 2014, after only 170 new units in the previous ten years. Employment grew 11% between 2004 and 2013.

City of Seattle-funded Infrastructure in Northgate (partial list):

- Hubbard Homestead Park Acquisition: $3 million
- Thornton Creek Water Quality Channel: $7 million
- Northgate Civic Center Park: $1 million acquisition
- Library: $6.7 million
- Community Center: $8.85 million
- 5th Avenue NE Streetscape Improvements: $2.1 million

Northgate Library, Community Center and Park - City investments have improved the livability of the Northgate Neighborhood and provided a platform for private sector investment (Miller Hull, 2015).

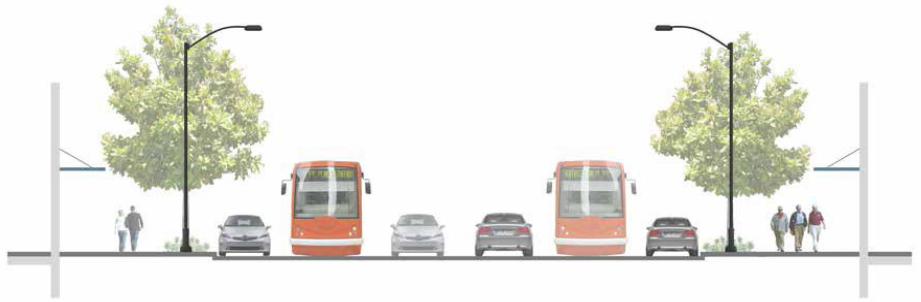
South Lake Union

Until the early 2000s, South Lake Union (SLU) consisted primarily of light industrial and auto-oriented commercial uses, with a small population living in the Cascade neighborhood. Today, SLU is a dense, mixed use urban neighborhood and employment center with an increasing number of retail stores, restaurants, and housing. Between 2005 and 2014, SLU has added over 3,200 housing units and 16,000 new jobs. There are several reasons for the success of South Lake Union:

- The Mayor established an "Action Agenda" focused on infrastructure investments to support growth in jobs and housing.
- The City invested in transportation infrastructure, public park space, a street car, an electrical substation and affordable housing to support a dense mixed-use community.
- The City formed interdepartmental teams lead by the Mayor's office charged with moving projects forward quickly.
- A single property owner, Vulcan, owned a large portion of the land in SLU and worked with the City and community to craft a vision that aligned with the City's policies. Vulcan also partnered with the City on infrastructure investments.
- Market conditions, including the location near downtown and the University of Washington and the real estate boom of the mid-2000s, helped attract private investment.
- The City invested considerable effort and resources to plan and zone for growth in the neighborhood.

City of Seattle-funded Infrastructure in SLU (partial list):

- Street Car: $8.5 Million
- Electrical Substation: $201 Million (funded by ratepayers)
- South Lake Union Park: $9.4 Million
- Mercer Street Improvements: $83 Million



Westlake Avenue Streetscape Improvements have enhanced the pedestrian environment and attracted investment in South Lake Union.

ASSESSMENT OF CITY ACTIONS IN NORTH RAINIER

A 2013 report for DPD, *Implementing Transit Oriented Development in Seattle: Assessment and Recommendations for Action*, identified seven factors that led to successful neighborhood revitalization in Seattle. These factors were used to assess the City's process and actions in North Rainier.

1. City Leadership

Over the past fifteen years, the City of Seattle has at times shown leadership and vision for implementing the Urban Village Strategy in North Rainier. However, these periods of leadership have been interrupted by political or economic disruptions. During the early planning, several outside forces influenced political decisions:

- **Surface route controversy**: Planning for light rail in the Rainier Valley ran into significant controversy in the late 1990s and early 2000s over the proposed surface alignment on Martin Luther King Junior Way South. Concerns from the community included noise, safety, disruption to business, acquisition of properties, and unfair treatment of poor and minority populations. To allay concerns about disruptions to businesses, a $50 million fund for community development was created, leading to the Rainier Valley Community Development Fund. However, a climate of distrust of the light rail project would continue to impact decisions and activities in the area, including efforts to acquire properties for redevelopment.
- **Sound Transit woes:** The early 2000s were marked by major financial turmoil at Sound Transit, nearly leading to a loss of federal funds for light-rail and the folding of the agency. In 2001, the Board approved a drastically reduced initial light rail segment. These financial troubles may have reduced the agency's emphasis on development near stations and instead focused political and agency leadership on getting the rail line built.

Early City Planning, 1999-2001

The 1999 North Rainier Neighborhood Plan, 2001 zoning updates, and 2001 McClellan Town Center Development Strategy together show an impressive vision for the area, interdepartmental coordination, and a detailed implementation plan. The Town Center Development Strategy includes next steps for public investments and development activities at key parcels, with lead agencies identified for each. But despite the detailed strategy, little progress was made towards implementation. For example, the roundabout proposal for the Rainier Avenue South/ Martin Luther King Junior Way South intersection, identified in the Strategy as a way to

Concept Plan from McClellan Town Center Development Strategy

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improve safety and create a sense of place, was neither implemented nor replaced with an alternative proposal.

Failure to implement these strategies was the first major failure of leadership for North Rainier, and set back redevelopment several years. Disruptions from the 2001 recession, the 2002 change in Mayoral administration, and accompanying changes in city staffing and departments are the likely major reasons.

Southeast Seattle Action Agenda, 2004-2006

In 2004, then-Mayor Greg Nickels convened a broad group of stakeholders to discuss strategies for the revitalization of Southeast Seattle, resulting in the Southeast Seattle Action Agenda. The Agenda focused on five issue areas: business and job creation; physical development; education and workforce development; public safety; and arts, culture, and public space. When the Agenda was released in 2005, Mayor Greg Nickels promised to focus attention on the Rainier Valley:

> *Mayor Greg Nickels rolled out his Southeast Seattle "action agenda" yesterday, vowing to put as much city attention on Rainier Valley neighborhoods as he has focused on downtown, Northgate and South Lake Union in his first three years on the job (Seattle Times, 2005).*

Regarding physical development issues, the Agenda appears to reflect an assumption among city leaders that private development would automatically follow the introduction of light rail and therefore the City's primary role was to preserve small businesses and housing affordability rather than to encourage new market-rate development. As described in the Seattle Times:

> *Nickels' goal in Southeast Seattle is to take advantage of huge public investment in Sound Transit's new light-rail line to revitalize an area that private developers and employers have passed by for decades. The mayor's plan emphasizes preserving the diverse ethnic mix of businesses and residents in Rainier Valley more than it calls for new city spending to spur growth in the area. (Seattle Times, 2005)*

It appears that the City did not accurately perceive the market in North Rainier and what was needed to attract private investment, and therefore did not take actions to attract development such as transportation and utility improvements and partnerships with the private sector.

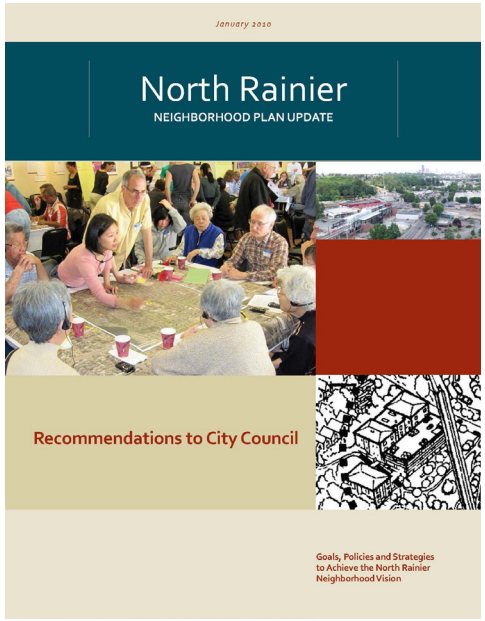
For the purpose of urban village development, the Action Agenda may have been too broadly focused, incorporating a wide variety of issues and several neighborhoods.

Community Renewal

One of the strategies recommended in the Action Agenda was using the Community Renewal Law to support investment in the Rainier Valley. In 2006, the City convened representatives of community organizations to explore a community renewal designation. The purpose was to encourage economic growth and development through public purchase of land for redevelopment. But the proposal ran into community opposition over the idea of public acquisition of private land, and was abandoned within a year. Planning and investment activities in North Rainier then lost momentum.

Recent City Planning, 2009-2015

Recent city actions in North Rainier have included a Neighborhood Plan update, an Urban Design Framework, an Action Plan, a Transportation Plan, and an upzone for the Station Area. While DPD staff performed the functions they were tasked with, strategic city leadership in infrastructure investment, interdepartmental coordination, and partnerships with the private sector have been lacking. Today, progress is being made. DPD's new TOD Manager is strengthening relationships with property owners and developers while SDOT has launched the Accessible Mount Baker study to improve transportation in the area. The study will include short and long-term improvements for improving safety and priority consideration for transit, pedestrian and bicycle modes.



- **FINDING:** City Leadership for planning and implementation in the North Rainier Urban Village has been inconsistent due to changes in political leadership, economic cycles, and staffing.
- **FINDING:** The Southeast Seattle Action Agenda did not include enough focus on attracting private investment, did not lead to needed public improvements, and was too broadly focused to be effective for urban village-specific goals.
- **FINDING:** Leadership to implement the neighborhood plan, including investments in the public realm, community facilities and infrastructure; interdepartmental coordination, and partnerships with the private sector, has been lacking.

2. Effective Coordination across City Departments

Since planning for North Rainier began in 1999, coordination among City departments has been inconsistent. While DPD was responsible for developing the North Rainier plan, it has not had a major role in implementation other than the two rezones. For example, discussions with property owners and developers about infrastructure investment are not generally conducted by the team that develops the neighborhood plan. It does not appear that any City Department or interdepartmental team is responsible or accountable for the implementation of the Urban Village Strategy and neighborhood plan in North Rainier.

The City started off well in the 2001 McClellan Town Center Development Strategy, which included participation from key departments and implementation tasks. However, the combination of recession and administration change in 2002 likely impacted momentum towards plan implementation

There have been several missed opportunities for City leadership and interdepartmental coordination in North Rainier. One is the Rainier Ave South and Martin Luther King Jr South intersection. The 2001 Strategy recognized that taming this intersection was key to attracting new development and creating an urban village. The plan recommended a roundabout, but the City never progressed beyond

the concept stage and the roundabout or any other solution for the intersection has not been implemented.

Another barrier to new development is the stormwater pipe at the QFC site, which if redeveloped could be a catalyst for the redevelopment of other sites. As revealed in stakeholder interviews, City TOD staff worked hard in the years before the 2009 recession with Seattle Public Utilities (SPU) and the property owner to find a way to move the pipe. However, agreement with SPU and the property owner was not reached and the opportunity for redevelopment was missed during that economic cycle.

Intra-departmental coordination also needs improvement. For example, individuals and divisions in SDOT are tasked with mode-specific responsibilities, such as implementing bicycle lanes. This becomes an obstacle to the comprehensive multimodal approach needed for addressing transportation issues in urban villages.

The 2011 North Rainier Neighborhood Action Plan includes a recommendation to create a "Neighborhood Action Team." However, there is little evidence that the team was formed or was effective at implementing the plan. Efforts may have been better spent on establishing a City interdepartmental team to implement the North Rainier Plan with a coordinated strategy for planning, design, funding, and construction of public investments.

- **FINDING:** Interdepartmental coordination during the creation and implementation of plans was insufficient in North Rainier, resulting in a lack of physical improvements or new development.

3. Early Planning

The City and DPD have done high-quality planning for North Rainier and made significant efforts to involve the community in the planning process.

- Between 1999 and 2001, the neighborhood plan and the McClellan Town Center Development Strategy set the vision and objectives for transforming the area to a mixed-use urban center.
- A rezone for the Mt. Baker Station Area was approved in 2001 to allow for development consistent with the neighborhood plan.
- The 2008-2011 planning period involved a robust public involvement effort and an update to the Neighborhood Plan.
- Another rezoning effort was approved in 2014 to allow for increased density in the Mt. Baker Station Area.
- In the Accessible Mt. Baker project, SDOT is looking at transportation issues in a comprehensive and multi-modal approach that may yield better results than previous efforts, which prioritized all modes equally.

Several stakeholders viewed the City's planning and zoning activities as lacking one crucial piece: strategic outreach to property owners and developers, the parties that would be needed to build the new housing, office, or commercial development outlined in the neighborhood plan. While property owners participated in the broader community planning processes, strategic outreach with this group was insufficient. When the City depends on actions by private actors to bring an urban village vision

to reality, it must understand what those private interests are looking for, rather than assuming "if you build it [light rail] and rezone, they [developers] will come." However, more strategic interaction with this group should not be viewed as a replacement for broad community outreach.

Today the City has a renewed effort to work with property owners and developers, led by DPD's TOD Manager. This work includes a market study and architectural massing study for the Lowe's property through a partnership between the City and property owner.

Aside from the lack of property owner and developer participation, there are a variety of stakeholder opinions about the recent neighborhood plan update and the 2014 upzone:

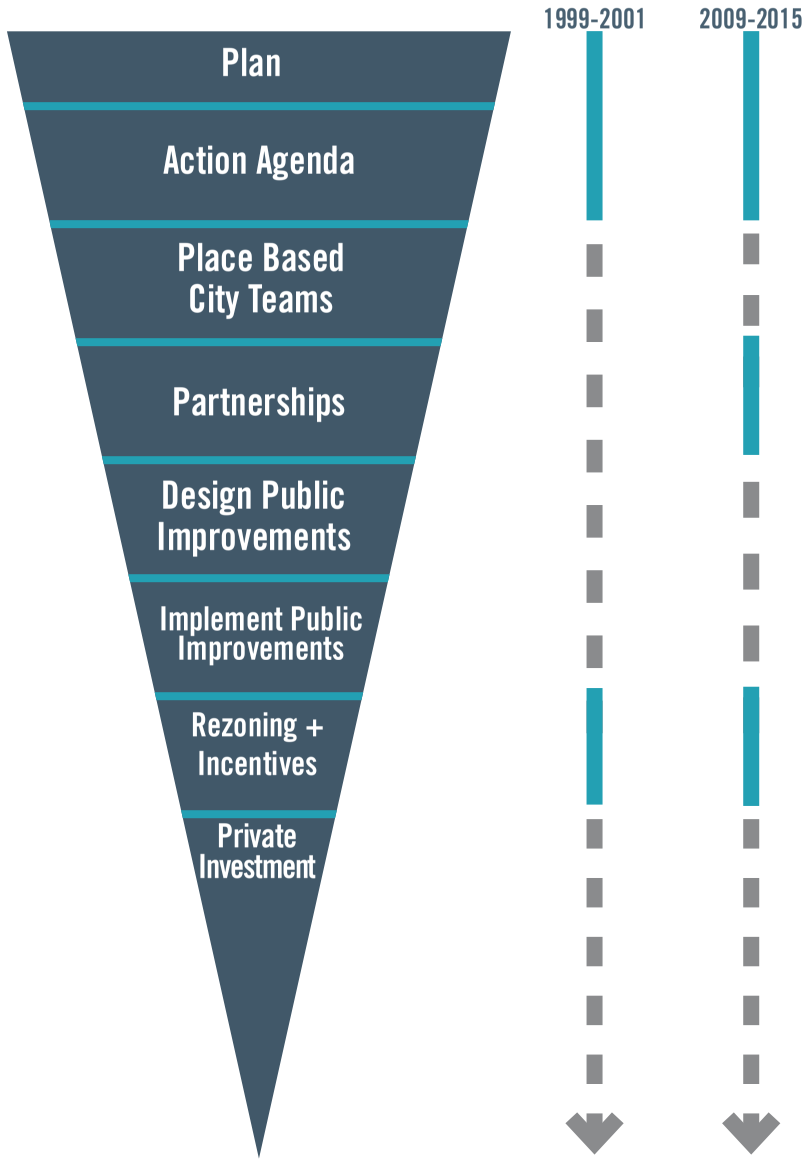
- In one view, the lack of demand from property owners or developers for the upzone limited its efficacy and may delay development by raising perceived property values. A better tactic to encourage development is to assess the market, implement the infrastructure needed to encourage development, and negotiate with individual property owners for zoning changes assuming the baseline zoning already supports TOD. Creating demand for the upzone then gives the City leverage to require community benefits from the property owner (such as widened sidewalks, affordable housing set-asides, etc.).
- Other stakeholders believe that a blanket rezone is preferable to site-by-site actions and negotiations. In this view, a blanket rezone encourages property owners and developers to take action and lowers their risk and engages a wider array of community members in the process. Further, some stakeholders believe that community suspicion of developers limits the City's ability to negotiate with individual developers (even to achieve greater community benefits).
- While some community members supported the goals of the upzone as a way to encourage a vital Town Center, others opposed it for a variety of reasons. Concerns included several issues: taller buildings would block views; employers and commercial businesses could be pushed out; the City was not doing enough to attract jobs in the area; and the upzone would lead to more subsidized affordable housing, harming the neighborhood. All these concerns were not shared by all opponents as people opposed for different reasons.
- **FINDING:** The City has spent considerable effort and resources planning for the area over the last 15 years, including broad-based community outreach, which has resulted in high-quality plans.
- **FINDING:** City planning processes, particularly the 2011 neighborhood plan update, should have focused more on property owner/developer/business participation, with an emphasis on partnerships to coordinate public investments with private development and understand market conditions.
- **FINDING:** The time and resources used in the 2014 rezone may have been better directed toward forming strategic partnerships and addressing major infrastructure needs that are barriers to redevelopment. In addition, upzones may lead to property owners waiting longer to develop or sell their property, further delaying development, and therefore should be carefully weighed by the City.

- **FINDING:** In the 2014 rezone, the City missed an opportunity to generate new community or public benefits through agreements with property owners in exchange for incentives such as increased height.

IMPLEMENTATION SCALE LADDER

Implementation of the Urban Village Strategy in North Rainier requires a high level of coordination and timing to move from the planning stage to seeing private investment consistent with adopted plans. The City has used this approach in South Lake Union and Northgate with a high level of success. However, external forces and changes in political leadership have prevented the approach from becoming institutionalized within the broader city structure for planning, coordination and implementation.

The City's approach to planning and implementation in North Rainier has resulted in gaps in the implementation scale ladder during both of the neighborhood planning periods. The gaps include investment in public infrastructure and creation of strong partnerships that remain barriers to private investment. Today some of these issues are being addressed, including property owner outreach by DPD's TOD Manager and a new multi-modal transportation plan. The recommended Urban Village Team would provide a framework for more coordinated planning and implementation to eliminate the gaps.



4. City Focus and Prioritization of Investment in Development Areas

The most significant infrastructure investment in North Rainier was the Mt. Baker Light Rail Station, although smaller scale investments have been made. It was widely acknowledged during stakeholder interviews that insufficient investment in infrastructure is a key factor explaining why the area has not transformed into a mixed-use center.

Stormwater facility: One of the major opportunity sites near the Mt. Baker station sits above a 102-inch stormwater pipe which effectively prevents redevelopment of the site. Conversations with Seattle Public Utilities about moving the pipe have been going on for years. The challenge has been getting agreement on who should pay. To move redevelopment forward at this site, the City may need to invest in moving the facility, possibly through a Community Benefit Agreement, which could require certain community benefits from the property owner.

Transportation: Over the past 15 years the City has proposed several ideas for calming traffic and improving pedestrian safety near the Mt. Baker light rail station, but no major projects have been implemented between 1999 and 2015. Reasons include: disagreement among stakeholders and opposition to some proposals; a desire to equally accommodate all modes that was unrealistic (creating better pedestrian crossings while also accommodating movement of heavy freight); a lack of City leadership; and a lack of funding.

Over the past 15 years, the City failed to make necessary streetscape, sidewalk, and intersection improvements to improve walkability in the area, which could have improved market demand by signaling the City's commitment to the area. Property owners could be partners in improving pedestrian space, similar to the widened sidewalk outside the Artspace development.

- **FINDING:** The City has not invested enough in public facilities and infrastructure near the Mt. Baker station, which remains a major obstacle to redevelopment. Investments in transportation are needed to support the transition to a mixed use center.
- **FINDING:** Historically the City has not prioritized transportation modes consistent with the vision for the area. Today, the Accessible Mt. Baker Project proposes to give a higher priority to pedestrians, bicyclists and transit.

5. Strong Partnerships

Over the past fifteen years, the City's planning efforts in North Rainier have focused more on broad community outreach and less on forming strategic partnerships with the stakeholders who can make development happen. The City's new TOD Manager is leading a renewed effort to form partnerships with key property owners, businesses, and developers, an important asset for the area.

Public-Private Partnerships: The 2001 McClellan Town Center Development Strategy included an assessment of market conditions in the station area and detailed analysis of seven parcels adjacent to the station. The implementation section includes next steps for each parcel with designated public sector leads including the Office of Housing, Office of Economic Development, Sound Transit, and the City's Strategic Planning Office. While this was a strong start for developing

partnerships, it appears that no single city agency or interdepartmental team had ownership of the Strategy.

Incentives & Community Benefit Agreements: In areas that are not already attracting private investment, incentives can help promote development. These can range from financial tools like tax incentives to flexibility on regulations. For example, requirements for ground-floor retail in North Rainier, while intended to improve the pedestrian environment, can be difficult to meet and may impede development. Flexibility on those types of standards are a tool which the City does not appear to have used in North Rainier. Community Benefit Agreements (also called Development Agreements) are another tool that cities can use to coordinate public and private investments that include significant community benefits in exchange for development incentives.

Infrastructure: The lack of infrastructure investment may make strategic partnerships more difficult if stakeholders are not confident that infrastructure will be improved. Strong public/private partnerships such as the Thornton Creek Restoration Project in Northgate or South Lake Union Streetcar have not occurred in North Rainier.

Partnerships with Transit Agencies: Partnerships with transit agencies are critical to implementing the Urban Village Strategy, particularly in areas without the infrastructure or market conditions to support development. At the Mt. Baker Station, Sound Transit chose to lease rather than purchase properties needed for construction, due to concerns about displacement of businesses and residents. Acquiring less land makes it more difficult to assemble larger parcels, which are better suited to development. Today Sound Transit is more focused on facilitating TOD at new station locations. For example, at the Capitol Hill Station, Sound Transit purchased (rather than leased) properties for construction. This has allowed assembly of large parcels and a redevelopment process in conjunction with the City.

- **FINDING:** The City historically has not formed strong partnerships with property owners and developers in North Rainier to coordinate private and public investments.
- **FINDING:** In an area that is not market-ready and attracting private investment, some City regulations may pose additional constraints on new development, such as the requirement for ground-floor retail.
- **FINDING:** The City and transit agencies did not acquire sufficient parcels to support major development opportunities.
- **FINDING:** The City must actively engage transit partners before, during, and after station construction on issues of land acquisition, station design, and redevelopment.

6. Other Factors

Market Timing and Location

The market viability for new development and investment in the project area is a key factor that is influenced in part by outside forces that the City has little or no control over. One lesson from North Rainier is that outside economic and political forces can disrupt momentum for urban village development. Recessions in 2001 and 2008 reduced private investment and public funds. On the political front, opposition to community renewal proposals in 2006 reduced momentum for development while changes in mayoral administrations in 2002, 2010, and 2014

slowed City momentum as new leaders got up to speed, brought in new staff, and decided on priorities. Recessions and political change cannot be predicted, yet they happen regularly and can disrupt Seattle's Urban Village Strategy, particularly in neighborhoods with lower market demand like North Rainier.

However, City actions in the project area can help to influence market demand, as has occurred in Northgate and South Lake Union. The "Great Recession" affected the degree to which private investment occurred in North Rainier following light rail opening in 2009, but it is not the only factor. The number of apartments developed citywide in 2013, 2014, and expected in 2015 are greater than any single year over the last 20 year period, yet North Rainier has not seen significant new residential development compared to other urban villages (Seattle Times, 2014). As shown on the next page, average rents are lower in the area which has certainly contributed to patterns of development.

To be successful, the City needs to be prepared to capture the momentum that occurs during times of economic growth. At times over the past fifteen years of planning, it appears that public officials have viewed private investment near rail stations as inevitable and were most concerned about preserving small businesses and housing affordability. The City made investments in subsidized housing and to preserve existing commercial businesses, but did not take steps needed to attract substantial new private investment, such as providing infrastructure or incentives.

- **FINDING:** The lack of market demand in the project area remains a significant challenge for implementing the neighborhood vision and plan. City investments in infrastructure may signal a commitment to improving the area thereby improving market demand for additional growth and development.
- **FINDING:** Public officials and agency staff should not assume that "if you build it, they will come" regarding private investment after transit investments are made. Careful market analysis and interaction with property owners and developers is needed to determine the likelihood of development.

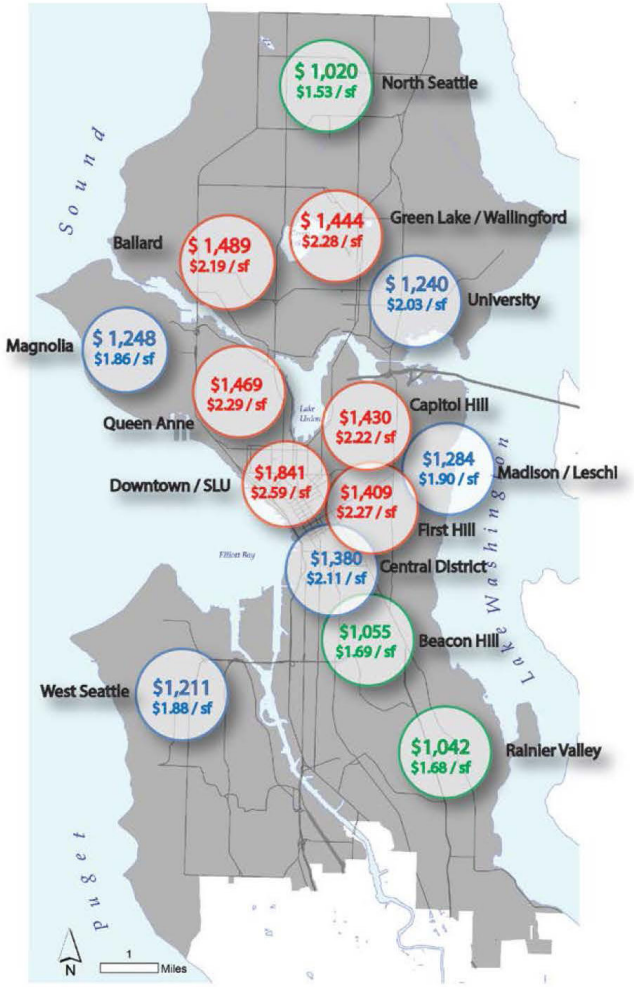
Jobs Strategy

Job growth is frequently mentioned by local residents and public officials as a top goal for the Rainier Valley, along with post-secondary educational facilities and workforce training.

To attract jobs to North Rainier as part of the Urban Village Strategy requires a focused employment strategy from the City and other partners. However, it is unclear that the City has a unified strategy for job growth in the Rainier Valley that is specific and realistic.

In addition, the types of jobs desired are not always articulated. Attracting light industry is very different from attracting commercial businesses or new office development, and may have different chances of success and require different strategies and infrastructure needs. Many of the recommendations in this report are necessary to support any new development and growth whether it includes housing, employment, or mixed-use components.

A unified strategy for attracting employment to the Rainier Valley would include goals, a market assessment, marketing, match-making, and other activities. The City also needs to determine what realistic job growth goals for the Rainier Valley look like, and communicate with residents about those goals.



Average Rents by Sub-Market (1 Bedroom)

Rents are highest in Downtown, and around Lake Union and the Ship Canal.

Lowest rents are in North Seattle, Rainier Valley, and Beacon Hill.

- $1,400+
- $1,200 - $1,399
- $1,000 - $1,199

Dupre+Scott Apartment Advisors, Apartment Vacancy Report, 20+ unit buildings, Fall 2014, Seattle-14 market areas.

Source: Dupre+Scott, 2014

RECOMMENDATIONS

How the City of Seattle can Encourage Great Urban Neighborhoods

Overall, the Urban Village Strategy has been successful at focusing growth in urban villages. However, some urban villages have seen high rates of growth while others, such as North Rainier, have grown slowly despite several neighborhood planning efforts and the opening of light rail. As a result, city and neighborhood goals identified in neighborhood plans have not been achieved. The City lacks a coordinated system to implement the Urban Village Strategy and in particular to prioritize city resources and move beyond the planning stage to implementation. North Rainier, and other urban villages that aren't seeing growth, require a higher level of involvement and coordination from the City to implement the neighborhood plans. Coordination between city departments, a way to prioritize the allocation of city resources, and stronger partnerships are needed to advance the Urban Village Strategy.

1. Integrate City Functions Necessary to the Execution of the Urban Village Plans

Right now, no one person or agency is responsible for implementing the Urban Village Strategy. DPD creates plans, proposes zoning changes, and reviews development proposals; OED provides assistance to businesses; SDOT, SPU, and other agencies build and maintain city infrastructure; and DON connects residents with city services. Developing thriving urban villages, particularly in areas that are not already attracting growth, requires committed and accountable City leadership.

To create accountable and responsible leadership, the City should create an Urban Village (UV) Team to oversee citywide urban village planning, implementation, and monitoring. DPD, as the planning agency, would lead the team, which would also include decision-makers from all relevant city agencies and the Mayor's office, as well as regional transit agencies. Creating a new city department to coordinate the Urban Village Strategy is an option, but this team proposal is simpler to implement and builds upon existing resources. The UV Team would be responsible for assessing the needs within urban villages, prioritizing city actions among urban villages, monitoring and assessing urban village progress, and managing smaller place-based teams working on particular villages at specific times.

Place-based teams would include city staff from DPD, SDOT, OED, SPU, DON, SPD, and other relevant agencies as needed, and would be responsible for community engagement, the design of streets and public spaces, market analysis, business and property owner relations, zoning, design review, public safety, and other functions. Planning activities would reflect both city goals and neighborhood aspirations, as well as constraints posed by the market, economic conditions, and departmental budgets. In addition, the City should strongly encourage participation by decision-makers at important regional partners including Sound Transit and King County Metro.

URBAN VILLAGE TEAM

The combination of an Urban Village Team and urban village specific interdepartmental teams would lead to better planning and implementation both for the overall Urban Village Strategy and neighborhood plans. Organizing interdepartmental teams around places allows for a more integrated approach to implementing Seattle's Urban Village Strategy in specific locations. Rather than having independent departmental efforts to address planning, regulations, transportation, infrastructure, and facilitating partnerships, interdepartmental placed-based teams should be used to provide a more cohesive and focused effort.

Example: San Jose Neighborhood Initiative

The City of San Jose has used interdepartmental staff teams to implement 75% of priority neighborhood projects identified by local residents as part of its "Strong Neighborhoods Initiative." The neighborhood plans were implemented by six Strong Neighborhood Teams, which consisted of representatives from four city departments as well as the City Council. Each Strong Neighborhood Team was led by a team manager and included staff members from the Planning, Building, Code Enforcement, Police, Parks and Neighborhood Services Departments.

2. Improve Capacity to Assess Needs and Prioritize Investments Across Urban Villages

Assessing

Not all urban villages are the same; each has its own history, strengths, and needs. A fast-growing area will need a different strategy for livability than a neighborhood with scant development. Before undertaking planning for an urban village, the City should undertake a SWOT analysis (strengths, weaknesses, opportunities, and threats). This would include an assessment of current growth levels, infrastructure, social equity indicators, public safety, community engagement, market demand, and other factors. The City can then determine what actions and what level of financial and staff resources are needed to make the area a thriving urban village. Appendix B includes a high-level SWOT analysis for the North Rainier Urban Village developed by the consultant team.

Prioritizing

No prioritization system is currently in place for allocating city resources among Urban Villages. While no neighborhood would or should be left out of city funding opportunities, it is possible to prioritize among urban villages. A detailed rating scale for urban villages is beyond the scope of this report, but general factors for prioritization are discussed below.

One general principle for determining priority is equal opportunity – everyone in Seattle should get an equal chance at success. To realize that vision, the City should do more in areas where opportunity is lower and facilities are sub-standard, while taking care to preserve affordability. Under this screen, neighborhoods with lower socioeconomic indicators would receive higher priority for city dollars.

A second screen for prioritizing city resources is the location of high-capacity transit. Areas within walking distance of light rail have the potential to become home to a large proportion of the city's homes and jobs without adding to city traffic, and therefore should receive high priority for city funds leveraging the region's billion dollar investment in light rail.

Investing

New homes, stores, offices, or other development will not be created unless basic infrastructure is present, including everything from city streets and sidewalks to water and sewer access. In addition, parks, open spaces, and community facilities such as libraries and community centers also contribute to livability and make neighborhoods more desirable.

To attract and support growth in urban villages, the City should assess infrastructure needs and follow through by funding improvements consistent with the prioritization, particularly when needs are a barrier to redevelopment.

Monitoring

Building on the data collection analysis in the report *Seattle Sustainable Neighborhoods Assessment Project* the City should continue to monitor the overall success of the Urban Village Strategy and adjust the City's strategy accordingly.

3. Increase Private Sector Partnerships

Concentrating housing and job growth in urban villages requires community engagement and partnerships between the public, private, and nonprofit sectors.

Consistent with neighborhood priorities, the City (specifically the Urban Village Team) should take the lead to initiate partnerships with property owners, developers, nonprofit organizations, institutions, and public agencies to coordinate public and private investments and planning in urban villages. While the City did a good job involving the community in neighborhood planning efforts, consultation and partnerships with the private sector were lacking. Coordination of public and private investments is critical, particularly in areas that are not market ready. The City demonstrated it has the ability and capacity to develop successful partnerships with the private sector in both South Lake Union and Northgate.

Community benefit agreements or other tools should be considered to facilitate partnerships and ensure that the value created by public improvements is shared by the community and larger public. These incentives should also be used to respond to demand for neighborhood infrastructure and amenities.

Transportation Improvements - Additional transportation improvements to address pedestrian safety, mobility, and comfort are necessary to support additional development consistent with the neighborhood plan.

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APPENDIX A

Interview List

- Steven Shain, TOD Manager, Seattle Department of Planning and Development
- Lyle Bicknell, Principal Urban Designer, Seattle Department of Planning and Development
- Michael James, Strategic Advisor, Seattle Department of Transportation
- Matt Anderson, Heartland
- Jenny Frankl, Seattle Department of Neighborhoods
- David Essig, Rainier Valley Community Development Fund
- A-P Hurd, Touchstone
- Catherine Vandenbrink, Artspace
- Jeannie O'Brien, Lakewood Seward Park Community Club
- Ray Akers, Akers & Cargill Properties
- Marshall Foster, Waterfront Design Manager (Former City Planning Director)
- Ron Lewis, Sound Transit
- Nora Liu, Community Development Manager, Seattle Department of Planning and Development
- Talis Abolins, Friends of Mt. Baker Town Center
- Stephen Johnson, Director, Seattle Department of Economic Development
- Sally Clark, Seattle City Council
- Dan Rosenfeld, Property Owner

APPENDIX B

SWOT Analysis

STRENGTHS

- Light Rail
- Location within the City and Region
- Infill and Redevelopment Opportunities (Large Catalyst Sites)
- City Planning Efforts
- Grocery and Drug Stores
- Franklin High School
- Understanding of factors that have lead to stagnation

WEAKNESSES

- Market
- Auto-Dominated Environment
- Street Design + Lack of Pedestrian and Bicycle Facilities
- Infrastructure
- Public Safety
- Location and Function of Bus Layover
- Schools

OPPORTUNITIES

- Infill and Redevelopment Opportunities
- City Population and Employment Growth
- Improving Opportunity
- Accessible Mt. Baker Effort
- Only in Seattle Grants
- Proposed Land Bridge
- Mountain Bike Park
- East Link Light Rail Expansion
- Sound Transit Redevelopment Opportunities and Strategic Plan
- Adjacent Neighborhood Centers

THREATS

- Economic Cycles
- Political Changes
- Community Opposition
- Cost of Infrastructure Investments
- Other City Priorities
- Transportation Funding Limitations and Cycles
- Lack of progress to date

BEFORE THE GROWTH MANAGEMENT HEARINGS BOARD
CENTRAL PUGET SOUND REGION
STATE OF WASHINGTON

TALIS ABOLINS AND MARLA STEINHOFF,

Petitioners,

v.

CITY OF SEATTLE,

Respondent.

Case No. 14-3-0009

FINAL DECISION AND ORDER

SYNOPSIS

Petitioners challenge the adoption of an ordinance rezoning land within the City of Seattle's North Rainier Hub Urban Village, amending the Official land Use Map, implementing affordable housing and open space bonus provisions, and adopting development standards. The Board concludes Petitioners failed to demonstrate the action of the City violated RCW 36.70A.020, RCW 36.70A.040, RCW 36.70A.070, RCW 36.70A.120, or RCW 36.70A.130(1)(d). The appeal is denied and the case is dismissed.

I. PROCEDURAL BACKGROUND

On September 2, 2014, Talis Abolins and Marla Steinhoff, husband and wife, filed a Petition for Review (PFR) challenging the City of Seattle's July 3, 2014, enactment of Ordinance No. 124513 (the Ordinance) amending the Land Use Map, rezoning land in the North Rainier Hub Urban Village, expanding the boundaries of the Mount Baker Station Area Overlay District, and implementing affordable housing and open space bonus provisions, development standards, and parking requirements. The Petition was assigned Case No. 14-3-0009.

Eleanore Baxendale, Assistant City Attorney, appeared for the City September 17, 2014. Petitioners are represented by Mr. Abolins, petitioner and attorney acting *pro se*. The

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City filed its Index of the Record October 2, 2014. The same day, Petitioners filed an amended PFR. A Prehearing Conference was held telephonically on October 6, 2014, at which the parties jointly requested a 30-day settlement extension. The Board granted the settlement extension in its Prehearing Order on October 14, 2014.

Petitioners filed a Second Amended PFR on October 13, 2014. On October 21, 2014, the City filed motions to extend the deadline for its Response Brief and to strike Issue 11. Petitioners responded to the City's motion on October 30, 2014, opposing only the motion to strike. The Board granted the motion to extend the deadline for the City's Response Brief and denied the motion to strike.

On November 6, 2014, the parties jointly moved to amend the case schedule to extend the due date for Motions to Supplement the Record. The Board Granted the Motion on November 7, extending deadlines for Response and Reply to Motions accordingly.

The City also filed Motions to Dismiss various issues set forth in the PFR on November 6, 2014. Petitioners responded in opposition on November 20, 2014 and the City replied November 26, 2014. The City's motions as to subject matter jurisdiction, participation standing, and GMA consistency requirements were denied.[1] Its motions to dismiss NR-P34 as inapplicable (dismissing Issue 2) and NR-P35, LU 212, LU215, and LU 216 as inapplicable (dismissing Issue 3 except as to LU 48 and LU 73) were granted.[2]

On November 13, 2014, Petitioners motion to extend the deadline for Motions to Supplement was granted[3] and Petitioners' motion to Supplement was received on November 17, 2014. The City responded November 19, 2014. The motion was granted in part and denied in part.[4]

The briefs and exhibits of the parties were then timely filed and are referenced in this order as follows:

- Petitioners' Brief on the Merits, December 30, 2014 (Petitioners' Prehearing Brief);

[1] Order On Motions (December 10, 2014) at 3-5, 8-11..
[2] *Id.* at 6-8.
[3] *Id.* at 1.
[4] *Id.* at 11-18.

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- City of Seattle's Prehearing Brief, January 14, 2015 (City Brief);
- Petitioners' Reply Brief, January 26, 2015 (Petitioners' Reply).

Due to scheduling conflicts involving the parties and the Board, the Hearing on the Merits (HOM) was rescheduled from January 30, 2014, to February 11, 2014. The HOM afforded the parties a chance to highlight the arguments presented in their briefs and to respond to questions from the Board.

II. PRESUMPTION OF VALIDITY, BURDEN OF PROOF, AND STANDARD OF REVIEW

Pursuant to RCW 36.70A.320(1), comprehensive plans and development regulations, and amendments to them, are presumed valid upon adoption.[5] This presumption creates a high threshold for challengers as the burden is on the petitioners to demonstrate that any action taken by the City is not in compliance with the GMA.[6]

The Board is charged with adjudicating GMA compliance and, when necessary, invalidating noncompliant plans and development regulations.[7] The scope of the Board's review is limited to determining whether a City has achieved compliance with the GMA only with respect to those issues presented in a timely petition for review.[8] The GMA directs that the Board, after full consideration of the petition, shall determine whether there is compliance with the requirements of the GMA.[9] The Board shall find compliance unless it determines that the City's action is clearly erroneous in view of the entire record before the Board and in light of the goals and requirements of the GMA.[10] In order to find the City's

[5] RCW 36.70A.320(1) provides: [Except for the shoreline element of a comprehensive plan and applicable development regulations] "comprehensive plans and development regulations, and amendments thereto, adopted under this chapter are presumed valid upon adoption."
[6] RCW 36.70A.320(2) provides: [Except when city or county is subject to a Determination of Invalidity] "the burden is on the petitioner to demonstrate that any action taken by a state agency, county, or city under this chapter is not in compliance with the requirements of this chapter."
[7] RCW 36.70A.280, RCW 36.70A.302.
[8] RCW 36.70A.290(1).
[9] RCW 36.70A.320(3).
[10] *Id*.

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action clearly erroneous, the Board must be "left with the firm and definite conviction that a mistake has been committed."[11]

In reviewing the planning decisions of cities and counties, the Board is instructed to recognize "the broad range of discretion that may be exercised by counties and cities" and to "grant deference to counties and cities in how they plan for growth."[12] However, the city's actions are not boundless; their actions must be consistent with the goals and requirements of the GMA.[13]

Thus, the burden is on Petitioners to overcome the presumption of validity and demonstrate that the challenged action taken by the City is clearly erroneous in light of the goals and requirements of the GMA.

III. BOARD JURISDICTION

The Board finds the Petition for Review was timely filed, pursuant to RCW 36.70A.290 (2). The Board finds the Petitioner has standing to appear before the Board, pursuant to RCW 36.70A.280(2)(a) and (b) and RCW 36.70A.210(6).[14] The Board finds it has jurisdiction over the remaining subject matter of the petition[15] pursuant to RCW 36.70A.280(1).

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[11] *City of Arlington v. CPSGMHB,* 162 Wn.2d 768, 778, 193 P.3d 1077 (2008)(Citing to *Dept. of Ecology v. PUD District No. 1 of Jefferson County,* 121 Wn.2d 179, 201, 849 P.2d 646 1993); See also, *Swinomish Tribe v. WWGMHB,* 161 Wn.2d 415, 423-24, 166 P.3d 1198 (2007); *Lewis County v. WWGMHB,* 157 Wn.2d 488, 497-98, 139 P.3d 1096 (2006).

[12] RCW 36.70A.3201 provides, in relevant part: "In recognition of the broad range of discretion that may be exercised by counties and cities consistent with the requirements of this chapter, the legislature intends for the boards to grant deference to counties and cities in how they plan for growth, consistent with the requirements and goals of this chapter. Local comprehensive plans and development regulations require counties and cities to balance priorities and options for action in full consideration of local circumstances. The legislature finds that while this chapter requires local planning to take place within a framework of state goals and requirements, the ultimate burden and responsibility for planning, harmonizing the planning goals of this chapter, and implementing a county's or city's future rests with that community."

[13] *King County v. CPSGMHB,* 142 Wn.2d 543, 561, 14 P.2d 133 (2000) (Local discretion is bounded by the goals and requirements of the GMA). See also, *Swinomish,* 161 Wn.2d at 423-24. In *Swinomish,* as to the degree of deference to be granted under the clearly erroneous standard, the Supreme Court has stated: The amount [of deference] is neither unlimited nor does it approximate a rubber stamp. It requires the Board to give the [jurisdiction's] actions a "critical review" and is a "more intense standard of review" than the arbitrary and capricious standard. *Id.* at 435, n.8.

[14] Except for Legal Issue 3, view protection, as set forth below.

[15] See n. 2 and discussion *supra* regarding partial dismissal in Issues 2 and 3.

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IV. PRELIMINARY MATTERS

A typographical error, noted at the prehearing conference but not corrected in the Prehearing Order is noted in the prefatory note to the issue statements. RCW 36.70A.040(5) refers to counties other than King. The corrected reference is RCW 36.70A.040(3).[16]

As noted *supra*, Petitioners' Issue 2 and Issue 3 as it pertained to inapplicable code policies (NR-P35, LU 212, LU215, and LU 216) were dismissed.[17] In the Petitioners' prehearing brief, Petitioners' reorganize and consolidate their arguments in a generally helpful way. However, Issue 6[18] was omitted and not briefed. Pursuant to WAC 242-03-590(1),[19] Issue 6 is deemed abandoned and will not be considered further.

With its Response Brief, the City moved to supplement the record with rebuttal documents. At the HOM, the Board ruled orally to admit these documents as Exhibits 75-80 pursuant to WAC 2242-03-565(1).[20]

Prior to the HOM, Petitioner Abolins shared his PowerPoint presentation with the City and the Board. Hearing no objection from the City, paper copies of the PowerPoint presentation were allowed as an illustrative exhibit pursuant to WAC 242-03-610.

V. ISSUES AND DISCUSSION

Petitioners advance eleven legal issues in the Petition for Review.[21] In Petitioners' briefs, those issues are discussed under four general allegations of non-compliance pertaining to (1) open space opportunities; (2) preservation of views; (3) inconsistency with

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[16] Prehearing Order And Order Granting Settlement Extension (October 14, 2015) at 2; Second Amended Petition For Review (October 10, 2014) at 1.
[17] Order On Motions (December 10, 2014) at 6-8.
[18] *See* Appendix A; Prehearing Order And Order Granting Settlement Extension (October 14, 2015) at 3; Second Amended Petition For Review (October 10, 2014) at 2.
[19] WAC 242-03-590 reads, in pertinent part:

> (1) A petitioner, or a moving party when a motion has been filed, shall submit a brief addressing each legal issue it expects the board to determine. Failure by such a party to brief an issue shall constitute abandonment of the unbriefed issue.

[20] WAC 242-03-565(1) reads, in pertinent part, "The Board may allow a later motion for supplementation on rebuttal. . . ."
[21] *See* Appendix A to this Order.

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the City's Capital Improvement Plan (CIP) regarding provision of open space; and (4) failure to coordinate with other entities, including Franklin High School officials.

To facilitate its decision, the Board organizes its discussion as follows:

A. Background

B. Open Space needs of a Hub Urban Village

C. View preservation

D. Concurrency of Capital Facilities Planning

E. Coordination with other Entities

Petitioners ask whether the City violated RCW 36.70A.020(1), (9), (10), (12) and (13) (Planning Goals to guide development and adoption of development regulations)[22]; RCW 36.70A.040(3) (city development regulations must implement comprehensive plans); RCW 36.70A.070 (requiring land use map consistency with Comprehensive Plan); RCW 36.70A.120 (each city shall perform activities and make capital budget decisions in conformity with its comprehensive plan);[23] RCW 36.70A.130(1)(d) (development regulation amendments shall be consistent with and implement the comprehensive plan); and RCW 36.70A.320(3) (city actions must not be clearly erroneous in light of the GMA goals and

[22] RCW 36. 70A.020 reads, in relevant part:

> The following goals are adopted to guide the development and adoption of comprehensive plans and development regulations of those counties and cities that are required or choose to plan under RCW 36.70A.040. The following goals are not listed in order of priority and shall be used exclusively for the purpose of guiding the development of comprehensive plans and development regulations:
>
> (1) Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner. . .
>
> (9) Open space and recreation. Retain open space, enhance recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities. . . .
>
> (10) Environment. Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water. . . .
>
> (12) Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards. . . .
>
> (13) Historic preservation. Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance.

[23] RCW 36. 70A.120 reads: "Each county and city that is required or chooses to plan under RCW 36.70A.040 shall perform its activities and make capital budget decisions in conformity with its comprehensive plan."

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requirements), as detailed more specifically [in the eleven issue statements in appendix A]?[24]

A. Background

The City of Seattle has two decades of pioneering experience in planning for urban density under GMA using the "urban village strategy," an approach that directs most new household and employment growth into places the Plan designates as either urban centers or urban villages.[25] Both urban centers and urban villages are expected to take both job and housing growth, but the growth planned for urban villages is to be at lower densities than the urban centers.[26] Within the category of "urban village," the City distinguishes between Hub Urban Villages and Residential Urban Villages, with the latter centered around smaller business districts that are expected to experience primarily residential growth.[27]

The urban village strategy is a recent innovation nationally. Further, the GMA establishes over-arching goals but leaves much to local discretion. Thus, there have been numerous Board cases involving the inter-relationship of neighborhood plans, the comprehensive plan (particularly the land use, neighborhood planning, and capital facilities elements) and capital facilities financing plans.[28]

In the *West Seattle Defense Fund v. City of Seattle (WSDF I)*, the Board found that the City had violated RCW 36.70A.070 because:

> … the City has not conducted sufficient analysis regarding the effects on existing capital facilities of distributing a large portion of anticipated growth into Seattle's urban centers and villages. Unlike a generalized land-use policy, Seattle's Plan contains a substantial localized focus on a relatively small portion of the city. The Plan distributes 45 percent of projected population and 65 percent of projected employment growth into urban centers, which comprise only six percent of the city's total acreage. This has

[24] Overarching issue statement containing Petitioners' references to statutory violations; *See* Second Amended PFR (October 10, 2014) at 1; Order on Motions to Strike and Revise Case Schedule (October 30, 2014) at 2-3.
[25] Ex. 53: Seattle Comprehensive Plan, Readers' Guide, Introduction at 3.
[26] *Id*.
[27] *Id.* at 4.
[28] *See, e.g*. *WSDF* I, GMHB 94-3-0016, FDO (April 4, 1995); *WSDF II*, GMHB 95-3-0040, FDO (September 11, 1995); *WSDF III*, GMHB 95-3-0073, FDO (April 2, 1996); *WSDF IV*, GMHB 96-3-0033, FDO (March 24, 1997).

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> significant implications on the amount of analysis required for the capital facilities element of the Plan. The Plan does not contain the required analysis.[29]
>
> RCW 36.70A.070(3)(b) requires a forecast of "future needs" for such existing capital facilities. WSDF challenges the City for failing to adequately conduct this analysis and the Board agrees. The Plan simply indicates that the City is already well-built and that the basic infrastructure to serve the current population and the small amount of projected population increase in the next six years already exists. . . Part C also incorporates by reference the CIP. Although the City's conclusion may prove to be accurate, the Plan currently lacks the requisite analysis to verify this.[30]

At about the same time, the Board in *Gig Harbor* looked to the Act's planning goals and determined that park facilities are among the facilities for which the City must plan:

> The GMA's planning goals at RCW 36.70A.020(1) and (9), coupled with that at subsection (12), require the County to provide for adequate parks. However, the County has full discretion in deciding what level of service is adequate, and when, where and how parks will be developed. Because the County has established minimum level-of-service standards for its parks and addressed the need to develop additional parks in the Plan, it has complied with planning goals 1 and 9 of the Act.[31]

Later, in *WSDF IV*, the Board noted that the City of Seattle has a unique neighborhood planning program. In effect, the City has delegated the initial preparation of neighborhood plans, which include capital facilities, utilities, transportation and land use to the neighborhoods themselves, giving the neighborhoods substantial scope so long as required growth is accommodated. However,

> [t]he ultimate decision-makers in land use matters under the GMA are the elected officials of cities and counties, not neighborhood activists or neighborhood organizations. Citizens provide input to the land use decision-making process, but "citizens do not decide."[32]

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[29] *WSDF IV* at 14 (citing *WSDF I* at 50-51).
[30] *WSDF I v. Seattle,* GMHB 94-3-0016, FDO (April 4, 1995), at 35.
[31] *Gig Harbor v. Pierce County*, GMHB 95-3-0016, FDO (October 31, 1995) at 14.
[32] *WSDF IV* at 12; *See Benaroya v. Redmond*, GMHB 95-3-0072, FDO (March 25, 1996) at 22; ~~and~~ *WSDF III v. Seattle*, GMHB 95-3-0073, FDO (April 2, 1996) at 24.~~)~~

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Therefore, the Board found that

> . . . any provision or policy of a neighborhood plan that purports to guide land use decision-making (including subarea or neighborhood plans, including land use, capital facility and transportation planning) **must be incorporated into the jurisdiction's comprehensive plan** to be implemented pursuant to Chapter 36.70A RCW. Conversely, provisions or policies of a neighborhood plan or program that will not be used to guide land use decision-making, and therefore not be implemented pursuant to Chapter 36.70A RCW, need not be incorporated into a jurisdiction's comprehensive plan.[33] **Emphasis added.**

The Neighborhood Planning Element of the City's comprehensive plan explains how Seattle chose to integrate neighborhood planning:

> In early 2000, the City concluded a five-year neighborhood planning process. The City took three actions in response to each plan produced in this process. From each plan a set of neighborhood specific goals and policies were adopted into the Comprehensive Plan. These goals and policies constitute the "adopted" neighborhood plans. The City also approved by resolution a work-plan matrix indicating the intent of the City concerning the implementation of specific recommendations from each neighborhood plan. Finally, the City recognized by resolution that each plan, as submitted to the City, constitutes the continuing vision and desires of the community. The recognized neighborhood plans, however, have not been adopted as City policy.[34]

In summary, then, sub-area planning for high density neighborhoods requires that the specific boundaries of the neighborhood be designated, and that an inventory and needs analysis based on population projections be used to determine capital facilities needs, including parks. This work need not be adopted into the City plan, but must be done to lay the public participation groundwork and to support of the adequacy of the plan. Much planning may be delegated to the neighborhood itself, but eventually the City Council must adopt into its Comprehensive Plan those portions of the neighborhood plans that purport to guide land use planning. It is these adopted policies that are given effect by development regulations and must be consistent with other Plan provisions, including the Capital

[33] *WSDF IV* at 11.
[34] Ex. 53: Seattle Comprehensive Plan, Neighborhood Planning Element, A. Introduction, discussion at 8.3.

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Facilities Element. While the City has responsibility to conduct inventory and needs analyses and to substantiate the sufficiency of its capital facilities plan, it retains discretion to decide what its level of service standards will be. Once articulated, those standards and the resulting needs assessment must be addressed consistently in the capital facilities financing plan, here Seattle's Capital Improvement Plan (CIP).

In that context, the Board evaluates the various documents related to planning for the community variously referred to as North Rainer, Mount Baker, and the McClellan Station – planning that stretches back decades and more, and encompasses an exemplary, in the Board's view, exchange between the community and City planners.

The more recent efforts leading up to the challenged Ordinance began with the North Rainier Neighborhood Plan (February 1999).[35] The City's 2005 Comprehensive Plan update designated the area as an urban village. After a lengthy public process, the North Rainier Neighborhood Plan was again updated in January 2010 to designate the area as a **Hub Urban Village**[36] in anticipation of light rail service to the Mount Baker Town Center, which began in 2010.[37]

Later that year, the Seattle Planning Commission[38] issued a *Seattle Transit Communities* report containing recommendations for transit hubs in different types of communities, including mixed use neighborhoods, along with specific funding and implementation strategies. The Commission noted that:

> . . . the success of Transit Communities requires three integral components: investment in transit; appropriate zoning for focused, higher density

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[35] Ex. 27: *MOUNT BAKER TOWN CENTER Urban Design Framework* (October 2011) at 4.
[36] Petitioners' Prehearing Brief at 12, Ex. 53: Seattle's Comprehensive Plan, Urban Village Element, Urban Village Figure 1 at 1.8.
[37] Ex. 1, Fiscal Note at 2.
[38] Ex. 64, *Seattle Transit Communities*, *Integrating Neighborhoods with Transit – A report from the Seattle Planning Commission* (November 2010) at 2 states:

> The Planning Commission is comprised of 16 volunteer members appointed by the Mayor and the City Council, is the steward of the Seattle Comprehensive Plan. In this role, the Commission advises the Mayor, City Council, and City departments on broad planning goals, policies, and plans for the development of Seattle.

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> development; and necessary investment in the essential components for livability.[39]

Addressing the problem of funding of necessary facilities and infrastructure, "such as parks, open space, libraries, sidewalks, plazas, pedestrian improvements and lighting," the Planning Commission report emphasizes, that "[w]ithout the essential components, urban life becomes unattractive and inhospitable."[40] Key actions identified as necessary to maximize the transit investment include implementing the neighborhood plan update by improving and expanding connections to the Mount Baker Station and the planned Rainier Station; in particular:

> . . . improve pedestrian connections to Franklin High School, Somali Community Services, Seattle Lighthouse for the Blind, and the residential Mt. Baker neighborhood to the east. Improve connections to and usability of the Cheasty Greenspace.[41]

The next step came with the Department of Planning and Development (DPD) 2011 Mount Baker Town Center Urban Design Framework.[42] The stated purpose of the Urban Design Framework is:

> . . . to guide the future work and investment of the community, developers and the City to make [the] vision [of the North Rainier Neighborhood Plan (February 1999)] a reality. It identifies the existing conditions and specific planning and design strategies necessary to achieve the community's vision.[43]

The Urban Design Framework contains numerous specific recommendations[44] and projected timelines.[45] Under the chapter headed IMPLEMENTATION, the Urban Design

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[39] *Id.* at 32.
[40] Ex. 64: *Seattle Transit Communities, Integrating Neighborhoods with Transit – A report from the Seattle Planning Commission* (November 2010) at 32.
[41] *Id.* at 48.
[42] Ex. 27: *MOUNT BAKER TOWN CENTER Urban Design Framework (*October 2011) at 4.
[43] *Id.*
[44] *See, e.g.*, Ex. 27 at 16:

> Provide bicycle infrastructure … Make sidewalk network complete and safe … Use mid-block crossings to … break down the scale of large blocks. Insert mid-block pathways as large blocks are redeveloped … Increase pedestrian connections ... at S. Lander Street and S. Hanford Street.

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Framework specifically anticipates the issuance of the DPD's Director's Analysis and Recommendation as the source of "a detailed description and analysis of rezoned recommendations."[46]

Subsequently, the DPD issued the Director's Analysis and Recommendation on North Rainier/Mount Baker Town Center Rezone Proposal,[47] which the Ordinance also describes as preliminary to the adoption of the Ordinance.[48]

The Director's Analysis states that the DPD recommended the rezones, amendments to development standards, and incentive zoning "to implement the goals and policies of the recent North Rainier Neighborhood Plan Update to develop a vibrant neighborhood core that concentrates housing, employment, commercial uses and services . . . well served by a range of comfortable and convenient travel options," concluding "[t]he proposed zoning fully supports the Goals and Policies of the North Rainier Neighborhood Plan."[49] A stated goal of the rezone was to "create a walkable town center around the Mount Baker light rail station" within the North Rainier Hub Urban village.[50]

Although the challenged Ordinance makes no amendments to Seattle's Comprehensive Plan, it specifically references the updates to the North Rainier Neighborhood vision and plan and Urban Design Framework[51] as foundational to the rezone process.

The area of the rezone is approximately eight blocks north and east of the Mount Baker Light Rail station – blocks now developed with one- and two-story commercial

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> Streetscape recommendations focus on the three arterial streets – Rainier Avenue S. MLK Jr. Way S. and S. McClellan Street. The street scape concepts … align with the "Bowtie Traffic Concept". . . .

[45] Ex. 27 at 29-30.
[46] *Id.* at 24.
[47] Ex. 3.
[48] Ex. 2 at 2.
[49] Ex. 3, at 14, 16-17.
[50] Ex. 1 at 1.
[51] Ex. 27: *MOUNT BAKER TOWN CENTER Urban Design Framework* (October 2011) at 4 reads:

> The purpose of this Urban Design Framework is to guide the future work and investment of the community, developers and the City to make [the North Rainier Neighborhood Plan, January 2010] vision a reality. It identifies the existing conditions and specific planning and design strategies necessary to achieve the community's vision.

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buildings and parking lots. The rezone allows higher intensity Seattle Mixed zoning, changes multifamily zoning designations, and increases heights on specific blocks to 65, 85, or 125 feet. The Ordinance applies incentive zoning provisions for affordable housing and open space amenities to residential developments in order to allow for more housing units and foster job growth,[52] and to "encourage future development that strengthens the neighborhood's core . . . [and] supports the neighborhood's pedestrian environment"[53]. . . "as redevelopment occurs."[54] New development regulations include street-level uses and development standards, upper-level setbacks, landscaping standards, and parking and access regulations.[55]

The 13-acre property now occupied by Lowe's a block from the light rail station is viewed as a special redevelopment opportunity and rezoned to the 125-foot maximum, assuming use of incentive zoning provisions. The 2010 Neighborhood Plan envisioned a major public open space bisecting this property.[56] The Urban Design Framework recommended: "Use mid-block crossings to … break down the scale of large blocks. Insert mid-block pathways as large blocks are redeveloped."[57] The Ordinance requires that the Lowe's parcel be opened up with 60-foot wide internal passages that may be developed as two-lane roads and parking.

Petitioners challenge the Ordinance's allowance of substantially increased development without adequate provision for either public open space at the heart of the neighborhood or protection of the "ring of green" beyond the up-zoned area.

B. Open Space needs of a Hub Urban Village (Issue 1 and 11) *[Issue Two was dismissed.]*

Petitioners' General Issue 1: Did the rezone violate NR-P33 of the neighborhood Planning Element because it failed to preserve, protect or provide opportunities for the design of

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[52] Ex. 1, Fiscal Note at 1.
[53] Ex. 3, Director's Analysis at 3.
[54] *Id.* at 11.
[55] Ex. 2
[56] 2010 Neighborhood Plan, maps on pp. 13-15.
[57] Ex. 27, at 16

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parks and open spaces to accommodate users of diverse ages, interests and cultures within the Town Center rezone area (Issues 1 and 11)?

Issue One: Is the Ordinance inconsistent with **NR**-P33 [North Rainier Policy 33] of the City's Comprehensive Plan because it does not preserve, protect or provide opportunities for the design of parks and open spaces and programming to accommodate users of diverse ages, interests and cultures within the Town Center rezone area?

Issue 11: Is the Ordinance inconsistent with **NR**-G13 and **NR**-G14 [North Rainier Goals 13 and 14] of the City's Comprehensive Plan because it fails to consider, protect or provide opportunities for reclamation and development of Cheasty Boulevard and Greenbelt, and the 1909 Olmsted Parks and Boulevards Plan?

> **NR**-P33 Design parks and open spaces and programming to accommodate users of diverse ages, interests and cultures.[58]
>
> **NR**-G13 Cheasty Boulevard and Greenbelt has been reclaimed and developed in a manner consistent with the 1909 Olmsted Parks and Boulevards Plan.[59]
>
> **NR**-G14 A "ring of green" surrounding the urban village with strong connections to the greenbelts, boulevards and parks, augmented with a hierarchy of open spaces.[60]

Applicable Law

> **RCW36.70A.040(3)** (city development regulations must implement comprehensive plans)
>
> (d) if the county has a population of fifty thousand or more, the county and each city located within the county shall adopt a comprehensive plan under this chapter and development regulations that are consistent with and implement the comprehensive plan. . . .

[58] Ex. 53: Seattle Comprehensive Plan, B-21 North Rainier Neighborhood Plan, Open Space Policies at 8.132
[59] *Id.* at 8.131.
[60] *Id.*

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RCW 36.70A.130 Comprehensive plans — Review procedures and schedules — Amendments.

(1)(d) Any amendment of or revision to a comprehensive land use plan shall conform to this chapter. Any amendment of or revision to development regulations shall be consistent with and implement the comprehensive plan.

RCW 36.70A.020 (Planning Goals to guide development and adoption of development regulations)

The following goals are adopted to guide the development and adoption of comprehensive plans and development regulations of those counties and cities that are required or choose to plan under RCW 36.70A.040. The following goals are not listed in order of priority and shall be used exclusively for the purpose of guiding the development of comprehensive plans and development regulations:

(1) Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner. . .

(9) Open space and recreation. Retain open space, enhance recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities. . .

(10) Environment. Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water. . .

(12) Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards. . . .

(13) Historic preservation. Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.

RCW 36.70A.320(3) (city actions must not be clearly erroneous in light of the GMA goals and requirements)

Preserving Open Space

Positions of the Parties

Asserting that the North Rainier Neighborhood Plan "governs" the North Rainier Hub Urban Village, Petitioners allege that the Ordinance "violates" **NR**-P33[61] because it "failed to preserve, protect or provide opportunity for the design of parks and open spaces to accommodate users of diverse ages, interests and cultures within the Town Center rezone area.[62]

Petitioners point to a section of the Framework entitled "Open Space and Gateways" which describe the existing open space system as a "'ring of green; surrounding the Town Center – the Cheasty Greenbelt, the Olmsted Boulevards and the slopes along the east side of MLK Jr. Way S." This section also highlights the conclusion of the Gap Report: "Of the Southeast Sector's five urban villages, the North Rainier Hub Urban Village has the largest gaps in Usable Open Space. . . ."[63] Citing numerous Plan policies not cited in the PFR, Petitioners assert that the City is required to insure that the new development regulations "achieve public benefits to mitigate impacts of high density development," but that the incentive zoning provisions in the Ordinance have the opposite effect by providing more density than mitigation.[64]

The Framework includes specific recommendations, including:

- **Create new open space in the Core.** Use new developments and public improvements to increase green space within the Town Center. *Redevelopment of the 13-acre Lowe's site, the largest opportunity site, should include an open space and pathways system that can break down this large block into a more pedestrian friendly form.*

The City argues that the North Rainier Hub Urban Village already exceeds the Comprehensive Plan's goals for park acreage per household such that, even though the rezone increases the village's overall development capacity from 7,279 to 7,914 housing

[61] Ex. 53: Seattle Comprehensive Plan, Neighborhood Planning Element, B-21 North Rainier, open space policies at 8.131.
[62] Petitioners' Prehearing Brief at 13.
[63] Ex.27 at 20.
[64] Petitioners' Prehearing Brief at 7-8, 14.

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units,[65] there will still be more than enough open space per household.[66] Further, the Parks Department has property "landbanked" for a new park at 35th and Charleston (seven or eight blocks south of the transit station and Hub) that it hopes to develop under the new Park District levy.[67] The City alludes to the needs of "other denser, faster growing areas that are still under-performing on the park acreage per household goal" as competing for prioritization in the department's Capital Facilities planning.[68] Nevertheless, it concedes that the North Rainier Hub does not meet the comprehensive plan goal of having a 10,000 sq. ft. park within 1/8 mile **of each residential unit**.

Further, according to the City, any parcel could, theoretically, become a park someday, thus preserving "park opportunities" throughout the rezone.[69]

Board Discussion

Petitioners and Respondents urge the Board to start its analysis with significantly different understandings of both the present day and future adequacy of Open Space in the North Rainier Neighborhood. As discussed in the Background section *supra*, Seattle has heeded prior decisions requiring an inventory and needs analysis for capital facilities. Seattle divides open spaces into three relevant categories:

1. Usable Open Space: Within the boundaries of a hub urban village, Seattle's 2005 Comprehensive Plan calls for one acre of Village Open Space per 1,000 households. Useable open space must be "relatively level and open, easily accessible, primarily green available for drop-in use."[70] The spaces must be a minimum of ¼ acre in size and be developed as a usable park space. Space on public school or college grounds does not qualify. Similarly, boulevards without park amenities, undeveloped greenbelts, and natural

[65] Ex. 3, Director's Analysis at 13. This estimate is nearly twice the estimated 362 unit/20 years anticipated by the Framework. *See* Ex. 27 at 27.
[66] City's Prehearing Brief at 2.
[67] *Id.*; City's comments at HOM.
[68] City's Prehearing Brief at 2-3.
[69] *Id.* at 10.
[70] Ex. 58: *An Assessment of Gaps in Seattle's Open Space Network: The 2011 Gap Report Update* (May 13, 2011) at 2, 7-8.

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areas do not qualify.[71] The City's useable open space goals are **distribution based**, meaning that adequacy is not evaluated city-wide. Useable open space must be located within 1/8 mile of the hub urban village.[72]

2. Breathing Room Open Space: This category includes all types of open space, including natural areas and golf courses, but does not include public school or college grounds or Parks Department property that is either undeveloped or built out without open space amenities (such as pools, administrative facilities, and maintenance facilities). The City defines a two-level goal:

a. *Desirable:* 1 acre per 100 residents

b. *Acceptable*: 1/3 acre per 100 residents[73]

3. Village Commons: For Hub Urban Villages, Seattle's 2005 Comprehensive Plan identifies the goal of "at least one Usable Open Space of at least one acre in size" located within the boundaries of the urban village and not separated from the urban village by difficult terrain or a major arterial.[74]

Applying the comprehensive plan goals city-wide, the 2011 Gap Report Update finds the Breathing Room Open Space goal for available acreage is met at both the desirable and acceptable levels.[75] Further, the acreage goals for Village Commons are met.[76] The report states that all the urban villages have sufficient Usable Open Space, but contradicts itself on the same page by stating **"the North Rainer Hub Urban Village has the largest gaps in Usable Open Space with over half of the Urban Village located farther than 1/8 of a mile from park sites.**" The Board fails to see how the Hub Urban Village can have sufficient useable open space if the space that is being counted is too far away to qualify as useable. In fact, the area being up-zoned for highest density appears to be furthest from existing parks. This situation is made worse by the fact that existing open spaces are separated from

[71] *Id.* at 2, 5-6.
[72] *Id.* at 8-9.
[73] *Id.* at 6.
[74] *Id.* at 10.
[75] *Id.* at 6.
[76] *Id.* at 51.

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the urban Hub by two high-volume arterials, each carrying over 30,000 vehicle trips daily,[77] with inadequate pedestrian crossings. In one block of the upzoned Hub along Martin Luther King Jr. Way, there is not even a sidewalk.

In its report, *Mount Baker Station Area Open Space Nexus Analysis*, the DPD recommended increasing the allowed structure height to provide incentive zoning programs that help provide affordable housing and other amenities. DPD notes that **open space has been identified as a priority amenity in the North Rainier Hub Urban Village** and evaluates the current availability and deficits in open space, emphasizing that the City's Comprehensive Plan "affirms the importance of a variety of open space opportunities."[78]

As with the 2011 Open Space Gap Report Update, the Nexus Analysis notes that the North Rainier Hub Urban Village has sufficient open space to meet population-based goals, but that the space is predominantly comprised of a few large parks located on the edge of the Hub Urban Village and a significant distance from the Station Area. None of the parks is located in the Station Area.

> The North Rainier Hub Urban Village is a particularly large and linear urban village compared with other urban villages, so it is likely appropriate to consider the Station Area as well as the Urban Village. If the Station Area were used as the unit for calculating residential population-based goals, it would not meet these goals as there are no parks within the station area . . . Martin Luther King Jr. Memorial Park is not immediately accessible to the Station Area given that it is geographically separated from the Station area by a large arterial street and a substantial grade change.[79]

Addressing the Breathing Room Goals, the report notes that the Comprehensive Plan doesn't provide breathing room goals for local areas, so that it is not appropriate to apply this standard to the Mount Baker Station Area, yet it notes that thoughtfully-planned open space will be critical to the success of a pedestrian-friendly transit hub at this location:

> The environment is very uninviting to pedestrians as there are very few areas to rest or relax. In order to maximize the investment of the light rail station in

[77] Petitioners' Prehearing Brief at 2.
[78] Ex. 59: *Mount Baker Station Area Open Space Nexus Analysis* (December 5, 2012) at 1.
[79] *Id.* at 2.

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> this area, it will [be] very important to develop more open space opportunities that can help to make this area a more pleasant place for pedestrians. Small, local open space opportunities will be especially important since the large roads and auto-oriented environment discourage walking.
>
> Overall, this analysis suggests there is a substantial existing open space need within the Mount Baker Station Area that would justify allowing public open space amenities to count toward incentive zoning.[80] The majority of the area does not appear to meet distribution standards and the population-based standard is not met within the Station Area. Martin Luther King Jr. Memorial [Park] represents the only major amenity for the area and is separated by substantial barriers which make it unlikely to be used on a regular basis by users of the Station Area. Additionally, the large roads and auto-oriented environment create a very inhospitable situation for pedestrians which could be someone [sic] meliorated [sic] by the presence of open space.[81]

The City cannot have it both ways. Either there is a lack of open space that justifies incentive zoning provisions, or there is plenty of open space such that provisions incentivizing developers to provide public open space are not appropriate.

The Board finds the City's extensive inventory, needs analysis, and planning documents amply demonstrate that the current level of useable open space in the North Rainier Hub Urban Village is inadequate to satisfy its distribution-based goals. The question then becomes whether adoption of the Ordinance makes this issue subject to review now, or whether it is a matter for the 2015 Plan update.

Consistency of Neighborhood Plans and Comprehensive Plan.

Positions of the Parties

Petitioners start by asserting that the City violated the requirements of RCW 36.70A.020,[82] requiring GMA planning goals to guide the adoption of development

[80] *Id.* at 5.
[81] *Id.* at 3-4.
[82] Planning Goals to guide development and adoption of development regulations.

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regulations, and RCW 36.70A.040(3)[83] and RCW 36.70A.130(1)(d),[84] requiring development regulations to be consistent with and implement the comprehensive plan.[85] Petitioners urge that planning documents, including the North Rainier Neighborhood Plan Update adopted in 2010, the Planning Commission's 2011 *Transit Oriented Communities* report,[86] the DPD's 2011 *Urban Design Framework*,[87] and the *Mount Baker Station Area Open Space Nexus Analysis*,[88]must be "read as a whole"[89] with the comprehensive plan. The implication is that failure to incorporate Department recommendations within the rezone has resulted in development regulations that are inconsistent with, or fail to implement, the comprehensive plan in violation of RCW 36.70A.130(1)(d). For the proposition that "inconsistency is not tolerated" between the comprehensive plan and neighborhood plans, Petitioners cite Comprehensive Plan policy N2, which reads:

> Maintain consistency between neighborhood plans and the Comprehensive Plan. In the event of an inconsistency between the comprehensive plan and a proposed neighborhood plan, **consider** either amendments to the comprehensive plan which are consistent with its core values, or amendments to the neighborhood plan. (**Emphasis added.**)

In support of their theory, Petitioners note that the Director's Analysis & Recommendation describes the Ordinance as "the product of a two-year neighborhood plan update process" and states the DPD recommends the rezone, amendments to development standards, and incentive zoning based on the 2011 *Urban Design Framework* "to carry out key actions identified by the community during the recent update of the North Rainier

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[83] RCW 36.70A.040(3)(d): "… each city … shall adopt a comprehensive plan under this chapter and development regulations that are consistent with and implement the comprehensive plan …"
[84] RCW 36.70A.130(1)(d) reads:
> Any amendment of or revision to a comprehensive land use plan shall conform to this chapter. Any amendment of or revision to development regulations shall be consistent with and implement the comprehensive plan.

[85] Petitioners' Prehearing Brief at 10.
[86] Ex. 64, *Seattle Transit Communities, Integrating Neighborhoods with Transit – A report from the Seattle Planning Commission* (November 2010).
[87] Ex. 27: *MOUNT BAKER TOWN CENTER Urban Design Framework* (October 2011).
[88] Ex. 59: *Mount Baker Station Area Open Space Nexus Analysis* (December 5, 2012).
[89] Petitioners' comments at the HOM.

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Neighborhood Plan 2011" and encourage future development that "strengthens the neighborhood's core" and "supports the neighborhood's pedestrian environment. . . . "[90]

The City responds that the Ordinance did not amend the City's Comprehensive Plan, but merely enacted development regulations. Although the Official Land Use Map was amended to rezone certain land and the Mount Baker Station Area Overlay District was expanded, it did not expressly amend the Comprehensive Plan's Future Land Use Map.[91] Under the provisions of its Land Use element,[92] the rezones in the Ordinance do not require amendments to the Future Land Use Map of the Comprehensive Plan, because they do not "significantly change" the function of the areas rezoned from the function shown on the Future Land Use Map. Thus allegations that the Ordinance creates a comprehensive plan inconsistency would be misplaced and untimely.

Further, the City argues that RCW 36.70A.040(3) and RCW 36.70A.130(1)(d) are only applicable to those policies of the North Rainier Neighborhood Plan that have been adopted into the comprehensive plan. Therefore, the Ordinance need not be consistent with the Framework and other documents, because they "are not the Comprehensive Plan."[93]

Secondly, the City asserts that "there is no requirement in the Comprehensive Plan or GMA that the City must do all the possible actions identified in the adopted Neighborhood Plan concurrently with Ordinances adopting development regulations."[94] Instead, the City argues that consistency requires only that the regulations advance **at least one goal of the Comprehensive Plan**,[95] and it is only noncompliant if it thwarts[96] a comprehensive plan

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[90] Ex. 3; Director's Analysis & Recommendation at 3; Petitioners' Prehearing Brief at 3.
[91] City's Prehearing Brief at 15; Ex. 51: Ordinance at 2.
[92] City cites LU2, LU3, LU4.
[93] City's response at the HOM.
[94] City's response at the HOM.
[95] City's response at the HOM; *See* City's Prehearing Brief at 7-8 (citing *Koontz Coalition v. Seattle*, GMHB 14-3-0005 FDO (August 19, 2014) at 18-19; listing NR G1, NR G17, NR G19, and NR G20 as goals identified in Director's Analysis). The Board notes the City's assertions unduly stretch the *Koontz* ruling, in which the Board found petitioner failed to demonstrate the comprehensive plan policies it relied upon were thwarted, and the City showed other policies were weighed and balanced.
[96] City's Prehearing Brief at 7 (citing *Chevron U.S.A. Inc. v. Hearings Bd*., 123 Wn. App. 161, 93 P.3d 880, 2004 Wash. App. LEXIS 1129 (Div. I 2004).

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directive.[97] The City also puts considerable weight on the Director's Analysis which identifies goals other than NRP33 that the upzone supports and asserts GMA Goal 12[98] is not thwarted.

Board Discussion

The Board has previously held in *WSDF IV* that:

> Any provision or policy of a neighborhood plan that purports to guide land use decision-making (including subarea or neighborhood plans including land use, capital facilities and transportation planning) must be incorporated into the jurisdiction's comprehensive plan to be implemented pursuant to Chapter 36.70A RCW. Conversely, provisions or policies of a neighborhood plan or program that will not be used to guide land use decision-making, and therefore will not be implemented pursuant to Chapter 36.70A RCW, need not be incorporated into a jurisdiction's comprehensive plan.[99]

The *WSDF IV* decision was rendered at a time when some jurisdictions had adopted neighborhood or sub-area plans prior to adopting their comprehensive plans under GMA. Today, most jurisdictions adopt a neighborhood or sub-area plan as a further refinement of their comprehensive plan.[100] Seattle's extensive process for delegating the adoption of neighborhood plans to the community and then picking and choosing which policies will actually be implemented by adoption into the comprehensive plan is somewhat unusual. It is not surprising that some in the community may believe that the neighborhood plans "meant more."

Nevertheless, **the Board finds** Seattle's process is within its legislative discretion.

As regards the *sufficiency* of open space, the City has thoroughly explored the amount, type, and kind of existing open space. The ample evidence suggests that satisfying

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[97] City's response at the HOM.

[98] RCW 36.70.020(12) says: "Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards."

[99] *WSDF IV,* FDO (March 24. 1997) at 11.

[100] *Laurelhurst Community Club v. City of Seattle*, GMHB 03-3-0008, Order on Motions (June 18, 2003) at 8, "subarea plans typically augment and amplify policies contained in the jurisdiction-wide comprehensive plan."

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comprehensive plan and neighborhood goals for the North Rainier Hub Urban Village will require development of more usable open space. The question of concurrency is discussed in section D below.

The Director's statement describes the Ordinance as "the product of a two-year neighborhood plan update process."[101] Given the many assertions in the Director's Analysis and the Ordinance itself declaring that the intent of this action was to advance neighborhood priorities and implement recommendations from the *Urban Design Framework*, it can come as no surprise that Petitioners expected more adherence to the key priorities of open space and pedestrian-friendly design identified in the Neighborhood Plan and Framework. The City's suggestion that Petitioners' expectations were a "fanciful inference" is almost disrespectful. That said, the Board must agree with the City that the GMA imposes no requirement that a comprehensive plan be consistent with those portions of neighborhood plans that have not been adopted into the comprehensive plan, as is the case with the North Rainier 2010 update, nor is a challenge to the internal consistency of the City's Comprehensive Plan timely absent any amendment to the comprehensive plan.

The Board finds that Petitioners' allegations of internal consistency within the City's comprehensive plan (RCW 36.70A.130 (1)(d)) is untimely. Therefore, the insufficiency of useable open space in the North Rainier Hub Urban Village to satisfy distribution-based goals is not subject to review at this time.

Consistency of Development Regulations with Adopted Comprehensive and Neighborhood Plan

The dispositive question, then, is whether development regulations that do not realize, or commit to realizing, the **adopted** comprehensive plan goals and policies for the North Rainier Neighborhood violate the consistency requirements of RCW 36.70A.040(3) and 36.70A.130(1)(d). Petitioners' Legal Issue 1 addresses the mid-block open-space on

[101] Ex. 3, Director's Analysis and Recommendations at 3.

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the Lowe's parcel. Legal Issue 11 addresses the "ring of green" at the exterior of the up-zoned area.

Mid-block Open Space on Lowe's Parcel

Petitioners' Legal Issue 1 asserts the rezoning violates NRP-33 by failing to "[d]esign parks and open spaces and programming to accommodate users of diverse ages, interests, and cultures." In contrast to the planning commission's *Transit Communities* goal statement that "open space areas near transit stations are essential components of livability,"[102] Petitioners observe that the Ordinance allows the mid-block open space corridor on the Lowe's parcel, which was to be a green open space and pathway system under the Framework,[103] to include a 2-lane vehicle access road with parking on its margins, plus landscaping and sidewalks.[104] Petitioners assert these shortcomings fail to implement comprehensive plan policies and goals in violation of RCW 36.70A.040(3) and RCW 36.70A.130(1)(d).[105]

There can be no doubt that a road with sidewalks is unlikely to function as a park, although it will likely be landscaped and provide a pedestrian/bicycle corridor. As these interior roadways will serve residents and visitors to four, 8-12 story buildings, this cannot qualify as usable public open space. Regrettably, Petitioners again face the problem that the specific expectations promoted within the *Urban Design Framework* have not been adopted into the City's comprehensive plan and so are not mandated to be included in this rezone. Further, Petitioners have not demonstrated the policy is thwarted by the upzone of the Lowe's parcel, as this may not be the only opportunity for usable open space development in the Mount Rainier Town Center.

The Board finds Petitioners have not met their burden to show that the development regulations are inconsistent with the City's Comprehensive Plan. Legal Issue 1 is dismissed.

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[102] Petitioners' Prehearing Brief at 14; *See* Ex. 64, *Seattle Transit Communities* at 17-18.
[103] Ex. 27: Urban Design Framework at 22, photo at 20.
[104] City's response at HOM.
[105] Petitioners Prehearing Brief at 10-15.

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"*Ring of Green"*

Petitioners' Legal Issue 11 asserts failure of the Ordinance to consider and protect the Cheasty Boulevard and Greenbelt and the 1909 Olmstead Parks and Boulevard Plans is inconsistent with adopted goals of the North Rainier plan. Petitioners contend the upzoned Hub violates NR-G13 including reclamation of Cheasty Boulevard and the Olmstead Plans[106] and NR-G-14 requiring urban village design with "strong connections" to the surrounding "ring of green."[107] The City asserts that development regulations are only inconsistent if they "thwart" the implementation of comprehensive plan policies[108] and that "goals" represent the results that the City hopes to realize over time, perhaps within the 20-year life of the Plan, and are not mandates.

> Plans provide policy direction to land use decision-making by providing guidance and direction to development regulations, which must be consistent with and implement the Comprehensive Plan. In turn, these development regulations govern the review and approval process for development permits.[109]

Here, the City's upzone of the Mount Baker Transit Station area did not extend to the Cheasty Greenbelt or the Olmstead Boulevards which lie beyond the more-intense redevelopment zone. Petitioners have not demonstrated comprehensive plan goals NRG-13 and NRG 14 will be thwarted by the additional development allowance.

The Board finds Petitioners have not met their burden to show that the Ordinance precludes implementation of comprehensive plan policies or attainment of plan goals.

Legal Issue 11 is dismissed.

C. View preservation (remaining part of Issue 3)

Petitioners' General Issue 3: Is the Ordinance Inconsistent with LU-48 because it fails to preserve and Enhance Important Views from the Town Center Rezone, Including Mount Rainier and the "Ring of Green" (Issue 3)?

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[106] NR G13.
[107] NR G14.
[108] City's Prehearing Brief at 7 (citing *Leenstra*).
[109] *Bremerton II v. Kitsap County*, GMHB 04-3-0009c, FDO (August 9, 2004), at 15.

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Is the Ordinance inconsistent with **LU**48 and **LU**73 of the City's Comprehensive Plan because the City failed to balance housing needs with the surrounding neighborhood character; failed to properly identify, preserve and enhance important open spaces, green spaces and views in or near the Town Center rezone area?

> **LU**48 Seek to preserve views through:
> • land use regulations that address view impacts with height, bulk, scale, view corridor and design review provisions;
> • zoning policy that considers the effect of zone designations on views, with special emphasis on protection of views related to shoreline areas; and
> • application of adopted environmental policy to protect public views, including views of mountains, major bodies of water, designated landmarks and the Downtown skyline, in review of development projects.[110]
>
> **LU**73 Balance the objective to increase opportunities for new housing development to ensure adequate housing for Seattle's residents with the equally important objective of ensuring that new development is compatible with neighborhood character.[111]
>
> **NR**G-18 Rainier Ave. S. is a highly functioning multimodal "complete street" that serves as the spine of the Rainier Valley and retains its existing vistas of Mount Rainier.[112]

Positions of the Parties

Petitioners assert that the City's enactment of the rezone was clearly erroneous because it failed to preserve views of Mount Rainier from Rainier Avenue and of the "ring of green" as required by the neighborhood plan[113] because "there was no deliberate effort to require setbacks needed to preserve the view . . . that the community wanted to preserve."

The City first submits Exhibits 20,[114] 24,[115] and 32[116] to support its assertion that Petitioners did not raise the view preservation issue with the Council and therefore lack

[110] Ex. 53: Seattle Comprehensive Plan, Land Use Element, A-2. Uses: views policy at 2.11
[111] Ex. 53: Seattle Comprehensive Plan, Land Use Element, B-2. Multifamily Residential Areas: policies at 2.16.
[112] Cited for the first time in Petitioners' PowerPoint at the HOM.
[113] Petitioners' Prehearing Brief.
[114] Ex. 20: Abolins' email to CM O'Brien and Harrell.
[115] Ex. 24: Petitioner Abolins' testimony to Council May 1, 2014, transcribed by Trudy Jaynes.
[116] Ex. 32: Petitioner Abolins' testimony to Council May 20, 2014, transcribed by Trudy Jaynes.

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participation standing. In reply, Petitioners cite the Board's previous denial of the City's motion to dismiss issues regarding protection of existing public facilities.[117]

Next the City suggests that one of the adopted neighborhood plan policies, **NR**-G18, "modifies" the general policy in **LU**48 requiring the City to "Seek to preserve views" such that the only view specifically protected in the comprehensive plan is the existing view of Mount Rainier from Rainier Avenue.[118]

The City also asserts that Petitioners have not cited evidence in the record showing that existing views will be impaired.

Board Discussion

Standing

The Board's Order on Motions addressed the issue of protection of public facilities. Petitioners have submitted no rebuttal evidence showing they raised the issue of views before the Council, nor have they argued for APA standing.

The Board finds Petitioners do not have standing to raise the issue of view preservation.

View obstruction

Standing aside, the Board officially notices the fact that Rainier Avenue S. runs directly toward Mount Rainier. Given that the Ordinance does not propose to locate building on the street itself, the view of the mountain from Rainier Avenue is protected as required by **NR**-G18.

It is likely that Petitioners' argument would fail for reasons similar to some previously discussed allegations: they seek to enforce comprehensive plan requirements that employ verbs such as "seek to" and "balance." Additionally, Petitioners have submitted no evidence that would allow the Board to determine which views the City has not sought to preserve, nor have Petitioners identified what statute they allege the City has violated.

[117] Order on Motions (December 10, 2014) at 4-5.
[118] City's Prehearing Brief at 12-14.

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The Board finds Petitioners have not carried their burden to prove the Ordinance fails to comply with GMA provisions.

Issue 3 is dismissed.

D. Concurrency of Capital Facilities Planning (Issues 4, 5, 7, 8, 9)
[Issue 6 is deemed abandoned][119]

Petitioners General Issue 4. The Ordinance violates the GMA and Comprehensive Plan because it fails to address the amount, types, and distribution of open space necessary to serve the dense growth targeted for the new Town Center (Issues 4,5,7,8, and 9).

Issue Four: Is the Ordinance and Capital Facilities Plan inconsistent with UV46, UV49, UV51 and UV53 of the Comprehensive Plan, RCW 36.70A.070(3) and (8) and WAC 365-196-415 because it neither analyzes nor strives to accomplish the open space standards identified in the Neighborhood Plan and Urban Village Appendix B for the amount, types, and distribution of open space necessary to serve the new Town Center residents, thereby defeating the express goals of **UV**3**, UV**G12, **UV**G15, **UV**G37, **UV**G39?

Issue Five: Is the Ordinance inconsistent with **UV**-2, **UV-**7.5 and **UV** 10.5 of the Comprehensive Plan because the City failed to consider, preserve or promote conditions necessary to support healthy Town Centers, including those conducive to helping mixed-use urban village communities thrive, such as a minimum range of park and open space facilities, and community food gardens to support access to healthful food for the dense areas within the Town Center?

Issue Seven: Is the Ordinance and Capital Improvement Plan inconsistent with **N**10**, N**11**, N**12**, N**13 **and N**14 of the Comprehensive Plan because the City failed to: (1) establish a firm and clear relationship between the City's budgeting processes and the adopted Neighborhood Plan; (2) demonstrate how the urban village strategy reflected in the Neighborhood Plan and related project documents shall be effectively carried out under the rezone Ordinance; and (3) properly consider and utilize the adopted North Rainier Neighborhood Plan goals, policies and work plan matrices to balance competing goals?

Issue Eight: Is the Ordinance (including its Fiscal Note) inconsistent with **CF**G4**, CF**G5**, CF**1**, CF**2**, CF**7**,** and **CF**8 of the Comprehensive Plan and the Capital Improvement Plan where the City failed to provide for the siting and design of open space and other required green features (including community gardens) in a manner that would allow them to be

[119] See Preliminary Matters, *supra.*

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considered assets to the Town Center community; and they fail to consider and encourage protection of City-owned historic facilities, including the Olmsted Boulevards, Cheasty Green Space, and Franklin High School, in light of the values and social equities reflected in the Neighborhood Plan?

Issue Nine: Is the Ordinance (including its Fiscal Note, and the City's related financial budgeting processes) and the Capital Investment Plan inconsistent with CF1, CF2, CF7, CF8, CF9, CF10, CF11 and CF-F[120] of the Comprehensive Plan where the City failed to properly consider, plan, preserve and provide opportunities for necessary open space, parks and playgrounds needed to bridge the recognized gaps in those facilities, and to create an incentive for public and private investment in and near the Town Center area?

Applicable Law

RCW 36.70A.070 reads, in pertinent part:

> (3) A capital facilities plan element consisting of: (a) An inventory of existing capital facilities owned by public entities, showing the locations and capacities of the capital facilities; (b) a forecast of the future needs for such capital facilities; (c) the proposed locations and capacities of expanded or new capital facilities; (d) at least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies sources of public money for such purposes; and (e) a requirement to reassess the land use element if probable funding falls short of meeting existing needs and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent. Park and recreation facilities shall be included in the capital facilities plan element. . .
>
> (8) A park and recreation element that implements, and is consistent with, the capital facilities plan element as it relates to park and recreation facilities. . . .

WAC 365-196-415 reads, in pertinent part:

> (1) Requirements. The capital facilities element of a comprehensive plan must contain at least the following features:
> (a) An inventory of existing capital facilities owned by public entities, also referred to as "public facilities," showing the locations and capacities of the capital facilities;

[120] There is no policy **CF**-F. Petitioners appear to be referring to a discussion section; *See* Ex. 53: Seattle's Comprehensive Plan, Capital Facilities Element, F. Consistency & Coordination at 5.8.

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(b) A forecast of the future needs for such capital facilities based on the land use element;
(c) The proposed locations and capacities of expanded or new capital facilities;
(d) At least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies sources of public money for such purposes; and
(e) A requirement to reassess the land use element if probable funding falls short of meeting existing needs and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent. Park and recreation facilities shall be included in the capital facilities plan element. . .

(3) Relationship between the capital facilities element and the land use element.
(a) Providing adequate public facilities is a component of the affirmative duty created by the act for counties and cities to accommodate the growth that is selected and allocated, to provide sufficient capacity of land suitable for development, and to permit urban densities.
(b) The needs for capital facilities should be dictated by the land use element. The future land use map designates sufficient land use densities and intensities to accommodate the population and employment that is selected and allocated. The land uses and assumed densities identified in the land use element determine the location and timing of the need for new or expanded facilities.

Does the City's comprehensive plan impose a duty to concurrently update the CIP?

Positions of the Parties

Petitioners assert that the Planning Commission stressed the City's obligation to coordinate the Comprehensive Plan Urban Village strategy with the Capital Improvement Plan (CIP) and other City capital investments, citing Exhibit 64, *Seattle Transit Communities* at 38,[121] and then "completely failed to plan for capital facility investment [sic] needed to overcome the worsening open space gaps created by its self-defeating and ineffective open space incentive formulas."[122] Asserting that, under RCW 36.70A.120,[123] the City was

[121] Petitioners attached portions of Ex. 64 to their Prehearing Brief, but not p. 38.
[122] Petitioners' Prehearing Brief at 9.

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required to perform its activities and make capital budget decisions in conformity with its comprehensive plan policies, and GMA planning goals,[124] Petitioners allege that Seattle violated RCW 36.70A.070(3), which requires the City to include a plan, scheme or design for park and recreation facilities within its capital facilities plan element.[125]

Petitioners allege that the City's Capital Facilities element mandates that the City's CIP must be "**concurrently** updated with the rezone to **proactively** accommodate the substantial density and growth"[126] because the discussion section, identified by Petitioners as **CF**-F, reads:

> Consistency & Coordination: discussion: As part of the City's CIP process, the City considers whether probable funding will be sufficient to meet the currently identified needs for new or expanded city capital facilities to accommodate planned growth. Should anticipated funding not materialize, or should new needs be identified for which no funding is determined to be probable, the City will reassess the land use element of this Plan to ensure that it is coordinated, and consistent, with this element, and in particular with the six-year finance plan. A review for coordination and consistency between this Element and the Land Use Element will be part of the City's annual budget review and Comprehensive Plan amendment processes.[127]

Petitioners cite numerous comprehensive plan policies and goals in support of their assertion that the City was obligated, at the least, to revise its CIP concurrent with the rezone to provide for the needed North Rainier usable open space. Most of the cited policies employ verbs like "consider,"[128] "promote,"[129] "encourage,"[130] "strive,"[131]

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[123] RCW 36.70A.120 **Planning activities and capital budget decisions — Implementation in conformity with comprehensive plan.**
Each county and city that is required or chooses to plan under RCW 36.70A.040 shall perform its activities and make capital budget decisions in conformity with its comprehensive plan.

[124] Petitioners' Prehearing Brief at 17; Order On Motions (December 10, 2014) at 8-10.

[125] Petitioners' Prehearing Brief at 16, 22.

[126] Petitioners' Prehearing Brief at 18. **Emphasis added.**

[127] There is no policy **CF**-F. Petitioners appear to be referring to a discussion section; See Exhibit 53: Seattle's Comprehensive Plan, Capital Facilities Element, F. Consistency & Coordination at 5.8.

[128] **UV**3. **UV**49, **UV**53, **N**6, **N**13, **N**14, **CF**2, **CF**7, **CF**8, **CF**9, **CF**11, **CF**-F.

[129] **UV**1, **UV**2, **UV**G12.

[130] **UV** 10.5, **CF**8, **CF**9.

[131] **UV** 46, **CF**1 (in part).

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"coordinate,"[132] "help balance,"[133] "explore,"[134] and "seek,"[135] but directive verbs such as "provide" and "establish" make a number of the cited policies obligatory:

> **N**10 Establish a firm and clear relationship between the City's budgeting processes and adopted neighborhood plans and, using the biennial budget, demonstrate how the urban village strategy is being carried out.
>
> **N**11 Assess as part of the City's budget process, neighborhood plan implementation needs and resources, taking into consideration the results of implementation activities for each area and public input into the budget process.[136]
>
> **CF**1 Plan capital investments strategically, in part by striving to give priority to areas experiencing or expecting the highest levels of residential and employment growth when making discretionary investments for new facilities. The City will use fiscal notes and policy analysis to assist in making informed capital investment choices to achieve the City's long-term goals.[137]
>
> **UV**G15 Provide parks and open space that are accessible to urban villages to enhance the livability of urban villages, to help shape the overall development pattern, and to enrich the character of each village.[138]
>
> **UV**G37 Provide safe and welcoming places for the people of Seattle to play, learn, contemplate, and build community. Provide healthy spaces for children and their families to play; for more passive activities such as strolling, sitting, viewing, picnicking, public gatherings, and enjoying the natural environment; and for active uses such as community gardening, competitive sports, and running.[139]
>
> **UV**G39 Enhance the urban village strategy through the provision of:
> 1. Amenities in more densely populated areas
> 2. Recreational opportunities for daytime populations in urban centers

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[132] **UV** 7.5.
[133] **N**12.
[134] **CF**8.
[135] **CF**10.
[136] But *see* N13 which reads in pertinent part "Consider recommendations from neighborhood plans in the context of Seattle as a whole." Ex. 53: Seattle's Comprehensive Plan, Neighborhood Planning Element, A. Introduction: neighborhood plan implementation policies at 8.5.
[137] Ex. 53: Seattle's Comprehensive Plan, Capital Facilities Element, A. Capital Facilities Policies: strategic capital investment policies at 5.3.
[138] Ex. 53: Seattle's Comprehensive Plan, Urban Village Element, A. Urban Village Strategy: policies at 1.5
[139] Ex. 53: Seattle's Comprehensive Plan, Urban Village Element, C. Open Space Network: goals at 1.25

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3. Mitigation of the impacts of large scale development
4. Increased opportunities to walk regularly to open spaces by providing them close by.

UV2 Promote conditions that support healthy neighborhoods throughout the city, including those conducive to helping mixed-use urban village communities thrive, such as focused transportation demand management strategies, vital business districts, a range of housing choices, a range of park and open space facilities, and investment and reinvestment in neighborhoods.[140]

UV10.5 Encourage the location of grocery stores, farmers markets, and community food gardens to support access to healthful food for all areas where people live.[141]

UV51 Provide unstructured open play space for children in or near residential neighborhoods.

In rebuttal, the City cites from the Land Use Element of its Comprehensive Plan, which states that the Official Land Use Map is part of the regulatory structure that implements the plan.[142] The City argues that it is not required to change its capital facilities plans when zoning is changed within the existing Map parameters. The Plan indicates most changes to the location of specific zones will not require amendments to the Future Land Use Map. Future Land Use Map amendments will generally only be considered for significant changes to the intended function of a large area.[143]

LU2 Generally, Future Land Use Map[144] amendments will be required only when significant changes to the intended function of a large area are proposed. Changes in the Land Use Code zone designation of land that does not significantly change the intended function of a large area generally will not require an amendment to the Future Land Use Map.

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[140] Ex. 53: Seattle's Comprehensive Plan, Urban Village Element, A. Urban Village Strategy: policies at 1.5
[141] *Id.* at 1.7
[142] Ex. 53: Seattle's Comprehensive Plan, Land Use Element, A. Citywide land Use Policies: discussion at 2.4.
[143] *Id.*
[144] The Future Land Use Map is part of the Comprehensive Plan. Revision to it would constitute a comprehensive plan amendment.

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Board Discussion

As in our previous discussion regarding Open Space Requirements of a Hub Urban Village, the Petitioners' disappointment is understandable. As outlined *supra*, the Planning Commission noted that:

> . . . the success of Transit Communities requires three integral components: investment in transit; appropriate zoning for focused, higher density development; and necessary investment in the essential components for livability.[145]

Addressing the problem of funding of necessary facilities and infrastructure, "such as parks, open space, libraries, sidewalks, plazas, pedestrian improvements and lighting," the Planning Commission report emphasizes that "[w]ithout the essential components, urban life becomes unattractive and inhospitable."[146] Key actions identified as necessary to maximize the transit investment include implementing the neighborhood plan update by improving and expanding connections to the Mount Baker Station and the planned Rainier Station; in particular:

> . . . improve pedestrian connections to Franklin High School, Somali Community Services, Seattle Lighthouse for the Blind, and the residential Mt. Baker neighborhood to the east. Improve connections to and usability of the Cheasty Greenspace.[147]

The Board sympathizes with Petitioners, who may well have a *firm and definite conviction that inadequate planning decisions have been made* [requiring concurrent update of the CIP]. Unfortunately that is not the Board's standard of review under GMA. As applied to this case, RCW 36.70A.320(1) requires that the Board presume that the challenged development regulations are valid unless the Board has a *"firm and definite conviction" that the regulations are inconsistent with a comprehensive plan provision*. Here the rezone of the North Rainier Hub Urban Village increased the intensity of allowed development within the parameters of the Future Land Use Map without significantly changing the function of a

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[145] Ex. 64: *Seattle Transit Communities* (November 2010) at 32.
[146] *Id.*
[147] *Id.* at 48.

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large area. Absent action amounting to a comprehensive plan amendment, the plan does not require concurrent updating of the CIP.[148]

The Board finds Petitioners have not carried their burden to prove that the Ordinance enacts regulations inconsistent with the comprehensive plan.

Does the GMA impose a duty to concurrently update the CIP?

Positions of the Parties

Petitioners read WAC 365-196-415 to impose an affirmative duty on the City to reassess its Land Use Element to insure that the CIP is sufficient to meet the increased need for open space that can eventually result from the rezone[149] by providing "a rational mechanism for maintaining consistency with its concurrent capital facilities and open space obligations" by, at a minimum, assessing the increased needs in the rezone area and providing a means to fund the necessary infrastructure through the City's projected revenue or other local funding.[150] Instead, Petitioners lament that "the City's capital facilities documents reflect a complete failure to engage in the planning required to accommodate the growth intended by the rezone."[151]

The City objects that the Board lacks jurisdiction to review the Capital Facilities Plan for GMA compliance and comprehensive plan consistency when the challenged action is one adopting development regulations without amending the Comprehensive Plan itself. The City argues the GMA capital facilities planning requirements apply only to the comprehensive plan, and the Ordinance here amends development regulations.[152]

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[148] The Board does not decide whether the City can use its Future Land Use Map to insulate it from any duty to update its capital facilities plan, only that Petitioners fail to demonstrate the North Rainier Hub Urban Village rezone triggers such a duty.
[149] Petitioners' Prehearing Brief at 16-17.
[150] *Id.* at 18-20.
[151] *Id.* at 22; Ex. 74: Dept. of Parks and Recreation 2014-2015 Adopted Capital Improvement Program
[152] City's Prehearing Brief at 2, 17.

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Board Discussion

To begin, the Board concurs with the City that a GMA challenge to the Comprehensive Plan is not timely when, as here, the challenged action does not amend the Plan. The question raised by the Petitioners is whether GMA requires that the City update its CIP concurrent with the adoption of an Ordinance that increases development capacity.

The Board has previously determined

> . . . that the GMA requires a capital facilities element with a financing plan that ensures the provision of necessary urban services within the 20-year planning horizon. However, a specific funding plan is only required for capital facilities needed in the coming six years. The 6-year CFP must be consistent with the comprehensive plan.[153]

A recent decision from the Division II Court of Appeals further held:

> In providing for annual amendment of the comprehensive plan, the statute imposes no requirement that there be contemporaneous reevaluation of the local government's capital facilities plan. . . ."[154]

Considering this question in *Gig Harbor v. Pierce County*, the Board found that the GMA expectation is that for public amenities such as parks, the GMA requirement focuses on assuring the facilities will be available at the time new development is ready for occupancy:

> RCW 36.70A.020(1) by itself does not require the County to provide for adequate parks. Instead, it requires the County to be guided by the planning goal to concentrate future growth into urban areas that already have public facilities or where they can someday most efficiently be developed to meet the needs of the urban area population.

RCW 36.70A.020(12) states:

> (12) Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development **at the time the development is available for occupancy and**

[153] *KCRP VI v. Kitsap County, GMHB 06-3-0007*, Order Finding Compliance (November 5, 2007), at 8-9; *see also WSDF I* FDO (April 4, 1995), at 49.
[154] *Spokane County v. E. Wash. Growth Mgmt. Hearings Bd*., 173 Wn. App. 310, 339, 293 P.3d 1248, (Div. II 2013).

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> **use** without decreasing current service levels below locally established minimum standards.[155] **Emphasis added.**

In the present case, the parties agree that redevelopment is not imminent. It may be well beyond six years before funding for supportive infrastructure and amenities for the hub urban village will be needed. Unfortunately, without the City's commitment to investment in livability, the area is just as likely to remain blighted and underdeveloped. As the Board noted in a case concerning the Greenwood Urban Village:

> [Sidewalks are a critical component of successful compact urban development. However,] the Board cannot, with the facts and argument presented in this case, discern a GMA duty that would oblige the City to adopt "levels of service" for sidewalks in urban villages nor subject projects in urban villages to a "concurrency" requirement for the installation of such facilities.[156]

Regarding Petitioners' reading of RCW 36.70A.070(3) and WAC 365-196-415, the Board explains that these provisions relate to facilities needs in adopted comprehensive and capital facilities plans. If probable funding for these needs falls short, the statute contains a "trigger" for reevaluation and action by local government "to ensure that existing identified needs are met."[157] The rub for Petitioners here is that the needs identified in the Framework and other planning documents for the North Rainier Hub Urban Village have not been adopted as commitments into the City's Comprehensive Plan and so do not fall under the cited provisions. In other words, funding does not "fall short" because there are more needs which the City will eventually be required to plan for. It could fall short because the City allows more development than it has plans to serve with appropriate infrastructure, because the City commits to more projects than it has funding for, or because revenue sources could become insufficient.

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[155] *Gig Harbor v. Pierce County,* GMHB 95-3-0016c, FDO (May 20, 1996), at 13.
[156] *Radabaugh v. City of Seattle, GMHB 00-3-0002,* FDO (July 26, 2000), at 13-14. The Board commented: "Clearly the City has taken some pains to place no policy duty upon itself to do anything other than 'strive' to provide pedestrian infrastructure in urban villages."
[157] *McVittie v. Snohomish County,* GMHB 99-3-0016c, FDO (February 9, 2000), at 26.

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Nevertheless, based on prior case law and, in particular, the appeals court ruling that the statute imposes no requirement for contemporaneous reevaluation of the capital facilities plan as annual comprehensive changes are enacted, the Board concludes there is no GMA duty to revise the CIP concurrently to include parks or other amenities that might eventually be needed for the North Rainier Hub Urban Village rezone.

The Board finds Petitioners have not carried their burden to show that the City's adoption of the Ordinance failed to comply with RCW 36.70A.070 or WAC 365-196-415.

Issues 4, 5, 7, 8, and 9 are dismissed.

E. Coordination with other entities (Issue 10)

Petitioners' General Issue 5. The Ordinance is inconsistent with Seattle's Comprehensive Plan because the City failed to coordinate with other entities, including Franklin High School officials, on opportunities needed to accommodate growth near the rezone area (Issue 10).

Issue 10: Is the Ordinance inconsistent with **CF**14 and **CF**15 of the Comprehensive Plan because the City failed to coordinate with other entities, including Franklin High School officials, on the opportunities needed to properly maintain, site, renovate and/or expand school facilities best equipped to accommodate growth near the rezone area?

> **CF**14 Work with other public and non-profit entities to include urban village location as a major criterion for selecting sites for new or expanded community-based facilities or public amenities.[158]
>
> **CF**15 Work with the School District to encourage siting, renovation, and expansion of school facilities in areas that are best equipped to accommodate growth.[159]

Positions of the Parties

Petitioners assert that the City violated its comprehensive plan policies because the Ordinance rezoned property near and adjacent to Franklin High School without any evidence of coordination or work on the siting of facilities and "other amenities needed to

[158] Ex. 53: Seattle's Comprehensive Plan, Capital Facilities Element, A. Capital Facilities Policies: relations with other public entities policies at 5.4.
[159] *Id.*

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accommodate . . . new growth. . . .” Petitioners allude to concerns about pedestrian amenities[160] and open space.[161]

In their reply brief, Petitioners articulate their frustration with allowing the City to evade review of its actions by construing mandates to “strive,” consider,” “direct efforts,” “coordinate,” “encourage,” “work with,” and “provide” as meaningless and unenforceable exhortation.[162]

The City responds that these comprehensive plan policies relate to the process of selecting and budgeting capital facilities, which the City again asserts is not required to be done contemporaneously with the rezone.

Board Discussion

Once again the Board has great sympathy for the Petitioners’ frustration with the City’s narrow view of the applicability of its comprehensive plan provisions. However, it is equally unreasonable to assert that **no** comprehensive plan policy can provide general guidance. Even if the cited policies clearly required contemporaneous action, and **CF** 14 and **CF** 15 do not, Petitioners could still not prevail without showing how the City failed to work with the school district or “other entities.” For example, in what way did the City fail to avail itself of the opportunity to “work with” the Seattle School District? Petitioners may not flip the burden of proof to require the City to prove that it did “work with” other entities.

The Board finds Petitioners have failed to carry their burden to prove that the challenged ordinance fails to comply with RCW 36.70A.020, RCW 36.70A.040, RCW 36.70A.120, or RCW 36.70A.130(1)(d).

Issue 10 is dismissed.

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[160] Petitioners Prehearing Brief at 23.
[161] Petitioners Reply at 11.
[162] *Id.* at 10 (citing City’s Prehearing Brief at 18).

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VI. ORDER

Based upon review of the Petition for Review, the briefs and exhibits submitted by the parties, the GMA, prior Board orders and case law, having considered the arguments of the parties, and having deliberated on the matter, the Board Orders:

- The Petition for Review in *Talis Abolins and Marla Steinhoff v. City of Seattle* is dismissed. Case No. 14-3-0009 is closed.

SO ORDERED this 1st day of April, 2015.

_____
Cheryl Pflug, Board Member

_____
Margaret Pageler, Board Member

_____
Nina Carter, Board Member

Note: This is a final decision and order of the Growth Management Hearings Board issued pursuant to RCW 36.70A.300.[163]

[163] Should you choose to do so, a motion for reconsideration must be filed with the Board and served on all parties within ten days of mailing of the final order. WAC 242-03-830(1), WAC 242-03-840.
A party aggrieved by a final decision of the Board may appeal the decision to Superior Court within thirty days as provided in RCW 34.05.514 or 36.01.050. See RCW 36.70A.300(5) and WAC 242-03-970. It is incumbent upon the parties to review all applicable statutes and rules. The staff of the Growth Management Hearings Board is not authorized to provide legal advice.

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APPENDIX A: ISSUE STATEMENTS as revised by Order on Motions (Dec. 10, 2014)

Did the City violate RCW 36.70A.020(1), (9), (10), (12) and (13) (Planning Goals to guide development and adoption of development regulations); RCW 36.70A.040(3) (city development regulations must implement comprehensive plans); RCW 36.70A.070 (requiring land use map consistency with Comprehensive Plan); RCW 36.70A.120 (each city shall perform activities and make capital budget decisions in conformity with its comprehensive plan); RCW 36.70A.130(1)(d) (development regulation amendments shall be consistent with and implement the comprehensive plan); and RCW 36.70A.320(3) (city actions must not be clearly erroneous in light of the GMA goals and requirements), as detailed more specifically below?

1. Is the Ordinance inconsistent with **NR**-P33 of the City's Comprehensive Plan because it does not preserve, protect or provide opportunities for the design of parks and open spaces and programming to accommodate users of diverse ages, interests and cultures within the Town Center rezone area?

2. Dismissed.[164]

3. Is the Ordinance inconsistent with **LU**48 and **LU**73 of the City's Comprehensive Plan because the City failed to balance housing needs with the surrounding neighborhood character; failed to properly identify, preserve and enhance important open spaces, green spaces and views in or near the Town Center rezone area?[165]

4. Is the Ordinance and Capital Facilities Plan inconsistent with **UV**46, **UV** 49, **UV** 51 and **UV** 53 of the Comprehensive Plan, RCW 36.70A.070(3) and (8) and WAC 365-196-415 because it neither analyzes nor strives to accomplish the open space standards identified in the Neighborhood Plan and Urban Village Appendix B for the amount, types, and distribution of open space necessary to serve the new Town Center residents, thereby defeating the express goals of **UV**3, **UV**G12, **UV**G 15, **UV**G 37, and **UV**G 39?

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[164] Order on Motions (December 10, 2014) at 6-7.

[165] *Id.* at 7-8 (dismissing allegations that the Ordinance violated **BNR**-P35, **LU** 212, **LU** 215, **LU** 216, and allegations pertaining to protecting critical areas).

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5. Is the Ordinance inconsistent with **UV** 2, **UV** 7.5 and **UV** 10.5 of the Comprehensive Plan because the City failed to consider, preserve or promote conditions necessary to support healthy Town Centers, including those conducive to helping mixed-use urban village communities thrive, such as a minimum range of park and open space facilities, and community food gardens to support access to healthful food for the dense areas within the Town Center?

6. Is the Ordinance inconsistent with **N**6 of the Comprehensive Plan because it was enacted without proper consideration or preservation of the strong historical, cultural, and natural geographic interests reflected in the Olmsted Boulevard plans and Cheasty Green Space?

7. Is the Ordinance and Capital Improvement Plan inconsistent with **N10**, **N**11, **N** 12, **N** 13 and **N** 14 of the Comprehensive Plan because the City failed to: (1) establish a firm and clear relationship between the City's budgeting processes and the adopted Neighborhood Plan; (2) demonstrate how the urban village strategy reflected in the Neighborhood Plan and related project documents shall be effectively carried out under the rezone Ordinance; and (3) properly consider and utilize the adopted North Rainier Neighborhood Plan goals, policies and work plan matrices to balance competing goals?

8. Is the Ordinance (including its Fiscal Note) inconsistent with **CF**G4, **CF**G5, **CF**1 **CF**2, **CF**7 and **CF**8, of the Comprehensive Plan and the Capital Improvement Plan where the City failed to provide for the siting and design of open space and other required green features (including community gardens) in a manner that would allow them to be considered assets to the Town Center community; and they fail to consider and encourage protection of City-owned historic facilities, including the Olmsted Boulevards, Cheasty Green Space, and Franklin High School, in light of the values and social equities reflected in the Neighborhood Plan?

9. Is the Ordinance (including its Fiscal Note, and the City's related financial budgeting processes) and the Capital Investment Plan inconsistent with **CF**1, **CF** 2, **CF** 7,

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CF 8, **CF** 9, **CF** 10, **CF** 11 and **CF** -F[166] of the Comprehensive Plan where the City failed to properly consider, plan, preserve and provide opportunities for necessary open space, parks and playgrounds needed to bridge the recognized gaps in those facilities, and to create an incentive for public and private investment in and near the Town Center area?

10. Is the Ordinance inconsistent with **CF**14 and **CF**15 of the Comprehensive Plan because the City failed to coordinate with other entities, including Franklin High School officials, on the opportunities needed to properly maintain, site, renovate and/or expand school facilities best equipped to accommodate growth near the rezone area?

11. Is the Ordinance inconsistent with **NR-**G13 and **NR-**G14 of the City's Comprehensive Plan because it fails to consider, protect or provide opportunities for reclamation and development of Cheasty Boulevard and Greenbelt, and the 1909 Olmsted Parks and Boulevards Plan?

[166] The Board finds no policy "**CF**-F" in the City's Comprehensive Plan. Under the Capital Facilities Element (**CF**) there is a section "F. Consistency & Coordination" which contains a discussion to which Petitioner appears to refer. There are no policies set forth in this portion of the Comprehensive Plan.

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APPENDIX B
Comprehensive Plan policies and goals

Issue 1

NR-P33 Design parks and open spaces and programming to accommodate users of diverse ages, interests and cultures.[167]

Issue 3

LU48 Seek to preserve views through:
• land use regulations that address view impacts with height, bulk, scale, view corridor and design review provisions;
• zoning policy that considers the effect of zone designations on views, with special emphasis on protection of views related to shoreline areas; and
• application of adopted environmental policy to protect public views, including views of mountains, major bodies of water, designated landmarks and the Downtown skyline, in review of development projects.[168]

LU73 Balance the objective to increase opportunities for new housing development to ensure adequate housing for Seattle's residents with the equally important objective of ensuring that new development is compatible with neighborhood character.[169]

Issue 4

UV46 Strive to accomplish goals in Urban Village Appendix B for the amount, types, and distribution of open space.

UV49 Consider open space provisions identified in adopted neighborhood plans, including specific open space sites and features, in guiding the expansion of the open space network.

UV51 Provide unstructured open play space for children in or near residential neighborhoods.

UV53 Direct efforts to expand the open space network according to the following considerations:
1. Locations for new facilities:

[167] Ex. 53: Seattle Comprehensive Plan, B-21 North Rainier Neighborhood Plan, Open Space Policies at 8.132.
[168] Ex. 53: Seattle Comprehensive Plan, Land Use Element, A-2. Uses: views policy at 2.11.
[169] Ex. 53: Seattle Comprehensive Plan, Land Use Element, B-2. Multifamily Residential Areas: policies at 2.16.

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a. Urban centers and villages targeted for largest share of residential growth; especially those existing high density residential areas presently not served according to the population-based or distribution goals for urban village open space;
b. Other urban village locations where an adopted subarea plan or recognized neighborhood plan includes open space recommendations consistent with these policies; and
c. Specific locations enumerated in the Parks functional plan outside urban centers or villages.

2. Types of open space acquisitions and facility development:
a. Village open space sites, urban center indoor recreation facilities, village commons sites, and community gardens;
b. Critical open space linkages, connectors, and corridors that are highly accessible for active use within or directly serving urban villages, high density and/or high pedestrian, bicycle, or transit use areas;
c. Open space linkages, connectors, and corridors that are highly accessible for active use serving other high pedestrian, bicycle, or transit use areas; and
d. Other types of open space within or adjacent to urban villages that is accessible from adjacent urban villages. [170]

UV1 Promote the growth of urban villages as compact mixed-use neighborhoods in order to support walking and transit use, and to provide services and employment close to residences.[171]

UV3 Consider the following characteristics appropriate to all urban village categories except Manufacturing and Industrial Centers:
1. Clearly defined geographic boundaries that reflect existing development patterns, functional characteristics of the area, and recognized neighborhood boundaries.
2. Zoning sufficient to accommodate the residential and employment growth targets established for that village.
3. The ability to accommodate a range of employment or commercial activity compatible with the overall function, character, and intensity of development specified for the village.
4. Zoning that provides locations for commercial services convenient to residents and workers and, depending on the village designation, serving a citywide and regional clientele.
5. Zoning sufficient to allow a diversity of housing to accommodate a broad

[170] Ex. 53: Seattle Comprehensive Plan, Urban Village Element, C. Open Space Network Policies at 1.26.
[171] Ex. 53: Seattle Comprehensive Plan, Urban Village Element, A. Urban Village Strategy Policies at 1.5.

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range of households.
6. Zoning regulations that restrict those public facilities that are incompatible with the type of environment intended in centers and villages.
7. Most future households accommodated in multifamily housing.
8. Additional opportunities for housing in existing single-family areas, to the extent provided through neighborhood planning, and within other constraints consistent with this Plan.
9. Public facilities and human services that reflect the role of each village category as the focus of housing and employment and as the service center for surrounding areas.
10. Parks, open spaces, street designs, and recreational facilities that enhance environmental quality, foster public health and attract residential and commercial development.
11. A place, amenity, or activity that serves as a community focus.
12. Neighborhood design guidelines for use in the City's design review process.[172]

UVG12 Promote physical environments of the highest quality, which emphasize the special identity of each of the city's neighborhoods, particularly within urban centers and villages.[173]

UVG15 Provide parks and open space that are accessible to urban villages to enhance the livability of urban villages, to help shape the overall development pattern, and to enrich the character of each village.[174]

UVG37 Provide safe and welcoming places for the people of Seattle to play, learn, contemplate, and build community. Provide healthy spaces for children and their families to play; for more passive activities such as strolling, sitting, viewing, picnicking, public gatherings, and enjoying the natural environment; and for active uses such as community gardening, competitive sports, and running.[175]

UVG39 Enhance the urban village strategy through the provision of:
1. Amenities in more densely populated areas
2. Recreational opportunities for daytime populations in urban centers
3. Mitigation of the impacts of large scale development
4. Increased opportunities to walk regularly to open spaces by providing them close by

---

[172] *Id.* at 1.5-1.6.
[173] *Id.* at 1.5.
[174] *Id.*
[175] Ex. 53: Seattle's Comprehensive Plan, Urban Village Element, C. Open Space Network: goals at 1.25.

5. Connections linking urban centers and villages, through a system of parks, boulevards, community gardens, urban trails, and natural areas
6. A network of connections to the regional open space system
7. Protected environmentally critical areas
8. Enhanced tree canopy and understory throughout the city[176]

Issue 5

UV2 Promote conditions that support healthy neighborhoods throughout the city, including those conducive to helping mixed-use urban village communities thrive, such as focused transportation demand management strategies, vital business districts, a range of housing choices, a range of park and open space facilities, and investment and reinvestment in neighborhoods.[177]

UV7.5 Coordinate public and private activities to address transportation, utilities, open space and other public services to accommodate the new growth associated with subarea rezones (e.g., in transit station areas) that result in significant increases in density.[178]

UV10.5 Encourage the location of grocery stores, farmers markets, and community food gardens to support access to healthful food for all areas where people live.[179]

Issue 6

N6 Require that the following be taken into consideration in establishing future planning area boundaries:
1. Areas defined by a strong historical, cultural, geographic, or business relationships.
2. Natural or built barriers (e.g., I-5, major topography change).
3. Manageable size of area, manageable complexity of issues for resources available.
4. Generally agreed upon neighborhood boundaries.
5. The Urban Village Strategy.
6. The appropriateness of the area for the issues being addressed in the plan.[180]

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[176] *Id.* at 1.25-1.26
[177] Ex. 53: Seattle's Comprehensive Plan, Urban Village Element, A. Urban Village Strategy: policies at 1.5
[178] *Id.* at 1.7
[179] *Id.* at 1.7
[180] Ex. 53: Seattle's Comprehensive Plan, Neighborhood Planning Element, A. Introduction: policies at 8.4.

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Issue 7

N10 Establish a firm and clear relationship between the City's budgeting processes and adopted neighborhood plans and, using the biennial budget, demonstrate how the urban village strategy is being carried out.[181]

N11 Assess as part of the City's budget process, neighborhood plan implementation needs and resources, taking into consideration the results of implementation activities for each area and public input into the budget process.[182]

N12 Use adopted neighborhood plan goals and policies and the City's neighborhood plan work plan matrices to help balance between competing goals in City decision making and the allocation of budget resources.[183]

N13 Consider recommendations from neighborhood plans in the context of Seattle as a whole. Incorporate such requests into City prioritization processes, as appropriate, for capital expenditures and other decision making recognizing the City's legal, administrative and fiscal constraints.[184]

N14 When allocating resources to implement neighborhood plans, at a minimum consider the following factors:
• Where the greatest degree of change is occurring;
• Where growth has exceeded current infrastructure capacities;
• Where there is a deficit in meeting service levels called for by the Comprehensive Plan or the expectation of other City policies or agency plans;
• Where there is an urban center or urban village designation;
• Where the neighborhood plan goals and policies or work plan matrix have specific prioritized plan recommendations endorsed by the City;
• Where resources would help spur growth in urban centers or urban villages;
• Where there are opportunities to leverage other resources, or partnerships;
• Where the resource would address priorities of more than one neighborhood; and
• Where the impact of a single, large activity generator will have detrimental effects on the infrastructure capacities of the neighborhood.[185]

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[181] Ex. 53: Seattle's Comprehensive Plan, Neighborhood Planning Element, A. Introduction: neighborhood plan implementation policies at 8.5.
[182] *Id.*
[183] *Id.*
[184] *Id.*
[185] *Id.*

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Issue 8

CFG4 Site and design capital facilities so that they will be considered assets to the communities in which they are located.[186]

CFG5 Provide capital facilities that will keep Seattle attractive to families with children. [187]

CF1 Plan capital investments strategically, in part by striving to give priority to areas experiencing or expecting the highest levels of residential and employment growth when making discretionary investments for new facilities. The City will use fiscal notes and policy analysis to assist in making informed capital investment choices to achieve the City's long-term goals.[188]

CF2 Assess policy and fiscal implications of potential major new and expanded capital facilities, as part of the City's process for making capital investment choices. The assessment should apply standard criteria, including the consideration of issues such as a capital project's consistency with the Comprehensive Plan and neighborhood plans, and its effects on Seattle's quality of life, the environment, social equity, and economic opportunity.[189]

CF7 The City will consider capital improvements identified in neighborhood plans, in light of other facility commitments and the availability of funding and will consider voter-approved funding sources.[190]

CF8 Explore tools that encourage sufficient capital facilities and amenities to meet baseline goals for neighborhoods and to address needs resulting from growth.[191]

Issue 9

CF9 Encourage the location of new community based capital facilities, such as schools, libraries, neighborhood service centers, parks and playgrounds, community centers, clinics and human services facilities, in urban village areas. The City will consider providing capital facilities or amenities in urban

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[186] Ex. 53: Seattle's Comprehensive Plan, Capital Facilities Element, A. Capital Facilities Policies: goals at 5.3.
[187] *Id.*
[188] Ex. 53: Seattle's Comprehensive Plan, Capital Facilities Element, A. Capital Facilities Policies: strategic capital investment policies at 5.3.
[189] *Id.*
[190] *Id.* at 5.4.
[191] *Id.*

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villages as an incentive to attract both public and private investments to an area.[192]

CF10 Seek to locate capital facilities where they are accessible to a majority of their expected users by walking, bicycling, car-pooling, and/or public transit.[193]

CF11 Consider the recommendations from neighborhood plans in siting new or expanded facilities. The needs of facility users will also be considered in making these decisions.[194]

CF-F Consistency & Coordination: discussion: As part of the City's CIP process, the City considers whether probable funding will be sufficient to meet the currently identified needs for new or expanded city capital facilities to accommodate planned growth. Should anticipated funding not materialize, or should new needs be identified for which no funding is determined to be probable, the City will reassess the land use element of this Plan to ensure that it is coordinated, and consistent, with this element, and in particular with the six-year finance plan. A review for coordination and consistency between this Element and the Land Use Element will be part of the City's annual budget review and Comprehensive Plan amendment processes.[195]

Issue 10

CF14 Work with other public and non-profit entities to include urban village location as a major criterion for selecting sites for new or expanded community-based facilities or public amenities.[196]

CF15 Work with the School District to encourage siting, renovation, and expansion of school facilities in areas that are best equipped to accommodate growth.[197]

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[192] *Id.*
[193] *Id.*.
[194] *Id.*
[195] There is no policy **CF**-F. Petitioners appear to be referring to s discussion section; *See* Ex. 53: Seattle's Comprehensive Plan, Capital Facilities Element, F. Consistency & Coordination at 5.8.
[196] Ex. 53: Seattle's Comprehensive Plan, Capital Facilities Element, A. Capital Facilities Policies: relations with other public entities policies at 5.4.
[197] *Id.*

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Issue 11

Applicable Law

NR-G13 Cheasty Boulevard and Greenbelt has been reclaimed and developed in a manner consistent with the 1909 Olmsted Parks and Boulevards Plan.[198]

NR-G14 A "ring of green" surrounding the urban village with strong connections to the greenbelts, boulevards and parks, augmented with a hierarchy of open spaces.[199]

[198] Ex. 53: Seattle Comprehensive Plan, Neighborhood Planning Element, Neighborhood Plans, B-21 North Rainier: open space goal at 8.131
[199] *Id.*

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B.8 Letter 249 Attachment

Introduction

Appendix B.8 contains the attachements for Letter 249 from Eden Mack.

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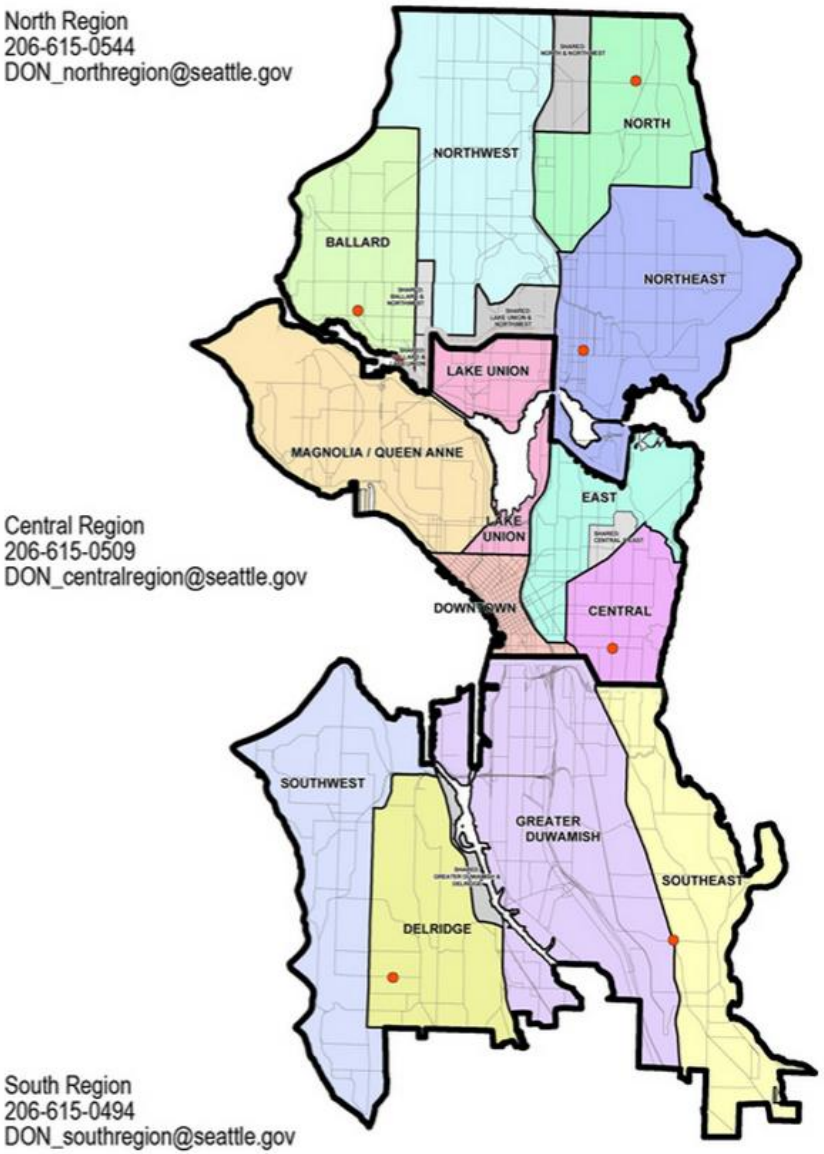
Planning for Seattle's Growing Neighborhood Schools

Presentation to Seattle City Neighborhood Council - 4/27/2015

Eden Mack, Chair of CNC Youth, Schools and Education Committee

The health of our neighborhoods is critically tied to the health of neighborhood schools.



The health of our neighborhoods is critically tied to the health of neighborhood schools.

Layer 1--Investments "we" make for Seattle Schools' Buildings?

LOCAL FUNDING

- **Building Excellence Levy (BEX) –** every 6 years
  - BEX IV approved in February 2013
  - improve, modernize, and expand 17 schools.
  - *Largest EVER --$694.9 million*
- **Buildings, Technology and Academics/Athletics (BTA)** – every 6 years
  - BTA IV Slated for February 2016
  - Undetermined project list and $$ amount
  - nominations accepted through 4/30/2015
- **Developer Impact Fees**- *NOT YET*

WA STATE FUNDING

- School Construction Assistance Program
  - some (~20% per project) "match" provided
- McCleary Decision (State's PARAMOUNT Duty is Basic Ed)
  - Some bills proposed for limited funding fo K-3 classrooms
  - SPS has a capital "ask" of $34 million for 2015

Layer 2 – Unexpected Growth

Seattle is the fastest growing city in the Nation, and enrollment has grown and is growing DRASTICALLY faster than expected.

2008 Projections

Table 4-8: Current and Projected Student Enrollment by Grade Level

Grade Level	2007 Enrollment	2012 Projected Enrollment	Growth, 2007-2012	2017 Projected Enrollment	Growth, 2007-2017
K-5	22,099	22,183	84	21,995	-104
6-8	9,318	9,265	-53	9,327	9
9-12	13,859	12,889	-970	13,205	-654
Total	**45,276**	**44,337**	**-939**	**44,527**	**-749**
Percent Growth			**-2.1%**		**-1.7%**

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6-8	9,318	9,265	-53	9,327	9
9-12	13,859	12,889	-970	13,205	-654
Total	**45,276**	49,864	**-939**	**44,527**	**-749**
Percent Growth			**-2.1%**		**-1.7%**

- *That is 5,528 more kids than expected = about 10 school buildings*

School Closures

2004 “Potential School Consolidation – Beginning a Community Conversation”

Capacity Analysis

6. Keeping 5% extra space, how many buildings do we need by 2012?

Building	Buildings Needed	Current Buildings	Difference
Elementary	61.6	70	-8.4
Middle	11.2	18	-6.8
High	10.7	11	-.3

*School Sizes: Elementary (400), Middle (800), High (1200)

2000-2010 School Closures– 12 buildings

Building Name	Year closed	Year re-opened
Martin Luther King	2007	SOLD
EC Hughes	2007	TBD
View lands	2007	2011
Rainier View	2007	2011
Fairmont Park	2007	2014
John Marshall	2007	2014
Columbia	2007	2014 (?)
Genessee Hill	2009	2015
Old Hay	2009	2010
Mann	2009	planned for 2014
TT Minor	2009	2016
Van Asselt	2009	2014

Over-crowded buildings

Education | Local News

Surging enrollment blindsides Seattle schools

Originally published October 16, 2011 at 9:34 am | *Updated October 17, 2011 at 7:23 am*

2 of 8 *Schmitz Park Elementary, West Seattle: A student leaves the main school building and heads for the playground. In the background are several of the 10...* **More**

Buildings take every nook and cranny for classrooms

Start of ~ 30 portables (size of one high school) being added each year

BTA III Levy–
Re-opening Buildings and Adding Portables

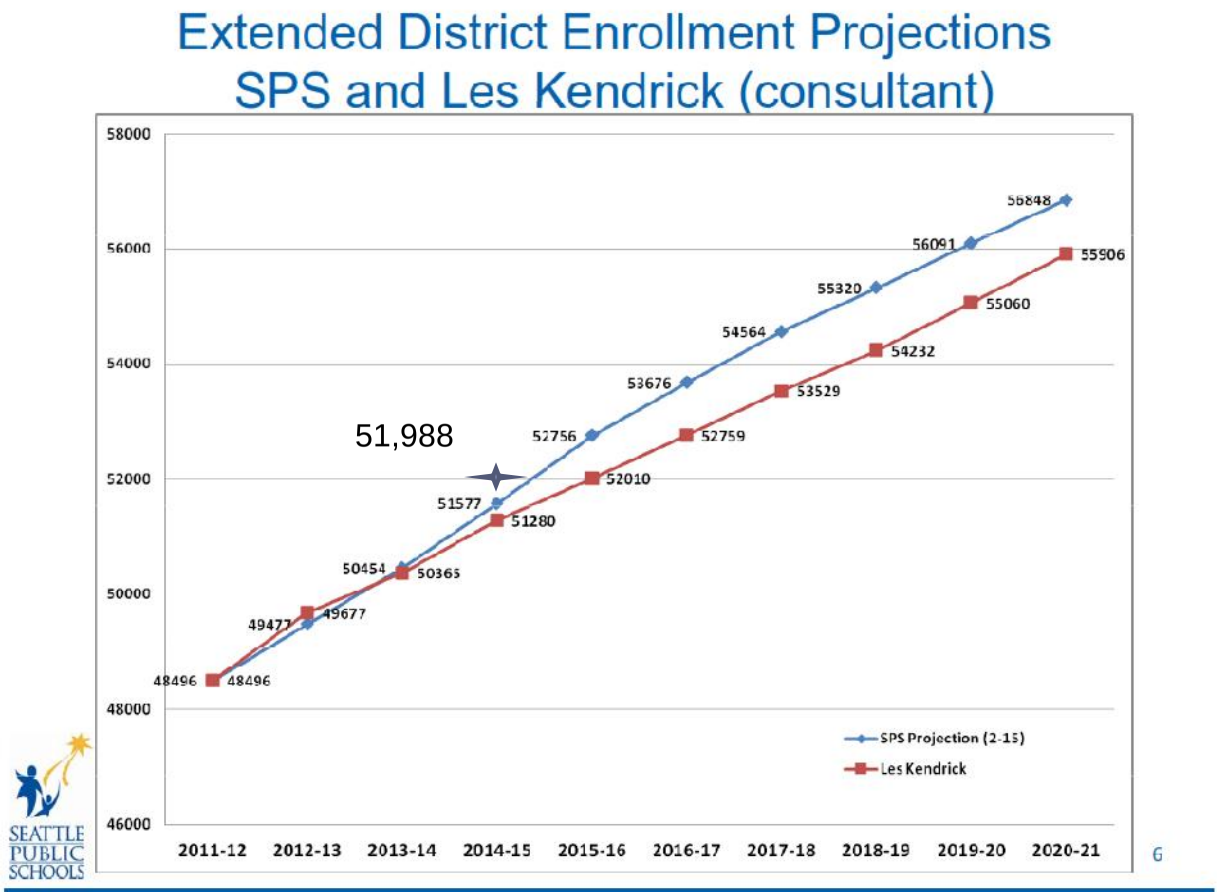
7 New Schools by 2012	Interim site	Building Open	
Queen Anne Elementary	n/a	2010	was closed in 2009
Rainier View Elementary	n/a	2012	was closed in 2007
Sand Point Elementary	n/a	2012	was closed 1981
Viewlands Elementary	n/a	2012	was closed 2007
McDonald Elementary	2010	2014	4 portables added
K-5 STEM at Boren	2012	2016	waiting for Arbor Heights
APP at Lincoln (to WP)	2011	2017	2014 enrollment exceeds WP

And… **~ 5 schools full of kids in portables**

- ~12 New schools full of kids by 2012

BEX IV -- We Need More School Buildings!

April 2012 Projections



- Recap: 2007 = 45,276 2014 = 51,988 **Increase = 6,712**

BEX IV– A MAJOR Investment

- approved in February 2013
- projects through 2020
- *$694.9 million*
- *10 buildings re-built and/or expanded*
- *Re-opening 6 buildings*
- *1 new elementary school*
- *Planned to reduce portable usage*

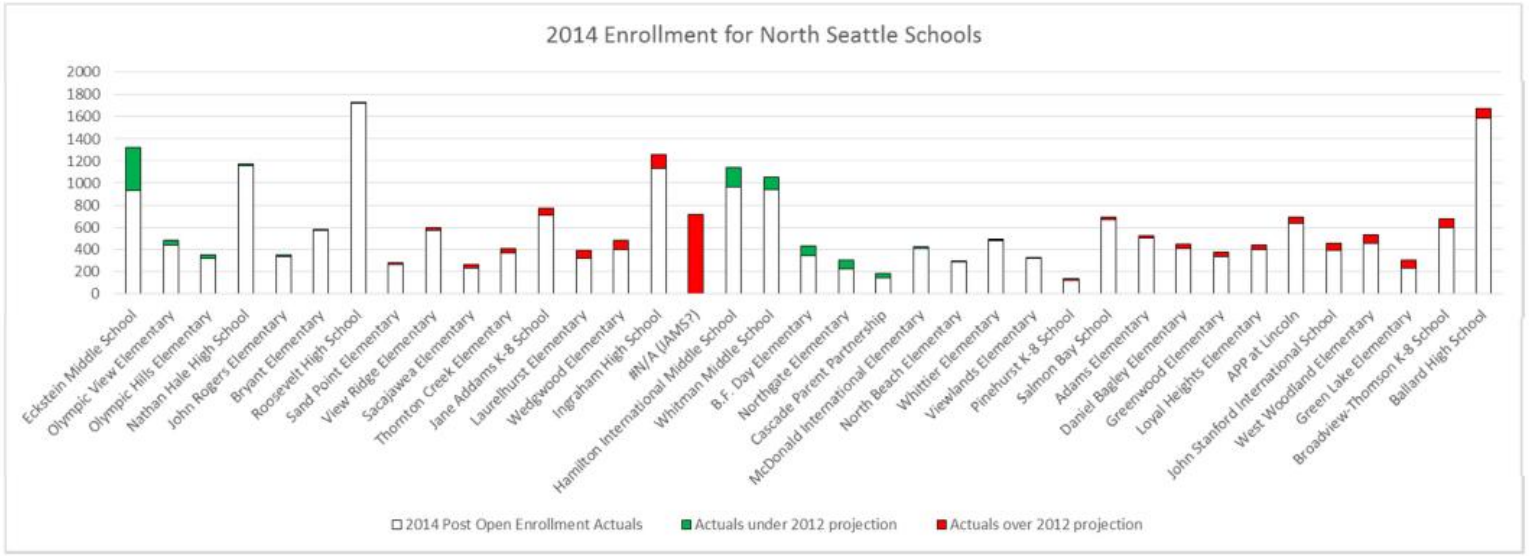
But still…not enough and not fast enough

Layer 3– Uneven Growth

Enrollment is growing faster in some neighborhoods and schools than others.

2014 Post Open Enrollment Actuals (Stewart) vs. 2012 Projections (SPS)

North Seattle =18 out of 37 schools (49%) are OVER 2012 projections by 20 or more kids



- ~ 1350 more kids in North and West Seattle than expected in 2012

Pushed in MORE Properties and Portables

2013- 2015 ADDITIONAL 7 buildings:

	Why
Fairmont Park	New School
Jane Addams Middle School	New school
North Queen Anne	Cascade PP
Old Van Assalt	SPED/ Pre-K
Lincoln HS South wing	Licton Springs K-8 interim
Queen Ann Gym	Interagency
John Marshall	“Interim” building

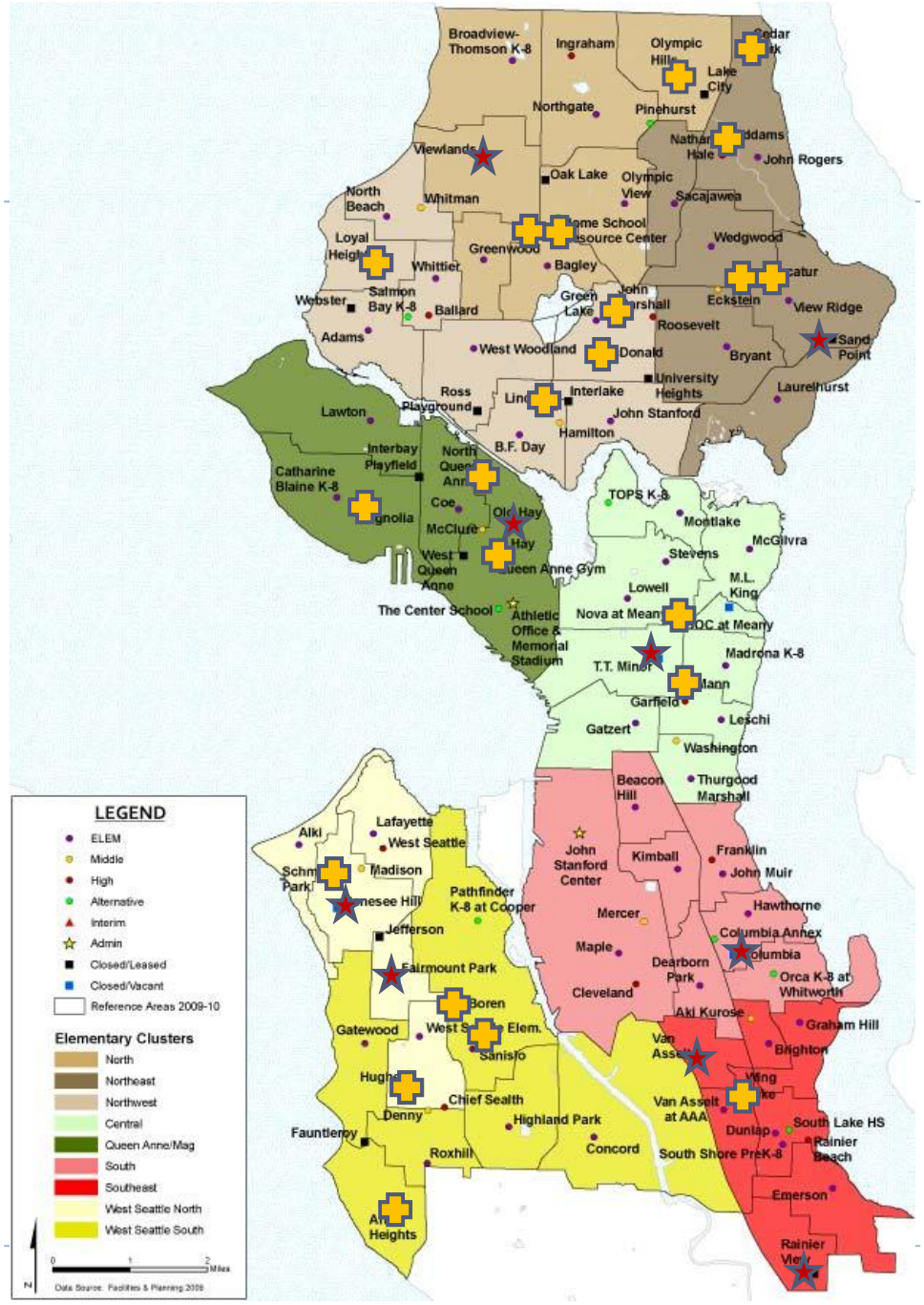
And ~ 60 portables = 3 buildings

- Recap: ~12 schools by 2012 + ~10 more by 2015 = ~22 schools

BEX IV– A MAJOR Investment

BEX IV Schools	Project type	Building Complete	Occupied in 2014	2014 Enrollment	Building Capacity at Completion	Over?
Farimount Park	re-opening- addition	2014	yes	290	500	
Mann (NOVA HS)	re-opening	2014	no	273	?	full
Schmitz Park at Genessee Hill	Rebuild	Dec-15	no	608	500	OVER
NE school at Thornton Creek	New building	Sep-16	yes-same	412	660	
Hazel Wolf K-8 @ Pinehurst	Rebuild	Sep-16	no	763	680	OVER
World School @ TT Minor	re-model	Sep-16	no	280	360	
Olympic Hills	Rebuild	Jul-17	yes-same	318	500	
Wilson Pacific Elementary	Rebuild	Sep-17	no	696	660	OVER
Jane Addams Middle School	re-model	Sep-17	yes-same	708	960	
Wilson Pacific Middle School	Rebuild	Sep-17	no	Milddle = 0 K-8 = 242	850-Middle 150 k-8	K-8 OVER
Meany Middle School	re-model	Sep-17	yes-NOVA	0	850	
Loyal Heights	re-model and addition	Dec-18	yes	448	?	
Arbor Heights	Rebuild	Sep-16	no	341	660	
Cedar Park	re-opening	Sep-15	no	0	400	
Queen Anne	addition	Jul-19	yes	413	? (+200?)	
Lincoln High School	re-model	Sep-19	yes- 3 schools	0	1600	
Wing Luke	Rebuild	Sep-20	yes	335	500	
Bagely	re-model and addition	Sep-20	Yes- Bagely	443	503	Full

- 17 more projects through 2020, but some schools already too big.



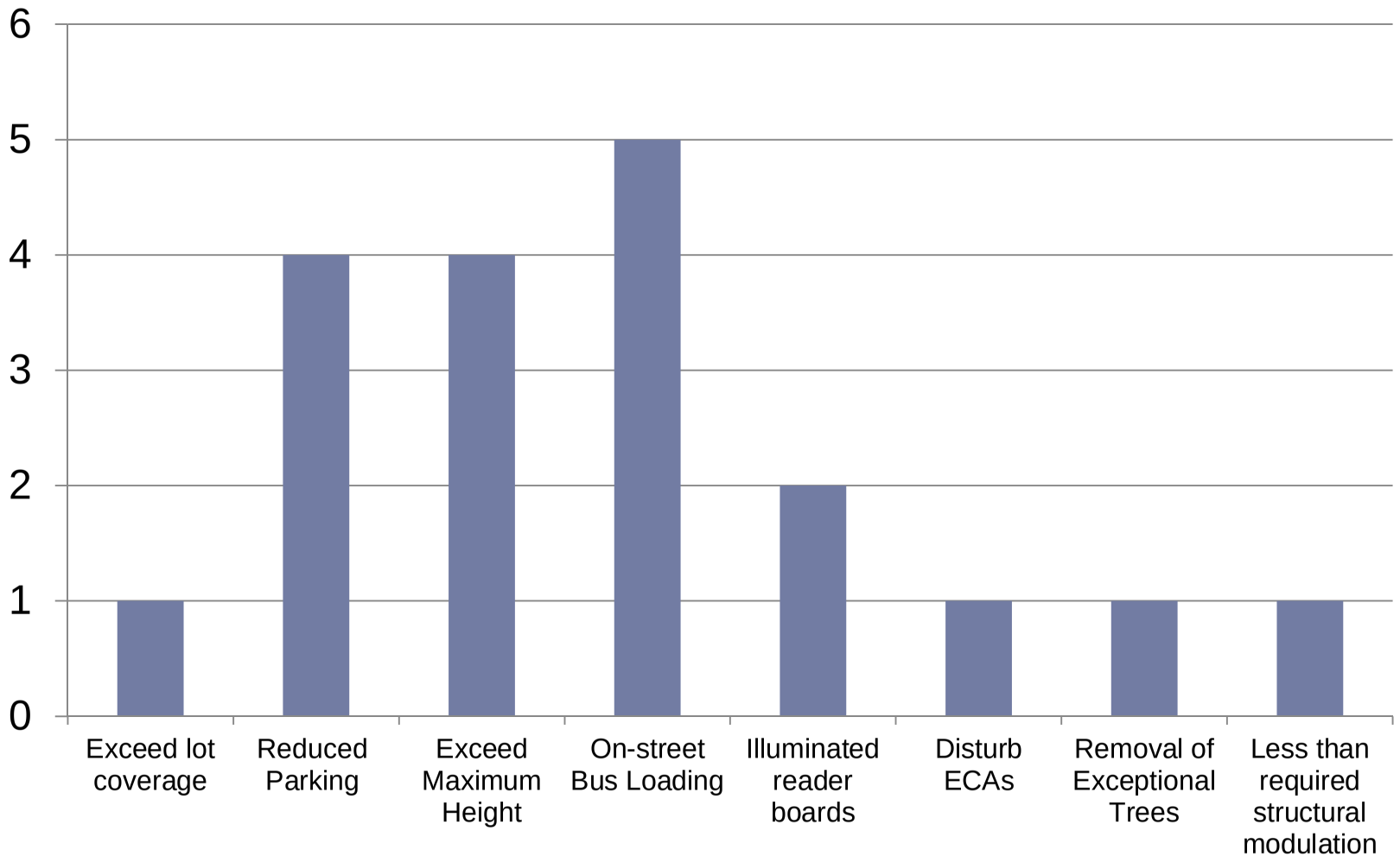
Closed in 2007-2009 but reopened.

Expanded, rebuilt or returned to service by 2020

Layer 4 – “Required” departures

Required **19 departures** from City Municipal Code

What are these departures?

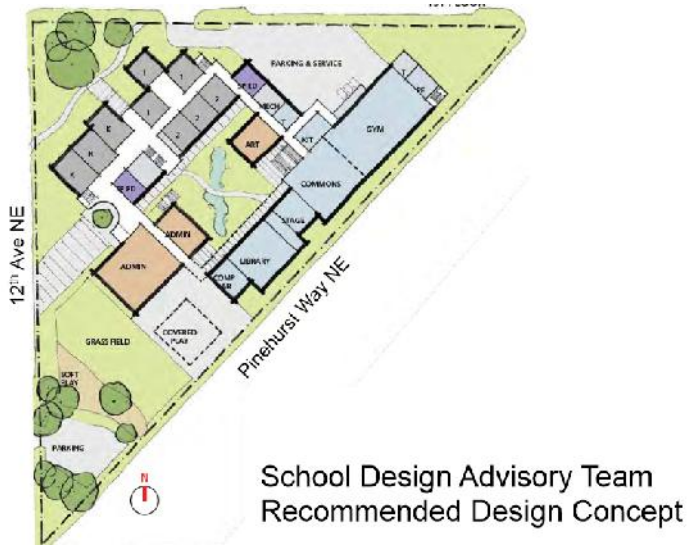


Lot Coverage?

More kids squeezed in:

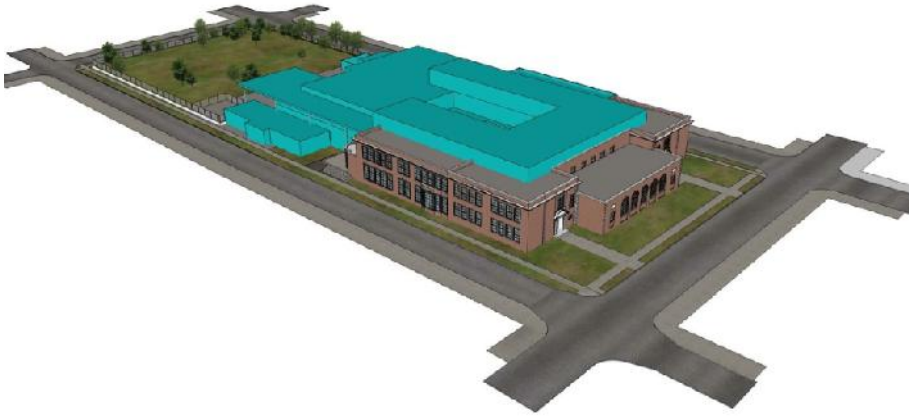
- Increase # of classrooms in buildings – (17 to ~25)
- Increase in # of kids (from 400 to 660+)

Pinehurst K-8



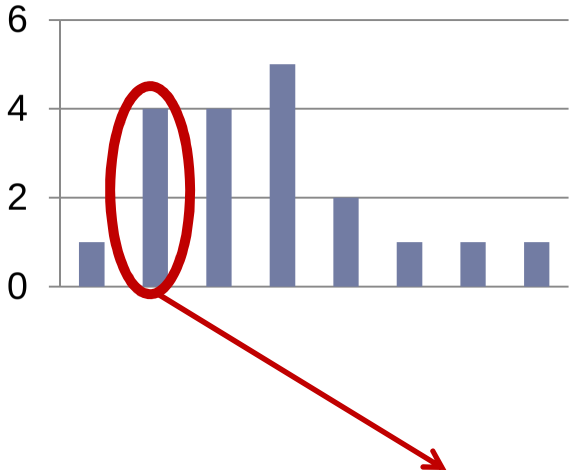
School Design Advisory Team
Recommended Design Concept

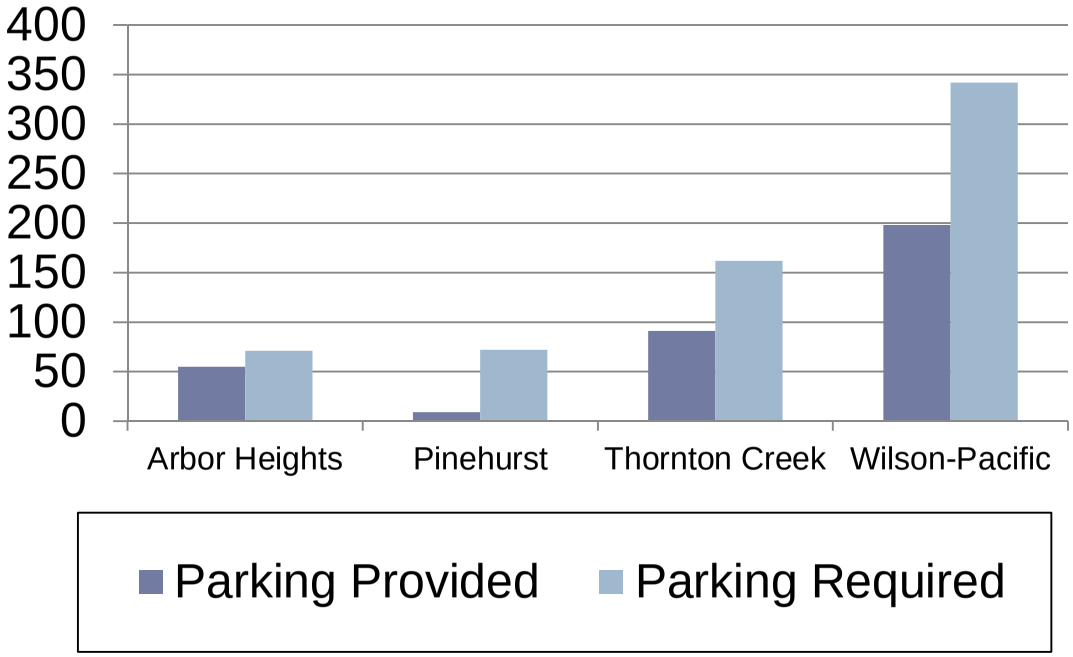
Loyal Heights Elementary



- Lot sizes vary from 6.5 acres to 2.0 acres, but building for 660+ kids

Parking?





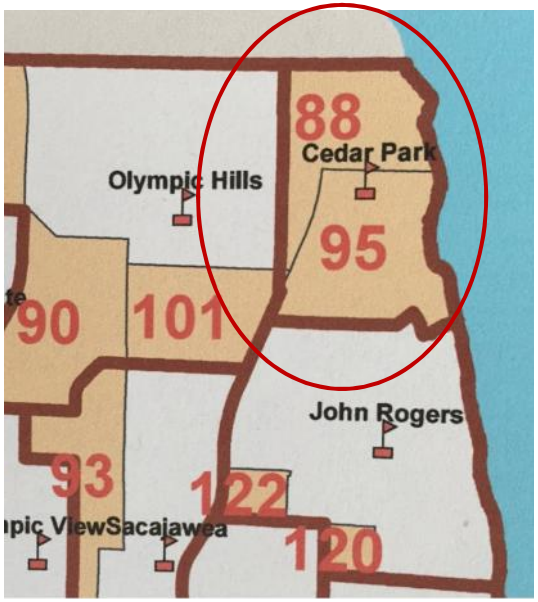
- A total of 294 required parking spots are absent from the plans.

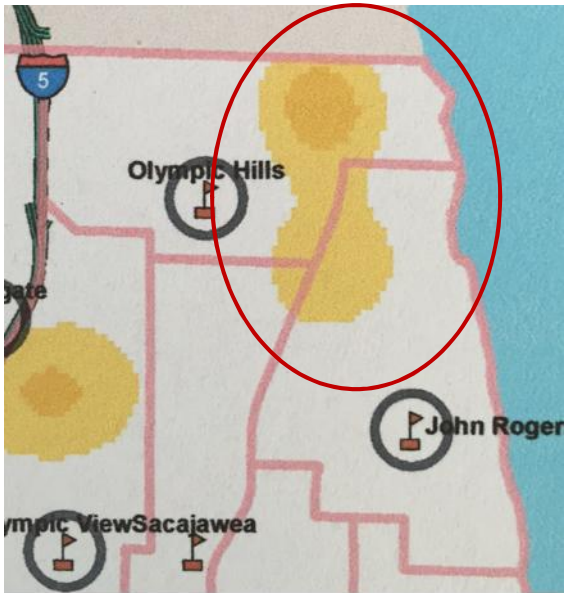
Another casualty…

- **One elementary school will OPEN with 8 portables**, with no expansion of the building's core facilities.
  - **Almost ½ the school is portables** (SPS planning goals are 5%-15%) and will **overburden the facilities (bathrooms, lunchroom, etc.)** from day one.
- **No:**
  - **library,**
  - **computer lab,**
  - **music/art rooms,**
  - **preschool or**
  - **before/afterschool programming.**

This will likely be the highest poverty school in the district.
Whose neighborhood?

High poverty and/or immigrant children will be assigned to this sub-standard school.



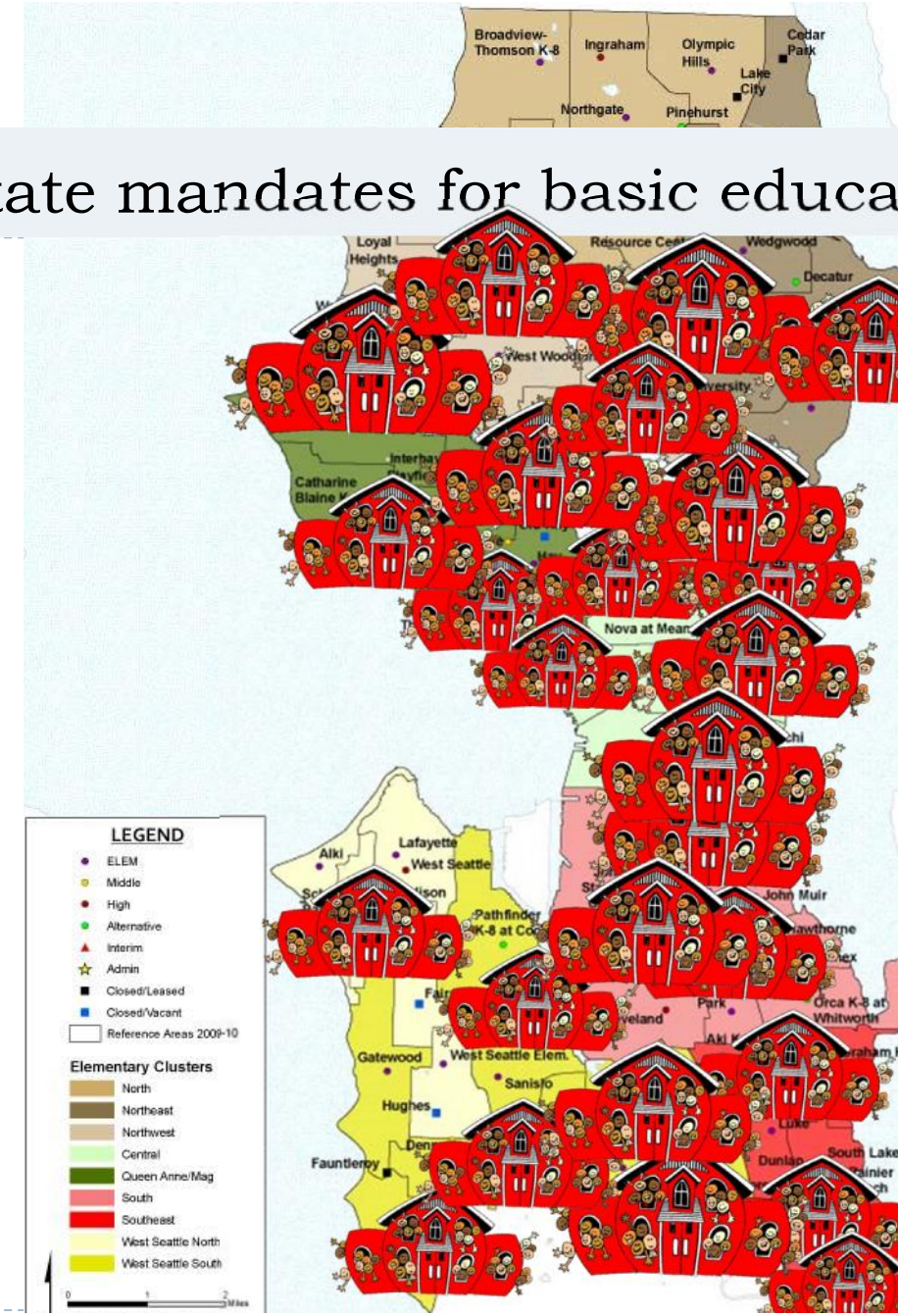


English Language Learners

- Low-income neighborhoods: Lake City Court (SHA), Jackson Park Village (SHA), Little Brook, Lake City Hub Urban Village.

- Lake City HUV = one of the lowest median household incomes AND largest increases of persons of color.

Layer 5– State mandates for basic education



- 20 ADDITIONAL buildings needed by 2017 for K-3 (+ ~6 buildings to reduce portables)

What do “we” want for kids & neighborhoods?

- Schools (buildings, not portable villages) near where kids live that compliment the community
- Safe walk zones
- Sufficient and healthy play ground space
- Reasonable class sizes
- Not ending up in split shifts because we didn’t plan for the buildings we need
- Other?

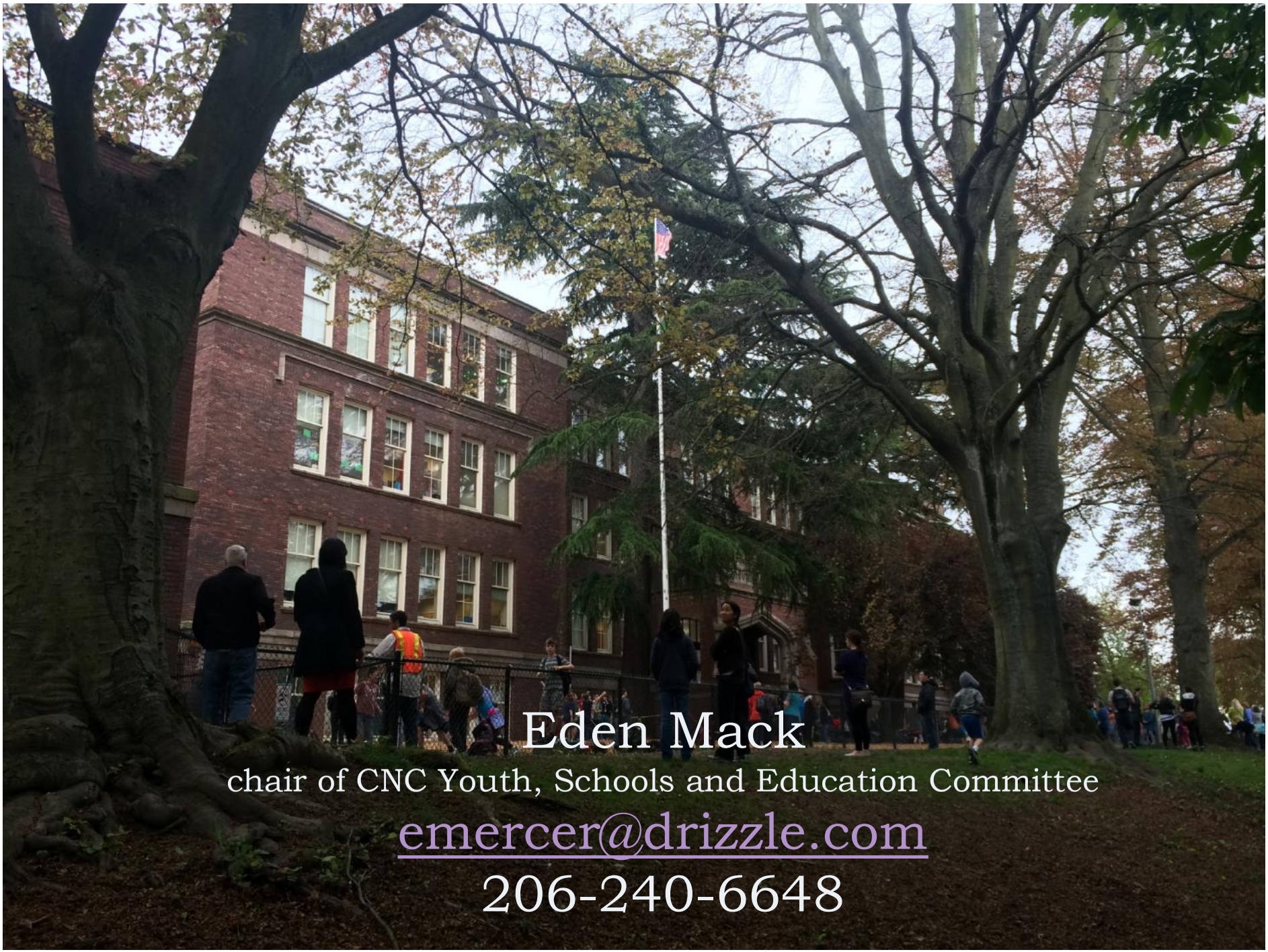
What can CNC do?

NEAR TERM ACTIONS:

- Nominate projects for BTA IV – *Deadline 4/30*
- Ask SPS to have the CNC participate as a stakeholder in BTAIV levy project decision process.
- Ask for CNC representation at SPS – CITY planning meetings

LONGER TERM ACTIONS:

- Support improved urban/neighborhood planning for school facilities and successful implementation of the KC GMPC Motion 15-1
  - "requires engagement between each school district and each city that is served by the school…[to] Plan, through a cooperative process between jurisdictions and school districts, that public school facilities are available, to meet the needs of existing and projected residential development consistent with adopted comprehensive plan policies and growth forecasts…"
- Support increased and more progressive funding for school facilities (over reliance on levies… what about Developer Impact Fees?)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