Livable South Downtown Planning Study

Final
Environmental Impact Statement

May 2008

City of Seattle
Department of Planning and Development

FINAL

ENVIRONMENTAL IMPACT STATEMENT

FOR

LIVABLE SOUTH DOWNTOWN PLANNING

May 2008

City of Seattle

Department of Planning and Development

Prepared in compliance with:
State Environmental Policy Act
Chapter 43.21, Revised Code of Washington
Chapter 197-11, Washington Administrative Code

PREFACE

INTRODUCTION

On May 15th, 2006, the City of Seattle Department of Planning and Development (DPD) issued a SEPA Determination of Significance (DS) for recommendations arising from the Livable South Downtown planning effort. The South Downtown planning process was inspired by a vision for future growth in South Downtown expressed by neighborhood plans, community organizations and property owners. The idea of encouraging more residents through infill development and through improvements to the physical environment was attractive to city leaders, and is an extension of neighborhood plan objectives for Pioneer Square and Chinatown/I.D. Numerous discussions between neighborhood stakeholders and City staff since 2004 have informed DPD's work in defining recommendations that are being advanced for further discussion and decisionmaking.

~~DRAFT~~ FINAL EIS ORGANIZATION

This ~~Draft~~ Final EIS (FEIS) is organized as follows: **Chapter 1** includes a summary of the topics addressed, major conclusions, and a summary of the alternatives' impacts in table form; **Chapter 2** provides background information on the Livable South Downtown planning effort, and a description of the ~~four~~ five alternatives evaluated in the Draft EIS (DEIS); **Chapter 3** analyzes the environmental impacts of the recommendations; **Chapter 4** includes the comment letters received during the Draft EIS comment period, and responses to those comments prepared by the lead agency. **Chapter 5** includes the transcript of the public comment meeting on the Draft EIS and responses to comments made during that meeting. The **FEIS Appendices** contain technical reports (those that have been updated since DEIS publication) from City staff and consultants that support the analyses presented in Chapter 3. Together, the EIS volumes include the FEIS, FEIS Appendices and DEIS Appendices.

SEPA NON-PROJECT REVIEW

Pursuant to the State's SEPA requirements, this environmental impact statement has been prepared to examine the potential for environmental impacts from this proposal. This is a "non-project" proposal in that it involves decisions on land use and zoning regulations for a widespread area rather than a single site-specific project. In this case, the proposal is for changes to zoning, the Land Use Code and possible Comprehensive Plan amendments. The analysis is intended to describe how the proposed regulatory changes would affect future long-term development patterns, and whether those changes would result in significant adverse impacts. The intent of this EIS is to provide substantive analysis of impact implications (at a "programmatic" level of detail), to aid in making final decisions on the proposal.

The State's SEPA rules provide for flexibility in the content and formatting of programmatic environmental review for non-project proposals. Topics that should be addressed include: background, objectives, existing conditions, description of the proposal and alternatives, and environmental impact analysis. The level of analysis should be consistent with the specificity of the proposal and available information.

Programmatic SEPA analyses of non-project proposals can lead to "phased review" in which future development proposals may adopt all or part of a programmatic SEPA analysis and add further site-specific impact analysis as necessary. This can increase the efficiency of environmental review for development proposals in the study area.

FACT SHEET

Project Title	**Livable South Downtown planning recommendations**
Nature and Location of Proposal	Livable South Downtown planning recommendations have been prepared in draft form, with further work ~~underway~~ by DPD staff to prepare final recommendations and subsequent proposal documents. These are expected to include several rezones in the study area, changes to the Land Use Code, and Comprehensive Plan amendments. This Draft EIS examines ~~four~~ five alternatives that cover a range of possible rezone actions for the City Council's consideration. ~~Three~~ Four of the alternatives **(Alternatives 1, 2, ~~and~~ 3, and the Preferred Alternative)** consist of different combinations of possible zones, maximum heights and densities (volumes) of buildings. Some of the possible zones would also require amendments to the Comprehensive Plan's preferred land use map. A **"No Action" Alternative (Alternative 4)** is included to assess what is likely to occur over time under the current Land Use Code and zoning. The impact analysis evaluates hypothetical growth patterns to the year 2030, based on assumptions consistent with Puget Sound Regional Council projections. The area affected by the proposal includes the entire Pioneer Square and Chinatown/International District neighborhoods, a portion of the Greater Duwamish Manufacturing and Industrial Center (MIC) immediately south of the Downtown Urban Center (to 1st Ave. S./S. Holgate St.), and a western edge of the Central District known as the Jackson Place neighborhood.
Proponent	City of Seattle
Lead Agency	City of Seattle Department of Planning and Development 700 Fifth Avenue, Suite 2000 PO Box 34019 Seattle, WA 98124-4019
Responsible Official	Diane Sugimura
Date of Implementation	The proposal will be forwarded to the City Council in 2008.
Contact Person	Gordon Clowers City of Seattle Dept. of Planning and Development 700 Fifth Avenue, Suite 2000 PO Box 34019 Seattle, WA 98124-4019 206-684-8375
Required Approvals	Actions on the proposal will require approval by the City Council.
Comment Period	Comment period for the DEIS was through December 17th, 2007.

Date of Public Meeting	The public meeting to accept verbal comments on the Draft EIS was ~~will be~~ held on Wednesday, December 5th, 2007 at City Hall, 6:30 PM, in the Bertha Landes Room. City Hall address: 600 4th Avenue (enter from 5th Avenue between James and Cherry Streets).
EIS Authors and Principal Contributors	**Primary author, EIS coordination** City of Seattle Dept. of Planning and Development staff: Gordon Clowers, Susan McLain, Dennis Meier, John Skelton **Real Estate/Economic consultants** BHC Consultants, Property Counselors Strategic Economics, Trang D. Tu Consulting **Transportation consultant** The Transpo Group **Noise Analysis consultant** ESA Adolfson **Urban Design consultant** Nakano and Associates Makers Atelier Dreiseitl **Historic Resources consultant** Beth Dodrill Consulting **Sustainability consultant** International Sustainable Solutions
Location of Background Data	City of Seattle Dept. of Planning and Development 700 Fifth Avenue, Suite 2000 PO Box 34019 Seattle, WA 98124-4019
FEIS Date of Issuance	May 29, 2008
Nature and Date of Final Action	The City Council is expected to take action in 2008 on the recommendations.
Availability of Draft EIS	Copies of the Final EIS are available for public review at several branches of the Seattle Public Library. Interested parties may obtain copies of the Draft EIS free of charge (while supplies last) at DPD, 20th floor Seattle Municipal Tower, 700 Fifth Avenue. The Draft EIS also may be viewed at DPD's website, at www.seattle.gov/dpd. A postage fee of $5.00 must be paid for each volume if documents (FEIS volume and appendix volume) are to be mailed. Please send a check payable to the **City of Seattle** to: City of Seattle DPD Public Resource Center PO Box 34019 Seattle, WA 98124-4019

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B.1 REVISED FOR FINAL EIS. Land Use—Height, Bulk, Scale and Compatibility (Seattle DPD)

C. Land Use—Business and Economic Impacts. "Little Saigon & Chinatown/ International District, Impacts on Local Businesses from Proposed Land Use/Zoning Changes and Dearborn Street Mixed-Use Shopping Center (Strategic Economics, Trang D. Tu Consulting)

C-1 Phase I: Assessment of Existing Business and Retail Real Estate Conditions

C-2 Phase II: Evaluation of Likely Impacts of Zoning Changes and Dearborn Street Project

C-3 Phase III: Economic Development Strategies

D. Land Use. "An Assessment of Real Estate and Economic Conditions in South Downtown Neighborhoods" (BHC Consultants, Property Counselors)

E.1 REVISED FOR FINAL EIS. "Housing Resources Evaluation and Impact Analysis" (Seattle DPD)

F. Noise. "Seattle South Downtown Noise Study (ESA Adolfson)

G.1 REVISED FOR FINAL EIS. Transportation and Parking. "Livable South Downtown Transportation Discipline Report" (The Transpo Group)

H. Historic Resources. "Historic & Cultural Resources Report for the Livable South Downtown Draft EIS" (Beth Dodrill Consulting)

I. Pioneer Square – Skid Road National Historic District Map and Property Information

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ELEMENTS OF THE ENVIRONMENT[1]

Earth – Earthquake Hazards ..... Reviewed
Air Quality (see Environmental Health section) ..... Reviewed
Water ..... Not Reviewed
Plants and Animals ..... Not Reviewed
Energy ..... Reviewed
Natural Resources ..... Not Reviewed
Environmental Health—Noise ..... Reviewed
Environmental Health—Toxic/hazardous materials ..... Reviewed
Environmental Health—Risk of Explosion ..... Not Reviewed
Land Use ..... Reviewed
Business/Economic Impacts ..... Reviewed[2]
Height/Bulk/Scale ..... Reviewed
Housing ..... Reviewed
Population and Employment ..... Reviewed[3]
Historic and Cultural Preservation ..... Reviewed[4]
Light and Glare (see Land Use—Height, Bulk, Scale & Compatibility section) ..... Reviewed
Scenic Resources and Public View Protection ..... Reviewed
Transportation ..... Reviewed
Parking ..... Reviewed
Fire/Emergency Protection ..... Reviewed
Police Protection ..... Reviewed

[1] Other elements of the environment not shown in this list are excluded from the EIS scope. With regard to SMC 25.05.440 E 6 a, analysis of employment growth is included but the topics of public investment and taxation are excluded from the EIS scope.

[2,3,4] The topics of business/economic, cultural preservation, population- and employment-related impacts are included as "additional analysis" topics per SMC 25.05.440 G. The adequacy of such analyses shall not be used to determine whether the EIS meets the requirements of SEPA.

Schools ..... Not Reviewed
Parks and Recreation ..... Reviewed
Water Supply ..... Reviewed
Stormwater Utilities ..... Reviewed
Sewer ..... Reviewed
Solid Waste ..... Not Reviewed
Maintenance ..... Not Reviewed
Communications ..... Not Reviewed
Other Governmental Services/utilities ..... Not Reviewed
Shadows on Open Spaces (see Land Use—Height, Bulk, Scale & Compatibility) .... ~~Not~~ Reviewed

Chapter One

Summary

CHAPTER ONE
SUMMARY

INTRODUCTION

The Livable South Downtown planning effort is a multi-year planning process conducted by the Seattle Department of Planning and Development. The project will result in land use recommendations for City Council consideration in 2008. South Downtown planning involves assessment of growth possibilities, review of community objectives, and analysis of potential updates to land use and zoning regulations and changes to Comprehensive Plan future land use designations that will support a desirable future for South Downtown.

~~The Draft~~ This Final Environmental Impact Statement (FEIS) was prepared to describe the environmental effects of possible land use actions in South Downtown as required by the State Environmental Policy Act (SEPA). The FEIS provides a comprehensive analysis of the implications of possible zoning choices, for the elements of the environment included in the EIS scope. It also provides information to the public and to decision-makers, and ~~ensures~~ documents that environmental considerations ~~are~~ have been incorporated into planning.

Chapter 1 summarizes ~~four~~ five possible land use scenarios or "alternatives" that are fully described in Chapter 2, including a Preferred Alternative newly added to this Final EIS. Chapter 1 also features a table that compares the alternatives' impacts (Table 1-1). These impacts are analyzed in detail throughout Chapter 3. Chapter 4 contains several comment letters received during the comment period following Draft EIS publication, and responses to those comments by the lead agency. Chapter 5 includes the transcript of the public comment meeting on the Draft EIS and responses to comments made during that meeting. Several technical reports that support the impact analysis are contained in the Appendices to the EIS, bound in a separate volume. Those appendices included with the Final EIS update and supplement the appendices published with the Draft EIS, all of which comprise the documentation for the Environmental Impact Statement. Please note that in this Final EIS, underlines and struck-out text indicate where additions and deletions have been made since publication of the Draft EIS.

The Livable South Downtown planning project acknowledges the visions expressed in the neighborhood plans, including Pioneer Square, Chinatown/International District (I.D.), and the Greater Duwamish Manufacturing and Industrial Center (MIC) Plan. South Downtown planning pursues the next steps to implement several land use-related aspects of these plans (predominantly those in the Pioneer Square and Chinatown/I.D. neighborhood plans), and the planning effort and this EIS analyzes potential impacts associated with such changes. This includes the possibility of changes away from industrial land use and zoning ~~whether existing conditions~~ in the portion of the study area within the MIC, ~~warrant~~ which would contrast with the objectives of the MIC Plan. Such changes are evaluated by the City through the Livable South Downtown planning project in its consideration of possible amendments to the Comprehensive Plan, Land Use Code and zoning intended ~~a change of direction in order~~ to encourage desirable patterns of growth.

EIS ALTERNATIVES AND GROWTH SCENARIOS

The FEIS compares and contrasts ~~four~~ five alternative zoning scenarios for the South Downtown study area (see Figure 1-1). ~~Three~~ Four of the alternatives (1, 2, ~~and~~ 3 and the Preferred Alternative) suggest varied sets of rezones for sub-areas throughout South Downtown. Alternative 4 ("No Action") analyzes future growth within the framework of existing zoning.

- Alternative 1 proposes a greater degree of change to zoning in the western portion of the study area
- Alternative 2 suggests greater change in the central and eastern portions of the study area
- Alternative 3 proposes a set of rezones that is distributed evenly across the study area
- Alternative 4, the "No Action" Alternative, addresses future conditions within existing zoning.
- The Preferred Alternative proposes zoned height limits and densities that are among the highest levels studied for each portion of the study area, except for the Stadium Area south of Royal Brougham Way. The Preferred Alternative is comparable in most respects to a hybrid of Alternative 1 and Alternative 2.

The EIS impact analysis is facilitated by projecting hypothetical patterns of growth that could ~~are likely to~~ occur by the year 2030 under each of the alternative zoning scenarios. The hypothetical distribution of development identifies future buildings that would be possible under each alternative's zoning pattern. The amount of assumed growth aligns with growth projections of the Puget Sound Regional Council (PSRC) for 2030. ~~as well as the City's projections of future growth.~~ The Population and Employment section of Chapter 3 provides further discussion on this topic.

TOPICS ADDRESSED IN THE IMPACT ANALYSIS

This Final EIS examines how the zoning alternatives and possible future development would affect various elements of the natural and built environment, with an emphasis on identifying potential significant adverse impacts. These are evaluated within the City's framework of policies that relate to the SEPA requirements for environmental review. An EIS scoping process that occurred during mid-2006 contributed to the selection of environmental elements to study.

Environmental elements studied within the South Downtown EIS can be grouped into three broad categories:

Neighborhood Character and Functions

The EIS discusses impacts relating to neighborhoods' economic functioning, availability of affordable housing resources, preservation of historic and cultural resources, and compatibility of future new construction within existing land use patterns and neighborhood settings.

Public Services, Utilities, Transportation Systems

The EIS discusses impacts on the functioning of systems that serve the city. These include transportation, parking, water, sewer and energy systems. They also include the provision of public services such as police and fire protection, parks and other recreational amenities.

Relationship to Natural Environment

The EIS discusses impacts relating to noisy conditions and hazardous or polluting substances that are present and may have a bearing on future development. It also discusses impacts relating to the area's susceptibility to damage from earthquakes.

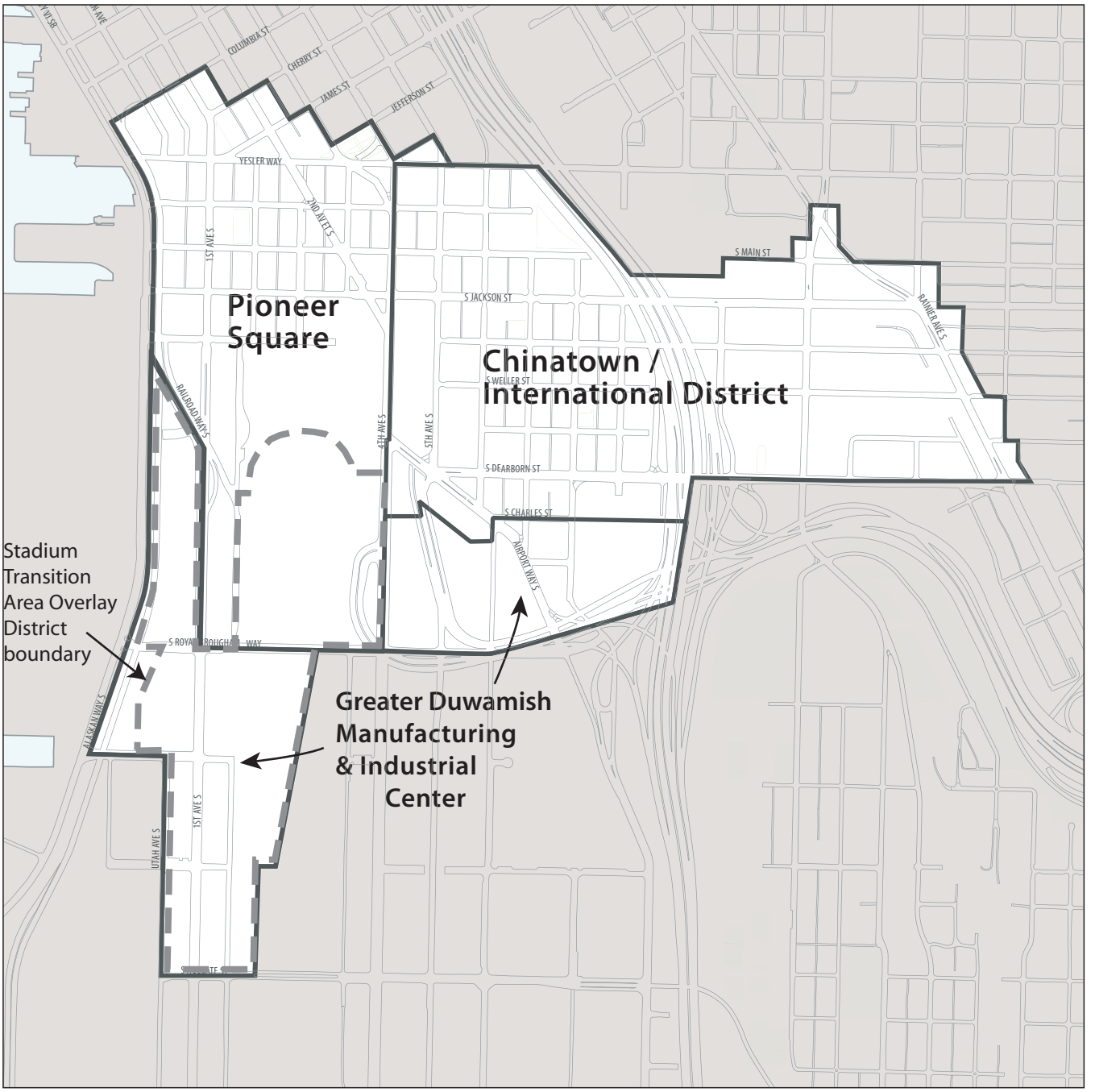


Figure 1-1

Study Area

Livable South Downtown

MAJOR CONCLUSIONS

The major impact conclusions reached in this Final EIS suggest that rezone choices across the study area should be carefully made. Zoning will significantly influence how new development fits in with the historic neighborhoods, including the size and shape of buildings in the larger properties at these neighborhoods' periphery. Decision-makers should also consider how zoning choices may affect the existing business communities and affordable housing resources currently in these neighborhoods. Chapter 3 and the Appendices of this Final EIS provide more details on the impact analyses, and describe several mitigation strategies that would be able to effectively address identified significant adverse impacts.

Height, Bulk, Scale, Historic Preservation and Compatibility Impacts

The Final EIS zoning alternatives describe a range of possible zoning actions in South Downtown, including a Preferred Alternative. For most zone choices, the potentially undesirable impacts that might occur from additional building height and bulk are avoided through carefully selecting the zones applicable to geographic areas, as well as through the application of design controls, height and bulk controls, or other impact-mitigating factors that would be applied through City codes or future City actions. For this reason, most zone scenarios would ~~likely~~ be able to result in future development that is compatible with the scale of the surrounding environment. For example, zoning alternatives in Pioneer Square and Chinatown/I.D. would protect historic resources and maintain compatible bulk and scale by limiting higher height limits to non-historic properties, and by allowing the greatest density only outside historic core areas and only ~~through~~ with the application of development standards that would help control the shape of future buildings. A further safeguard would be provided through design review and historic district special review processes, of which one would be required for most new development proposals in or near the historic districts.

However, the analysis also concludes that significant adverse impacts related to height, bulk and scale could possibly occur, in the worst case, in some locations under a number of the alternatives. These include the zoning scenarios with the greatest levels of change in height and density, under Alternatives 1, 2, 3, and the Preferred Alternative, that would affect the largest development sites: the "WOSCA" property (west side of 1st Avenue S.), the north half of Qwest Field's north parking lot, the "over-tracks" property near King Street Station, and the "Frye properties" in the south-of-Dearborn vicinity. Due to the size of these properties, the amount of increase in their development potential, and their geographic locations, significant impacts could occur under certain zoning alternatives in these areas, depending upon how well height and bulk controls are defined and included in regulatory codes to influence building shape and architectural design. Similar findings are also made for certain zoning options located in close proximity to certain historic core locations, including at the Chinatown core near 6th Avenue S./S. King Street, and for one alternative along the west side of 4th Avenue S. between S. Jackson Street and S. Washington Street. This finding of significant adverse impacts does not rule out these zoning options. Rather, it means that height and bulk controls should be tailored in sufficient detail and included in regulatory codes to mitigate impacts if those height and density limits are recommended for adoption.

The Preferred Alternative includes several recommended rezones that are the same as or similar to concepts studied under Alternatives 1 and 2, but also includes higher height and density limits in some cases such as in the southern portion of the Chinatown core, and in the affected portion of the Qwest Field north parking lot. Similar to Alternatives 1, 2 and 3, there is a worst-case potential for significant adverse height, bulk and scale impacts. However, included in the Preferred Alternative is a sufficient level of detail about height, bulk and density controls that informs the analytic conclusion that worst-case impacts can be avoided by implementing the proposed controls.

The FEIS also addresses compatibility of adjacent uses by identifying locations near highways, railroads and port facilities that are subject to elevated noise levels and possible adverse light/glare conditions. This could discourage the presence of residential uses unless they are carefully located and built to mitigate the adverse exposure of residents to such impacts. The Preferred Alternative's recommendations for zoning along the 1st Avenue S. corridor south of Railroad Way, which do not include residential uses, help avoid the potential for compatibility impacts identified in this EIS that relate to the proximity and exposure of residential uses to adjacent railroad tracks and the Port's Terminal 46 operations.

Housing Impacts

The FEIS zoning alternatives avoid direct impacts on many but not all of the affordable housing resources in the Chinatown/I.D. and Pioneer Square neighborhoods. The identified potentially adverse housing impacts relate to:

- additional demand for affordable housing generated by additional future employment in South Downtown (up to approximately 2,400 dwelling units); and
- the possible impacts of rezones that would directly affect properties with affordable housing resources (approximately 550 dwelling units in Japantown and Chinatown) that are not secured by long-term rent subsidy agreements in affordable housing categories. Such properties are described as "at-risk" ~~"medium" or "high" risk~~ of future rent increases to market-rate rental rates, condominium conversion or redevelopment.

The FEIS zoning alternatives include proposed land use strategies, such as bonus and transfer of development rights (TDR) programs that would be coupled with existing housing subsidy programs to help retain and expand affordable housing resources over time. The findings in Chapter 3 describe the additional funding for affordable housing that could be generated and affordable housing production that could occur with the assistance of subsidies.

Business/Economic Impacts

Business/economic impact analyses identify existing economic vulnerabilities in the Chinatown and Little Saigon business districts. These are indicated by narrow profit margins, sensitivity to lease rate increases, and declines in revenues from restaurants in Chinatown. However, the analyses conclude that few direct significant adverse impacts to businesses are likely to occur as a result of Livable South Downtown zoning actions and subsequent growth. The zoning ~~alternatives~~ choices made would be able to define the location and magnitude of possible changes so that significant adverse "gentrifying" effects on the business communities are not probable. Despite the limited identification of adverse impacts, the analyses identify possible actions the City should consider as part of a community-based economic development strategy. Such strategies would reinforce and enhance the economic, social and cultural contributions of Chinatown/I.D. neighborhoods.

Transportation and Parking Impacts

Analyses of transportation systems indicate that additional development likely to occur under the "Action Alternatives" (Alternatives 1, 2 ~~and~~ 3 and the Preferred Alternative) would contribute to increased congestion and poorer performance along most of the study area street corridors. There are relatively few differences among these alternatives in their overall impacts on the street network, although the modest differences among the findings are relevant to interpreting relative levels of adverse impacts. However, the analysis identifies several locations where traffic conditions in 2030, with or without zoning changes, are likely to perform measurably worse than current conditions. This would occur despite anticipated improvements in the street network provided by state highway projects and other projected

improvements. The projected peak hour congestion would also reduce overall bus transit performance unless other bus-related street network improvements are made.

Future infill development is likely to occur within several properties currently in parking use. This would displace some of the parking supply that serves the neighborhoods. Under growth scenarios to year 2030, the potential amount of off-street parking demand displaced by infill development could range up to approximately 850 to 1,300 ~~1,200~~ parking spaces. This would generate additional spill-over parking demand. It is possible, however, that a portion of this parking demand would be accommodated by people switching to other transportation modes that are highly accessible in this area's transit hub. Also, other actions affecting on-street and off-street parking resources could occur to address future parking demand, such as changes in on-street and off-street parking management strategies, and private development of other off-street parking resources.

Public Services, Utilities, and Earthquake Hazards

Analyses of water, sewer, energy, parks/recreation, fire and police protection do not identify significant adverse impacts to public services or utilities as a consequence of additional growth through 2030. Future site specific development reviews would determine whether localized utility improvements would be needed. Also, future review of structural and fire/emergency safety systems would be needed if development bridging the railroad tracks near 4th Avenue S. is proposed. With or without zone changes, the study identifies risk of earthquake damages to some utility systems if a major seismic event occurs. The extent of damage could be reduced if investments to protect such systems are made, as part of long-term citywide improvement efforts by the City to increase protection against seismic damage. A possible example is the installation of isolation valves in the water system near Yesler Way.

The utility analyses also mention the potential benefits of enhancing environmentally sustainable practices in the study area. This includes a range of possible strategies that are either proposed or encouraged by DPD's recommendations, such as rainwater harvesting and green roofs. ~~and on-site treatment of wastewater.~~ These and other measures could ~~reduce~~ increase water use efficiency and reduce peak stormwater and sewage flows, assisting in the continued efficient functioning of the sewer system. ~~resulting in better water quality for Elliott Bay.~~ Other strategies would encourage or require better energy performance in future development.

COMPARATIVE SUMMARY OF ALTERNATIVE IMPACTS

Table 1-1 summarizes the impact conclusions of Chapter 3, to provide the reader an overview and comparison of the alternatives' impacts. In the table, underlines and struck-out text indicate where additions and deletions have been made since publication of the Draft EIS.

Table 1-1
Summary of Impacts

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emph. Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	Preferred Alternative (all new)
LAND USE: ZONING & DEVELOPMENT PATTERNS				
Alternative 1 includes the following types of land use and zoning designation changes: 1. On west side of 1st Ave. S. corridor north of Royal Brougham, a rezone from current industrial zone to a non-industrial zone, moving the area into the Downtown Urban Center, and associated change in the Comprehensive Plan land use designation for this area. 2. Little Saigon east of 12th Ave. S.: a rezone from current industrial zone to a non-industrial zone, and associated change in the Comprehensive Plan land use designation for this area. 3. A rezone from IG to IC in the "south-of-Dearborn" vicinity 4. A rezone from IG to IC in the southwest corner of the "Pyramid block" near 1st Ave. S. (Note: These lists for the alternatives do not include changes to height limits.)	Alternative 2 includes the following types of land use and zoning designation changes: 1. Similar type of change as #2 in Alt. 1, in Little Saigon (except change is to Downtown Mixed zones) 2. Similar type of change as #3 in Alt. 1, in "south-of-Dearborn" vicinity 3. Similar type of change as #4 in Alt. 1, in corner of "Pyramid block" 4. A rezone from Pioneer Square Mixed to IC in south half of the Qwest Field "north parking lot", and associated change in the Comprehensive Plan land use designation for this area.	Alternative 3 includes the following types of land use and zoning designation changes: 1. Similar type of change as #1 in Alternative 1. 2. Similar type of change as #2 in Alt. 1, in Little Saigon 3. A rezone from IG to a non-industrial "South Downtown Mixed" zone in the "south-of-Dearborn" vicinity, moving the area into the Downtown Urban Center, and associated change in the Comprehensive Plan land use designation for this area. 4. A rezone from IC to a non-industrial "South Downtown Mixed" zone on the west side of 4th Ave. S. to 1.5 blocks south of S. Dearborn St., and change in the Comprehensive Plan land use designation.	No changes	The Preferred Alternative includes the following types of land use and zoning designation changes: 1. Similar type of change as #2 in Alt. 1, in Little Saigon (except change is to Downtown Mixed zones) 2. Similar type of change as #3 in Alt. 1, in "south-of-Dearborn" vicinity

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emph. Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	<u>Preferred Alternative</u> <u>(all new)</u>
Pioneer Square ***"Core"*** Significant adverse impacts would be avoided by protecting historic properties through Special Review District oversight, and through the limited extent of proposed height increases that apply only to non-historic contributing properties.	***"Core"*** Similar to Alternative 1, with somewhat less potential for impacts due to a zoning pattern tailored more closely than Alternative 1 to existing building patterns.	***"Core"*** Less potential for land use impacts than Alternatives 1 or 2, due to a height limit capped at 100' and other minor changes in zoning.	***"Core"*** No impacts because no changes are proposed.	***"Core"*** Similar to Alternative 2.
Qwest Field north parking lot and "Over-Tracks" property ~~Proposed~~ <u>Alternative 1</u> zoning avoids significant adverse land use impacts through the mix of compatible uses, conformance with Pioneer Square regulations, and <u>implementation of</u> bulk controls that <u>would</u> provide a transition to surrounding properties. Also, the outcome would be consistent with a planning approach that locates employment centers near transit hubs. These conclusions are independent of the height, bulk and scale impact analysis.	***Qwest Field north parking lot and "Over-Tracks" property*** Alternative 2 would result in the most abrupt transition from surrounding land uses, with height limits up to 240' on the north parking lot and 180' on the "over-tracks" property. Otherwise, land use impact conclusions are similar to Alternative 1.	***Qwest Field north parking lot and "Over-Tracks" property*** Land use impact conclusions are similar to Alternative 1. While zoning would accommodate 180' height limits on the "over-tracks" property, a new "South Downtown Mixed" zone would increase the potential for compatibility of development with the immediate surroundings.	***Qwest Field north parking lot and "Over-Tracks" property*** No impact because no changes are proposed.	***Qwest Field north parking lot and "Over-Tracks" property*** At north parking lot, the intensity of non-residential uses would be greater than other alternatives, with height limits up to 240' over a greater portion of the property than Alternative 2. However, compatible use patterns are anticipated. At the "over-tracks" property, worst-case potential for impacts is similar to Alts. 2 and 3. However, height, bulk and density controls included in the proposed zoning for both locations would shape and constrain the total amount of building bulk that could occur.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emph. Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	<u>Preferred Alternative</u>
LAND USE: ZONING/DEV. (cont.) ***"Railroad gap" properties north of S. Jackson St. on 4th Ave.*** Infill development over railroad tracks would increase continuity of land uses between Pioneer Square and Japantown. Development standards for this site would allow tall buildings. Further bulk controls and design review would help avoid significant adverse land use impacts (see height, bulk, scale findings below).	***"Railroad gap" properties north of S. Jackson St. on 4th Ave.*** Similar to Alternative 1. However, a rezone that extends west to 3rd Avenue would likely result in a significant adverse impact on historic buildings because the additional allowed height could subject the buildings to increased development pressure.	***"Railroad gap" properties north of S. Jackson St. on 4th Ave.*** No impact because no changes are proposed.	***"Railroad gap" properties north of S. Jackson St. on 4th Ave*** No impact because no changes proposed.	***"Railroad gap" properties north of S. Jackson St. on 4th Ave.*** Similar to but less impact potential than Alternative 2, because maximum height limit would not be usable by properties with historic-contributing structures.
Chinatown No significant adverse land use impacts are associated with increased residential/mixed use development in lightly developed portions south of S. Weller Street.	**Chinatown** Similar to Alternative 1 for the area south of S. Weller Street. However, extending the 125' zoned height to the full block north of the Uwajimaya complex (north of S. Weller Street) <u>in the worst-case</u> would represent a significant adverse land use impact due to contrast with the scale of adjacent National Register Historic District properties (see also the height, bulk and scale and historic preservation impact conclusions below).	**Chinatown** No impacts because no changes are proposed.	**Chinatown** No impacts because no changes are proposed.	**Chinatown** Similar to but slightly greater impact potential than Alternative 2, due to 150' zoned height limit that includes a block north of S. Weller Street. However, with proposed bulk controls included in this alternative, the potential for worst-case significant adverse land use impacts would be avoided.
Japantown No significant adverse land use impacts are associated with increased residential density through infill development.	Similar to Alternative 1, with less intensive levels of infill development.	Similar to Alternative 2.	No impacts because no changes are proposed.	Similar to Alternative 1.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emph. Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
LAND USE: ZONING/DEV. (cont.) **Little Saigon** Zoning with an 85' height limit could encourage future redevelopment that could adversely affect the long-term availability of existing commercial retail structures and properties for small businesses. Categorized as an "adverse" but not a "significant adverse" impact.	The proposed 125' height limit would avoid significant adverse height/bulk/scale impacts, but could adversely affect the long-term availability of the existing commercial retail structures and properties for small businesses.	Similar to Alternative 1.	No impacts because no changes are proposed.	Similar to Alternative 2 but with somewhat greater potential for adverse impacts such as those related to small business presence. However, net positive effect on area land use pattern could also occur.
South-of-Dearborn No significant adverse land use impacts are identified. Alternative 1 anticipates the retention of industrial zoning with a more intensive development pattern in commercial/office uses.	Similar to Alternative 1.	A non-industrial zone and assumed inclusion of this sub-area into the Downtown Urban Center would encourage a denser mixture of commercial, office and residential uses. Potential adverse impacts may result from proximity of residents to industrial uses, but no significant adverse land use impacts are identified.	No impacts because no change is proposed.	Similar to Alternative 2.
Stadium Area				
Significant adverse land use impacts are probable due to the relative incompatibility of residential uses that could be located in the northern portion of the WOSCA property adjacent to Port and railroad operations.	No significant adverse land use impacts are associated with the retention of IC zoning, retention of existing density limits, and increase in allowable height from 65' to 85' and 100'.	Conclusions about residential uses west of 1st Avenue S. are similar to Alternative 1. An additional concept to allow lodging as a permissible use in the 1st Ave. S. vicinity south of S. Royal Brougham Way is concluded to generate	No impacts because no change is proposed.	Conclusions similar to Alternative 2, with the retention of IC zoning, even though height and density of probable future commercial uses would be denser than could occur under Alternative 2.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emph. Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	Preferred Alternative
LAND USE: ZONING/DEV. (cont.) On the east side of 4th Avenue S. north of S. Royal Brougham Way, a rezone from IG2 to IC would increase the probability of office uses and diminish the probability of industrial use even though the industrial zone would be retained. Categorized as an "adverse" but not a "significant adverse" impact.	Similar to Alternative 1.	probable significant adverse compatibility-related impacts due to this vicinity's high level of activity, potential conflicts with traffic and relatively high noise levels. Similar to Alternative 1, except the vicinity would likely be included in the Downtown Urban Center, shifting the expected use pattern away from industrial uses and toward mixed uses.	No impacts because no change is proposed.	Similar to Alternatives 1 and 2.
LAND USE: HEIGHT, BULK, SCALE & COMPATIBILITY				
Pioneer Square ***"Core"*** Height limits up to 130' on vacant or non-historic-contributing properties would not generate significant adverse height, bulk and scale impacts (also see findings for land use/development pattern impacts).	***"Core"*** Similar to Alternative 1, with somewhat less potential for impacts due to a zoning pattern tailored more closely than Alternative 1 to existing building patterns.	***"Core"*** Less potential for land use impacts than Alternatives 1 or 2, due to a height limit capped at 100'.	***"Core"*** No impacts because no changes are proposed.	***"Core"*** Similar to Alternative 2.
Qwest Field north parking lot and "Over-Tracks" property Maximum building heights to 180' on the north parking lot and 150' on the "over-tracks" property would represent "moderate-to-large" differences in scale from	***Qwest Field north parking lot and "Over-Tracks" property*** Maximum building heights to 240' on the north parking lot and 180' on the "over-tracks" property would be "large" and "moderate-to-	***Qwest Field north parking lot and "Over-Tracks" property*** Maximum building heights to 150' on the north parking lot and 180' on the "over-tracks" property would be	***Qwest Field north parking lot and "Over-Tracks" property*** No impact because no changes are proposed.	***Qwest Field north parking lot and "Over-Tracks" property*** Maximum building heights to 240' on the north parking lot and 180' on the "over-tracks" property would represent "large"

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
LAND USE: HEIGHT, BULK, SCALE & COMPATIBILITY (continued) nearby Pioneer Square uses. In the worst-case, significant adverse height, bulk and scale impacts could occur, depending on the effectiveness of architectural and site design in shaping building bulk and arranging buildings on these properties. Additional mitigation to ensure specific bulk controls would be possible to help avoid significant impacts.	large" differences in scale from nearby Pioneer Square uses. In the worst-case, significant adverse height, bulk, and scale impacts could occur, depending on the effectiveness of architectural and site design in shaping building bulk and arranging buildings on these properties. Additional mitigation to ensure specific bulk controls would help avoid significant impacts.	"moderate" and "moderate-to-large" differences in scale from nearby Pioneer Square uses. In the worst-case, this could result in "adverse" and "significant adverse" impacts, respectively. Additional mitigation to ensure specific bulk controls would be possible to help avoid significant impacts.		and "moderate-to-large" differences in scale from nearby Pioneer Square uses, respectively. Also, a greater amount of building bulk at higher heights than other alternatives is expected. However, the inclusion of proposed controls such as setbacks and lot coverage limits at various heights means that worst-case potential for significant adverse impacts would be avoided.
"Railroad gap" properties north of S. Jackson Street on 4th Ave. A maximum building height of 180' at this location could result in significant adverse height-related impacts, due in part to the sensitivity of the historic building context.	***"Railroad gap" properties north of S. Jackson St. on 4th Ave.*** A maximum building height of 150' would not result in significant adverse impacts if limited to the "railroad gap" properties. However, rezone of other properties near 3rd Avenue could result in impacts on historic buildings (see findings in prior land use section).	***"Railroad gap" properties north of S. Jackson St. on 4th Ave.*** No impact because no changes are proposed.	***"Railroad gap" properties north of S. Jackson St. on 4th Ave*** No impact because no changes proposed.	***"Railroad gap" properties north of S. Jackson St. on 4th Ave.*** Similar to Alternative 2, except that the specific assumption that the maximum height limit would not be usable by properties with historic-contributing structures means that significant adverse impacts would be avoided.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
LAND USE: HEIGHT, BULK, SCALE & COMPATIBILITY (continued)				
Chinatown				
A maximum building height of 125' in the vicinity south of S. Weller Street would represent a "moderate" difference in scale from existing buildings. No significant adverse height, bulk, scale impacts are identified.	Similar to Alternative 1 for the area south of S. Weller Street. However, the extension of the 125' height limit to the full block north of the Uwajimaya complex (north of S. Weller Street) could result in significant adverse impacts due to proximity to and contrast with the building scale of the adjacent National Register Historic District.	No impacts because no changes are proposed.	No impacts because no changes are proposed.	Similar to but slightly greater impact potential than Alternative 2, due to 150' zoned height limit that includes a block north of S. Weller Street. However, with proposed bulk controls included in this alternative, significant adverse impacts would be avoided.
Japantown				
A maximum building height of 240' with recommended bulk controls would not generate significant adverse height, bulk and scale impacts, except on properties on the hill near 6th Avenue S., due in part to the hill's elevation.	A maximum building height of 180', with recommended bulk controls, would result in less potential for impacts than Alternative 1. No significant adverse height, bulk and scale impacts are identified.	Similar to Alternative 2.	No impacts because no changes are proposed.	Similar to Alternative 1, except that the proposed height, bulk and scale controls under the Preferred Alternative would help avoid the potential for significant adverse impacts.
Little Saigon				
A maximum building height of 85' in this vicinity would represent a "minor" change from existing zoning. No significant adverse height, bulk, and scale impacts are identified.	A maximum building height of 125' in this vicinity would result in a larger contrast with the scale of existing buildings than Alternative 1. However, with recommended bulk controls, no significant adverse height, bulk & scale impacts are identified.	Similar to Alternative 1.	No impacts because no changes are proposed.	The potential for adverse impacts would be some-what greater than under Alternative 2, due to a larger extent of properties with potential for 125-ft., 150-ft., or 160-ft. towers. However, with recommend-ded bulk controls, no significant height, bulk & scale impacts are identified.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
LAND USE: HEIGHT, BULK, SCALE & COMPATIBILITY (continued) **South-of-Dearborn** "Adverse" but not "significant adverse" height, bulk, and scale impacts are identified, due to the combination of maximum building height of 125', bulk controls, and their likely effects on new building development.	Significant adverse height, bulk, and scale impacts are probable, due to the combination of maximum building height to 160', increased density, and the worst-case potential for poor design, siting and bulk controls.	Similar to Alternative 2, but with greater potential for significant adverse height, bulk, and scale impacts. The combination of a maximum building height to 160' and a higher permissible density for mixed use development than Alternative 2, would encourage increased levels of development. Special review processes under the proposed South Downtown Mixed zone would help achieve urban design objectives & avoid worst-case impacts.	No impacts because no changes are proposed.	Similar to Alternative 2, except that with the recommended bulk and density controls, this alternative would be better able to avoid significant adverse height, bulk and scale impacts.
Stadium Area				
A worst-case potential for significant adverse height, bulk and scale impacts exists along the west side of 1st Avenue S. However, such impacts would be avoided through the use of special review processes likely to be included in the proposed South Downtown Mixed zone.	No significant adverse height, bulk and scale impacts are associated with proposed height limits ranging from 65' to 100', proposed bulk limits, and existing design review requirements for this IC zone.	Similar to Alternative 1, with slightly less potential for significant adverse height, bulk and scale impacts due to a lower height limit in the northern portion of the vicinity near Railroad Way S.	No impacts because no changes are proposed.	Worst-case potential for significant adverse impacts that is approximately similar to Alternative 1, except that proposed height, bulk and land use controls, combined with design review processes, would help to avoid significant adverse impacts.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
LAND USE: HEIGHT, BULK, SCALE & COMPATIBILITY (continued)				
Along the southern portion of the 4th Avenue S. corridor, no significant adverse height, bulk and scale impacts are identified in the industrial zoned area. (See also the "over-tracks" property conclusions.)	Worst-case potential for significant adverse height, bulk and scale impacts exists along the southern portion of the 4th Avenue S. corridor. This is due to a height limit up to 240' in the vicinity nearby to the north of S. Royal Brougham Way.	Potential impacts are somewhat less than under Alternative 1. (See also the "over-tracks" property conclusions.)	No impacts because no changes are proposed.	No change in zoning south of I-90 ramps means less potential for adverse impacts than Alternatives 1, 2 or 3. North of the I-90 ramps, potential for impacts is similar to but slightly less than Alternative 3.
Light/Glare Minor potential for adverse light/ glare impacts due to potential future designs near I-5, SR 99 or I-90, in the Chinatown, Little Saigon, "south-of-Dearborn", and Stadium Area.	**Light/Glare** Minor potential for adverse light/glare impacts, similar to Alternative 1.	**Light/Glare** Minor potential for adverse light/glare impacts, similar to Alternative 1.	**Light/Glare** No impacts because no changes are proposed.	**Light/Glare** Minor potential for adverse light/glare impacts, similar to Alternative 1.
Potential significant glare impact on Safeco Field that is identified for Alternative 2 could conceivably occur with 125' buildings between Royal Brougham Way and the I-90 off-ramp on the west side of 4th Ave. S.	Alt. 2 zoning would allow 240' buildings on west side of 4th Ave. S. between I-90 ramps and Royal Brougham that could in the worst-case reflect glare into the home-plate area of Safeco Field, a potential significant adverse impact on the ballpark's operation.	This potential effect is not likely under Alt. 3 due to a proposed height limit of 85'.	No impacts because no changes are proposed.	This potential effect is not likely under the Preferred Alternative due to a proposed retained height limit of 65' in the relevant area, with no other effect expected from proposed "over-tracks" zoning to the north of the I-90 offramp.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
LAND USE: HEIGHT, BULK, SCALE & COMPATIBILITY (continued) **Shadows** Minor adjustments to IDR 150' zone and associated slight increases in bulk potential from development at one property on Main St. could potentially result in intermittent shadowing impacts on Danny Woo Garden, although not within the spring and summer months.	**Shadows** Same as Alternative 1.	**Shadows** Same as Alternative 1.	**Shadows** No impacts because no changes are proposed.	**Shadows** Same as Alternative 1.
LAND USE: ECONOMIC & BUSINESS IMPACTS Rezones and probable future development in Little Saigon would contribute to interruption and eventual displacement of up to eight production, distribution and repair businesses located east of 12th Avenue S. in Little Saigon. This would likely occur over the next decade under existing zoning.	Similar to Alternative 1.	Similar to Alternative 1.	If existing industrial zones are retained, this impact is less likely but still could occur.	Similar to Alternative 1.
Rezones in Little Saigon could result in modest increases in the likelihood of redevelopment. Such development could result in displacement of existing businesses. This might occur under existing zoning, depending upon real estate market factors.	Similar to Alternative 1, although greater increases in development capacity are proposed by this alternative.	Similar to Alternative 1.	No impacts because no change is proposed.	Similar to Alternative 2, with slightly greater extent of change in zoning.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
LAND USE: ECONOMIC & BUSINESS IMPACTS (continued)				
The proposed Dearborn Street Project would attract a greater volume and diversity of mass market customers to the Little Saigon vicinity. This offers existing businesses an opportunity for expansion, but could also dilute the district's existing niche orientation and displace specialty businesses that do not adapt. This is an indirect impact that could occur within the next decade.	Similar to Alternative 1.	Similar to Alternative 1.	If the Dearborn Street Project is not built, these impacts would not occur.	Similar to Alternative 1.
In the Japantown vicinity near 4th and 5th Avenues, 4 to 8 businesses could be displaced by future development.	Similar to Alternative 1.	Similar to Alternative 1.	No impacts because no change is proposed.	Similar to Alternative 1.
HOUSING Rezones could negatively impact non-profit developers through increased development capacity and associated increases in property values that may affect non-profit project feasibility.	Similar to Alternative 1.	Similar to Alternative 1.	No impacts because no changes are proposed.	Similar to Alternative 1.
Employment growth in South Downtown would generate new demand for housing (around 15,000 dwelling units). ~~including Downtown housing (around 4,300 dwelling units) of which some would be for affordable housing (around 700 dwelling units).~~	Similar to Alternative 1.	Similar to Alternative 1.	Projected employment growth would generate additional housing demand for 10,000 dwelling units~~, including Downtown housing (around 2,900 units) of which some would be for affordable housing (around 470 units)~~	Similar to Alternative 1.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
HOUSING (continued) Approximately ~~1,102~~ 1,048 affordable dwelling units in Chinatown/I.D. and ~~178~~ 310 affordable dwelling units in Pioneer Square are at-risk ~~medium or high risk~~ of potential rent increases in the next 20 years. Of these, 496 dwelling units in Japantown and 58 dwelling units in the Chinatown core are within proposed rezone areas.	Similar to Alternative 1.	Less than Alternative 1. Under Alternative 3, an estimated 496 affordable dwelling units in Japantown would be directly affected by potential rezones, but no change is proposed in the Chinatown core.	Similar to Alternative 1, an estimated 1,280 units of affordable housing are considered to be at medium and high risk of rent increases or conversion with or without zoning changes. However, none would be directly affected by Alt. 4 due to no zone changes	Similar to Alternative 1.
Proposed South Downtown commercial and residential bonus programs could generate approximately 89 units and ~~135~~ 168 units of affordable housing respectively. Also, proposed TDR programs and existing programs would likely fund other affordable housing in the future.	Under Alternative 2, commercial and residential bonus programs could generate approximately 114 units and ~~120~~ 149 units of affordable housing, respectively. Other affordable housing is expected to be generated by existing affordable housing programs.	Under Alternative 3, commercial and residential bonus programs could generate approximately 110 units and ~~107~~ 133 units of affordable housing, respectively. Other affordable housing is expected to be generated by existing affordable housing programs.	Affordable housing would continue to be supported through existing programs. Affordable housing bonus programs would not apply.	Under the Preferred Alternative, commercial and residential bonus programs could generate approximately 153 units and 200 units of affordable housing, respectively.
POPULATION AND EMPLOYMENT				
No significant adverse impacts are identified. This section describes the distribution of projected growth and effects on development capacity in South Downtown sub-areas to 2030.	Similar to Alternative 1.	Similar to Alternative 1.	Less residential and job growth is projected under Alternative 4 existing zoning.	Similar to Alternative 1.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
HISTORIC & CULTURAL PRESERVATION				
Pioneer Square Adverse impacts relating to contrasts in scale from future infill development up to 130' could be possible at individual development sites in the core of Pioneer Square.	Somewhat less potential for adverse impacts is anticipated due to the presence of zones with maximum height limits less than 130' in the core of Pioneer Square.	Minimal potential for adverse impacts due to potential height limits of 100'.	No impacts identified.	Similar to Alternative 2.
Taller buildings allowed up to 180' at the "railroad gap" properties on the west side of 4th Avenue S. could result in significant adverse impacts due to scale relationships with nearby historic buildings in Pioneer Square.	Compared to Alternative 1, lesser adverse impacts are anticipated at the 150' height limit for the "railroad gap" properties. The lower heights would result in less potential for impacts on historic resources near that location. However, the inclusion of properties abutting 3rd Avenue S. in Alternative 2 rezones would increase risks of redevelopment of historic buildings, which would be a significant adverse impact.	No impacts in the 4th Avenue S. "railroad gap" vicinity because no changes are proposed at this location.	No impacts identified.	Similar to Alternative 2, except that the highest height limits would not be applicable to properties with historic resources.
Chinatown/I.D. Limited potential for adverse impacts to historic resources in the Chinatown core, due to avoidance of rezones in the National Register Historic District.	Similar to Alternative 1, except the 125' height limit for the "old Uwajimaya grocery" block would overlap with the National Register Historic District at the Publix Hotel property. The additional height could	No impacts in the Chinatown core, due to avoidance of rezones between S. Jackson Street and S. Dearborn Street.	No impacts identified.	Similar to Alternative 2 but slightly greater potential impact due to a 150' height limit for the "old Uwajimaya grocery" block (excluding the Publix Hotel property) and resulting potential, in the

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
HISTORIC & CULTURAL PRESERVATION (continued)				
	result in significant adverse impacts by creating contrasts in scale between new, taller buildings and the adjacent historic district.			worst-case, for contrasts in scale. However, height/bulk controls incorporated into this alternative would help avoid this impact.
Alteration of floorplate size limits within the IDR 150' zone could conceivably increase redevelopment pressure on four buildings within the National Register-designated Japantown area near 6th Avenue S./S. Main Street.	Similar to Alternative 1.	Similar to Alternative 1.	No impacts identified.	Due to the zoning recommendations of this alternative, this potential impact is avoided.
The Alternative 1 rezone with a height limit increase to 85' could potentially adversely affect the long-term retention of the historic landmark Victorian Row Apartments located on S. King Street east of 12th Avenue S.	The Alternative 2 rezone with a height limit increased to 125' would increase potential for adverse impacts, compared to Alternative 1.	Similar to Alternative 1.	No impacts identified.	Similar to Alternative 2.
A survey indicates the presence of 14 non-designated buildings that "may" meet landmark designation criteria in the study area. Of these, 10 may be directly affected by proposed rezones. Later processes would be needed to determine which, if any, of the locations would meet landmark criteria.	Similar to Alternative 1.	Similar to Alternative 1.	No impacts identified.	Similar to Alternative 1.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	Preferred Alternative
TRANSPORTATION Approximately 37,800 person trips are anticipated to/from study area locations in the AM peak ~~hour~~ period and 54,100 person trips in the PM peak ~~hour~~ period. For all alternatives, it is noted that 90% of all trips in the study area are pass-through trips, meaning they do not begin or end in the study area but contribute to congestion.	Approximately 38,300 person trips to/from study area locations in the AM peak ~~hour~~ period and 54,550 person trips in the PM peak ~~hour~~ period.	Approximately 38,800 person trips to/from study area locations in the AM peak ~~hour~~ and 55,250 person trips in the PM peak ~~hour~~ period.	Approximately 32,100 person trips to/from study area locations in the AM peak ~~hour~~ period and 46,600 person trips in the PM peak ~~hour~~ period.	Similar to Alternatives 2 and 3. Approxi-mately 38,000-39,000 person trips in the AM peak period, 54,500-55,500 person trips in the PM peak period, and similar percent of pass-through trips for the Preferred Alternative.
AM Peak Hour, Corridor: Average travel speeds and the corridor's "level of service" (graded in terms of "A" to "F") in the AM peak hour would decline to levels very similar to "No Action" 2030 baseline levels in most locations (see Alt. 4). Along Rainier Avenue S. and S. Jackson Street corridors, a 1-2 mile per hour decline in travel speeds is attributed to projected development levels in Little Saigon.	**AM Peak Hour, Corridor:** Similar to conclusions for Alternative 1. The modeled speeds would be low, at approximately 2 mph along northbound Rainier Avenue S. and westbound S. Atlantic Street.	**AM Peak Hour, Corridor:** Similar to conclusions for Alternative 1. The modeled speeds would be low, at approximately 2 mph along northbound Rainier Avenue S. and westbound S. Atlantic Street.	**AM Peak Hour, Corridor:** Average travel speeds and the corridor's "level of service" (LOS) (graded in terms of "A" to "F") in the AM peak hour would decline by one or two grades and a few miles per hour along most arterial street corridors. Most notably, travel along routes such as northbound Rainier Avenue S., S. Atlantic Street (both directions), 4th Avenue S. (both directions) and westbound S. Dearborn Street would experience greater reductions in travel speed.	**AM Peak Hour, Corridor:** Similar to conclusions for Alternative 2, except within the 1st Avenue S. corridor where results would likely be between those of Alternatives 1 and 2.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	Preferred Alternative
TRANSPORTATION (continued) **PM Peak Hour, Corridor:** Nearly all level of service findings would be the same as identified for Alternative 4, which is the 2030 No Action baseline condition. Average travel speeds in the PM peak hour would show additional declines of 2 to 6 mph from the baseline condition on Rainier Avenue S., and 2 mph on S. Dearborn Street, attributed to projected development levels in Little Saigon.	**PM Peak Hour, Corridor:** Similar to conclusions for Alternative 1, except additional declines in average travel speeds on S. Dearborn Street could range up to 5 mph, slightly worse than Alternative 1. The modeled average speeds would be low at 1-2 mph in the eastbound direction on S. Dearborn Street, and in the southbound direction of Rainier Avenue S.	**PM Peak Hour, Corridor:** Similar to conclusions of Alternative 2.	**PM Peak Hour, Corridor:** Average travel speeds and the corridor's "level of service" in the PM peak hour would decline by one grade and a few miles per hour along some arterial street corridors. All east-west corridors would experience corridor LOS F, and the north-south 4th Avenue S., Rainier Avenue S., and 2nd Avenue Extension corridors would also experience LOS F conditions.	**PM Peak Hour, Corridor:** Similar to conclusions for Alternative 2, except within the 1st Avenue S. corridor where results would likely be between those of Alternatives 1 and 2.
AM Peak Hour, Intersections: Eight of 49 signalized intersections are predicted to operate at LOS E or F, of which five would operate at LOS F: • 1st Ave. S./S. Spokane St. • 1st Ave. S./S. Atlantic St. • 4th Ave. S./S. Spokane St. • 4th Ave. S./Airport Way S. • Rainier Ave. S./S. Jackson St.	**AM Peak Hour, Intersections:** Ten of 49 signalized intersections are predicted to operate at LOS E or F, of which six would operate at LOS F: • 1st Ave. S./S. Spokane St. • 1st Ave. S./S. Atlantic St. • 4th Ave. S/S Spokane St. • 4th Ave. S./Airport Way S. • Rainier Ave. S./S. Jackson St. • 4th Ave. S./S. Weller St.	**AM Peak Hour, Intersections:** Ten of 49 signalized intersections are predicted to operate at LOS E or F, of which six would operate at LOS F: • 1st Ave. S./S. Spokane St. • 1st Ave. S./S. Atlantic St. • 4th Ave. S/S Spokane St. • 4th Ave.S./Airport Way S. • Rainier Ave. S./S. Jackson St. • SR 99 "frontage" road at S. Royal Brougham Way	**AM Peak Hour, Intersections:** Seven of 49 signalized intersections are predicted to operate at LOS E or F, of which five would operate at LOS F: • 1st Ave. S./S. Spokane St. • 1st Ave. S./S. Atlantic St. • 4th Ave. S./S. Spokane St. • 4th Ave. S./Airport Way S. • Rainier Ave. S./S. Jackson St.	**AM Peak Hour, Intersections:** Based on a qualitative overview comparison among the alternatives, the probable impacts would be within the range of those identified for Alternatives 2 and 3.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	Preferred Alternative
TRANSPORTATION (continued) **PM Peak Hour, Intersections:** Twelve of 49 signalized intersections are predicted to operate at LOS E or F, of which six would operate at LOS F: • Rainier Ave. S./S. Jackson St. • Rainier Ave. S./S. Dearborn St. • 4th Ave. S./S. Royal Brougham Way • 4th Ave. S./S. Spokane St. • 1st Ave. S./S. Lander St. • Airport Way S./S. Dearborn St.	**PM Peak Hour, Intersections:** Similar to Alternative 1.	**PM Peak Hour, Intersections:** Similar to Alternative 1, except one additional intersection would degrade from LOS E to F, located at 1st Ave. S./S. Royal Brougham Way.	**PM Peak Hour, Intersections:** Seven of 49 signalized intersect-tions are predicted to operate at LOS E or F, of which five would operate at LOS F: • Rainier Ave. S./S. Jackson St. • Rainier Ave. S./S. Dearborn St. • 4th Ave. S./S. Royal Brougham Way • 4th Ave. S./S. Spokane St. • 1st Ave. S./S. Lander St.	**PM Peak Hour, Intersections:** Based on a qualitative overview comparison among the alternatives, the probable impacts would be within the range of those identified for Alternatives 2 and 3.
Transit operating speeds: The average operating speed of transit vehicles along primary corridors would decline slightly more than the 2030 baseline conditions (see Alt. 4). The identified differences in speed, per average travel speed in 2030 as a percentage of posted speed limits, would range from 0% to a 4% difference. This would occur most notably along Rainier Ave. S. and S. Jackson St.	**Transit operating speeds:** Similar to Alternative 1, with a slight additional decline in transit speeds along 1st Avenue S. north and south of S. Royal Brougham Way.	**Transit operating speeds:** Similar to Alternative 2.	**Transit operating speeds:** Increasing traffic volumes and congestion would contribute to slower average transit speeds. These speeds would fail to meet a goal of 30% of the posted speed limit.	**Transit operating speeds:** Based on a qualita-tive overview com-parison among the alternatives, the prob-able impacts would be most comparable to Alternative 2.
Typical passenger loads on buses in peak hours would increase, most notably along S. (see next page)	Approximately the same as Alternative 1 and Alternative 4.	Slightly less passenger loading impacts than Alternative 1 and Alternative 4.	Approximately the same as Alternative 1.	Approximately the same as Alternative 1.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
TRANSPORTATION (continued) Jackson Street, 2nd and 3rd Aves. Alternative 1's measures of passenger loading are similar to those identified for the 2030 No Action Alternative (Alt. 4).				
Increasing general traffic volumes will mean fewer gaps in traffic to allow truck movements to and from Major Truck Streets, from local streets and driveways.	Impacts similar to Alternative 1.	Impacts slightly greater than Alternative 1 due to more congestion.	Impacts similar to but slightly less than Alternative 1.	Impacts similar to Alternative 1.
Average travel speeds along most truck routes would decline, similar to results shown above for AM and PM peak hours. This would reduce the efficiency of truck movements on these corridors	Impacts similar to Alternative 1, with slightly worse travel speeds along S. Dearborn Street during peak hours.	Somewhat lower average travel speeds, most notably along S. Dearborn Street during peak hours, indicating slightly greater impacts than Alternative 1.	Impacts similar to but slightly less than Alternative 1.	Impacts likely in the range between Alternatives 2 and 3.
More development would contribute to higher pedestrian, bicyclist and automobile traffic volumes, which could increase the number of pedestrian-vehicle and bicycle-vehicle conflicts in the study area. It could also exacerbate conditions where there are deficiencies in bicycle facilities.	Similar to Alternative 1.	Similar to Alternative 1.	Lesser impacts than Alternative 1. With a lesser amount of projected new development, there would likely be lesser volumes of pedestrians and bicyclists subject to possible conflicts.	Similar to Alternative 1.
Additional congestion and traffic volumes generated by future development would contribute to adverse traffic conditions during stadium event periods. Changes in traffic patterns and road systems may also influence how stadium event traffic and access is man-aged by the responsible parties.	Similar to Alternative 1.	Similar to Alternative 1.	A lesser amount of projected growth under Alternative 4 could mean a somewhat lesser impact on event management concerns.	Similar to Alternative 1.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
PARKING **Off-Street:** By 2030, the potential amount of off-street parking demand that is displaced by infill development could range up to approximately 1,100-1,200 parking spaces. This would generate additional amounts of spill-over parking demand, unless the demand was altered by changes to transit travel, or otherwise served.	Similar to Alternative 1, except the estimate of displaced parking demand is for approximately 1,000 spaces.	Similar to Alternative 1.	With growth projected for 2030 under this alternative, a lesser level of displaced parking demand, of approximately 850 parking spaces. Also, up to 120 off-street parking spaces could be lost, in relation to road improvement projects.	Similar to Alternative 1, except that approximately 60 – 160 additional parking spaces could be lost due to projected development, most in Little Saigon.
On-Street: With future infill development and other parking losses incurred through road improvement projects, demand and competition for on-street parking would increase. On-street parking could be lost with new curb cuts or other sidewalk or transit improvements, and could be subject to conversion from free to paid parking in some locations.	Impacts are relatively similar to Alternative 1, although there could be localized differences in demand for on-street parking depending on where the greatest amounts of new development occur.	Impacts are relatively similar to Alternative 1, although there could be localized differences in demand for on-street parking depending on where the greatest amounts of new development occur.	Even if no zone changes occur, the study area would be subject to losses of approximately 220 to 650 parking spaces, in relation to road improvement projects	Similar to Alternative 1.
PUBLIC VIEW PROTECTION				
In views west from Danny Woo Garden, future development could block most of a view toward mountains and Puget Sound.	Impacts are relatively similar to Alternative 1, but with a lesser maximum height limit.	Similar to Alternative 2.	Somewhat less potential for impacts, due to existing zone with a 150' height limit.	Similar to but slightly less potential for impacts than Alternative 1.
Future development at the "over-tracks" property along the west side of 4th Avenue S. would affect views from a designated scenic route toward the Downtown skyline and the King Street Station clock tower.	Impacts are relatively similar to Alternative 1, but with a greater maximum height limit.	Similar to Alternative 2.	This impact unlikely to occur under existing zoning.	Somewhat less potential for impacts than Alternatives 1, 2, or 3, due to the recommended zoning and bulk controls.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
PUBLIC VIEW PROTECTION (continued) From the Harborview Viewpoint, views toward the southwest could be adversely affected by future development to 240' heights in the 6th Ave./ Yesler Way vicinity.	Adverse impacts would be less than under Alternative 1, due to future development up to 180' heights	Similar to Alternative 2.	Development under existing zoning to 150' would have less potential for adverse impacts than Alternatives 1, 2 or 3.	Similar to Alternative 1.
ENVIRONMENTAL HEALTH				
Noise Increased numbers of newly-developed residential units would face adverse exposure to high noise levels, if built in proximity to SR 99 (and adjacent railroad tracks) and Interstate 5. Interior noise levels could be reduced by noise dampening construction techniques if included in design of ~~they are required by future City review~~ of individual development proposals.	Potential exposure to noisy ~~impacts~~ conditions would be relatively more possible than Alternative 1 along the east side of I-5 in Little Saigon, but less possible near SR 99 due to the industrial (non-residential) zoning that would be located on the west side of 1st Ave. S. south of Railroad Way S.	Potential exposure to noisy ~~impacts~~ conditions would be similar to Alternative 1, except residential uses would also be possible in the south-of-Dearborn vicinity	No additional exposure to noisy ~~impacts~~ conditions identified, but SR 99 and I-5 would continue to generate the potential for adverse noise exposure on developments on nearby properties.	Similar to Alternative 2.
Hazardous Substances Due to presence of hazardous substances in industrial areas, there is a worst-case potential for elevated exposure and health risks. However, required cleanup would help avoid the worst-case scenario.	Due to zoning patterns, less potential for exposure than Alternative 1.	Due to zoning patterns, greater potential for exposure than Alternative 1.	Due to zoning patterns, less potential for exposure than Alternatives 1 or 2.	Similar to Alternative 2.
Odor/Air Quality ~~If~~ fFuture residential development ~~occurs~~ within approximately one block (300-600 feet) ~~100-200~~ feet of I-5, I-90, SR 99 and railroad tracks~~,~~ ~~there is potential for~~ could adversely expose residents to particulate air pollutants and related health effects.	Less potential for impacts than Alternative 1, due to no residential exposure to SR 99 and nearby railroad tracks.	Somewhat greater potential for impacts than Alternative 1, due to potential presence of residents in the south-of-Dearborn vicinity.	No impacts identified.	Similar to Alternative 2.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
FIRE/EMERGENCY PROTECTION Gradual increases in call volumes, with an associated need for increased staffing and equipment over time.	Similar to Alternative 1.	Similar to Alternative 1.	Somewhat less than Alternative 1 due to less assumed development.	Similar to Alternative 1.
A worst-case potential for a rail accident under the "over-tracks" properties near King Street Station would necessitate ventilation, fire preventive and life safety systems sufficient to protect the railroad tracks use.	Similar to Alternative 1, potentially with increased "over-tracks" development.	Similar to Alternative 1.	This impact not likely under Alternative 4.	Somewhat reduced potential for worst-case safety impacts than Alternatives 1, 2 or 3 due to differences in assumed future "over-tracks" development.
POLICE PROTECTION				
Gradual increases in call volumes, due to increased residential and employee presence, increasing demand for police resources	Similar to Alternative 1.	Similar to Alternative 1.	Somewhat less than Alternative 1 due to less assumed development.	Similar to Alternative 1.
PARKS AND RECREATION				
Additional levels of residential and employment growth would increase anticipated demand for parks/recreational amenities above previous City estimates. This would amount to an additional: -- 3.7 acres of park/recreation space for new residents	Similar to Alternative 1, amounting to an additional: -- 4.0 acres of park/recreation space for new residents	Similar to Alternative 1, amounting to an additional: -- 4.1 acres of park/recreation space for new residents	Less than Alternative 1, amounting to an additional: -- 1.4 acres of park/recreation space for new residents	Similar to Alternative 1, amounting to an additional: -- 4.1 acres of park/recreation space for new residents
ENERGY				
Increased demand for energy with future development, moderated by the incorporation of proactive strategies for energy efficiency and carbon emission reductions.	Similar to Alternative 1.	Similar to Alternative 1.	Somewhat less than Alternative 1 due to less assumed development.	Similar to Alternative 1.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
ENERGY (continued) No significant adverse impacts identified on the energy system. However, local improvements might be needed on a site-by-site basis with future projects. This might include cases where clearances between overhead lines and new buildings would need to be addressed through building design adjustments or undergrounding of electric utilities.	Similar to Alternative 1.	Similar to Alternative 1.	Similar to Alternative 1.	Similar to Alternative 1.
WATER UTILITY				
Increased demand for domestic water service and fire flow availability with future development.	Similar to Alternative 1.	Similar to Alternative 1.	Somewhat less than Alternative 1 due to less assumed development.	Similar to Alternative 1.
No significant adverse impacts identified on the water utility system.	Similar to Alternative 1.	Similar to Alternative 1.	Somewhat less than Alternative 1 due to less assumed development.	Similar to Alternative 1.
SEWER & STORMWATER UTILITY				
Increased generation of sewage and stormwater volumes with future development.	Similar to Alternative 1.	Similar to Alternative 1.	Somewhat less than Alternative 1 due to less assumed development.	Similar to Alternative 1.
No significant adverse impacts identified on the sewer utility systems.	Similar to Alternative 1.	Similar to Alternative 1.	Somewhat less than Alternative 1 due to less assumed development.	Similar to Alternative 1.

Alternative 1 Infill Emphasis Toward West	Alternative 2 Infill Emphasis Toward East	Alternative 3 Distributed Growth	Alternative 4 No Action Alternative	**Preferred Alternative**
EARTH (SEISMIC HAZARDS) With or without zone changes, future development would occur in study area vicinities with elevated risk of seismic damage. A tsunami with a potential flood surge of five feet across portions of the study area would also be possible if an earthquake occurred under Elliott Bay.	Potential damage risks are similar to those under Alternative 1.	Due to a greater potential residential presence between S. King Street and S. Royal Brougham Way, the potential risks relating to seismic damage could be greatest under Alternative 3.	Potential damage risks are similar to those under Alternative 1.	Similar to Alternative 2.

Chapter Two
Description of Alternatives

CHAPTER TWO

DESCRIPTION OF ALTERNATIVES

INTRODUCTION AND LOCATION OF PROPOSAL

The Livable South Downtown planning process was initiated in 2005 by the City's Department of Planning and Development (DPD). Preliminary recommendations were released by DPD in March 2006, and the Livable South Downtown recommendations report was released in late May with this Final EIS. Land use and zoning alternatives are required to undergo environmental review prior to legislative decision-making. Consequently, DPD has published this environmental impact statement (EIS) to provide information to decisionmakers, agencies and interested citizens.

The EIS studies the environmental impacts of ~~three~~ four "action" alternatives including a Preferred Alternative that include possible land use and zoning changes associated with Livable South Downtown planning, and one "no-action" alternative. ~~These~~ Land use and zoning changes, if adopted, would influence future patterns of growth and development in South Downtown, including maximum heights and sizes of future buildings that may be built in the area. The EIS analysis considers the implications of the full range of recommendations covered within the Livable South Downtown planning process.

The South Downtown study area addressed in this EIS covers the southern portion of the Downtown Urban Center (Pioneer Square and Chinatown/I.D. neighborhoods), segments of industrial lands located at the northern boundaries of the Greater Duwamish Manufacturing and Industrial Center (MIC), and a peripheral edge of the Jackson Place neighborhood just east of Rainier Avenue S. (see Figure 2-1). This narrow strip extends as far north as the intersection of 12th Avenue S. and Boren Avenue S. and as far south as S. Dearborn Street.

BACKGROUND

Origins of the Livable South Downtown planning process

The South Downtown planning process was inspired by a vision for future growth in South Downtown expressed by neighborhood plans, community organizations and property owners. The idea of encouraging more residents through infill development and through improvements to the physical environment was attractive to city leaders, and is an extension of neighborhood plan objectives for Pioneer Square and Chinatown/I.D.

DPD staff identified current challenges and impediments to desired objectives, including:

- a high water table and earthquake hazards that influence building design and renovation
- public safety perceptions
- traffic congestion
- possibly dated land use and zoning designations and regulations
- the complexity of special review processes in areas of historic and cultural significance
- challenges relating to planning for and addressing affordable housing needs.

Also, a number of land use policy-related topics to consider were identified, a few of which are:

- preservation and rehabilitation of historic structures
- effective transition between Downtown and industrial areas to the south
- ~~preservation of~~ the possibility of making changes to the zoning status of industrial lands near the northern edge of the Greater Duwamish Manufacturing and Industrial Center, and potential impacts of residential uses near industrial uses.

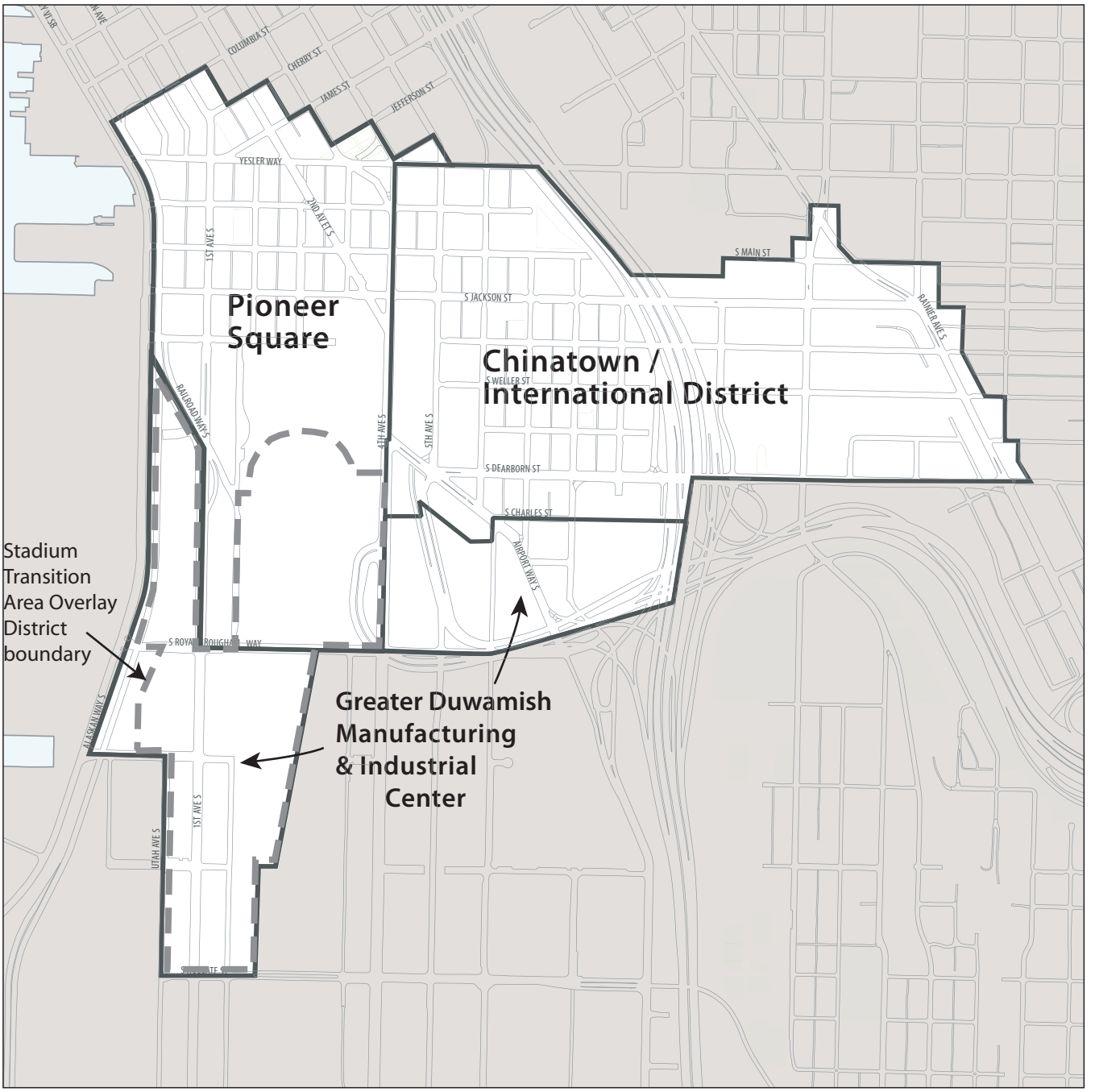


Figure 1-1

Study Area

Livable South Downtown

Positive influences and opportunities relating to current and future neighborhood character were also identified, including:

- a well-established and valued historic, cultural and social character in core neighborhoods;
- access to transportation including the interstate, light rail, seaport, and intercontinental rail, including the transit hub at King Street Station;
- commercial areas composed of small and large businesses
- proximity to the Downtown employment center
- the presence of several large parcels where future development could create new business activity, jobs, housing and amenities that could enhance the area's overall character.

The Department of Planning and Development initiated a planning process for the South Downtown study area to examine land use and zoning in the area. This effort was informed by advice and feedback from an advisory group comprised of approximately 25 area stakeholders representing the diversity of interests in the South Downtown area. After ten advisory group meetings and additional general public meetings, DPD issued a "Phase 1 Staff Report" with preliminary land use recommendations in March 2006. Subsequently, staff has proceeded with the required environmental reviews that accompany such proposals. Legislation to amend the Land Use Code and possibly the Comprehensive Plan is expected to follow in 2008.

Objectives of the Livable South Downtown planning process

Goals for the Livable South Downtown project include:

- Stimulate future housing and job growth through adjustments in zoning and land use codes
- Respect neighborhood character and neighborhood plans
- Promote an integrated mix of uses
- Support quality connections between neighborhoods and Downtown as a whole
- Encourage economic vitality and environmental sustainability
- Accommodate regional services and ensure they align with the goals of the local community

Specific objectives to accomplish through the project include:

- Evaluate zoning opportunities and constraints, particularly in regard to achieving more housing and job growth
- Identify desired development direction
- Recommend and implement City land use actions to support emerging residential/employment communities
- Consider opportunities for environmentally sustainable practices in future development
- Recommend public and private investments that would contribute to a well-balanced community in South Downtown.

The South Downtown advisory group has also helped refine other key issues that planning recommendations should address, including:

- improved streetscape design;
- amenities and services available to support an increased population;
- a range of housing opportunities for households at different income levels;
- maintaining freight mobility;
- industrial land preservation;
- recognition and accommodation of Port and stadia/exhibition hall activities and mobility needs;
- quality design in new development and compatibility with existing neighborhood character; and
- a viable environment for all businesses, particularly small businesses throughout Chinatown/I.D.

SUMMARY OF ~~DRAFT~~ PLANNING RECOMMENDATIONS

~~For the purposes of this Draft EIS,~~ The Livable South Downtown planning recommendations are summarized below to provide a relatively brief overview for the EIS reader. ~~in a draft form. At this point in the planning process, these are not meant to represent final recommendations but to illustrate a range of possible actions that could be taken. After~~ In the Draft EIS, the draft planning recommendations covered the contents of the "Phase 1 Staff Report," the "Overall Vision" and the Action Alternatives (Alternatives 1, 2 and 3) expressed in this chapter. These described the planning objectives and a range of possible land use and zoning alternatives that could reasonably achieve the objectives. Since the Draft EIS ~~is~~ was published and circulated, additional public comments have provided useful perspectives that have been considered by DPD staff in ~~will inform the development of~~ developing proposed final recommendations. For this Final EIS, the planning recommendations are augmented and refined by the contents of the Livable South Downtown recommendations report and the "Preferred Alternative" discussed in this chapter. ~~In this manner,~~ The environmental review process ~~will~~ fulfills a purpose to inform planning staff, the public, and decision-makers about the SEPA environmental impact implications of decisions to be made on possible land use and zoning changes, per the SEPA rules.

Overall Vision

The Livable South Downtown study area includes neighborhoods that are cherished for their historic and cultural resources. South Downtown is also uniquely positioned at the juncture of Seattle's Downtown business district, its deep-water port terminals, its regional transportation facilities and largest sport entertainment venues.

The Livable South Downtown planning process provides an opportunity to reflect on the area's past, its present and ~~consider~~ its possible futures. The area must maintain its historic and cultural identity while at the same time prepare for the future. Seattle and the region will grow substantially over the coming years. South Downtown will be subject to the forces and effects of growth ~~perhaps~~ as much or more than any area in the region. Recommendations from this process will play an important role in shaping how these neighborhoods grow in the coming years.

As a collection of neighborhoods with distinctive history and character, South Downtown is highly valued by the City and by people who reside and work in the area. Many of the physical patterns of use and development in South Downtown's neighborhoods have changed little over several decades. While this has supported the preservation of the historical legacy of the neighborhood, it has also contributed to a degree of stagnation. ~~its decline.~~ Some properties have not been adequately maintained, failing to retain their full usefulness even as the city's economy has changed. Other properties have remained vacant or lightly developed, fulfilling a variety of functions ranging from vehicle parking to light industry and product distribution.

From a national and global perspective, Seattle is an important west coast port city that is well situated for trade with Asia, supporting the export and import of goods that drives the local economy. City policies support the ~~continued and~~ long-term well-being of port-related activity. As a regional center, Downtown Seattle supports a wide variety of jobs and economic activity that are key to the well-being of the region, and generate daily volumes of people commuting to and from jobs and residences. The Livable South Downtown study area is complementary to Downtown's economic role, supporting a variety of businesses and an increasing population of office workers.

Recent economic trends, combined with expressed interest in developing several larger properties, suggest that the future will inevitably bring new development that will affect these neighborhoods

regardless of zoning. The challenge for the Livable South Downtown planning process is to assess present-day conditions and identify measures that will help to achieve the desired future vision of the neighborhoods as they evolve. These choices will influence how each neighborhood functions, and how they fit into the larger framework of the city's infrastructure. More importantly, the choices will affect the quality of environment and the quality of life for neighborhood residents, visitors and employees for many decades to come.

Consistent with the goals of Seattle's Comprehensive Plan and the neighborhood plans of Pioneer Square and Chinatown/I.D., the Livable South Downtown planning process envisions neighborhoods that are complemented by new developments that incorporate appropriate mixes of uses and are compatible with their surroundings due to high-quality and sensitive architectural design. New development will be optimally sized to fit with each area's location within or near the Downtown Urban Center and transit hub. Infill of vacant properties in Pioneer Square and Chinatown/I.D. with new buildings will enliven and knit together the neighborhoods, and provide greater continuity of street-level uses including retail and other services for residents and visitors. An increase in residents within and near these neighborhoods will provide additional customers for local businesses, increased social activity and "eyes on the street" that will contribute to public safety. Police and emergency protection will be sufficiently provided to ensure that personal safety is improved and criminal activity is discouraged.

The South Downtown planning process also envisions a system of public spaces and streetscapes that are pleasant environments, well-located, well-lit, well-connected, with ample amenities including parks, art and landscaping. As growth occurs, it will be important to retain the cultural, socioeconomic and historic character of Pioneer Square and Chinatown/I.D. through appropriate actions to support the health of residents, businesses and the social character of these neighborhoods. Similarly, the physical and aesthetic qualities that define these neighborhoods will not be damaged by poor-quality or insensitively designed new structures, but will be enhanced by design that is respectful of the historic and cultural context.

Functionally, transit and road systems will effectively encourage efficient travel choices within manageable congestion levels. Freight mobility will be maintained by appropriately-sized streets, truck routes, highways and inter-connected rail systems. Industrial uses south of the study area, including Port activities, will be protected through thoughtful transition from the mixed use environment of South Downtown to the maritime industrial environment of the Duwamish. New development will be energy-efficient and incorporate features and techniques that will support environmental sustainability.

Relationship of the Preferred Alternative and Final Planning Recommendations to the Vision

The Preferred Alternative and the final planning recommendations describe a range of proposed and possible strategies that are recommended by the Executive to achieve the Overall Vision.

- The Preferred Alternative includes several proposed land use and zoning actions that would influence future development to be built in a manner contributing to achievement of the Overall Vision. This includes greater detail in building height and bulk controls than the Action Alternatives studied in the Draft EIS. It also describes the proposed bonus system, transfer of development rights strategies and other incentives that would contribute to public objectives such as new affordable housing, provision of open space and pedestrian circulation amenities, and enhanced energy efficiency and environmental sustainability.
- In addition to proposed land use and zoning actions, the Livable South Downtown recommendations report discusses a variety of other possible "non-zoning" strategies that could promote achievement of the Overall Vision. These are primarily future possible actions that could be undertaken through City and community efforts over time to improve conditions in

South Downtown, addressing livability and safety topics, housing and economic topics, and public spaces and infrastructure.

Emphasis on Recommending Land Use and Zoning Actions

The planning process has focused on how land use and zoning regulations may better support the diverse planning objectives related to residential and economic growth. These regulations typically focus on the size and shape of buildings, and the intended overall land uses and functions encouraged in specific areas. They also address complementary purposes such as urban design, public spaces, architectural quality, and how different areas relate in their functioning and characteristics. These factors also play an important role in influencing overall livability and character.

Identifying and implementing land use and zoning actions to support future growth in South Downtown will continue to be a high priority of the Livable South Downtown planning process. This will include consideration of supporting strategies or actions that may be needed to avoid or mitigate significant adverse impacts. In addition, recommendations will touch on other matters relating to livability, including housing, economic development, public safety, transportation, utilities and the environment.

Themes That Inform the Land Use and Zoning Recommendations

The planning analysis continues to support the goals, themes and approaches identified in the Phase 1 Staff Report:

Area-Wide Themes

- Create diverse opportunities for housing
- Ensure continued mobility
- Prioritize good design and connectivity
- Reinforce historic preservation policies and regulations
- Support the economic health of South Downtown
- Support sustainable patterns of development and transportation consistent with the City's Comprehensive Plan

Geographic Themes

- Careful infill in existing core neighborhoods
- Housing emphasized in "edge" areas
- A mix of uses in "emerging areas"
- Transition to industrial

Area-wide and geographic themes have implications for the range of actions likely to be included in final recommendations (see Figure 2-2). They suggest a priority for actions that will encourage compatible infill growth within the historic core neighborhoods, to enliven them and activate underutilized areas. Similarly, the themes suggest a preference for increased development capacity, particularly for residential-oriented development, to grow efficiently within and around the edges of core neighborhoods.

In the "emerging areas", generally those south of the historic neighborhoods, south to approximately S. Royal Brougham Way (and S. Dearborn Street in Little Saigon), the planning themes support actions that would increase development capacity, allowing employment growth, as well as possibly encouraging opportunities for residential development where it would support neighborhood objectives.

In the southern portion of the study area, the themes support a transition to industrial use and activity to the south. Transition may favor the retention of current zoning, or a transition in height and density between Downtown and the Greater Duwamish Manufacturing and Industrial Center. Revisions to Figure 2-2 for this Final EIS indicate that certain areas may be being perceived as both emerging areas and as transitions to industrial areas to the south.

Figure 2-2
Geographic Themes

Note: Shaded properties in Pioneer Square are those identified as not contributing to the historic district, due to lack of presence of historic-contributing structures.

References to Geographic Areas Throughout the Draft EIS Report

Throughout the EIS, both formally-recognized and informal references are made to specific geographic sub-areas within South Downtown to aid discussion (see Figure 2-3). In general these sub-areas are identified as follows:

Pioneer Square refers to areas that are zoned Pioneer Square Mixed (PSM) within the Pioneer Square neighborhood area.

Central Pioneer Square, or the "core" generally refers to areas located within the PSM 100' zone.

Chinatown/International District (I.D.), as a designated neighborhood refers to areas within South Downtown located east of 4th Avenue S., north of approximately S. ~~Dearborn~~ Charles Street and west of Rainier Avenue S. However, some analyses refer to the Chinatown vicinity as the portion of this neighborhood west of I-5 and approximately south of S. Main Street.

Chinatown historic core refers to areas located within the National Register Historic District. These areas are zoned IDM 75-85, predominantly north of S. Weller Street, south of S. Main Street and east of 5th Avenue S.

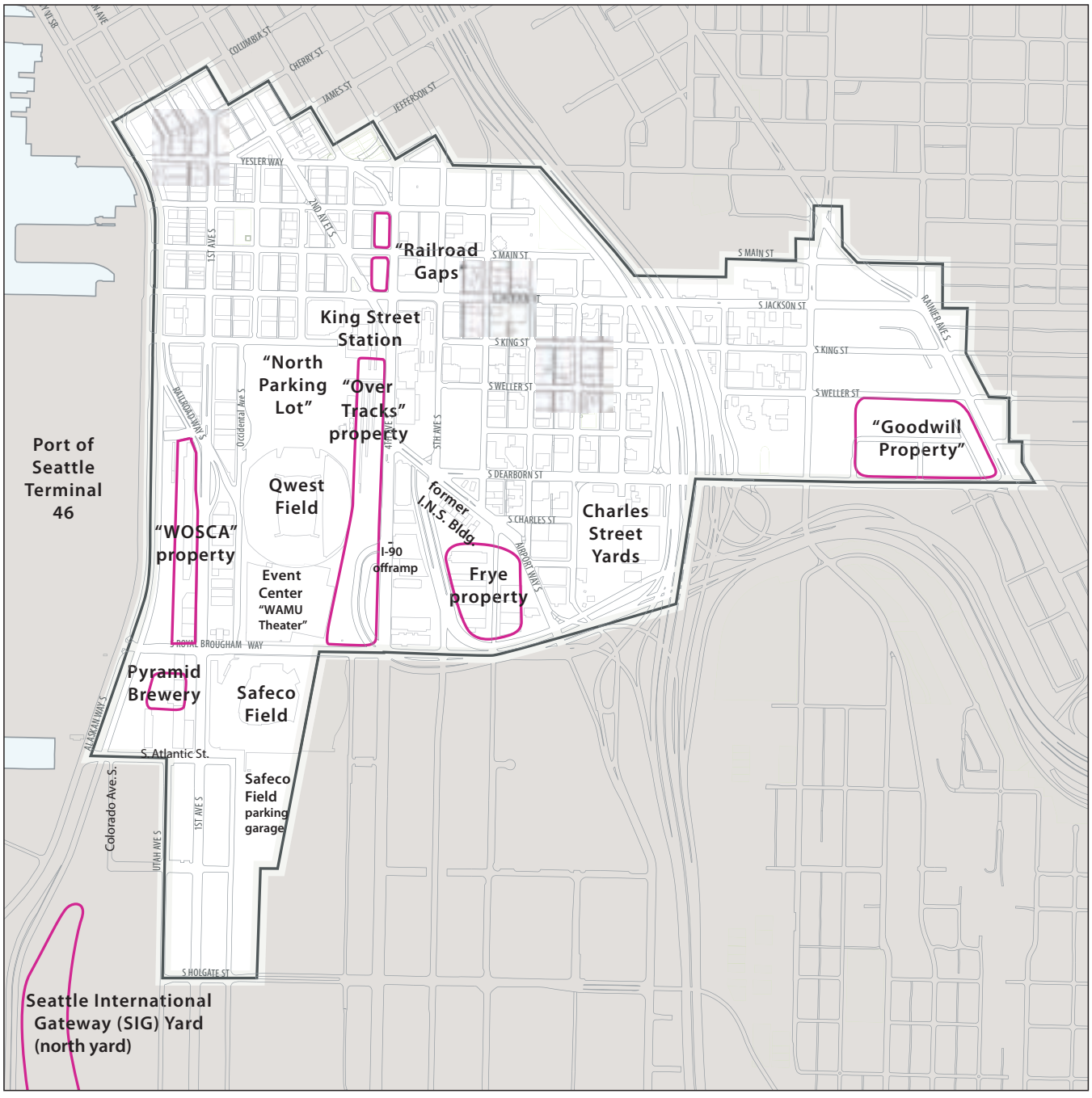


Figure 2-3

Properties Identified in the EIS Analysis

Livable South Downtown

Japantown refers to the northern portion of Chinatown/I.D. located approximately north of S. Jackson Street and east of 4th Avenue S. The hill portion of Japantown is located east of 5th Avenue S. between Yesler Way and S. Jackson Street.

"South-of-Dearborn" means the area located south of S. Dearborn Street and east of 4th Avenue S. However, some of the zoning recommendations for this area specify their relationship to the area "south of S. Charles Street, which is one block south of and parallel to S. Dearborn Street. Lands in the South-of-Dearborn area are currently zoned for general industrial (IG2) and general commercial (C2) use, the latter in the block between S. Charles Street and S. Dearborn Street.

Little Saigon refers to the area within the Chinatown/I.D. neighborhood that is located east of Interstate 5, to approximately Rainier Avenue S.

The WOSCA property is located on IC-65' zoned land north of Royal Brougham Way and west of 1st Avenue S., north almost to Railroad Way S. "WOSCA" refers to former site users, the "Washington Oregon Shippers Cooperative Association." This property is also identified as being located within the "1st Avenue S. corridor."

The Stadium Area primarily refers to land located within the Stadium Transition Area Overlay District (an overlay zone described in SMC 23.74 of the Land Use Code), near the 1st Avenue S. corridor south to S. Holgate Street, and both sides of the 4th Avenue S. corridor south to S. Royal Brougham Way.

The "Over-Tracks" property refers to the vicinity just west of 4th Avenue S. between approximately King Street Station and S. Royal Brougham Way, that primarily consists of development rights directly above the existing railroad right-of-way. A limited amount of other property not over the railroad tracks is also located in this vicinity.

The "Railroad gap" properties are two half-blocks located north of S. Jackson Street on the west side of 4th Avenue S., within Pioneer Square zoning. These properties extend north to S. Washington Street, north of which is the portal to a rail tunnel below Downtown. These blocks contain railroad right-of-way at ground level, which is below the street level of 4th Avenue S.

How and Why SEPA Alternatives are Defined

The EIS alternatives, defined by City staff, cover a range of possible land use and zoning actions and Code amendments. The net result of these alternatives will be a varied development pattern across the study area, with a range of possible environmental impacts. The EIS findings provide perspective on the range of choices and how particular choices could influence the future shape, patterns, and impacts of development.

Preparation of SEPA EISs for "programmatic" or "non-project" actions is allowed "more flexibility… because there is normally less detailed information available on their environmental impacts..." State law indicates that "the lead agency shall discuss impacts and alternatives in the level of detail appropriate to the scope of the non-project proposal and to the level of planning for the proposal." (SMC 25.05.442).

Environmental review provides information to decision-makers so they can choose from a range of possible actions. This range of choices can vary from "no change" to the maximum level of change under consideration. The studied alternatives should be defined to cover this range, an approach known as "bracketing" or "book-ending." Decisionmakers then can be confident that combinations of possible choices that are made within the range of the alternatives have received sufficient environmental review.

Otherwise, supplemental analysis may be needed. The Alternatives studied in this EIS follow this approach.

This EIS also is likely to support "phased review" of future development proposals in the study area, as indicated by SMC 25.05.060 E. Future development proposals may adopt all or part of a programmatic SEPA analysis and add further site-specific impact analysis as necessary. This can increase the efficiency of environmental review for development proposals in the study area.

DESCRIPTION OF ALTERNATIVES

The EIS alternatives address a range of possible City actions and regulatory choices, ~~with~~ that may lead to different implications over time for the amount and distribution of future growth and related environmental impacts.

- ***Alternative 1's*** zoning choices that emphasize somewhat greater levels of change in zoned development capacity in the western portion of the study area would likely result in greater levels of future growth in that area, including as far east as approximately 6th Avenue S. in the Japantown vicinity. ~~commercial development toward the west of the study area (along the 1st Avenue S. corridor, including the WOSCA property), while~~
- ***Alternative 2's*** zoning choices emphasize somewhat greater levels of change in zoned development capacity and future growth in the central and eastern portion of the study area (extending eastward from approximately the Qwest Field "north lot" vicinity and including the 4th Avenue S. corridor, Chinatown/I.D., Little Saigon, and "south-of-Dearborn vicinities). ~~would likely result in greater concentration of commercial development toward the east and central portion of the study area (along the 4th Avenue S. and Airport Way S. corridors, including the "over-tracks" and Frye properties sites)~~.
- ***Alternative 3*** assumes a more balanced distribution and moderated amount of change in zoned development capacity and future growth across the study area.
- ***Alternative 4*** is the ***"No Action Alternative"*** that analyzes what may happen with future growth and development if no changes are made to existing zoning and the Land Use Code. Refer to Figures 2-1 and 2-3 for location of subareas and key identified locations, and see Figures 2-4, 2-5, 2-6 and 2-7 for depictions of the Alternatives.

Following publication of the Draft EIS, the lead agency (DPD) developed a ***Preferred Alternative*** that describes the proposed land use and zoning recommendations, for which environmental review is provided in this Final EIS. The Preferred Alternative includes a mix of zoning recommendations, some of which are similar to other alternatives (primarily combining elements of Alternatives 1 and 2) and some of which are different in maximum height and density limits and other details (see the description beginning on page 2-20 for more information). For example, the Preferred Alternative includes more specific proposals for height and bulk controls, which are described in more detail under the "Preferred Alternative" description later in this chapter. Additional environmental review for this alternative, and other revisions, are included in underlined text in order to show what has changed since publication of the Draft EIS.

Alternative 1 – Neighborhood Infill with Commercial Growth Toward the West

Overview of Planning Concept

Alternative 1 encourages growth that will reinforce the neighborhood core areas, with modest expansion of development capacity in other peripheral vicinities. This means that the rezones would encourage infill development within the Pioneer Square and Chinatown/I.D. cores in locations where historic resources would not be directly impacted. Additional zoned development capacity would be provided in three areas at the edges of these neighborhood cores—the Qwest Field north lot vicinity, the Japantown vicinity (especially between 4th and 6th Avenues north of S. Jackson Street) and in the northern portion of the WOSCA property. This should result in the central neighborhoods experiencing the benefits of increased residential occupation, a more engaging streetscape with greater continuity of uses, and improved business vitality.

Alternative 1 includes a proposal to move the WOSCA property and south-of-Dearborn vicinity (south of S. Charles Street) into the Downtown Urban Center and out of the Greater Duwamish Manufacturing and Industrial Center, expressed as changes to designations on the Comprehensive Plan's Future Land Use Map. This change would indicate and require that zones compatible with the Comprehensive Plan's designations should be accomplished in the affected locations.

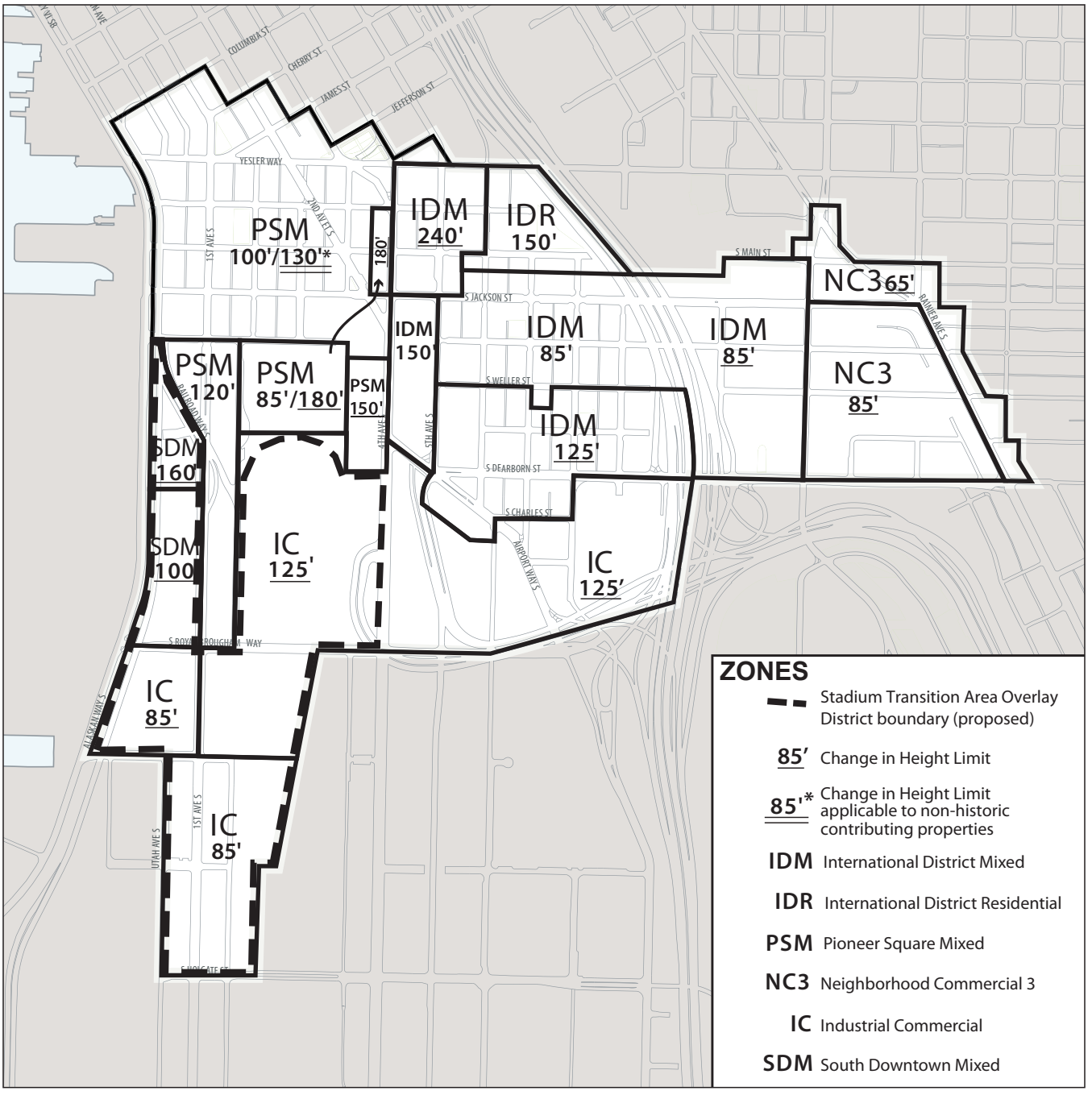
An emphasis on commercial growth "toward the west" would occur in part through increases in commercial development capacity along the 1st Avenue S. corridor south of Pioneer Square. The following summarizes Alternative 1's proposals for the individual subareas within South Downtown. Also, see Figure 2-4.

Zoning to Encourage Infill Development in Neighborhood Core Areas

Additional residential or commercial infill development of vacant properties would likely result in a more continuously activated streetscape within neighborhood core areas, thereby improving overall vitality and safety. Zoning and land use regulations would encourage infill development that is compatible with and complementary to existing development in neighborhood core areas. In Pioneer Square, the alternative envisions allowing additional height to encourage infill development at vacant properties (most in parking lot use) and at non-historically-contributing properties (see Appendix I). In the Chinatown/I.D. core, zoning changes would target the blocks south of S. Weller Street, outside the National Register Historic District, for residential infill development.

Increased Residential Development Capacity at Edges of Core Neighborhoods

Zone changes to encourage a significant new and denser residential presence at the edges (inside or just outside) of the neighborhood cores would help revitalize these established neighborhoods. Infill high-density residential development would add a new residential presence, would efficiently use these lightly developed areas near the King Street Station transit hub, and would provide a more continuously activated streetscape, all of which would augment neighborhood character. Affected areas include the Japantown vicinity located between 4th and 6th Avenues S. and approximately S. Jackson Street and Yesler Way, the northern portion of the Qwest Field parking lot, and properties ~~near~~ south of Railroad Way S. ~~(south to approximately S. Dearborn Street, if extended)~~ including the approximate northern third of the WOSCA property on the west side of 1st Avenue S. This 1st Avenue S. vicinity is part of an area that would be moved from the Greater Duwamish Manufacturing and Industrial Center into the Downtown Urban Center, with a proposed rezone to a new "South Downtown Mixed" (SDM) zone (see next paragraph for more details).



Note: Height limits shown correspond to maximum heights of future development anticipated by zoning concepts. However, final zoning designations could vary from this labeling.

Figure 2-4

Livable South Downtown

Alternative 1 Zones & Maximum Heights

Increased Commercial Development Capacity along 1st Avenue S.
Zone changes along the west side of 1st Avenue S., including the approximate southern two-thirds of the WOSCA property, ~~south of approximately S. Dearborn Street (if extended)~~ would encourage dense new commercial development with high-quality design, open space and pedestrian features, ~~primarily~~ on the WOSCA property, as far south as S. Royal Brougham Way. In this location, a new "South Downtown Mixed" (SDM) zone would be created to ~~facilitate~~ accommodate development that would include high-quality architectural design, public open space features, and pedestrian amenities. The SDM zone would be a Downtown zone, in recognition of the proposed inclusion in the Downtown Urban Center. The proposed SDM zone includes provisions for a "planned community development" process, including a public meeting requirement, which would help define objectives for design, open space and other public amenities. The SDM zone would also include development standards that would achieve similar purposes as development standards of the Stadium Transition Area Overlay District, such as those relating to the pedestrian environment, building bulk/density controls and screening/landscaping. However, the WOSCA property vicinity north of S. Royal Brougham Way and west of 1st Avenue S. would be retained in the Stadium Transition Area Overlay District. These zoning changes would increase the expected density of development and likely help improve the character of future development in the 1st Avenue S. corridor that lies between State Route 99 to the west and Pioneer Square-zoned properties on the east side of 1st Avenue S. ~~As noted above, this vicinity would be moved into the Downtown Urban Center.~~

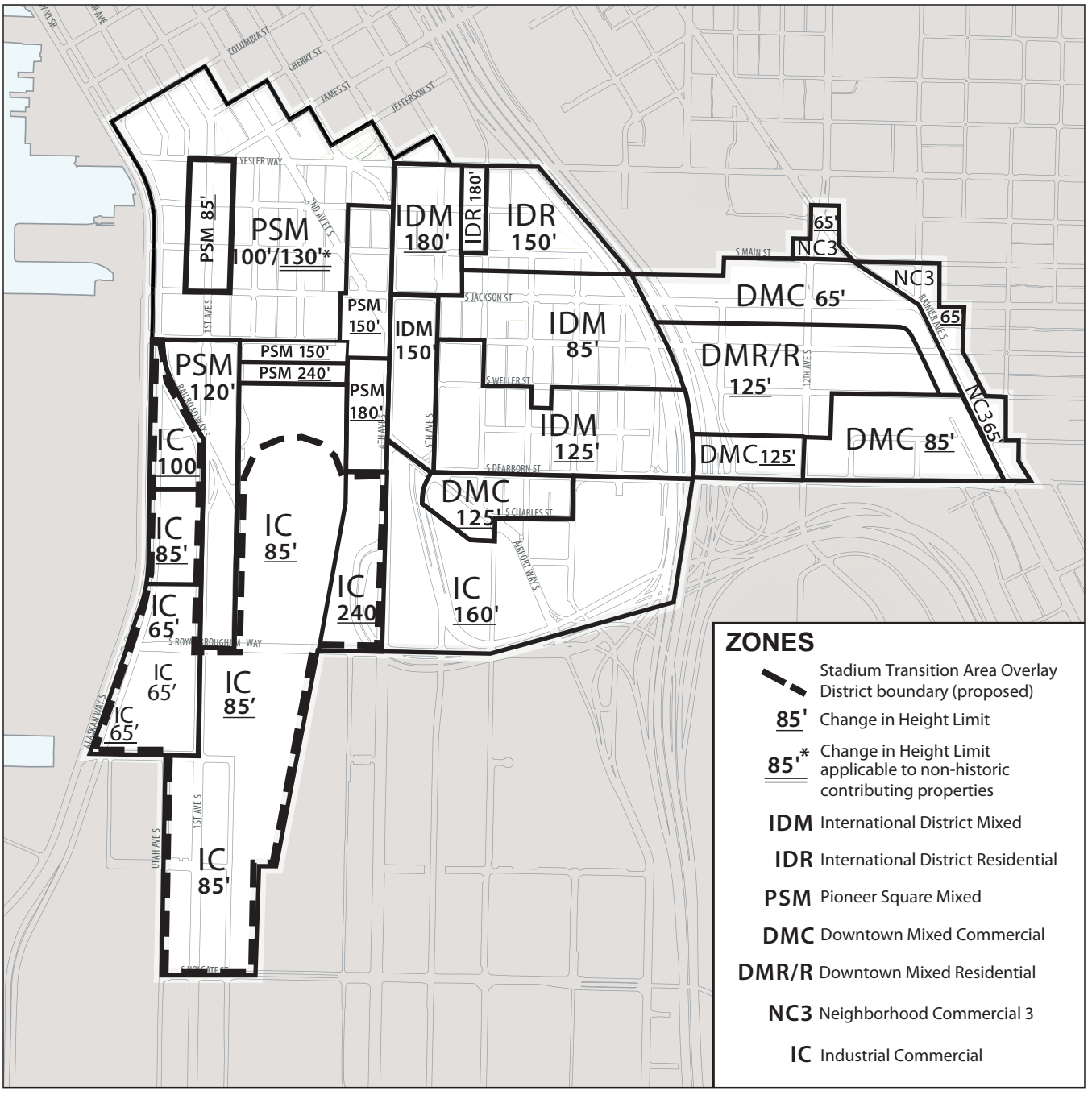
Moderate Commercial Concentration along 4th Avenue S. and the south-of-Dearborn vicinity
Alternative 1 would accommodate a moderate amount of additional density of commercial development along the west side of 4th Avenue S. above and near the existing railroad corridor. This would occur within the Pioneer Square Mixed and Industrial Commercial zones through increases in height and density limits.

Retention of Industrial zones and transition to industrial center to the south
Areas on the southern periphery of the study area would continue to be zoned Industrial (proposed as Industrial Commercial zones) prohibiting housing, and accommodating development that is compatible with and provides a transition to the industrial areas to the south. Under Alternative 1, the block containing the Pyramid Brewery (refer to Figure 2-4), between S. Atlantic Street and S. Royal Brougham Way, is proposed for a 20-foot increase in height limit to 85 feet but with no additional development capacity proposed. This could provide more flexibility within the building envelope such that better architectural design and arrangements of bulk and uses could occur.

Alternative 2 – Neighborhood Infill with Commercial Growth Toward the East

Overview of Planning Concept

Similar to Alternative 1, Alternative 2 encourages infill development within the central areas of Pioneer Square and the Chinatown/I.D., and dense residential development at the edges of the core neighborhoods on properties that are vacant, underused, or consist of non-historically-contributing structures. The primary difference is that Alternative 2 assumes an increased concentration of commercial development within the central and eastern portion of the study area. This would test a scenario of significant commercial growth along the 4th Avenue S. corridor, south of S. Dearborn Street, and in Little Saigon. The south-of-Dearborn vicinity would remain industrially-zoned, allowing more intensive commercial and industrial development transitioning to the more intensive industrial zone (IG2) to the south. No changes to Downtown Urban Center or MIC Center boundaries are proposed under this alternative, and the Stadium Transition Area Overlay District is proposed to be retained. The following summarizes Alternative 2's proposals for the individual sub-areas within South Downtown (see Figure 2-5).



Note: Height limits shown correspond to maximum heights of future development anticipated by zoning concepts. However, final zoning designations could vary from this labeling.

Figure 2-5

Livable South Downtown

Alternative 2 Zones & Maximum Heights

Zoning to Encourage Infill Development in Neighborhood Cores
Similar to Alternative 1, additional infill development of vacant properties would likely increase residential development and result in a more continuously activated streetscape within the neighborhood cores. Adjustment to zoning and land use regulations would encourage infill development compatible with and complementary to the neighborhood cores. In Pioneer Square, in addition to Alternative 1 strategies, maximum height limits would be assigned in sub-areas within the historic district to recognize variation in the existing building patterns, such as a 100-foot height limit along 1st Avenue S. between Yesler Way and S. Jackson Street. Also, an optional zoning strategy that would favor residential infill development in the core of Pioneer Square is studied. In the Chinatown/I.D. core, the Alternative 2 proposal is for rezones to 125 feet for residential-oriented development south of S. Weller Street similar to Alternative 1, but also an extension of the 125-foot zone to the "old Uwajimaya grocery" block that is north of S. Weller Street, east of 5th Avenue S., south of S. King Street, and west of 6th Avenue S. Also, the optional zoning strategy of accommodating residential uses at ground-level is analyzed.

Increased Residential Development Capacity at Edges of Core Neighborhoods
Similar to Alternative 1, a significant new residential presence at the periphery of the neighborhood cores would contribute toward revitalization of these established neighborhoods, and extend the pattern of development between the core neighborhood areas. Alternative 2 includes a proposal to increase maximum height limits to 180 feet in the Japantown vicinity (see Figure 2-5), to 240 feet in a portion of the Qwest Field north parking lot, and to 125 feet in Little Saigon.

Increased Commercial Concentration along 4th Avenue S. and the south-of-Dearborn vicinity
Zoning choices would accommodate a significant concentration of commercial uses in these areas immediately east of Qwest Field (over and near the railroad tracks) and south of the Chinatown/I.D. neighborhood. Areas over the railroad tracks would accommodate a greater concentration of commercial uses in a Pioneer Square zone with a height limit to 180 feet north of S. Dearborn Street (if extended), and Industrial Commercial zoning in the southern portion of this 4th Avenue S. corridor, with height limits extending to 240 feet. The denser commercial character would also extend to the south-of-Dearborn vicinity, with maximum height limits to 160 feet possible in Industrial Commercial zoning.

Industrial and Commercial mix retained along 1st Avenue S.
Under Alternative 2, the retention of Industrial Commercial zoning within the Stadium Transition Area Overlay District, with modest increases in height limits, would accommodate taller buildings in the northern portion of the WOSCA property vicinity, but with no increase in maximum development density.

Increased Residential Development Capacity in Little Saigon
Alternative 2 zoning options encourage denser and taller residential-oriented mixed-use development in a Downtown Mixed Residential (DMR/R) zone with a 125-foot height limit, on properties from one-half block south of S. Jackson Street to S. Weller Street (and some abutting properties to the south), east of I-5 to just west of Rainier Avenue S. They also encourage retention of the commercial-use orientation of corridors along S. Jackson Street, S. Dearborn Street and Rainier Avenue S., through Downtown Mixed Commercial (DMC) and Neighborhood Commercial 3 (NC3) zones (see Figure 2-5). This would allow continued functioning as a retail commercial center while providing the possibility of a new residential population. Downtown Mixed Residential and Downtown Mixed Commercial zones would acknowledge the area's location within the Downtown Urban Center, and would accommodate the collection and possible future use of bonus funds for affordable housing development in this vicinity.

Alternative 3 – Balanced Growth

Overview of Planning Concept

Alternative 3 defines a more balanced distribution of future employment growth capacity throughout the study area compared to the other alternatives. This includes lesser increases in zoned height limits in several areas, moderate changes in commercial capacity across the emerging area's large properties, and consistent Neighborhood Commercial (NC3-85') zoning throughout the Little Saigon vicinity (see Figure 2-6). Alternative 3 also includes a 20-foot increase in height limits to IC 85' north of S. Atlantic Street and hotel uses as a permissible use within the Stadium Transition Area Overlay District. No zoning changes are proposed within the Chinatown/I.D. core, but in the south-of-Dearborn vicinity a new South Downtown Mixed zone with a 160-foot height limit is proposed to allow for a more diverse mix of uses, including residential uses. Alternative 3 includes a proposal to move the WOSCA property and south-of-Dearborn vicinity into the Downtown Urban Center and out of the Greater Duwamish Manufacturing and Industrial Center, expressed as changes to designations on the Comprehensive Plan's Future Land Use Map. This change would indicate and require that zones compatible with the Comprehensive Plan's designations should be accomplished in the affected locations.

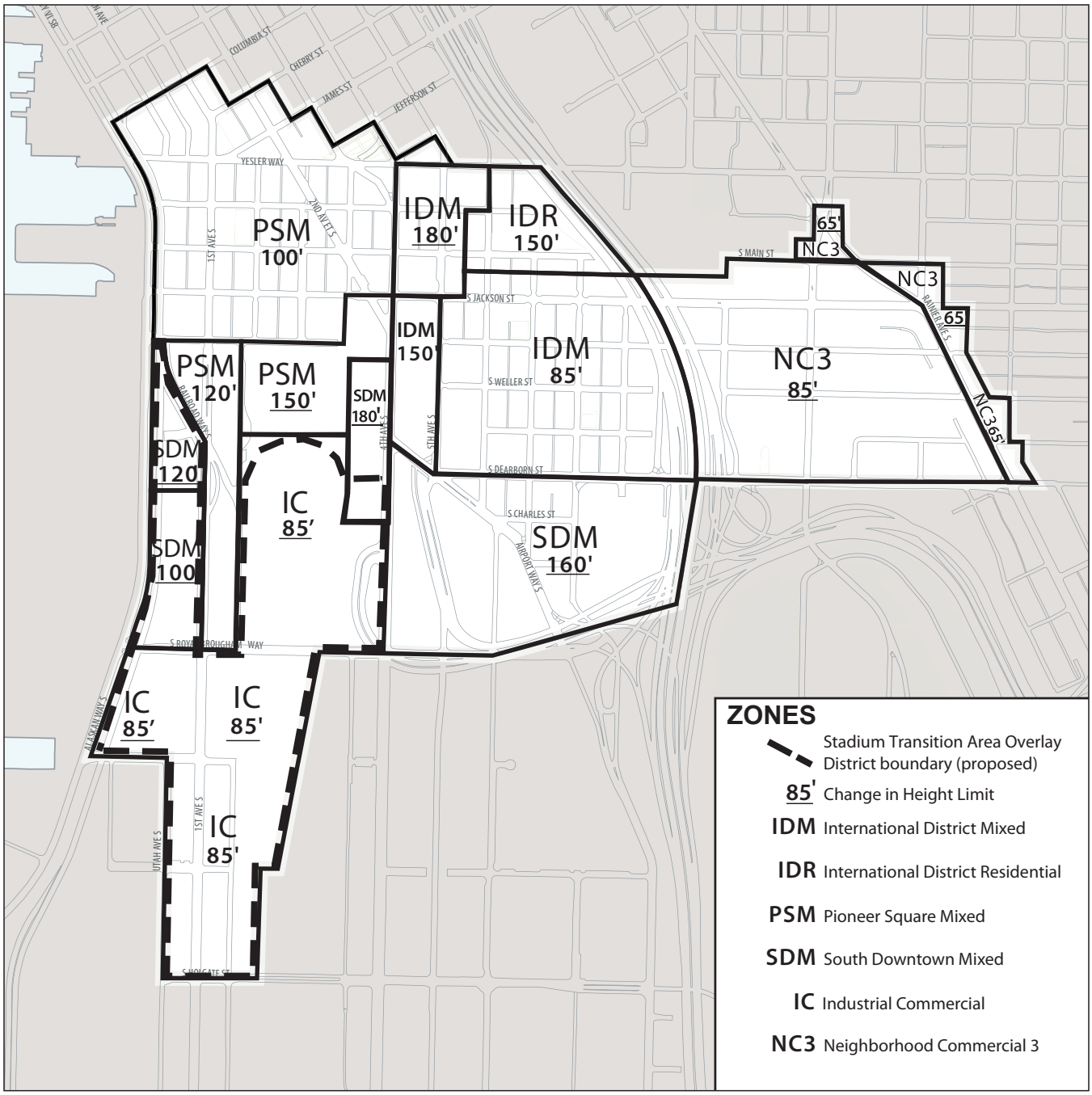
The following summarizes Alternative 3's proposals for the individual subareas within South Downtown.

Zoning to Encourage Infill Development in Pioneer Square
Similar to Alternatives 1 and 2, adjustments to zoning and regulations to suit the needs and characteristics of the Pioneer Square neighborhood core would encourage compatible infill development. Alternative 3 examines the possibility of other height limit strategies for Pioneer Square that do not include an incentive to exceed 100 feet in the area currently zoned PSM 100' and other property east to 4th Avenue S. In the Chinatown/I.D. core, Alternative 3 retains the existing zoning with no changes.

Moderately Increased Residential Development Capacity at Edges of Cores
Additional residential presence is encouraged at the periphery (inside or just outside) of the neighborhood cores, but with modest increases in height and development capacity that may have fewer impacts in terms of aesthetics and building bulk. This includes height limits to 180 feet in the Japantown vicinity, to 150 feet in the Qwest Field north parking lot, and to 120 feet in the northern portion of the WOSCA property (the latter in SDM zoning).

Mixed-Use Zoning South of S. Dearborn Street
Alternative 3 would rezone from industrial and commercial zones to a new South Downtown Mixed (SDM) zone that would accommodate mixed uses and a range of possible forms of development. This could result in future growth that is complementary to the adjacent Chinatown/I.D. core. Increased height and density, and provisions to allow residential use through a special review process, could promote more intensive mixed use development.

Moderately Increased Commercial Development Capacity along 1st and 4thAvenue S.
For Alternative 3, the proposed SDM zoning with height limits ranging to ~~from~~ 100 feet for commercial uses and to 120 feet for residential uses along the 1st Avenue S. corridor and to 180 feet along the 4th Avenue S. corridor (south to approximately S. Charles Street) would encourage more evenly distributed commercial growth through the center of the study area. Similar to Alternative 1, the SDM zone would include development standards that would achieve similar purposes as development standards of the Stadium Transition Area Overlay District, such as those relating to the pedestrian environment, building bulk/density controls and screening/landscaping. However, the WOSCA property vicinity north of S. Royal Brougham Way and west of 1st Avenue S. would be retained within the Stadium Transition Area Overlay District.



0 2 4 6 8 10
Scale in 100 Feet

N

Note: Height limits shown correspond to maximum heights of future development anticipated by zoning concepts. However, final zoning designations could vary from this labeling. (South of S. Atlantic St., IC 85' represents no change from existing zoning.)

Livable South Downtown

Figure 2-6

Alternative 3 Zones & Maximum Heights

Moderately Increased Mixed-Use Development Capacity in Little Saigon
For Alternative 3, the Little Saigon vicinity would be zoned Neighborhood Commercial 3 with an 85-foot height limit to provide a modest increase in development capacity consistent across the area between I-5 and Rainier Avenue S., S. Main Street, and S. Dearborn Street. This would allow flexibility in how future development defines overall land use patterns for this neighborhood—for commercial or mixed-use development.

Alternative 4 – No Action

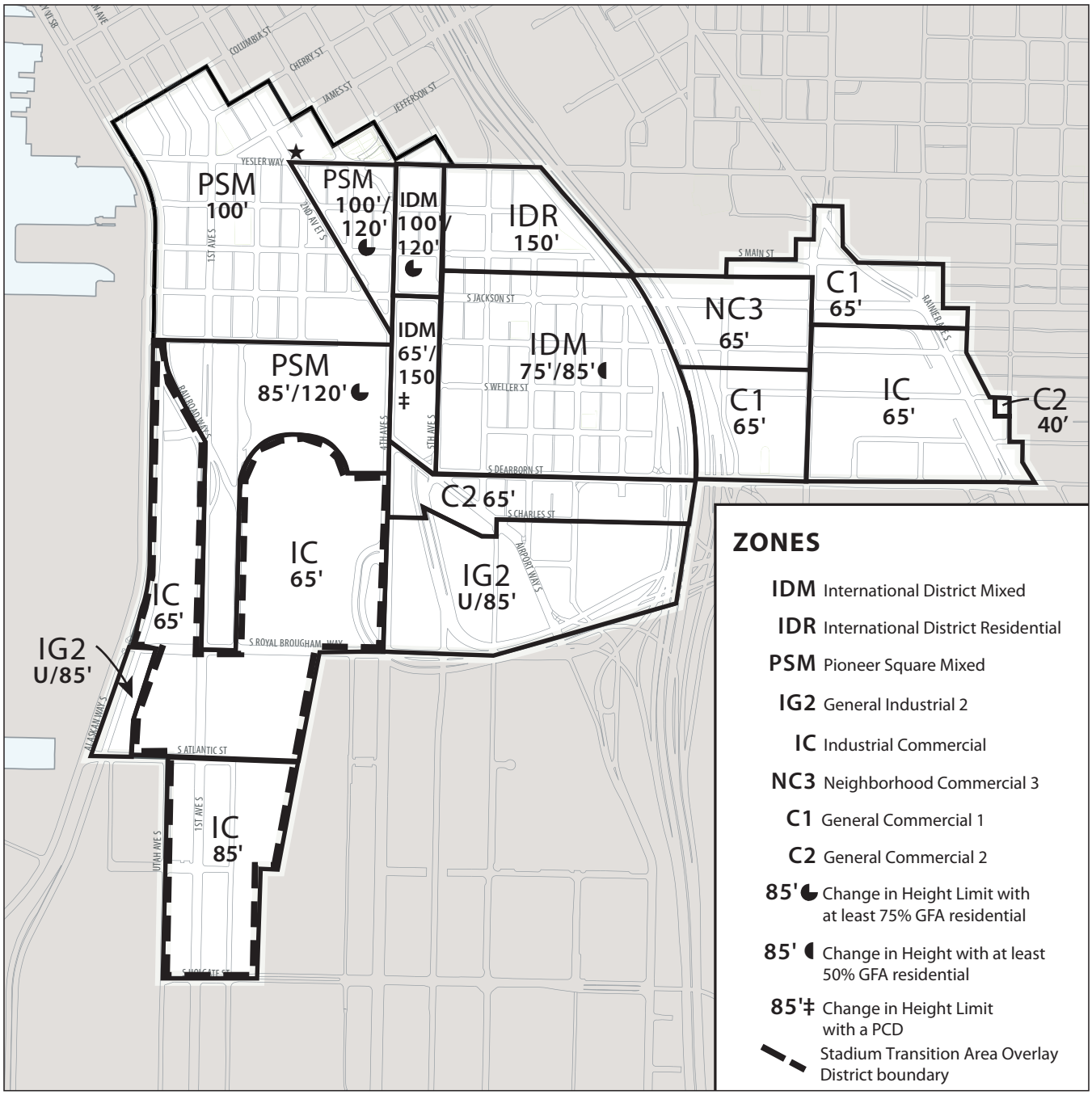
Overview of Planning Concept

Under Alternative 4, the No Action Alternative, no changes ~~would be~~ are assumed to be made to the existing Comprehensive Plan Future Land Use Map designations, zoning or ~~and~~ Land Use Code regulations (see Figure 2-7). The residential and employment growth targets established in the Comprehensive Plan for 2024 would continue to be the benchmarks for expected growth. However, the EIS impact analysis for this No Action Alternative uses a growth scenario that is related to growth projections for 2030 by the Puget Sound Regional Council (PSRC). See the Population and Employment section in Chapter 3 for further discussion.

The current zoning system would likely continue into the foreseeable future, including:

- ~~the~~ existing zoning tailored to the Pioneer Square and Chinatown/I.D. neighborhoods (west of I-5),
- Industrial zoning with a Stadium Transition Area Overlay District overlay zone along 1st Avenue S. and in the stadium vicinity,
- General Industrial zoning in the vicinity near Airport Way south of S. Charles Street, and
- a mixture of Commercial, Neighborhood Commercial and Industrial zoning in the Little Saigon vicinity.

Over time, the trend of gradual infill development in and around the neighborhood cores would likely continue. The northern half of Qwest Field's north parking lot would likely develop with at least 400 residential units. Major transportation projects, including SR99 construction and the second phase of SR 519, are assumed to be in place by 2030.



Note: PSM zone with a 245 foot height limit at the Smith Tower shown with a ★

Figure 2-7

Alternative 4 Zones
No Action / Existing Zones

Livable South Downtown

Preferred Alternative[1]

Overview of Planning Concept

The Overall Vision expressed earlier in this chapter and the Livable South Downtown recommendations report describe the intent to strengthen neighborhoods across the study area through future development that would enliven, knit together and complement their surroundings. Such development would consist of well-designed buildings that provide a place for many new residents and office workers, extend the continuity of street-level uses, provide additional services for residents and visitors, and encourage increased social activity and "eyes on the street" that will contribute to public safety. The Livable South Downtown recommendations report also describes numerous complementary actions that if implemented over time would contribute to enhanced urban design quality, better pedestrian connections and amenities, and support for affordable housing through future public-sector and private-sector actions.

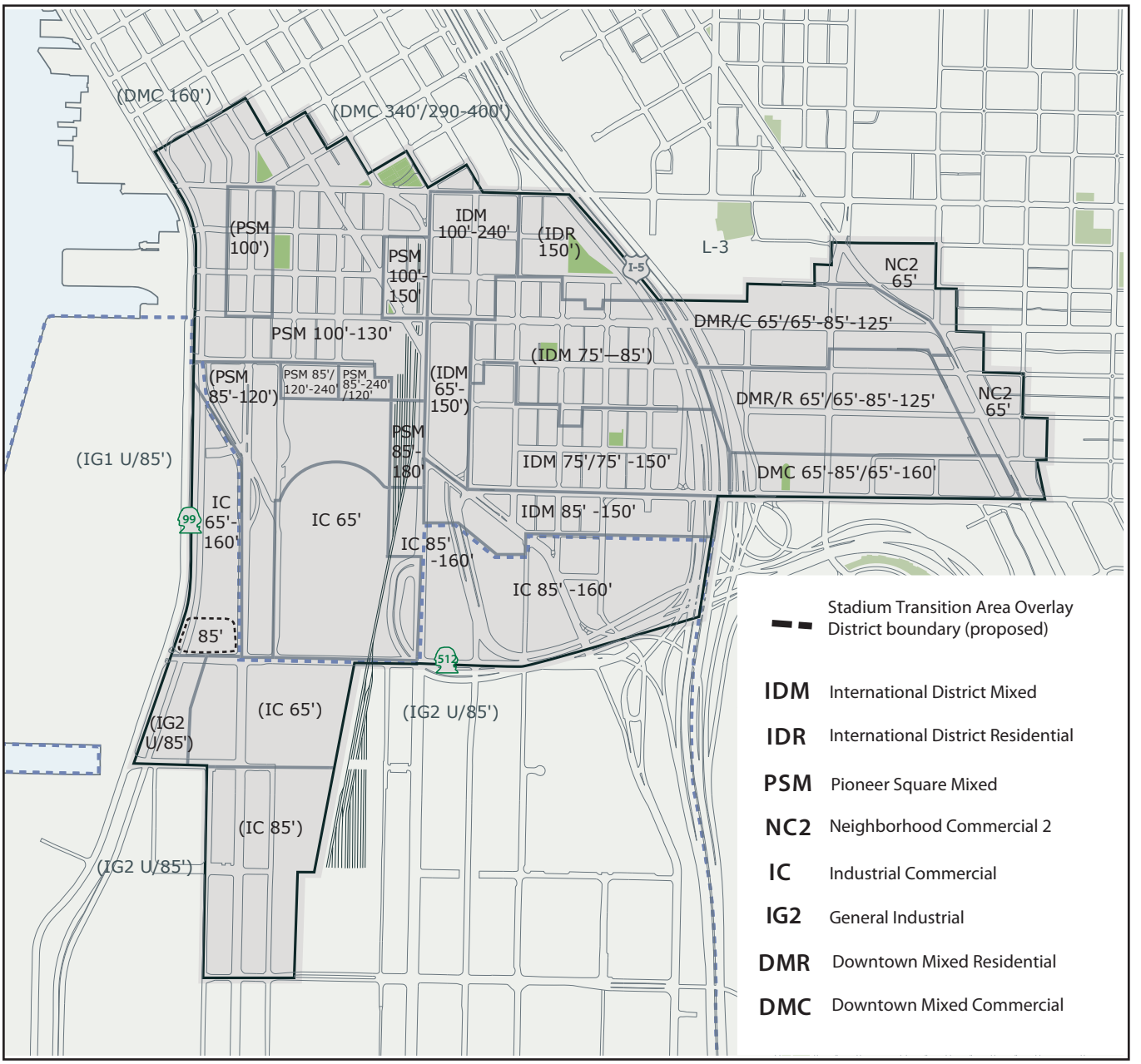
The Preferred Alternative's intent is to define a set of changes to land use and zoning, recommended by the Executive, which will encourage achievement of the Overall Vision. The Preferred Alternative contemplates levels of change in zoned development capacity and maximum height limits that are predominantly at or near the high end of the range evaluated in other alternatives, most notably those defined in Alternatives 1 and 2 (see Figure 2-8). Also, in some locations such as the southern portion of the Chinatown core, the Preferred Alternative proposes greater increases in height limits and zoned capacity than are evaluated by the other EIS alternatives. These changes would provide opportunities across nearly all of the study area for future development at scales and with mixes of uses that would complement the neighborhoods. No changes to Comprehensive Plan Future Land Use Map designations would be needed west of I-5, but rezones in Little Saigon away from Industrial Commercial zones would need such change. No changes to the boundaries of the Downtown Urban Center or Greater Duwamish Manufacturing and Industrial Center would be needed. Further details are described below, and in the Livable South Downtown recommendations report.

Zoning to Encourage Infill Development in Neighborhood Cores

The Preferred Alternative supports continued implementation of historic preservation policies but also encourages careful infill development within the existing core neighborhoods of Pioneer Square and Chinatown/I.D., in a manner that respects their unique qualities and physical scale characteristics. The proposed zoning approach in the Preferred Alternative is most comparable to Alternative 2 for both Pioneer Square and the core of Chinatown/I.D. In Pioneer Square this means preserving the maximum height limit at 100 feet for a segment of properties along 1st Avenue S. north of S. Jackson Street to Yesler Way, but accommodating infill development elsewhere in Pioneer Square on non-historic properties with maximum height limits that extend to 130 feet. In addition, the Preferred Alternative includes strategies for Pioneer Square that would further encourage residential uses above street-level in existing and new buildings, through methods ranging from Land Use Code requirements to transfer of development rights options. In Chinatown/I.D.'s National Register District historic core, the Preferred Alternative does not include changes to mapped height limits, but does include changes to transfer of development rights options that would encourage renovation and reuse of a number of buildings that are vacant in upper floors and in need of repair. See the Livable South Downtown recommendations report for more details.

Within Little Saigon east of Interstate 5, the Preferred Alternative supports future development of a residential population in mixed-use development within the core of this area. Where such development meets height/bulk requirements and is located adjacent to a space for pedestrian passage through blocks, a higher height limit would accommodate mixed-use development to 125 or 150 feet north of S. Lane

[1] This section on the Preferred Alternative is newly added to the Final EIS but not underlined, for readability.



1. Multiple height designations in zones refer to different maximum height limits depending upon residential or non-residential use, and may also refer to "base" height limits or height limits available upon performance with code requirements. See FEIS Chapter 2 and the Livable South Downtown recommendations report for more information.
2. No change proposed in Stadium Transition Area Overlay District boundaries, which are omitted in this graphic.
3. Greater Duwamish Manufacturing & Industrial Center boundary shown in gray dotted line.

Livable South Downtown

Figure 2-8

Preferred Alternative
Proposed Zoning Designations

Street. The proposal also encourages the continued presence of Little Saigon's retail commercial core, and provides for the possibility of denser development along the S. Dearborn Street corridor.

Increased Residential Development Capacity at Edges of Core Neighborhoods
Following from other concepts expressed earlier in this chapter as "area-wide themes" and "geographic themes," the Preferred Alternative supports a relatively high degree of change in zoned development capacity and an emphasis on encouraging dense housing in several locations at or near the edge of established neighborhoods. This leads to recommendations for increased heights and densities in locations in the "north parking lot" of Qwest Field, in the Japantown vicinity, in the Chinatown vicinity south of S. Weller Street to S. Charles Street, and in most parts of Little Saigon. These recommendations essentially combine the largest level of changes to height limits recommended by Alternatives 1 and 2 across these areas, except that:

- height limits of 240 feet would apply across the entire northern portion of the Qwest Field "north parking lot," (covering a greater area than in Alternative 2);
- a height limit of 150 feet (rather than 125 feet) would be set in the Chinatown core south of S. Weller Street;
- a height limit of 160 feet would set along the S. Dearborn Street corridor in Little Saigon; and
- an IDM zone with a 150-foot limit is proposed in the area one block south of S. Dearborn Street to S. Charles Street, which would recognize those blocks' use patterns and identification with the Chinatown neighborhood.

Increased Commercial Development Capacity along 1st Avenue S., "North Parking Lot", along 4th Avenue S., and "south-of-Dearborn"
In locations that include but are not limited to the WOSCA property along 1st Avenue S., Qwest Field's "north parking lot," the "Over-Tracks" area, and the "south-of-Dearborn" vicinity east of 4th Avenue S., the Preferred Alternative would accommodate the increased presence of commercial uses such as offices. These would be accomplished through either rezones to Industrial Commercial zones or new Pioneer Square Mixed zones that would accommodate commercial uses. This includes a rezone from a "General Industrial" zone to an "Industrial Commercial" zone south of S. Charles Street that would likely encourage denser commercial uses even as it would retain the possibility of industrial uses.

Retention of Industrial zones and transition to industrial center to the south
The Preferred Alternative recommends retention of Industrial Commercial zones and one General Industrial zone in the Stadium Area with no changes in regulations and height limits, including along 1st Avenue S. south of S. Royal Brougham Way, and the west side of 4th Avenue S. south of the Interstate 90 ramps.

Additional Regulatory Details of the Preferred Alternative

Additional proposed regulatory details of the Preferred Alternative are summarized below. This is not a comprehensive list of all details, but gives a sense of the breadth of bulk controls, incentive zoning strategies, transfer of development rights capabilities and similar strategies that will influence future development under this Alternative. These details help the proposed recommendations respond to local conditions in ways that will ensure future development complements the neighborhoods. Some additional zoning details are shown in Table 2-1 at the end of this chapter, and the Livable South Downtown recommendations report also extensively describes the proposed recommendations.

Bulk and Scale Control Strategies
The Preferred Alternative includes proposed regulations with bulk and scale control strategies tailored for each portion of the study area, so that future development would be compatible in bulk and scale to their surroundings. The strategies include the following as summarized examples of bulk control guidance:

Japantown north of S. Jackson St.:

- Maximum density limits for non-residential use, 20-foot setbacks from east/west streets and green streets above 45 feet elevation, and 10-foot setback along alleys at same elevation
- Maximum width and depth of up to 100 feet on towers above 85 feet elevation
- Varying coverage limits for towers depend on height of building's base (35% coverage if building base's elevation is 65 feet, and 40% coverage if building base's elevation is 45 feet)
- Tower separation of approximately 60 feet between towers greater than 120 feet in elevation that are on the same property
- For IDR 150' zone, an upper-level setback of 15 feet above 45 feet elevation

Southern portion of Chinatown core:

- Maximum density limits for non-residential use, upper-level setback of 20 feet along streets above 45 feet elevation; 2-foot upper-level setback from alleys, above 45 feet elevation
- Upper-level façade modulation required and maximum wall length
- Upper-level setback of 20 feet above 75 feet elevation, when adjacent to S. King Street or north of S. Weller Street

Little Saigon:

- Maximum density limits for non-residential use, upper-level setback of 20 feet at 45 feet elevation
- Upper-level lot coverage limited to between 40%-65% depending upon lot size and building height consistent with DMR provisions
- Highest height limit of 125 or 150 feet is possible when building abuts a through-block pedestrian connection

Qwest Field north parking lot (approximate northern half of parking lot):

- Base heights and maximum heights for commercial and residential uses
- Bulk controls tailored to differing dominant uses in eastern and western portions of property
- Lot coverage limits at various elevations, diminishing in higher levels
- Limit proximity of new building bulk to the King Street Station

"South-of-Dearborn" vicinity:

- Maximum density limits for non-residential use; residential use prohibited
- Average of floorplate sizes above 85 feet in elevation limited to 25,000 square feet
- Tower separation requirements in upper levels above 85 feet in elevation
- Street-level façade and setback requirements similar to Downtown Class II Pedestrian Street classifications

"Over-tracks" property:

- Maximum density limits for all uses, combined with setbacks and pedestrian and open space indications, and a probable railroad requirement to retain 30-60 feet of open airspace above mainline railroad tracks near 4th Avenue S.
- Minimum-width pedestrian corridor retained at 4th Ave. "lid" level on west side of property
- Open space with a minimum width requirement of 60 feet, accommodating open space and pedestrian pass-through connection purposes. Along open space, separation of 120 feet required between facades exceeding 125 feet in height.
- Possible modulation and setbacks for upper portions of structures

West side of 1st Avenue S. corridor north of Royal Brougham:

- Maximum density limits for commercial use; residential use prohibited. Street level retail uses will be exempt from FAR limit

- On up to 20% of the eligible property area (e.g., the portion more than 250 feet north of S. Royal Brougham Way), structures may be constructed taller than 120 feet, up to 160 feet in height
- Required façade modulation and open space/view corridors (with minimum widths) provided at intervals consistent with a block pattern characteristic of Pioneer Square. Separation of 80 feet between portions of structures above 45 feet in height along open space corridors
- Stadium Transition Area Overlay District designation proposed to remain in this area, applicable to development not exceeding the base density, including minimum façade height and façade setback limits, blank façade limits, transparency, street tree and landscaping requirements, curb cut limits, and plaza requirement near corner of 1st Avenue S. and S. Royal Brougham Way

In the Pioneer Square historic core, no bulk setbacks are proposed because the historic building pattern predominantly extends all buildings to the property line with no setbacks.

Incentive Zoning Strategies
These strategies are proposed to provide incentives to future development, using a voluntary approach so that applicants may develop within base development capacity without participating, and to primarily direct resources toward the production of affordable housing.

- *Commercial projects*: Up to 75% of nonresidential bonus floor area would be gained through bonuses for affordable housing and child care. Up to 25% of bonus floor area would be gained through non-housing bonuses or TDR.
- *Residential and mixed-use proje*cts: a minimum of 60% of bonus floor area would be gained through the provision of affordable housing ("performance option"). Under the performance option, floor area equal to 11% of the bonus floor area would be devoted to affordable housing. An option to provide a payment-in-lieu would direct resources toward the provision of affordable housing. Up to 40% of bonus floor area may be gained through other bonuses or non-housing TDR.
- The City Council may consider, through a formal legislative process, a definition of low-income affordable housing for the purposes of this program as follows:
  - Renter households: earn up to 80% of county area median income;
  - Home-owners: earn up to 100% of county area median income.

Proposed Program Application in South Downtown
The Incentive Zoning Programs as proposed for South Downtown contains these major components: 1) LEED "Silver" requirements, 2) affordable housing provided by residential or mixed-use developments, 3) affordable housing and childcare provided by commercial developments to mitigate increased needs for worker housing; and 4) non-housing amenities; and 5) TDR.

1. *Leadership in Energy and Environmental Design (LEED) Required*
   The proposal is that all buildings that exceed base development capacity must achieve a LEED Silver rating similar to the requirement for residential buildings under the Downtown Code.

2. *Proposed Affordable Housing Provisions*
   In South Downtown, the following program parameters are proposed for incentive programs

Residential and Mixed-Use Development Projects

Buildings 85' in height or less

- At least 11% of all gross bonus square footage must be provided as affordable housing.

OR

- A payment-in-lieu may be made, 100% of which must be applied to housing affordable to moderate wage workers

Buildings greater than 85' in height

- It is proposed, in South Downtown, that at least 60% of all gross bonus floor area must be acquired through provision of housing affordable to moderate wage workers, or a payment-in-lieu option.
  AND
- Up to 40% of all gross bonus floor area may be acquired through TDR or provision of other public benefits as discussed on the following page.

Commercial Development Projects

Consistent with existing Downtown bonus provisions, for any commercial development above the base allowance (including office and hotel uses), at least 75% of all gross bonus floor area would be gained through the provision of affordable housing and childcare or through TDR. Following the Downtown program, the following programs could apply:

- Preservation of existing low-income housing by transfer of development rights (TDR) or
- Housing/Childcare bonus: providing new affordable housing and child care, either a cash option or performance option based on analysis of needs created by new development.

3. *Proposed Non-Housing Public Benefits*
   Up to 25% of gross bonus floor area in future commercial projects would be gained through public benefits other than housing. Up to 40% in future residential and mixed use projects would be gained through public benefits other than housing affordable to moderate wage workers in South Downtown and childcare. In South Downtown, these are recommended to include:

   A. *TDR*:
      - *South Downtown Historic Transfer of Development Rights.*
      - *Open Space TDR.* Eligible open space sites from which rights may be transferred must have a contiguous minimum area of 5,000 square feet and must be directly accessible from the sidewalk or other public open space.

   B. *Amenity Bonus:*
      - *Open space Amenities*: Green Street Parcel Park. Downtown open space amenities proposed to be available to South Downtown projects include "commercial parcel parks" and "green street parcel parks" where applicable. Downtown Amenity Features and Standards, landscaping, furnishing, lighting and artwork would be required. Would be open and accessible to the public a minimum of ten hours each day.
      - *Streetscape and Circulation-related Amenities*: Green Street Improvements, Green Street Setback, Hillside Terrace. Future development projects in South Downtown may gain bonus floor area through the provision of streetscape and pedestrian circulation-related amenities, which may include "green street improvements" and "green street setbacks" (along designated Green Streets) and the development of "hillside terrace" public amenities (identified along step slopes in Japantown). Per the Downtown Amenity Features and Standards, they must include landscaping, furnishing, lighting and artwork, and must be open at all times of the day. The network of designated Green Streets are proposed to be extended in South Downtown along Maynard Avenue S. and S. Lane Street in Chinatown/I.D.; S. Washington Street in Japantown; Occidental Avenue S. south of S. King Street; and S. Main

Street and a portion of S. Weller Street in Little Saigon. Hillside Terrace amenities—pedestrian open space improvements along steeply sloping streets—are proposed as optional bonus improvement opportunities for the Japantown area, along 6th Avenue S. and S. Washington Street.

- *Public Art required.* In Downtown zones, Open Space Amenities and Streetscape and Circulation-related Amenities require the integration of high-quality public art. Before a building permit is issued, a final artwork plan must be reviewed and approved by the Seattle Arts Commission, according to the Downtown Amenity Standards.

Other private open space amenities

The South Downtown land use recommendations identify two other opportunities to locate open space adjacent to dense private development projects aside from those included in the incentive zoning program. In Little Saigon, it is proposed that mixed use projects on sites at least 40,000 square feet in size may be constructed to 125' if they abut through-block pedestrian connections that are at least 30' in width and include activated uses, such as retail or entrances to residential units, at the ground level. In areas west of I-5, projects on large development sites may include privately-owned open spaces. These larger sites include "over-tracks" properties, areas south of S. Charles Street, the WOSCA site, and the Qwest Field north parking lot.

Transfer of Development Rights Strategies

A South Downtown Historic Transfer of Development Rights (TDR) program is proposed to provide incentives for renovation and preservation of historic buildings in South Downtown while the area grows and changes. Consistent with the goals for each neighborhood, the South Downtown Historic TDR program will accomplish two long-term goals: 1) preserve historic-contributing structures; and 2) provide resources toward the rehabilitation of these historic resources.

To this end, South Downtown Historic TDR program is proposed to apply to historic contributing structures in Pioneer Square and Chinatown/I.D. Both neighborhoods have National Register Historic District designations with structures that have been identified as "historic, contributing" to the respective national designations. In addition the program would apply to nationally- and locally-designated landmarks in South Downtown outside the National Register Districts. This would include the Victorian Row Apartments and the former INS Building.

Allowing transfer of some development rights from properties that are restored will improve incentives to preserve and restore historic structures and help provide resources to owners for that purpose. Limiting the amount of floor area that may be transferred may avoid flooding the market with TDR, which could adversely affect owners of other eligible sending sites. Limiting the use of bonus development to sites where historic structures have *not* been located avoids creating new incentives for demolition by neglect.

Proposed eligible "sending sites" for the South Downtown Historic TDR program are:

- Pioneer Square - Skid Road National Historic District historic contributing properties;
- Seattle Chinatown National Register Historic District "primary" and "secondary" historic contributing properties; and
- Designated landmark structures within South Downtown and the Downtown Urban Center outside the National Register Districts.

Individually-designated National- and Seattle Landmarks located in South Downtown outside the National Register Historic Districts within the Downtown Urban Center include:

- The Chinese Southern Baptist Church at 925 S. King Street

- Nippon Kan Theater/Kobe Park Building 622 S. Washington Street
- The former Federal Immigration Services Building (INS Buildings), 815 Airport Way
- Victorian Row Apartments at 1234-1238 S. King Street

Eligible "receiving" sites that may use Historic TDR purchased from South Downtown structures would be:

- Commercial development projects throughout Downtown, including those within South Downtown.

"Green Factor" Landscaping and Vegetative Feature Requirements

The proposal includes a "green factor" landscaping/vegetative feature requirement. This factor means that added landscape vegetation and other features such as "green roofs" and "green walls" are provided in new development to achieve water quality, water re-use and runoff control benefits. The Green Factor requirement would be 0.3 or 0.4 in different parts of South Downtown, which would create environmental benefits comparable to retaining 30% or 40% of the site in natural vegetation. Historic buildings adjacent to areaways would be exempt from Green Factor requirements, but still may be able to add greenery in planters or other features.

Sustainability-related Energy Conservation Strategy

The recommended approach is to mandate a higher energy performance level in new commercial developments that exceed base density limits. The proposed goal for such projects is to demonstrate a minimum "energy cost savings" of 20% better than the current Seattle Energy Code minimum requirements.[2] This would be equivalent to achieving a LEED "Gold" performance level of 8 "EA1" credits for the energy-related portion of LEED, and approximately equivalent to beating the ASHRAE/IESNA Standard 90.1 by 30%. The Livable South Downtown planning effort also recommends considering "other possible actions" that could promote energy efficient approaches and sustainable strategies in future development:

- Ban electrical resistance space heating methods such as electric baseboards to avoid foreclosing future district energy heating and/or cooling solutions.
- Require energy efficiency that results in a 60% fossil fuel use reduction (e.g., natural gas) compared to a comparable building as described in the U.S. Dept. of Energy's "Commercial Building Energy Consumption Survey" database. This would promote achievement of the City's Climate Action Plan and related climate change mitigation initiatives.
- Encourage larger developments in particular to further explore district energy strategies, with the cooperative evaluation and possible assistance of public-sector agencies and energy providers such as the Seattle Steam Company.

[2] Based on using the methodology specified in USGBC LEED-NC program for EA Credit 1, Optimize Energy Performance, and based on the current version of ASHRAE/IESNA Standard 90.1.

Summary of Action Alternatives' Zoning Details

Table 2-1 summarizes details of Alternatives 1, 2, 3 and the Preferred Alternative.

BENEFITS AND DISADVANTAGES OF RESERVING IMPLEMENTATION

"Reserving implementation" means delaying or stopping decision-making processes on the proposal. This section briefly compares the relative benefits and disadvantages of *not* taking action.

Benefits

- Reserving implementation of proposed zoning and land use regulatory changes would allow additional time to evaluate growth trends, future growth needs, vulnerabilities of existing resources, and relationships to infrastructure needs.
- Reserving implementation would avoid potential risks inherent in any change away from the status quo.

Disadvantages

- Future infill growth could be delayed or stymied by zoning and land use regulations that do not correspond to contemporary conditions affecting real estate development.
- If current zones are retained, there would be a lost opportunity to adjust zoning in ways that would be compatible with increased density for housing and jobs envisioned by neighborhood plans within the Downtown Urban Center. This could contribute to lesser fulfillment of neighborhood and citywide growth management objectives, inconsistent land use patterns, and perhaps stagnation or declines in the vitality of these neighborhoods.
- There would be a lost opportunity to adjust zoning in ways that would be likely to generate additional funds through future development that would support affordable housing programs and preservation of valued historic resources.
- There would be a lost opportunity to realize physical improvements in the neighborhoods that could include: increased connectivity and quality of the streetscape, other community amenities, and improvements that would better realize environmental sustainability objectives.

Table 2-1
Summary of Alternative Zoning Details

Subarea/Exist. Zone	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative (all new)
Pioneer Square Core (PSM 100', PSM 100'/120')	**PSM 100'/130':** • On vacant & non-historic contributing properties, development up to 130 feet • Eliminate the existing "variable height limit" (within 15 feet of bldg. heights on same block or across street) • Consider other code adjustments and regulatory tools and incentives to encourage preservation, rehab and affordable housing	**PSM 85', PSM 100'/130'** • Similar to Alt. 1 in zone to 130 feet, except residential use could be encouraged in upper levels • Eliminate the "variable height limit" • Set a lower 85-foot max height in 1st Ave. S. portion of the core • Consider other code tools and incentives, similar to Alt. 1	**PSM 100':** • Set a consistently applied 100-foot height limit throughout the core, adjusting the existing "variable height limit" mechanism or eliminating it • Consider other code tools and incentives, similar to Alt.1	**PSM 100'/130', PSM 100'** • Similar to Alt. 1, in zone to 130 feet • Eliminate the "variable height limit" • Set a 100-foot max. height in 1st Ave. S. portion of the core • Flexibility afforded in location of residential uses within building • Floor area equivalent to that possible above 100 feet must be in residential use • Consider other code tools and incentives, similar to Alt. 1
Qwest Field north half of north parking lot (PSM 85'/120')	**PSM 85'/180':** • Density limit: 4.2 FAR base for non-residential uses to 85', 6.7 FAR maximum for all uses to 180' in height. 75% of building in residential uses above 85'. • Floor plate restrictions, upper-level coverage limits or similar strategies on building bulk and extent of non-residential uses	**PSM 85'/240':** • Density limit: 4.2 FAR base for non-residential uses to 85', 6.7 FAR maximum for all uses to 240' in height. 75% of building in residential uses above 85'. • Floor plate restrictions, upper-level coverage limits or similar strategies on building bulk and extent of non-residential uses	**PSM 85'/150':** • Density limit: 4.2 FAR base for non-residential uses to 85', 6.7 FAR maximum for all uses to 150' in height. 75% of building in residential uses above 85'. • Floor plate restrictions, upper-level coverage limits or similar strategies on building bulk and extent of non-residential uses	**PSM 85'-240'/120' (eastern ½):** • Density limit 4.5 FAR base, 8.5 FAR maximum for commercial uses, with 240 foot height limit. Ground-floor retail uses exempted from FAR calculation. Residential density unlimited up to 120'. • Upper-level lot coverage limits diminish at higher elevations, ranging from 75% to 35% coverages **PSM 85'/120'-240' (western ½):** • Commercial use limited to 1 FAR and 85' in height; unlimited residential density • All residential floor area above 120' gained through Downtown bonus program • Ground floor retail uses exempted from FAR calculation • Upper-level lot coverage limits diminish at higher elevations, ranging from 50% to 35% coverages

Subarea/Exist. Zone	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative (all new)
Over-Tracks property, S. King St. to approx. S. Dearborn St. (PSM 85'/120')	**PSM 85'/150':** • Density limit: 3.5 FAR maximum for all uses (no base FAR defined) • Bonus required for building floor area exceeding a base 85-foot height limit • Floor plate restrictions, upper-level coverage limits or similar strategies on building bulk	**PSM 85'/180':** • Density limit: 3 FAR base, 4 FAR maximum for all uses • Floor plate restrictions, upper-level coverage limits or similar strategies on building bulk and extent of non-residential uses	**SDM 85'/180' (south to S. Charles St.)** • Density limit: 3 FAR base, 5 FAR maximum for commercial-only, 6 FAR maximum for all uses in mixed-use • Floor plate restrictions, upper-level coverage limits or similar strategies on building bulk • Public meeting and negotiation process to define public amenity objectives	**PSM 85'/180': (south to ½ block south of S. Charles St.)** • Density limit: 3.5 FAR base, 6.5 FAR maximum for all uses • Combination of setbacks at 4th Ave. S. base level, upper-level setbacks and coverage limits or similar bulk control strategies, including recognition of scale relationships to King Street Station • Minimum width pedestrian corridor retained at "lid" level on west side of property
"Railroad gap" properties, north of S. Jackson St. (PSM 100'/120')	**PSM 100'/180':** • No density limit, as in current PSM • Must have 60% of floor area in residential use to reach 180-foot max. height	**PSM 100'/150':** • No density limit, as in current PSM • Must have 60% of floor area in residential use to reach 150-foot max. height	No Change	**PSM 100'/150':** • 6 FAR commercial use limit • Unlimited residential density • Floor area equivalent to that possible above 100 feet must be in residential use
Japantown Japantown 4th-6th Ave. vicinity (IDM 100'/120')	**IDM 100'/240':** • Density limit: No change from existing (residential use does not count against FAR limit) • Floor plate restrictions, upper-level coverage limits at various levels, and minimum site size required for building to extend above 100 feet. • Tower spacing requirement • Minimum site size of 19,000 square feet for building to maximum height • Bonus/TDR participation for density above base limit	**IDM 100'/180':** • Density limit: No change from existing (residential use does not count against FAR limit) • Floor plate restrictions, upper-level coverage limits at various levels, and minimum site size required for building to extend above 100 feet. • Tower spacing requirement • Minimum site size of 19,000 square feet for building to maximum height • Bonus/TDR participation for density above base limit	**IDM 100'/180':** • Same as Alternative 2, except different geographic coverage	**IDM 100'/240':** Similar to Alternative 1. Upper-level coverage limits for towers, maximum wall length and setbacks help define tower sizes. Above 100 feet in elevation, only residential uses allowed. Tower separation of 60 feet if towers on same property.

Subarea/Exist. Zone	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative (all new)
Japantown hill area (IDR 150')	**IDR 150':** • Density limit: No change from existing (residential development does not count against FAR limit) • Adjustments to upper-level coverage limits at various levels, floorplate dimensional restrictions • Tower spacing requirement	**IDR 150', IDR 180':** • Similar to Alternative 1, but with a variation to 180-foot maximum height for properties on west side of 6th Ave.	**IDR 150':** • Similar to Alternative 1, slight difference in geographic coverage	**IDR 150':** • Similar to Alternative 1, slight difference in geographic coverage
Chinatown Core south of Weller St (IDM 75'/85')	**IDM 75'/125':** • Density limit: No change from existing • Must have at least 50% of floor area in residential use to reach 125-foot max. height • A 15-foot setback from street property lines at a height of 45 feet • Other specific bulk or setback controls are possible	**IDM 75'/125':** • Same as Alternative 1, but this zone is also extended to the "old Uwajimaya grocery block" north of S. Weller St. and west of 6th Avenue S.	**IDM 75'/85':** • No change from existing zoning	**IDM 75'/150':** • Similar to Alternative 2 in geographic coverage, except Publix Hotel property excluded • Similar to Alternative 1 in use, setback and density details, except that north of Weller St., a 15-foot setback may occur at an elevation of 75 feet rather than 45 feet, along S. King St. and 6th Ave. S.
Between S. Dearborn St. and Charles St. (C2 65')	**IDM 75'/125':** Same as zone shown above	**DMC 125':** • Density limits: 5 base, 7 maximum for all uses • Facades and setbacks: per existing DMC rules	**SDM 160':** • Grouped with South-of-Dearborn Alt. 3, shown below.	**IDM 75'/150':** • Density limit: Base of 3 FAR and maximum of 6 FAR (residential use not subject to density limit) • 85-foot "base" height for all uses • Boundary extends across Charles St. Yards at S. Charles St.
"South-of-Dearborn" Area south of Charles St. (IG2 U/85')	**IC 125':** • Density limit: 3 FAR maximum, exempting the first 75,000 sq.ft. • Façade setback requirements, floorplate restrictions, upper-level coverage limits or similar	**IC 160':** • Density limit: 2.5 FAR base, 3 FAR max., exempting the first 75,000 sq.ft. • Must obtain density above base through participation in bonus/TDR programs	**SDM 160' (w/block north of Charles St.)** • Density limit: 2.5 FAR base, 3.5 FAR maximum for commercial-only development, 6 FAR maximum for all uses in mixed-use development • Must obtain density above base	**IC 160':** • Density limit: 1 FAR base, 3.5 FAR max. • Must obtain density above base through participation in bonus/TDR programs • Street-level façade and setback

Subarea/Exist. Zone	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative (all new)
	building bulk controls	• Façade setback requirements, floorplate restrictions, upper-level coverage limits or similar building bulk controls	through participation in bonus/TDR programs • Floorplate restrictions, upper-level coverage limits or similar building bulk controls • Public meeting and negotiation process to define public amenity objectives	requirements similar to Downtown Class II Pedestrian Street classifications, • 25,000 sq.ft. limit on average floor sizes for floors above 85 feet in height. Tower-spacing requirements. • Pedestrian safety and amenity improvements, open space improvement requirements • A 30,000 sq.ft. size-of-use limit on individual retail sales and entertainment uses, and IC prohibits drive-in businesses.
Little Saigon West of 12th Avenue S. (C1 65', NC3 65') East of 12th Avenue S. (C1 65', IC 65')	**IDM 75'/85':** • Same as existing zoning in the Chinatown core • Density limit: 3 FAR for non-residential uses, 6 for hotels **NC3 85':** • Density limit: 4.5 FAR for single uses, 6 FAR for mixed-use development • Setbacks: Per NC zone, upper levels limited per density limits	**Addressing areas west & east of 12th Avenue S.** **DMR/R up to 125':** • Density limit: 1 FAR base and 2 FAR maximum for non-residential uses (resid. use not counted in FAR limit) • Facades and setbacks: per existing DMC rules **DMC 65':** • Density limit: 4 FAR base and max. • Facades and setbacks: per existing DMC rules **DMC 85':** • Density limit: 4.5 FAR base and max. • Facades and setbacks: per existing DMC rules **DMC 125':** • Density limit: 5 FAR base, 7 FAR max. • Facades and setbacks: per existing DMC rules	**Addressing areas west & east of 12th Avenue S.** **NC3 85' (West and East of 12th Ave. S.)** • Density limit: 4.5 FAR for single uses, 6 FAR for mixed-use development • Setbacks: Per NC zone, upper levels limited per density limits	**Addressing areas west & east of 12th Avenue S.** **DMR/C 65' up to 125':** • Density limit: 1 FAR base and 4 FAR maximum for non-residential uses (resid. use not counted in FAR limit) • 65' base height limit; 85' maximum height achievable through incentive zoning; 125' maximum height achievable with through-block pedestrian amenity and participation in incentive zoning • Street-level retail uses, with size-of-use limits at 25,000 sq.ft., or 50,000 sq.ft. for groceries. Upper-level setbacks as described in text above under "Bulk and Scale Control Strategies" **DMR/R 65' up to 125':** • Density limit: 1 FAR base and 2 FAR maximum for non-residential uses (resid. use not counted in FAR limit) • 65' base height limit; 85' maximum height achievable

Subarea/Exist. Zone	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative (all new)
East of Rainier Avenue S. (IC 65', C1 65', C2 40')	**NC3 65':** • Density limit: 4.25 FAR for single uses, 4.75 FAR for mixed-use development • Setbacks: Per NC zone, upper levels limited per density limits	**NC3 65':** • Density limit: 4.25 FAR for single uses, 4.75 FAR for mixed-use development • Setbacks: Per NC zone, upper levels limited per density limits	**NC3 65' (East of Rainier Ave. S.)** • Density limit: 4.25 FAR for single uses, 4.75 FAR for mixed-use development • Setbacks: Per NC zone, upper levels limited per density limits	through incentive zoning; 125' maximum height achievable with through-block pedestrian amenity and participation in incentive zoning • Street-level retail uses, with size-of-use limits at 25,000 sq.ft., or 50,000 sq.ft. for grocery stores. Upper-level setbacks as described in text above under "Bulk and Scale Control Strategies" **DMC 65' up to 160':** • Density limit: 3 FAR commercial, 5 FAR residential • 65' base height; 160' maximum height achievable through incentive zoning • No size-of-use limits for commercial; drive-in and higher-impact uses prohibited. **NC2 65' (East of Rainier Ave. S.)** • Density limit: 4.25 FAR for single uses, 4.75 FAR for mixed-use development • Setbacks: Per NC zone, upper levels limited per density limits • Commercial size-of-use limits at 25,000 and 50,000 square feet.
Stadium Area WOSCA property vicinity-approximate northern third ~~of approx. Dearborn St.~~ (IC 65')	**SDM/R 65'/160':** • 2 FAR base, 3 FAR maximum for commercial-only development, 6 FAR maximum for all uses exempting the first 75,000 sf of ground floor uses per existing Stadium Transition Area Overlay District. • Must obtain density above base through bonus/TDR programs • Floor plate restrictions, upper-level coverage limits	**IC 100':** • Retain Stadium Transition Area Overlay District, which indicates a density limit of 3 FAR maximum, exempting the first 75,000 sq.ft. • Existing façade setback requiremts.	**SDM/R 65'/120':** • 2 FAR base, 3 FAR maximum for commercial-only development, 6 FAR maximum for all uses exempting the first 75,000 sf of ground floor uses per existing Stadium Transition Overlay. • Must obtain density above base through bonus/TDR programs • Floorplate restrictions, upper-level coverage limits or similar tools • Public meeting, negotiation	**IC 65'/160' (applicable to entire WOSCA property):** • 3 FAR base, 5 FAR maximum for non-residential uses (residential uses prohibited), achievable through participation in incentive zoning, for sites with a minimum area of 125,000 sq. ft. • For development that exceeds base development rights, all floor area for identified pedestrian-oriented street-level retail uses would be exempt

Subarea/Exist. Zone	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative (all new)
WOSCA property vicinity – approximate southern two-thirds ~~of approx. Dearborn St.~~ (IC 65')	or similar tools • Public meeting, negotiation process to define public amenity objectives **SDM 65'/100':** • 3 FAR base, 4.5 FAR maximum exempting the first 75,000 sq. ft. of street level retail sales, cust. service • Must obtain density above base through bonus/TDR programs • Floor plate restrictions, upper-level coverage limits or similar tools • Public meeting, negotiation process to define public amenity objectives	**IC 85':** • Retain Stadium Transition Area Overlay District, which indicates a density limit of 3 FAR maximum, exempting the first 75,000 sq.ft. • Existing façade setback requirements **IC 65':** • Similar to description above for IC 85'	process to define public amenity objectives • Permit lodging uses **SDM 65'/100':** • 3 FAR base, 4.5 FAR maximum exempting the first 75,000 sq. ft. of street level retail sales, cust. service • Must obtain density above base through bonus/TDR programs • Floorplate restrictions, upper-level coverage limits or similar tools • Public meeting, negotiation process to define public amenity objectives • Permit lodging uses	from FAR calculations • Stadium Transition Area Overlay District regulations, including a 75,000 sq.ft. exemption from FAR limits for certain street-level uses, would continue to apply to development projects that do not exceed base development rights (65' height and 3 FAR density) • Height limits in the area within 250 feet of S. Royal Brougham Way would be 85 feet. Through the remainder of the area to the north, structures could be constructed up to 120 feet in height, and on up to 20% of this total lot area outside of the area affected by the 85 feet limit, structures may be constructed up to 160 feet in height • Sidewalk widths and amenities that conform to the Right-of-Way Improvements Manual and any applicable requirements of the Stadium Transition Area Overlay District; and open space connections at least 50 feet in width that would allow pedestrian travel east-west through the site; and a continued mandate for a plaza at the northwest corner of 1st Ave. S. and S. Royal Brougham Way. • Bulk control strategies as described in text above under "Bulk and Scale Control Strategies"

Subarea/Exist. Zone	**Alternative 1**	**Alternative 2**	**Alternative 3**	**Preferred Alternative (all new)**
"Over-Tracks" property, south of approx. Dearborn St., and other nearby Stadium Overlay area (IC 65')	**IC 125':** • Retain Stadium Transition Area Overlay District • Density limit: 3 FAR maximum, exempting the first 75,000 sq.ft. of street level retail sales, cust. service • Façade setback requirements, floor plate restrictions, upper-level coverage limits or similar building bulk controls	**IC 240':** • Retain Stadium Transition Area Overlay District • 3 FAR base, 5 FAR maximum exempting the first 75,000 sq. ft. of street level retail sales, cust. service • Must obtain density above base through bonus/TDR programs • Floorplate restrictions, upper-level coverage limits or similar tools	**IC 85':** • Retain Stadium Transition Area Overlay District • Density limit: 3 FAR maximum, exempting the first 75,000 sq.ft. • Existing façade setback requirements • Permit lodging uses	**IC 65':** • No change in zoning south from approximately the northern edge of the existing I-90 offramp
East edge of 4th Ave. S., Airport Way to Royal Brougham Way (IG 2 U/85', C2 65')	**IC 125':** • Same as "Over-Tracks" IC zone described above (except not in Stadium Transition Area Overlay District)	**IC 160':** • Density limit: 2.5 FAR base, 3 FAR max., exempting the first 75,000 sq.ft. • Must obtain density above base through bonus/TDR programs • Façade setback requiremts., floorplate restrictions, upper-level coverage limits or similar building bulk controls	**SDM 160:** • Same as "South-of-Dearborn", as discussed above in Alternative 3	**IC 65'/160':** • Same as "South-of-Dearborn" as discussed above in Preferred Alternative
South of S. Royal Brougham Way: "Pyramid Brewery block" (IC 65', IG2 U/85')	**IC 85' (includes portion that changes from IG2 u/85'):** • Density limit: 3 FAR maximum, exempting the first 75,000 sq.ft. • Existing façade, setback and related bulk controls ~~requirements.~~	**IC 65':** • No change from existing zoning **IG2 u/85' to IC 65'** • Extends Stadium Transition Area Overlay District, which indicates a density limit of 3 FAR maximum, exempting the first 75,000 sq.ft., façade, setback and related controls	**IC 85' (includes portion that changes from IG2 u/85'):** • Density limit: 3 FAR maximum, exempting the first 75,000 sq.ft. • Existing façade, setback and related bulk controls ~~requirements.~~ • Permit lodging uses	**IC 65' and IG2 u/85':** • No change from existing IG2 and IC zoning

Subarea/Exist. Zone	**Alternative 1**	**Alternative 2**	**Alternative 3**	**Preferred Alternative (all new)**
South of S. Royal Brougham Way: Safeco Field block (IC 65')	**IC 125:** Same as "Over-Tracks" IC 125' zone described above, and remains within Stadium Transition Area Overlay District	**IC 85:** Same as existing IC 85' zoning currently applicable south of S. Atlantic Street	**IC 85:** Same as existing IC 85' zoning currently applicable south of S. Atlantic Street	**IC 65:** • No change from existing zoning
Other properties south of S. Royal Br. Wy to S. Holgate (IC 65', IC 85')	**IC 65' and 85':** • No change from existing zoning	**IC 65 and IC 85:** • No change from existing zoning	**IC 65 and IC 85:** No change from existing zoning, except permit lodging uses	**IC 65 and IC 85:** • No change from existing zoning

Chapter Three

Affected Environment, Impacts and Mitigation Strategies

LAND USE—ZONING, LAND USE AND DEVELOPMENT PATTERNS

AFFECTED ENVIRONMENT

SUMMARY OF EXISTING LAND USE AND ZONING

The study area includes land south of the Downtown office core and east of Alaskan Way, including the entire Pioneer Square and Chinatown/International District neighborhoods, the northern periphery of the Greater Duwamish Manufacturing and Industrial Center (MIC), and the western periphery of the Jackson Place neighborhood at Rainier Avenue S. This diverse area is many things to many people, including: a center of historic and cultural heritage, art and tourism; a place to live and work and conduct business; an entertainment center; a transportation hub; and a corridor for commerce and industry.

Land Use Patterns

An overview of South Downtown's land use patterns begins with its neighborhoods and districts.

Pioneer Square

Pioneer Square adjoins the Downtown office core and government core, extending as far north as Columbia Street and as far south as S. Royal Brougham Way. This historic district is characterized by an extensive and varied assemblage of century-old buildings, most with brick and stone facades and distinctive architectural qualities (see the Historic and Cultural Preservation section of this chapter for additional discussion). Typical buildings range from 20 feet up to 100 feet in height. Several taller buildings are located along the 1st Avenue corridor and along S. Jackson and S. King Streets. In the Occidental Park vicinity and eastward to around 3rd Avenue S., lower-height buildings are most common, in the range of approximately 10 to 50 feet. Interspersed throughout the district are approximately 30 properties used as parking lots, garages or with other structures that are considered non-contributing to the historic district. This creates a land use pattern with numerous buildings developed to the property line, but also occasional gaps in the continuity of streetfront uses created by vacant lots.

Complementing this pattern and creating localized open space nodes are Pioneer Place Park, Occidental Park, the Occidental pedestrian mall, Fortson Square and City Hall Park. The combination of a change in street grid orientation and a continuation of 2nd Avenue Extension at an angle from the dominant Pioneer Square street grid creates several triangular blocks and triangular spaces along 2nd Avenue Extension until it intersects with 4th Avenue S. at S. Jackson Street. South of S. King Street, the northern parking lot of Qwest Field creates a large open space, bordered by Qwest Field to the south, railroad tracks and King Street Station to the east, and buildings along Occidental Avenue S. and S. King Street. Along 1st Avenue S. south of S. King Street, an architectural style and building pattern compatible with Pioneer Square extends to uses on both sides of the street for approximately two blocks and then only on the east side of 1st Avenue S. to S. Royal Brougham Way. The west side is part of the Greater Duwamish MIC.

The mix of street-level uses in Pioneer Square includes many retail businesses devoted to tourism and specialty goods, art galleries, restaurants, bars and nightclubs, and social service agencies. Upper-story uses include a variety of offices, artist live-work spaces, social services, housing and assorted commercial uses. Some upper-story floors in historic buildings may be under-utilized or vacant. Residential uses are not very visible in the mix of uses, except the Florentine Condominiums south of S. King Street and subsidized housing structures such as the Morrison and Frye Hotels on Third Avenue near the King County Courthouse. However, recent renovation or new construction is bringing an increased inventory of residential uses in some vicinities, including the Lowman Building apartments (near 1st and Cherry), the Tashiro Kaplan Building (at Prefontaine Place), and the Quintessa Apartments near 2nd and Yesler

Way. The Smith Tower is also in design and permitting for conversion of its upper tower to residential uses.

King Street Station provides a hub for regional commuter trains, Amtrak and other train traffic. The bus tunnel stations accessed in Pioneer Square via 3rd Avenue entrances and near Union Station at 5th Avenue S., and various surface bus stops nearby King Street Station complement this hub by providing bus and eventual light rail transit service that generates daily commuting activity in the vicinity.

Chinatown/International District

This neighborhood and historic district adjoins the Downtown office core and government center, east of Pioneer Square between approximately Yesler Way to the north and S. Charles Street to the south. Its boundaries extend from 4th Avenue S. east to Rainier Avenue S., also encompassing the Little Saigon neighborhood described later. The Chinatown and Japantown vicinities west of I-5 are characterized by a varied assemblage of buildings, many with brick and stone facades and historic architectural character, located within a north-south-east-west gridiron street system. Most of the buildings range from 10 feet to approximately 60 feet in height; in Japantown a few residential buildings range up to approximately 150 feet. The architecture and use patterns in these areas reflect the cultural heritage of the Asian American communities of Seattle, and have historically served as a business and activity center for those communities. Street-level uses include a wide variety of restaurants, customer service offices, specialty goods stores, grocers, banks, a post office, private associations and social service providers. Upper-level uses include several buildings with residential uses, others with office or service uses, private associations, and a number of buildings with vacant or under-utilized upper floors.

Physically, the land use patterns include the densest core of historic buildings within a National Register Historic District that extends approximately between S. Main Street, S. Weller Street, 5th Avenue S. and I-5. This encompasses the active east-west corridors of S. King Street and S. Jackson Street. The vicinity centered at 6th Avenue S. and S. Main Street is known as Japantown or Nihonmachi, with a collection of buildings identified as a center of Japanese-American architectural and cultural heritage. Between approximately S. Main Street and Yesler Way to the north along 6th Avenue S., the pattern of use is primarily in apartment buildings of varying ages and heights, interspersed with parking lots, and other uses such as the Nippon Kan Theater commercial building. In this same vicinity between 4th and 5th Avenue S. is a lightly developed vicinity including surface parking lots that is a transitional area between Pioneer Square, Downtown and this neighborhood. A new Emergency Operations Center and fire station, under construction, will occupy one of the blocks in this vicinity.

At the west perimeter of the Chinatown neighborhood south of S. Jackson Street, a series of large office buildings and Union Station form an employment center and a physical "edge" that is penetrated by a few pedestrian walkways most notably at S. Weller Street, connecting to the Weller Street Bridge west of 4th Avenue S.

South of S. Weller Street in the Chinatown neighborhood, the character of development includes a mix of newer residential/mixed-use buildings, parking lots and utilitarian single-use buildings, as well as the Uwajimaya mixed-use grocery/retail and apartment complex. Compared to Pioneer Square, the Chinatown/Japantown neighborhood as a whole is less densely developed, and includes more parking lots and vacant or lightly developed properties in its land use mix.

Little Saigon and Jackson Place

This neighborhood, east of I-5, is the easternmost extension of the Chinatown/International District neighborhood and the Downtown Urban Center. It is characterized by a varied mixture of predominantly

commercial buildings, ranging from warehouses and poultry processing, to grocery stores, small businesses, social service agencies, small office buildings, churches, and the mixed-use Pacific Rim Center. Most of the buildings range from approximately 10 to 30 feet in height. Physically, this vicinity is characterized by its long east-west blocks, the intersecting S. Jackson Street and 12th Avenue S. corridors, and a terraced topography bounded by upslopes north of S. Jackson Street and downslopes south of S. Lane Street.

Little Saigon is identified as a key center of Vietnamese-American community business and cultural activity in Seattle. Many households take advantage of the clustering of businesses, restaurants, and nearby religious facilities to make this neighborhood a multi-stop destination, especially on weekends. In addition, this area is considered a point of entry where immigrants can find an economic foothold in the workforce and business world.

The most active business center is located at 12th Avenue S. and S. Jackson Street, with several small-scale commercial buildings providing space for numerous businesses, service providers and restaurants. Several of these uses include parking for automobiles between the street and the building. Along S. King Street is a diverse mixture of retail, warehouse, wholesale, goods and services uses, along with the historic Victorian Row Apartments. Along S. Weller Street, uses include the Leschi Center that provides services to Native Americans, and a variety of light industrial, commercial, and office uses east of 12th Avenue S. In the southeast corner of this vicinity is the Goodwill property south of S. Weller Street and west of Rainier Avenue S.

To the east of this vicinity across Rainier Avenue S. are the Jackson Place residential neighborhood and S. Jackson Street commercial corridor, to the north is the Yesler Terrace residential community and to the southeast is the continuation of the Rainier Avenue S. commercial/industrial corridor. The southeast-northwest angle of Boren Avenue S. provides an approximate northern edge to Little Saigon, connecting with Rainier Avenue S. and S. Jackson Street to form a five-way intersection. Commercial uses are located along both sides of Rainier Avenue S., and within a narrow transitional area immediately to the east of Rainier Avenue S. that is part of the Jackson Place vicinity. In this vicinity, the topography toward the east defines a transition in land use to low-density residential uses and provides territorial views for occupants. The Seattle Housing Authority is beginning to evaluate future development actions in the Yesler Terrace vicinity north of Main Street and east of I-5.

Stadium Area and "south-of-Dearborn"

These portions of the study area~~s~~ lie at the northern bounds of the Greater Duwamish MIC, extending as far south as S. Holgate Street in the 1st Avenue S. vicinity and S. Royal Brougham Way elsewhere. Functionally, these vicinities serve as a transitional area between Downtown neighborhoods to the north and the industrial area to the south, accommodating a variety of industrial and commercial uses. (See the "Zoning Patterns" discussion below for description of the "Stadium Transition Area Overlay District".)

In addition to the Qwest Field Event Center and Safeco Field complexes, the mix of industrial and commercial uses includes restaurants, warehouse/distribution, home products retail stores, wholesale, parking lots and offices. The "WOSCA property" (recently narrowed in east-west width by acquisition of the western half for SR 99 right-of-way purposes) extends north of S. Royal Brougham Way on the west side of 1st Avenue S. in this vicinity, representing the northernmost extension of the MIC. The 1st Avenue S., 4th Avenue S., S. Royal Brougham Way and Occidental Avenue S. corridors are intermittently affected by traffic from stadium and event center activities, such as 80+ baseball games a year, 10 football games a year, and numerous other regularly scheduled soccer, tradeshow and concert activities. These events

bring large volumes of pedestrians and related festival-style street vending that intermittently affect traffic congestion and the efficiency of business activities.

South of S. Dearborn Street in the Airport Way S. vicinity, uses include warehouses, printing, automobile repair, City operations yard, food preparation and distribution, as well as the William Booth Center (transitional housing), the vacant former Immigration and Naturalization Service (INS) building, and parking lots. Typical buildings in these vicinities range from 10 to 20 feet in height.

The largest nearby uses west and southwest of this vicinity are the Port of Seattle Terminal 46 container terminal and Seattle International Gateway (SIG) Railyard. These facilities provide for movement of large volumes of goods into and out of the country via container traffic by ship, truck and rail, at all times of day. Truck movements to and from the terminal occur via all streets in the local network, including movements that transfer goods to and from trains. A "tail track" that extends north-south near Alaskan Way allows for connection of railcars and other train movements. East of the stadiums, a Burlington Northern Santa Fe (BNSF) railyard and rail corridor serves Sound Transit, Amtrak and other rail service to/from King Street Station; at-grade rail crossings intermittently affect traffic on Royal Brougham Way and S. Holgate Street. Also adjacent to the study area at S. Atlantic Street, the Bemis Building provides live/work space for more than 30 tenants. East of 4th Avenue S. and south of S. Royal Brougham Way, the dominant uses near the study area are transportation-oriented, primarily related to the King County Metro bus base.

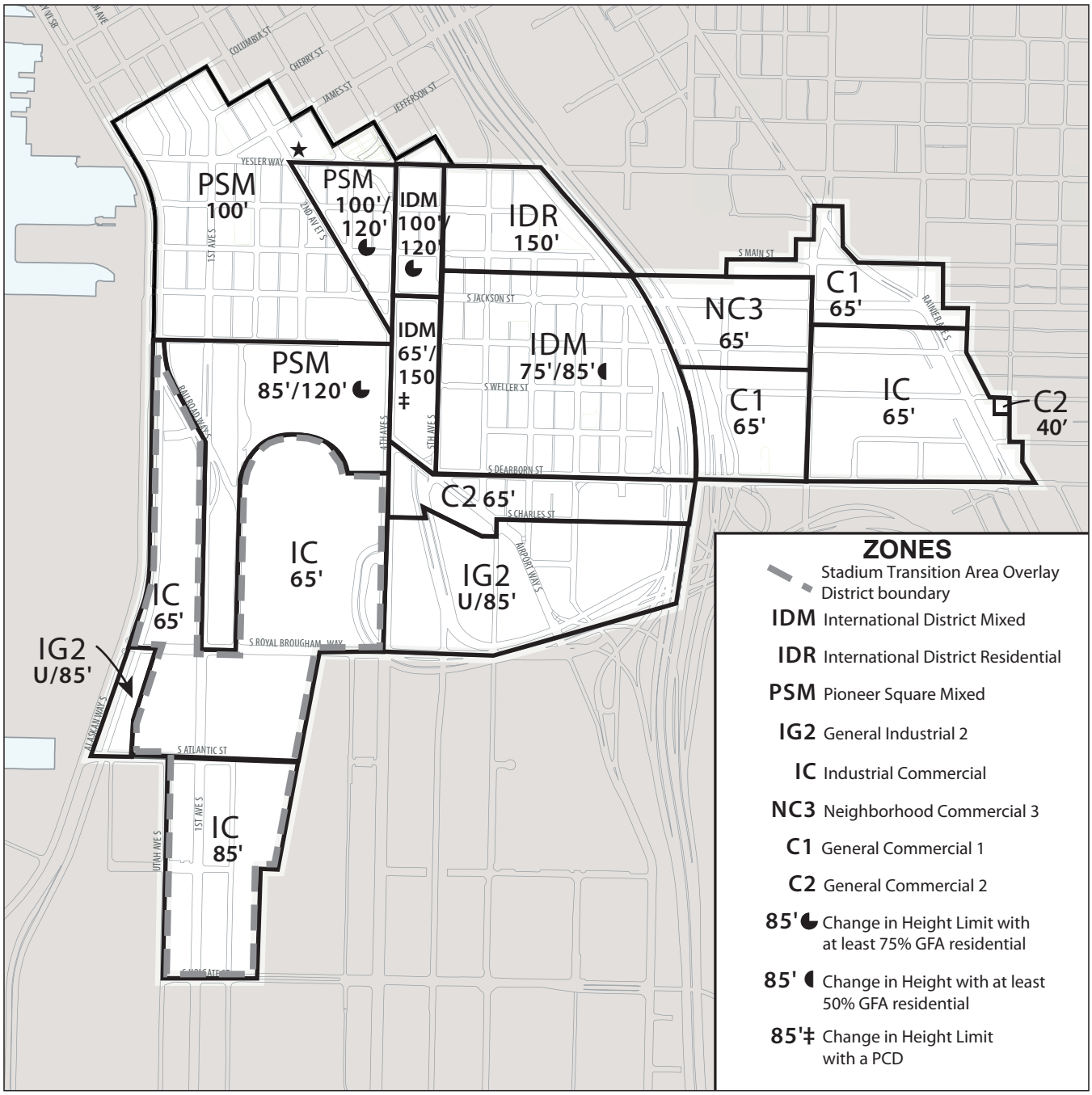
Zoning Patterns

Pioneer Square

The Pioneer Square neighborhood is uniformly zoned "Pioneer Square Mixed" (PSM), denoting a Special Review District and neighborhood-specific zone regulations. The PSM zone accommodates a wide variety of uses, but prohibits several types of heavy commercial and light industrial uses. Four different height districts are present in Pioneer Square: a 100-foot district, an 85/120-foot district, a 100/120-foot district, and a 245-foot district (the latter primarily at the Smith Tower property). The 100-foot district is the most prevalent, covering most of the area between Columbia Street and S. King Street. The 100/120-foot district lies predominantly east of Second Avenue Extension south of Yesler Way. The 85/120-foot district lies south of S. King Street in the stadium vicinity, including the North Lot of Qwest Field and properties along the east side of 1st Avenue S. south to Royal Brougham Way (see Figure 3-1). The maximum 120-foot height may be achieved in these areas only if 75% of the floor area of a building is in residential use.

Chinatown/I.D. West of I-5

This area is zoned "International District Mixed" (IDM) or "International District Residential" (IDR), denoting a Special Review District and neighborhood-specific zone regulations. The IDM and IDR zones accommodate a wide variety of uses, but prohibit several types of heavy commercial and light industrial uses. The IDR zone encourages residential uses. Three different height districts are present in the IDM zone: a 75/85-foot district, a 100/120-foot district, and a 150-foot district. The 75/85-foot district is the most prevalent, covering the central area between the north side of S. Jackson Street to S. Dearborn Street, and from 5th Avenue S. east to I-5. The 100/120-foot district lies north of S. Jackson Street in the 4th and 5th Avenue vicinity, adjacent to the similar height Pioneer Square zone. In both the aforementioned zones, the maximum heights may be achieved in these areas if at least 50% of the floor area of a building is in residential use. The 150-foot district defines the Union Station office development vicinity between 4th and 5th Avenues S., between S. Jackson Street and Airport Way S. (see Figure 3-1).



Note: PSM zone with a 245 foot height limit at the Smith Tower shown with a ★

Figure 3-1

Existing Zones

Livable South Downtown

Little Saigon

This area east of I-5 includes two commercial zones and one industrial zone that are unusual in their application to areas within the Downtown Urban Center. The "General Commercial 1" (C1) zone is present along S. Jackson Street east of 12th Avenue S., and also west of 12th Avenue S. on properties accessed by S. Weller Street south to S. Dearborn Street. The "Neighborhood Commercial 3" (NC3) zone is present on properties accessed by S. Jackson Street and S. King Street west of 12th Avenue S. An area-specific rule for this vicinity allows for maximized building bulk to the height envelope. The Industrial Commercial (IC) zone is present east of 12th Avenue S., on properties accessed by S. King Street south to S. Dearborn Street and beyond, and is also present on the east side of Rainier Avenue S. (refer to Figure 3-1).

South-of-Dearborn

This vicinity includes two zones: a "General Commercial 2" (C2) zone with an 85-foot height limit in the first block south of S. Dearborn Street (including the former INS building), and a General Industrial 2 (IG2) zone with an U/85-foot height limit, meaning industrial uses have no height limit and other non-industrial uses can reach 85 feet (refer to Figure 3-1).

Stadium Area

This portion of the study area is zoned "Industrial Commercial" (IC) with a "Stadium Transition Area Overlay District" overlay zone. This overlay zone includes area on the west side of 1st Avenue S. south of Railroad Way S., and also property as far north as the northern edge of Qwest Field east to 4th Avenue S. It also includes all of the EIS study area south of Royal Brougham Way except for an IG2 zone in the western portion of the "Pyramid Brewery block" near S. Atlantic Street. The Stadium Transition Area Overlay District's purpose is described in SMC 23.74.002 as allowing uses complementary to the athletic facilities that will contribute to a safer pedestrian environment in the District while minimizing conflicts with industrial uses (see the Relationship to Plans and Policies for the full text of the purpose and intent of this overlay zone). In effect, the Stadium Transition Area Overlay District recognizes the nature of the land use pattern that transitions between Downtown neighborhoods and industrial uses south and west of this vicinity.

The IC zone category accommodates a wider variety of commercial uses than the other Industrial zones. The area north of S. Atlantic Street, including the WOSCA property, most of the "Pyramid Brewery block," Safeco Field and Qwest Field event center uses, is zoned IC with a 65-foot height limit. South of S. Atlantic Street to S. Holgate Street along 1st Avenue S. and Occidental Avenue S., there is an IC zone with a 85-foot height limit (refer to Figure 3-1). This 85-foot height limit is comparable to other limits for non-industrial uses in the IG1 and IG2 zones located further south in the MIC. Within the Stadium Transition Area Overlay District, the spectator sports facilities are accommodated by other regulations that allow for heights for stadiums to be higher than 65 feet.

ENVIRONMENTAL IMPACTS

The objectives of Livable South Downtown planning are multi-layered—favoring a high-quality livable urban environment, increased housing opportunities complementary to these neighborhoods, respecting and enhancing neighborhood character and functions, encouraging appropriate economic growth, and ensuring efficient and sustainable transportation and utility systems. Urban design objectives encourage several kinds of streetscape, recreational and other improvements with amenities and aesthetic value. Not all of these potentially positive effects are included in this impact analysis, due to an emphasis in SEPA on identifying and disclosing adverse impacts.

The historic nature of the study area neighborhoods is an important aspect of the land use context. The alternatives have been defined in light of the historic values, with an intention to encourage land uses that will maintain compatibility with the existing historic neighborhood character.

The studied alternatives include zoning choices that would affect *where* infill development should occur, and *how much* growth should occur in terms of building height and density. These alternatives have been tailored to the characteristics of each subarea, with the intent of defining future development patterns that are plausible and would be compatible within the context of South Downtown. This should limit the potential for significant adverse land use and zoning impacts.

The impact discussion below discusses changes that would affect comprehensive plan designations, and land use and development pattern impacts. Further discussion about the height/bulk/scale implications of the alternatives is included in the Chapter 3 section "Land Use—Height, Bulk, Scale and Compatibility" and Appendix B to this Draft EIS. Development capacity implications of the alternatives are discussed in the Population and Employment section of Chapter 3 of this Draft EIS.

POTENTIAL CHANGES AFFECTING COMPREHENSIVE PLAN DESIGNATIONS

The alternatives include proposals for amendments to the Comprehensive Plan. Such changes occur through the annual amendment process for the Comprehensive Plan. In this process, decisionmakers make choices about amendments relating to land use plans, policies and preferred future land use patterns. The following paragraphs summarize and comment on the proposed changes that would affect the Comprehensive Plan. Figure 3-2 illustrates the areas addressed by these alternative proposals.

Stadium Area – West side of 1st Avenue S. – Alternatives 1 and 3

Under Alternatives 1 and 3, the west side of 1st Avenue S. south to Royal Brougham Way, consisting primarily of the WOSCA property, would be included in the Downtown Urban Center and removed from the Greater Duwamish Manufacturing and Industrial Center (MIC). Under both alternatives, the proposed zoning is a new "South Downtown Mixed" (SDM) zone that would accommodate commercial development in the southern two-thirds of the WOSCA property, and accommodate residential, commercial or mixed-use development in the northern third of the WOSCA property. This would represent a change in the current Comprehensive Plan's preferred future land use pattern, moving away from industrial uses and toward denser commercial and possible residential uses. Residential land use would be newly allowed on the west side of 1st Avenue S. south of Railroad Way S. (it is already permitted on the east side of 1st Avenue S. that is zoned Pioneer Square Mixed). Development density would be increased with adoption of SDM zones.

South-of-Dearborn vicinity – Alternative 3

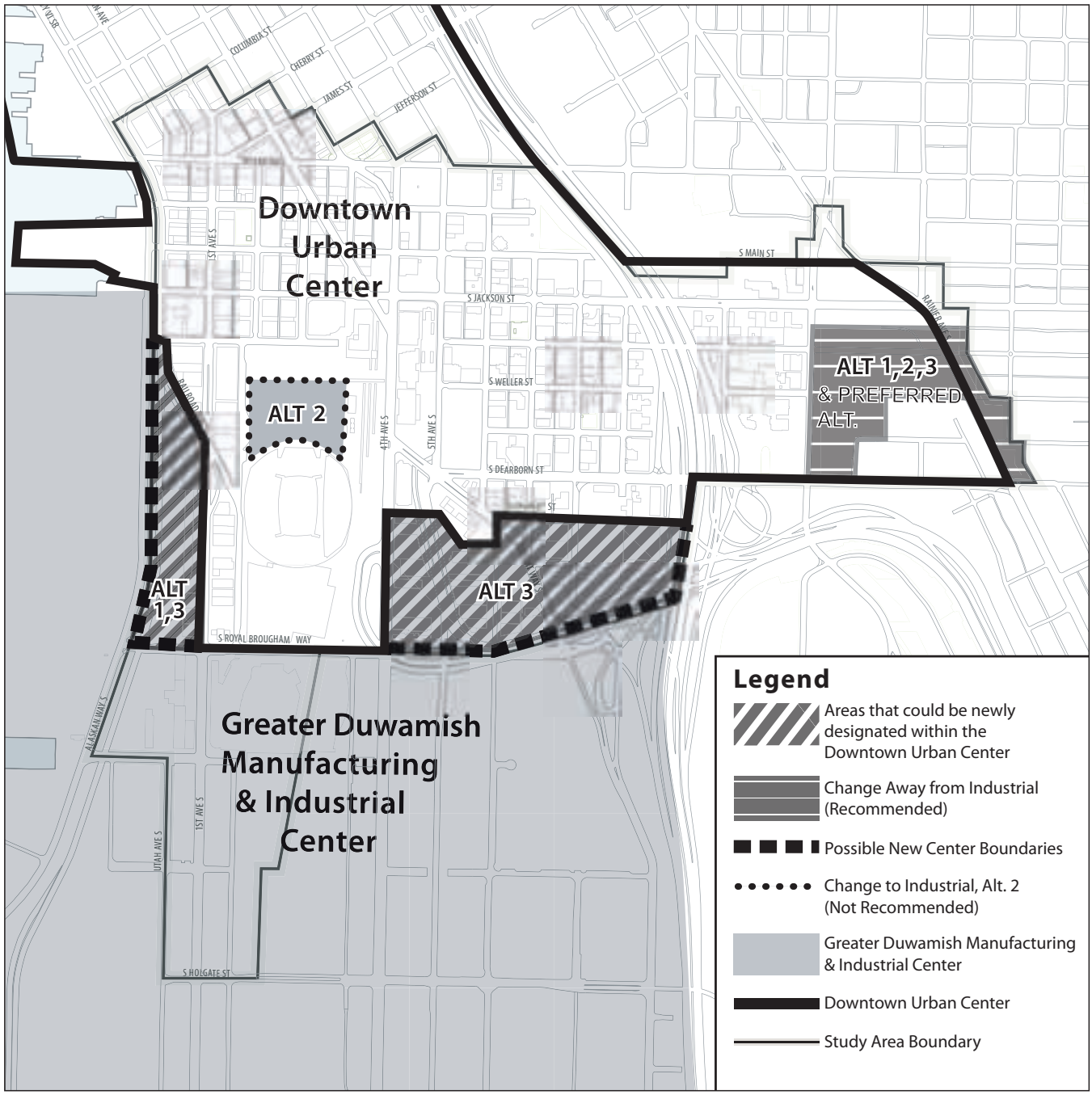
Under Alternative 3 the south-of-Dearborn vicinity would be moved into the Downtown Urban Center and removed from the Greater Duwamish MIC. Proposed zoning under Alternative 3 would be to the new SDM zone, encouraging a mix of commercial and residential development. The residential land use would be a type of use newly permitted in this vicinity, and development density would be increased through these changes.

Stadium Area, Pioneer Square – southern portion of Qwest Field north parking lot – Alternative 2

Alternative 2 includes a proposed rezone of the southern half of the Qwest Field north parking lot to Industrial Commercial, which would require a change in the comprehensive plan designation from a Downtown designation to an Industrial designation. This would also represent a change in future land use in an area currently zoned and designated within the Pioneer Square Preservation District. Such a change would alter the range of possible land uses that could occur within the Preservation District, including prohibiting residential land uses. It would also reduce density limits, given the difference between Pioneer Square and IC zones, of which the latter has a density limit of 3 FAR. Due to the extent of change in land use designation and potential future development patterns and the corresponding effects on a part of the Pioneer Square Preservation District, this proposal is interpreted as generating significant adverse land use impacts. For this reason, it is an action not likely to be included in Livable South Downtown final zoning recommendations.

Little Saigon – Vicinity east of 12th Avenue S. – all Alternatives

In 2006, the City Council approved an amendment to the Comprehensive Plan for the Goodwill property vicinity from Industrial to Commercial/Mixed Use. This leaves the balance of an area from one-half block south of S. King Street and west of 12th Avenue S., including property east of Rainier Avenue S., still within an Industrial use designation. All of the alternatives in this EIS assume a proposed change in this area from the Industrial use designation to Commercial/Mixed Use in the Comprehensive Plan. Such a change would newly accommodate residential uses and may increase the overall development density depending upon zoning choices. As of September 2007, a Comprehensive Plan amendment was proposed to reverse the 2006 changes and re-designate the Goodwill property vicinity back to an Industrial designation, but no decision had been made. However, that proposed amendment was not supported by the City Council.



0 2 4 6 8 10
Scale in 100 Feet

N

Figure 3-2

Summary Map of Alternative Changes to Comprehensive Plan Designations

Livable South Downtown

LAND USE AND DEVELOPMENT PATTERNS

This impact analysis discusses whether proposed land use and zoning under the alternatives would create conflicts due to the adjacency of zones and/or the future use and development patterns that could result from the zoning. This encompasses zoning principles such as impacts of more intensive zones on less intensive zones and similar concepts like transitions between zones. It also overlaps with the topic of compatibility, for which additional discussion is provided in the next section entitled "Land Use – Height, Bulk, Scale and Compatibility."

In general, the range of changes proposed in Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative would in most cases increase overall development capabilities within and near the historic cores of Pioneer Square and Chinatown/I.D., including a swath of property east and west of the Qwest Field vicinity extending eastward to I-5. The range of changes in Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative would also increase the capacity to grow in Little Saigon, which functions as a second core of the Chinatown/I.D. neighborhood, east of Interstate 5. The following interprets potential adverse land use impacts of future development under the alternatives' zone proposals.

Pioneer Square

The analysis reviews four primary sub-areas in this neighborhood: the "core" area currently in a PSM 100' zone; the north half of the Qwest Field north parking lot; the "over-tracks" properties south of S. Jackson Street; and the "railroad gap" properties on the west side of 4th Avenue S. that are north of S. Jackson Street. In each of these areas, the analysis concludes that the alternative zoning proposals would be able to occur without significant adverse impacts to land use and zoning patterns. This conclusion is independent of the height, bulk and scale impact analysis discussed in the next section of Chapter 3. The conclusions indicate that future uses within these zones would fit into the existing land use and zoning pattern without significant impacts related to transitions, development intensities or conflicts between zones. The conclusions are summarized briefly below for the neighborhood sub-areas, for the Alternatives.

"Core" area

Protections afforded by the existing PSM zone and Special Review District oversight, the limited extent of change, and the targeting of height increases (in Alternatives 1, ~~and~~ 2 and the Preferred Alternative) to vacant and non-historic-contributing properties would help avoid significant adverse land use impacts. Alternative 3's height limit at 100 feet would generate the least potential for significant impacts. These alternatives would accommodate infill development within the Pioneer Square core area that would fit into the historic district and could have positive impacts through increased numbers of residents, expanded business activity and a better-activated street environment with fewer gaps. All of the action alternatives would provide for complementary arrangements of land uses within the "core" area, including active non-residential uses at street-level and residential or non-residential uses in floors above street-level.

Qwest Field north parking lot

Future infill development in the north half of the north parking lot would likely consist of multifamily residential uses, retail commercial uses at ground floor, and other possible commercial uses such as hotel or office. Under the Preferred Alternative, a larger amount of commercial uses could occur primarily in the eastern portion of the subject property. This larger concentration of commercial uses would increase the intensity of use in this immediate vicinity and generate higher activity levels and traffic than identified for the other alternatives. However, under any of these alternatives, these kinds of uses would fit into and extend the land use pattern of the Pioneer Square neighborhood without generating significant adverse

land use or development pattern impacts or conflicts. Even though the intensity of use would increase under the Preferred Alternative and consequently vary to some degree from the historic land use pattern of Pioneer Square, the probable intensity and mix of uses would be compatible with the immediate environment that includes a transit hub, a concentration of office uses nearby, and adjacent Downtown Urban Center neighborhoods. ~~This~~ These conclusions are ~~is~~ inferred in part due to expected conformance with Pioneer Square regulations and guidelines, review of future development by the Pioneer Square Preservation Board, and a ~~scarcity~~ lack of incompatible uses and activities. ~~Stadium and event center activities~~ Future development would not generate significant adverse land use conflicts or incompatibilities in relation to stadium and event center activities, in part because event staging activity could continue to occur, even if off-street area available for staging is reduced by future development in the north half of the north parking lot. An agreement between the City and First & Goal, entitled "Event Traffic Management Plan, Plan Years 2008-2010," assists in defining arrangements for event staging activities. Transitions between existing buildings surrounding this vicinity and future development would vary, but controls on building bulk and density that lead to good transitions would be possible. Of the alternatives, Alternative 2 and the Preferred Alternative, with up to a 240-foot maximum height limit would represent the greatest transitions in height from the existing building pattern, Alternative 1 would accommodate up to 180 feet, and Alternative 3 would accommodate up to 150 feet. The Preferred Alternative would include a maximum height limit of up to 240 feet applicable to the entire north half of the north parking lot, but also includes height and bulk controls that would help shape and constrain the total amount of building bulk of future development on the north parking lot. See the height, bulk, and scale analysis in the next section of Chapter 3 and Appendix B for further discussion.

"Over-tracks" property

Under Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative, future infill development over the railroad tracks south of King Street Station would increase overall density of land uses and could provide enhanced pedestrian connectivity between the Pioneer Square and Chinatown/I.D. neighborhoods. It would be consistent with a zoning and growth planning approach that locates dense employment centers and mixed uses near a primary transit hub in Downtown. Under Alternative 3, a new "South Downtown Mixed" (SDM) zone would result in increased potential to achieve overall compatibility of future development with its immediate surroundings. Under the Preferred Alternative, proposed PSM zoning would achieve similar purposes as identified for the SDM zone for Alternative 3, and recommended height and bulk controls would influence the arrangement of building bulk in future development. No significant adverse land use-related impacts are identified. This conclusion is independent of the height, bulk and scale impact analysis, which is discussed in the next section of Chapter 3.

"Railroad gap" properties north of S. Jackson Street

In this area at the edge of the Pioneer Square historic core along 4th Avenue S., Alternatives 1 and 2 identify increased height limits to 180 feet and 150 feet, respectively. No changes in this area are proposed under Alternatives 3 and 4. Under the Preferred Alternative, a 150-foot height limit would be applicable to vacant and non-historic properties. Alternatives 1, ~~and~~ 2 and the Preferred Alternative would encourage denser development than possible today in an area where infill development would increase continuity of land uses and provide a transition to the Chinatown/I.D. neighborhood vicinity immediately to the east that could have denser and taller development. These changes would not generate significant adverse impacts on land use or development patterns, except that the inclusion of historic-contributing properties abutting 3rd Avenue S. under Alternative 2 could subject those properties to increased pressure for future development. If those properties are omitted from the rezone, or the height limit is not applicable to properties with historic-contributing structures (as under the Preferred Alternative), significant adverse impacts would be avoided. Also, see the height, bulk and scale analysis in the next

section of Chapter 3 and Appendix B, which identifies significant adverse height-related impacts related to Alternative 1.

Chinatown/Japantown, West of I-5

Japantown

Changes accommodating predominantly residential development up to 240 feet in Alternative 1 and the Preferred Alternative, and 180 feet in Alternatives 2 and 3, would encourage infill development in vacant or lightly-developed properties that would increase residential density in this area. No significant adverse land use or development pattern impacts are identified under these alternatives. Rather, net positive impacts of increased residential occupation and streets activated with street-level commercial uses could occur. Height and bulk controls incorporated into the alternatives (or as part of mitigation strategies) would help avoid significant height, bulk and scale impacts, as discussed in the next section of Chapter 3 and Appendix B.

Chinatown

Changes accommodating predominantly residential development up to 125 feet in Alternatives 1 and 2 (and up to 150 feet under the Preferred Alternative) would encourage infill development in vacant or lightly-developed properties that are mostly located south of S. Weller Street in the core of Chinatown. The optional concept to allow for "townhouse-style" residential units at street level is also included in Alternative 1 for selected street-faces south of S. Weller Street. Regardless of street-level use type, Alternatives 1 and 2 are not expected to result in significant adverse land use impacts south of S. Weller Street because future development patterns would not negatively affect land use patterns or create significant incompatibilities with the rest of the historic core. Net positive land use impacts could occur through increased numbers of residents, a more-activated street environment, and expanded business activity. See the other sections in Chapter 3 on height, bulk, scale, economic and business impacts, historic and cultural preservation, population, employment and housing for additional impact discussion.

Alternative 2 also includes the possibility of extending the 125-foot height limit to the block bounded by 5th and 6th Avenues S., S. Weller Street to the south and S. King Street to the north. This would overlap with the National Register Historic District only at the Publix Hotel property. Due to the combination of increased development scale and a sensitivity to maintaining compatibility of development character within and adjacent to the National Register Historic District, the extension of a 125-foot height limit to this particular block adjacent to S. King Street could result in significant adverse land use impacts. There is similar worst-case potential for significant impacts due to the 150-foot height limit under the Preferred Alternative (which would exclude changes to the Publix Hotel property). This does not mean that height limits to 125 feet or 150 feet cannot be adopted for this block. However, mitigation strategies or height and bulk controls, which are defined as part of the Preferred Alternative, should be implemented to further influence the height, bulk and scale of future development. ~~should be implemented.~~ See the next section in Chapter 3 and Appendix B for further discussion of height/bulk/scale impacts.

No changes to the Chinatown vicinity south of S. Weller Street are proposed under Alternative 3 or Alternative 4, meaning no potential for adverse impacts.

Little Saigon

Under Alternatives 1 and 3, different combinations of zones in Little Saigon (a majority of which would be Neighborhood Commercial zones) would include increased height limits up to 85 feet. For both of these alternatives, future development could contribute to the evolution of Little Saigon away from its current use mix that includes heavier commercial and industrial uses. While these trends can be

interpreted as having net positive impacts on the livability of the Little Saigon vicinity, they can also be interpreted as adversely affecting the long-term availability of the existing commercial retail structures for small businesses that have emerged along the Jackson Street retail corridor. However, these are not considered to be significant adverse land use impacts. Please see the Land Use—Economic and Business Impacts section of Chapter 3 and Appendices A, B and C for further discussion of impacts.

Under Alternative 2, proposed zones include Downtown Mixed Commercial (DMC) zones with a 65-foot or 85-foot height limit along commercial-use corridors, and a Downtown Mixed Residential (DMR/R) zone with a 125-foot height limit for residential use through the central portion of Little Saigon. As noted in the Chapter 3 Land Use—Height, Bulk, Scale and Compatibility section and Appendix B to the DEIS, the proposed DMR/R zoning, with the moderating effects of recommended bulk controls, would avoid significant adverse height/bulk/scale impacts. Alternative 2 may also adversely affect the long-term availability of the existing commercial retail structures and properties for small businesses. Please see the Land Use—Economic and Business Impacts section of Chapter 3 and Appendices A, B and C for further discussion of impacts.

Under the Preferred Alternative, proposed zoning is relatively similar to Alternative 2, but also includes the possibility of mixed-use development up to 125 or 150 feet along the S. Jackson Street corridor, and mixed-use development up to 160 feet in the Dearborn Street corridor. Conclusions about potential impacts are similar to those identified for Alternative 2, but with somewhat greater potential than Alternative 2 for "adverse" impacts such as those related to small business presence. Also, it should be noted that recommended bulk controls and amenity-related recommendations such as for through-block connections could result in greater potential for net positive land use impacts on the neighborhood over time, as infill development could help provide a land use pattern that has better pedestrian connections and better knits together Little Saigon with adjoining areas.

Under ~~all~~ Alternatives 1, 2 and 3, the vicinity east of Rainier Avenue S. is proposed for a Neighborhood Commercial 3 zone with a 65-foot height limit, the same maximum height limits as currently accommodated. Under the Preferred Alternative, the recommended zone is the slightly less-intensive Neighborhood Commercial 2 zone with a 65-foot height limit. Compared to existing Industrial Commercial and other incidental zones, ~~this~~ changes under any of these alternatives would be a favorable change for the sake of transition and compatibility of uses in this well-defined commercial corridor that quickly transitions to low-density residential uses uphill to the east.

South-of-Dearborn

Under Alternatives 1 and 2, an IC zone with a height limit of 125 feet or 160 feet, respectively, would alter the probable future use pattern toward a more intensive mix of structures more likely to be taller and intended for primarily commercial/office uses. Similar conclusions are reached with respect to the Preferred Alternative which has a similar IC zone with a 160-foot height limit. Under Alternative 1, ~~or~~ 2, or the Preferred Alternative, properties within the first block south of S. Dearborn Street (per International District Mixed or Downtown Mixed Commercial zone options) could develop either as commercial or as mixed-use structures including housing. None of these outcomes are identified as generating significant adverse land use or development pattern impacts, due to the retention of Industrial zoning south of S. Charles Street, the relatively low potential for conflicting land uses in this vicinity due to natural and manmade "edge" conditions, and the prevailing land use patterns in the surrounding area. See the height, bulk, and scale analysis in the next section of Chapter 3 and Appendices A and B for further discussion of impacts.

Under Alternative 3, proposed "South Downtown Mixed" (SDM) zoning could result in future development up to 160 feet in height that would likely include residential and commercial office uses concentrated along 6th Avenue S. This could achieve the greatest overall density of development and activity levels among the EIS alternatives. Due to the emphasis of SDM zoning on achieving enhanced public spaces and amenities, the overall urban design quality of sidewalks and outdoor areas could be higher than under other alternatives, potentially helping to establish a more pedestrian-friendly identity for this vicinity and improved connections to the Chinatown core to the north.

Under Alternative 3, a choice by City decisionmakers to move this vicinity into the Downtown Urban Center and out of the Manufacturing and Industrial Center would represent a significant shift in the preferred land use pattern expressed in the Comprehensive Plan. However, the predicted land use and development patterns identified in this EIS are not likely to generate significant adverse impacts. Several of the trends described in the paragraph above have the potential for net positive effects on land use and development patterns, through evolution of an enhanced multi-use district adjacent to Chinatown/I.D. Adverse impacts would include increased proximity of residents to the Charles Street Yards and potential increase in noise complaints due to that facility's operations, and increased density of non-industrial uses along freight routes in that immediate vicinity. With respect to their relationship to industrial uses, these are interpreted as adverse but not significant adverse land use impacts. Other potential for land use conflicts with industrial areas to the south is already mitigated by existing manmade features (e.g., Interstate 90 ramps) and topographical edge conditions and the predominant presence of low-density transit base uses nearby to the south—meaning a low potential for industrial land use-related conflicts. See the height, bulk, and scale and compatibility analysis in the next section of Chapter 3 and Appendices A and B for further discussion of impacts.

Under the No Action Alternative, no zoning-related impacts would occur. In the absence of zoning changes, this vicinity could continue to experience a trend away from small-scale commercial and industrial uses, toward denser commercial uses. A ~~planned~~ automobile dealership under construction on two blocks is assumed, as is re-use of the former INS Building. This could encourage additional gradual infill of commercial uses over time, but likely at densities lower than other alternatives. Beyond 2030, this vicinity could still have properties available for additional future development.

Stadium Area

The Stadium Area's current zoning and land use patterns establish it as a transitional area where both industrial and commercial uses are accommodated. For example, the Downtown Urban Center includes property on the east side of 1st Avenue S., while the Greater Duwamish MIC includes property on the west side of 1st Avenue S. north of S. Royal Brougham Way, and also includes the Port of Seattle's Terminal 46 facility west of the study area. The zoning pattern is similarly defined, with a further flexibility in the Industrial Commercial zone and Stadium Transition Area Overlay District that accommodates both industrial and commercial uses in locations within the MIC. In this context, a choice to shift the Comprehensive Plan's preferred land use pattern from "Manufacturing & Industrial Center" to "Downtown Urban Center" would represent a significant shift in the City's land use policy. However, the actual effect on future land use and development patterns would depend on the differences in what may be built within the possible zones.

Under Alternatives 1, 2, ~~or~~ 3, or the Preferred Alternative, the future development pattern would continue to represent a transitional environment, with a higher height and possibly higher density of development in locations farthest to the north, stepping down in a graduated fashion in locations further to the south. Under Alternatives 1 and 3, the relative incompatibility of residential uses with nearby Port property operations and railroad uses due to activity levels and possible light and noise impacts, results in the identification of probable significant adverse compatibility-related impacts for Alternative 1 and 3 zoning

in the northern WOSCA property vicinity. The primary strategies for avoiding such impacts would be to either prohibit residential uses in the relevant zone, or constrain their location and orientation to shield them from adverse exposure to Port facilities.

The Alternative 3 concept to define hotel (lodging) as a permissible use in the 1st Avenue S. vicinity south of S. Royal Brougham Way is identified as generating a probable significant adverse impact. This is due to the relative incompatibilities of hotels with industrial uses in this vicinity, the area's function as a transportation crossroads for freight, event and commuter traffic, and relatively high noise levels generated by rail systems and other activities. ~~However, no other significant adverse land use and development pattern impacts are identified for either the 1st Avenue S. corridor or the 4th Avenue S. corridors in the Stadium Area.~~

It should be noted as part of the context for this impact analysis that the probable use of the WOSCA property in the near-term will be for construction staging purposes for SR99 construction work, while the western half of that property was acquired by the State of Washington for probable right-of-way purposes. Additional supporting discussion for the impact conclusions in paragraphs above is provided below for the 1st Avenue S. and 4th Avenue S. corridors.

1st Avenue S. Corridor

Under Alternatives 1 and 3, the expected future land use and development patterns could be altered. Alternative 1 and 3 zoning in a new "South Downtown Mixed" zone would accommodate residential and commercial uses in taller, denser buildings in the approximate northern third ~~portion~~ of the WOSCA property west of 1st Avenue S. and south of Railroad Way S., ~~north of approximately S. Dearborn Street if extended~~, where ~~they~~ residential uses are not currently allowed. Alternative 1 defines a maximum height limit of 160 feet, and Alternative 3 ~~2~~ defines a maximum height limit of 120 feet in that vicinity. Both alternatives would allow taller, denser commercial buildings (to 100 feet in height) in the approximate southern two-thirds ~~balance~~ of the WOSCA property. This zoning would likely encourage future infill development along the west side of 1st Avenue S. The SDM zone would include a special review process that would positively influence characteristics such as the layout of buildings, public spaces and access to/from large properties. This process would encourage land use patterns compatible with adjacent streets and properties. ~~compared to other zoning options~~. Most commercial uses, as also contemplated by the existing IC zone, would not experience or generate a potential for significant land use incompatibilities or other land use/development pattern impacts. However, residential uses west of 1st Avenue S. in this subarea, in the worst-case, would generate probable significant adverse land use incompatibility impacts due to their sensitivities and conflicts with activity levels, noise and light generated by nearby railroad and Port operations. Such operations could increase in future years. Despite the identified worst-case impact, there would remain some potential for housing to be developed without significant adverse compatibility impacts, if the residential use was sufficiently shielded from the effects of railroad and Port operations. For example, housing might be oriented only toward 1st Avenue S., possibly incorporated into a single building with other non-residential uses, and/or constructed using materials and construction techniques that will ensure adequate attenuation of exterior noise.

With respect to zoning patterns under Alternatives 1 and 3, the SDM zone could be defined as the zone that underlies the Stadium Transition Area Overlay District overlay zone, or as a zone that could incorporate the purpose, intent and relevant details of the Stadium Transition Area Overlay District and thereby replace it. If the latter option was preferred, removal of the Overlay District from the area north of S. Royal Brougham Way and west of 1st Avenue S. under Alternatives 1 and 3 could be considered. Because in either case the purpose, intent and all relevant details of the Stadium Transition Area Overlay District can continue to be fulfilled by future zoning choices, no significant adverse land use impacts related to zoning patterns are identified in this subarea.

Under Alternative 2 and the Preferred Alternative, IC zoning in all locations south of Pioneer Square would be compatible with existing zoning patterns at the northern edge of the MIC, and no change in Comprehensive Plan designation would be needed. Along the west side of 1st Avenue S. in the northern two-thirds of the WOSCA property, height limits under Alternative 2 would be raised to 85 and 100 feet (refer to Figure 2-5), but the IC zone and the Stadium Transition Area Overlay District overlay zone would be retained with no increase in the permissible density of development. No significant adverse land use impacts would be associated with these changes. Under the Preferred Alternative, an increased height and density of probable commercial uses would accommodate larger buildings and denser uses along the west side of 1st Avenue S. However, due to the constraining effects of recommended height, bulk and density controls, and the nature of the zones and permissible uses and their compatibility with surroundings, future land uses under the Preferred Alternative could occur without incurring significant land use development pattern impacts. This conclusion is independent of conclusions made with respect to height, bulk and scale impacts. See the Land Use—Height, Bulk, Scale and Compatibility section in Chapter 3 and Appendices A and B for further discussion.

On the "Pyramid Brewery block" (located between S. Royal Brougham Way, 1st Avenue S., S. Atlantic Street and railroad right-of-way), the proposal under Alternatives 1 and 3 to increase the height limit from 65 feet to 85 feet would accommodate taller forms of future development, but would not increase the permissible density of development. For the portion of this block currently zoned IG2 U/85', the proposal under Alternatives 1 and 3 would change the zone designation to Industrial Commercial, would not increase the height limit from what is already allowed for non-industrial uses, and would increase permissible density of development by 0.5 FAR. No significant adverse land use impacts would be associated with these changes. See the Land Use—Height, Bulk, Scale and Compatibility section in Chapter 3 and Appendices A and B for further discussion.

In portions of the study area south of S. Atlantic Street under all alternatives, retention of IC zoning and Stadium Area Overlay at the current height limit of 85 feet means there would be no change in the expected land use and development pattern and no associated potential for significant adverse land use impacts. However, please note the conclusion earlier in this discussion about probable significant compatibility-related impacts of lodging uses under Alternative 3.

4th Avenue S. Corridor

On the east side of 4th Avenue S. between approximately S. Royal Brougham Way and S. Charles Street, a rezone from IG2 to IC under Alternatives 1, ~~and~~ 2, and the Preferred Alternative, would increase the probability of office uses and the probable commercial density of use just outside the Downtown Urban Center. The same is true for proposed height increases within the IC zone on the west side of 4th Avenue S. under Alternatives 1 and 2. These changes can be categorized as "adverse" land use impacts but not "significant adverse" impacts, because they would diminish the probability of future industrial uses, even though the industrial zone would be retained.

Similarly, under Alternative 3, a rezone to SDM east of 4th Avenue S. (which includes the entire south-of-Dearborn vicinity) would increase the probable density of future commercial use of this vicinity and would also introduce the possibility of new residential development as well. This type of change would be the result of a conscious choice by decision-makers to alter the future land use designations in this vicinity away from industrial uses and toward a mix of uses. This would represent a significant change from the land use patterns advocated by the Greater Duwamish MIC Plan. It can be categorized as an "adverse" land use impact. However, it would not likely represent a "significant adverse" land use impact under Alternative 3 because this is an "edge" area of the MIC, there is a scarcity of substantive conflicts

with surrounding land uses, and there is an ability to accommodate development in this vicinity without significant impairments to freight and general traffic in the 4th Avenue S. corridor.

No Action Alternative

Under the No Action Alternative, no zone changes would occur and no zoning-related impacts would occur. In the absence of zoning changes, this vicinity could experience a gradual trend toward increased commercial development and reduced presence of industrial uses. This might include development on larger parcels such as the WOSCA property (although it would appear that this property will be used for SR 99 construction staging purposes for several years), but existing low-density use patterns might otherwise continue on such parcels indefinitely. Construction staging demands for SR 99 highway construction could mean an occupation of some parcels for several years.

MITIGATION STRATEGIES

Alternatives 1 and 3

Stadium Area

- Significant adverse land use impacts generated by the potential location of residential uses west of 1st Avenue S. could be mitigated by strictly limiting the location and orientation of residential uses such that they are effectively screened from exposure to significant light/noise impacts from Port facilities to the west, and/or constructed using materials and construction techniques that will ensure adequate attenuation of noise.

Alternative 2 and the Preferred Alternative

Pioneer Square

- Confining a proposed 150-foot zoned height limit only to the "railroad gap" properties on the west side of 4th Avenue S. north of S. Jackson Street, or making the maximum height limit applicable only to properties without historic-contributing structures (as under the Preferred Alternative), would avoid increasing development pressures on other historic-contributing properties just to the west in the 3rd Avenue corridor.

Chinatown/I.D.

- See the mitigation strategy proposed in the next section of this chapter, with respect to height, bulk and scale impacts at the block bounded by 5th and 6th Avenues S. and S. King and S. Weller Streets.

Alternative 3

Stadium Area

- If lodging uses are allowed in locations south of S. Royal Brougham Way in the study area, additional controls should be identified to maintain compatibility with existing industrial uses in the affected area, minimize impacts to on-street traffic flows and minimize exposure to significant noise sources including rail yards, railroad tracks, highways and port facilities.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

With implementation of mitigation strategies to address the identified significant adverse land use impacts for the alternatives, no significant unavoidable adverse impacts are expected to occur.

LAND USE—HEIGHT, BULK, SCALE AND COMPATIBILITY

AFFECTED ENVIRONMENT

HEIGHT, BULK AND SCALE

"Height, bulk and scale" relates to the size of buildings and their relationship to surrounding properties. The City's environmental policies recognize that physical characteristics of buildings affect the character of neighborhoods. The policies also recognize an interest in addressing building height, bulk and scale to maintain smooth transitions from one zone to another.

Pioneer Square

Pioneer Square's dominant building pattern consists of buildings built abutting all property lines including alleys. This contributes to a continuity of street-level uses adjacent to public sidewalks and creates street corridors that are well-defined by the bulk of buildings on both sides of the street. This is most evident along 1st Avenue S., portions of 2nd and 3rd Avenue north of Yesler Way, and in the vicinity of S. Jackson Street and S. King Street, where the height of the buildings averages roughly 70-90 feet. Near Occidental Park and eastward to approximately 3rd Avenue, the predominant building scale is somewhat lower, in the range of 10 to 50 feet. However, several taller buildings such as the Frye Hotel, Smith Tower and King Street Station's clock tower tend to create a variety of heights in the built environment. The intermittent presence of vacant properties or parking lots provides some visual relief in portions of this area, but also creates gaps in the continuity of streetfront uses.

A distinctive aspect of Pioneer Square architecture is a frequent incidence of floor-to-floor heights that are larger than 10 feet. Heights of street-level spaces can range up to 15 feet. This tends to result in distinctive architectural treatments and shapes of windows (sometimes tall and narrow, sometimes large in both dimensions), and a perceived moderation in building scale due to the appearance of fewer but taller floors. The distinctive historic architecture and building materials also lend a grace and visual interest to a viewer's perception of the urban environment.

The northernmost portion of Pioneer Square is adjacent to the Downtown core, which includes larger-scale buildings nearby. In addition, the sloping streets of James, Cherry and Columbia Streets create a different street environment on east-west streets (including fewer ground-level uses) and increase the elevation of buildings on nearby blocks. These factors contribute to a transitional environment in building height, bulk and scale between Pioneer Square and Downtown.

Chinatown/I.D.

In Chinatown, both sides of S. King Street west of I-5 feature historic buildings ranging from 3 to 6 stories, approximately 30 to 70 feet in height. Other buildings in the immediate vicinity of S. Jackson and S. King Streets contribute to a concentration of development that is mostly continuous in street-level uses and roughly similar in average building height, bulk and scale. The primary exception is the old Uwajimaya grocery site near 6th Avenue S. and S. King Street which includes a large parking lot and low-scale building. Most of the buildings in this vicinity include Asian-American and/or historic architectural design features, many with brick facades, distinctive parapets and signage that help define the area's visual character.

In the vicinity south of S. Weller Street, typical buildings are lower in height, bulk and scale than along S. King Street. The development pattern south of S. Weller Street includes numerous parking lots and buildings widely varying in age, size and architectural design quality. The Uwajimaya mixed-use development is the largest structure in this area, filling much of a city block to a height of approximately

75 to 85 feet. A few relatively new residential and mixed-use buildings are also present, generally in the range of 5 to 7 stories. However, one-to-two story buildings and parking lots are the most common building pattern in this area.

Japantown has a somewhat different development pattern than Chinatown. Japantown includes an area in the National Register Historic District with several low- to moderate-scaled buildings along Main Street and 6th Avenue S. In addition, this immediate vicinity includes two senior apartment towers ranging up to approximately 150 feet in height. A variety of other residential buildings on the hill south of Yesler Way are generally in the range of 70 feet. In addition, an office building and the Downtowner Apartments, both at approximately 100 feet in height, are present between 4th and 5th Avenues ~~near~~ between S. Jackson Street and S. Main Street. Throughout this vicinity, parking lots and one-story buildings are also interspersed, contributing to a varied character in land use, building height, bulk and scale, but also adding to a sense of "missing teeth," breaking the continuity of the district.

Little Saigon

Given its location east of I-5 and current zoning, the pattern of building height, bulk and scale is lower than most other areas in the Downtown Urban Center. Most buildings in this vicinity are 10 to 30 feet tall, several with parking lots located between the building and the sidewalk. These are generally single-purpose retail buildings or multi-tenant strip shopping centers. However, several other buildings are built to the property line, contributing to a widely varying pattern and character of development. Vacant lots are also present on S. Jackson and S. King Streets, and a few single-family residences remain. The tallest buildings in this vicinity are the mixed-use Pacific Rim Center at approximately 65 feet, an office building on S. Weller Street at approximately 60 feet and a retail center near 12th Avenue S. and S. Jackson Street, at approximately 40 to 50 feet. Along Rainier Avenue S., the commercial buildings are generally one or two stories. East of Rainier Avenue S., a few commercial-oriented buildings sit behind and above the Rainier Avenue-abutting buildings, but further eastward the pattern immediately transitions to low-density single-family residences. Southeast of Rainier Avenue S./S. Dearborn Street, newer multistory apartment residences lie behind and slightly above the low-density commercial uses along Rainier Avenue S.

South-of-Dearborn

This longtime industrial area is low-scaled, primarily consisting of one-to-two story warehouses (two of which were demolished in 2008 to accommodate an automobile dealer facility under construction), up to three-to-four story commercial buildings and the former INS Building, which is roughly 50 feet in height. Much of the development extends to or near the property lines, with parking lots interspersed. These characteristics contribute to an environment that is well-defined at the sidewalk edge in some places, but also relatively open to light and air. At the eastern and southern perimeters of this area, I-5 and the I-90 ramps provide a visual boundary that separates it from Beacon Hill to the east and the rest of the Duwamish industrial area to the south. The Charles Street Yard, encompassing several City operations facilities, is located in the eastern portion of this vicinity adjacent to I-5.

Stadium Area

Building heights in the Stadium Area cover a range that reflects a diverse mixture of low- and moderate-scale building types, from 1-2 story structures to buildings up to approximately 80 feet in height, some of which are located within Pioneer Square zoning. Building patterns generally reflect the transitional nature of this vicinity. Along 1st Avenue S., typical buildings are typically lower to the south, with an increasing presence of buildings in the 50-80 foot range further to the north, in proximity to Pioneer Square neighborhood boundaries. In the middle of this transitional area along 1st Avenue S., the new Silver Cloud Hotel (in Pioneer Square zoning) reaches a height of 85 feet. Along 4th Avenue S. just north

of Royal Brougham Way, the building heights range up to 40-60 feet. North of Airport Way the typical scale on the east side of 4th Avenue S. ranges up to approximately 150 feet. In addition, this vicinity includes the Qwest Field and Safeco Field complexes that are over 260 feet in height, tall and massive structures that reflect a larger scale of development and define street corridor spaces along 1st Avenue S., Occidental Avenue S., 4th Avenue S., and S. Royal Brougham Way. Safeco Field's massing includes concourse areas that are scaled at approximately 65 feet along 1st Avenue S. (Qwest Field's west-side concourse level is at a similar height along Occidental Avenue S.), meaning that the concourse heights reflecting the approximate proportions of other buildings nearby in these ~~this~~ corridors. A multi-story parking garage and large plaza associated with Safeco Field contribute to the streetscape character of Occidental Avenue S. one block south of Edgar Martinez Way (S. Atlantic Street). A proposed commercial building, approximately 85 feet in height, extending the full length of the Home Plate Parking property (south of S. Atlantic Street, west of 1st Avenue S.) also is expected to contribute to a larger building scale and denser presence of building bulk in this vicinity. However, at present, large segments of the 1st Avenue S. streetfront remain in groups of relatively low-scaled structures conforming to the long north-south rectangular blocks in this vicinity. This includes the low-scaled warehouse structures currently present on the WOSCA property.

One interesting height-related juxtaposition in this vicinity is the extension of Pioneer Square zoning—PSM 85'/120'—on the east side of 1st Avenue S. as far south as Royal Brougham Way. This existing zoning affords the potential for 120-foot buildings if three-quarters of the building space is in residential use. Given the availability of some vacant parcels in this vicinity, there is a possibility that future development under existing zoning would result in buildings to that 120-foot height.

COMPATIBILITY AMONG EXISTING USES

Land Use Patterns and Height Transitions

Pioneer Square

This neighborhood is completely within a City-defined historic preservation district, and most of it also is located within a National Register Historic District. Only the Pioneer Square-zoned portion on the east side of 1st Avenue S. south of Railroad Way is outside of the National Register Historic District. Land use and zoning regulations protect historic character by ensuring compatible uses and visual relationships between buildings in the National Register Historic District and City-defined historic preservation district of Pioneer Square. Special Review District regulations and standards address many elements, such as how alterations, new construction, renovations of existing structures, signage changes, building relationships to the streetscape and street level uses may occur in a manner compatible with the historic district.

Actual building patterns exhibit a mix and distribution of buildings that are mostly compatible in terms of land use and heights within Pioneer Square. This is likely due to the preservation of historic buildings, a low amount of infill development, and effectiveness of existing zoning regulations. Taller buildings include the Smith Tower, which at 467 feet towers over other buildings in its vicinity, the King Street Station clock tower at 247 feet, and Qwest Field at 263 feet immediately adjacent to the Pioneer-Square zoned area.

Zoning regulations that affect height compatibility include: the zoned height limits, and a variable height limit in the PSM 100' zone, which indicates, "no structure shall exceed by more than 15 feet the height of the tallest structure on the block or the adjacent block front(s), to a maximum of 100 feet." On the whole, these rules promote similarity of new buildings to existing building heights. However, despite its intentions, the variable height limit does not preclude the possibility of variations up to 75 feet in height between buildings. Also, the variable height limits can change over time. For example, if a building on a

neighboring block becomes taller through renovation or new construction, the height limit affecting a nearby block face would increase, though it could not exceed 100 feet.

Chinatown/I.D.

This neighborhood is within a City-defined historic preservation district (extending east to 12th Avenue S.), a subset of which is a National Register Historic District, located approximately between Main Street and S. Weller Street, 5th Avenue S. and I-5. As with Pioneer Square, compatibility among uses and structures is an important purpose of the land use and zoning regulations. The Special Review District regulations are comparable to Pioneer Square's, but adapted in ways that address particular aspects of the neighborhood's visual character and use patterns. Similar to Pioneer Square, the zoned height limits accommodate more building height for residential uses in peripheral areas of the neighborhood, up to 150 feet in the IDR zone. The central part of the Chinatown neighborhood is currently limited to a maximum building height of 85 feet for structures with a majority of space in residential use, and 75 feet for structures with a majority of space in non-residential use.

These rules promote compatibility of land use and building heights. However, a few interesting implications of the current zoning patterns are noted.

- The boundary between the IDR 150' and IDM 75'/85' zones that is one-half block north of and parallel to S. Jackson Street creates a condition where maximum-height 150-foot buildings would be notably different in scale to the existing low-scale buildings along S. Jackson Street that are part of the National Register Historic District. Relatively steep up-sloping topography further contributes to this potential difference in height.
- SEPA view protection policies may be a constraining factor on the full use of the IDR 150-foot height limit along S. Main Street (east of 6th Avenue), if a building would substantially block views from the Kobe Terrace Park and Danny Woo Gardens property.
- The Chinatown/I.D. zone regulations do not include a "variable height limit" as described for Pioneer Square.

Helicopter flight paths to and from Harborview Hospital are another potential influence on building height in the Japantown hill vicinity. Maintaining sufficient clear airspace to allow helicopter inbound and outbound movements is preferred for aircraft safety. This airspace is located in the general vicinity of Harborview Hospital and Interstate 5. This is a potential influence on building height limit choices for the portion of the Japantown hill near Yesler Way and I-5.

Little Saigon

Existing land use regulations, the height limit of 65 feet, and past market forces have contributed to the existing pattern of automobile-oriented uses and low-rise building forms. The area is predominantly commercial but has residential uses in some peripheral locations. Zoning accommodates a wide variety of commercial uses, and some industrial uses east of 12th Avenue S. Topographical breaks provide natural transitions that aid in maintaining overall compatible conditions.

South-of-Dearborn

Existing land use and building patterns, along with a consistently-scaled zoned height limit of 85 feet, have contributed to good compatibility between uses. The area is undergoing change, with the introduction of retail and housing in recent years. Pacific Food Importers is an existing retail use, and a multi-block BMW dealership is ~~proposed~~ under construction. The William Booth Center provides

transitional housing, located at S. Charles Street/Maynard Avenue S., across the street from the General Industrial 2 zone.

Stadium Area

The range of land uses, daily activity patterns, and the street environment in the stadium area influence overall compatibility. Events at Qwest Field and Safeco Field on many days create influxes of pedestrian and vehicular traffic ranging as high as 50,000-68,000 ~~60,000~~ people. This can impact small and medium-sized commercial, warehouse and light industrial uses that operate in the vicinity, due to parking demand, pedestrian and vehicle traffic, and street closures. Large events can increase the difficulty of Port truck and rail traffic movements on all streets in the local street network, which access the heavily used Seattle International Gateway rail yard near this vicinity. Physically, local blocks include warehouse load/unload spaces that must remain open for efficient business activity. Trucks at times are parked perpendicular to and partially blocking streets. No sidewalks are present along these block faces, which, along with increased event-related pedestrian volumes, may encourage pedestrians to walk in the street. Food vending along certain street edges such as Occidental Avenue S. near Qwest Field also occurs during events. Major streets including 1st Avenue S. and S. Atlantic Street are key commuting corridors, adding to the potential for pedestrian-vehicle conflicts.

Existing zoning in the area provides some transition in zoned height limits, including 85-foot maximum heights south of S. Atlantic Street and 65-foot maximum heights north of S. Atlantic Street. These limits contrast with the 120-foot height limit present in the nearby Pioneer Square zoning on the east side of 1st Avenue S., and with the much taller presence of the athletic stadia.

Light and Glare Compatibility

Exposure of residential uses to excessive light or glare is an unfavorable condition. The level of exposure and proximity of the light source to the receivers are important factors. Glare issues can arise if reflections from glassy or shiny portions of new buildings adversely affect residents or passing motorists.

Sources of light/glare in the study area vicinity include: the athletic facilities, major highway and street arteries, port operations, and local commercial and business operations. Existing conditions are not known to create significant light/glare issues presently, except headlights from SR99 traffic passing near upper floors of Pioneer Square buildings may create unwanted light/glare for building occupants. Port facilities and athletic stadium facilities lighting contribute to illumination in the vicinity.

Shadows on Open Spaces

The City's SEPA regulations pertaining to shadow impacts are narrowly defined for Downtown. The policy background statement in SMC 25.05.675 Q recognizes that:

- access to sunlight is an amenity of public spaces;
- the Downtown land use code provides some protections against shadow impacts (through height, bulk and setback controls); but
- it is not practical to prevent shadowing at all public open spaces Downtown.

The SEPA policy defines five open spaces in Downtown where shadow impacts may be mitigated, including Freeway Park, Westlake Park/plaza, Victor Steinbrueck Park, Convention Center Park, and Kobe Terrace Park/Danny Woo Gardens (located in the Chinatown/I.D. neighborhood). Potential mitigation measures can include limiting the height and bulk of a proposed building, redesigning its profile or altering other building details, or adjusting its location on a property.

In the existing condition at Kobe Terrace/Danny Woo Gardens, there is one existing senior apartment building that reaches to approximately 150 feet in height located just southwest of the garden area. At certain times of day and certain times of year, this building likely casts shadows on portions of the garden. The garden is located on a slope that otherwise has good southern exposure toward sunlight. Another apartment building adjacent to the north has no probable shadowing effect on the garden. Other buildings nearby to the south, including a new 7-story apartment building, have no influence on sunlight access at the garden due to up-sloping topography.

In other portions of the study area, existing tree canopies and the characteristics of many existing buildings create conditions at street level that are often shaded. Other areas have fewer trees and lower buildings such that shadowing is not a significant factor affecting the streetscape.

Please see other discussion of compatibility-related topics in the Environmental Health section in Chapter 3.

ENVIRONMENTAL IMPACTS

The height and shape of buildings are two of the most direct influences on the character of an urban environment and on perceptions of compatible land use patterns. For this reason, Livable South Downtown planning emphasizes careful consideration of the height and bulk dimensions of future development. The preferred approach is to accommodate taller residential buildings in targeted areas around the edges of core neighborhoods, and allow infill of other buildings with contextually-appropriate heights and density limits in the historic cores.

The following discussion summarizes conclusions made about the potential for significant adverse impacts with future development under the EIS alternatives. More details on the analysis leading to these conclusions are provided in Appendix B to this Draft EIS. Also, see the Land Use—Zoning, Land Use and Development Patterns section, Economic and Business Impacts section, Environmental Health and Historic and Cultural Preservation sections in Chapter 3 and Appendices A, C, F and H for other impact discussion.

HEIGHT, BULK AND SCALE

Pioneer Square

In Pioneer Square, the range of alternatives addresses different height, bulk and scale levels for different parts of the neighborhood. Individual areas examined within Pioneer Square include the "core" area, the Qwest Field north parking lot, the "over-tracks" properties, and the "railroad gap" vicinity west of 4th Avenue S. and north of S. Jackson Street. In many cases, the alignment of height/density limits with favored land use patterns should help to limit the potential for impacts. However, for certain alternatives involving a greater increase in the scale of possible development, significant adverse height, bulk and scale impacts are identified. These conclusions relate to the worst-case outcomes if building bulk and scale is not adequately controlled or other mitigation is not otherwise defined. In all of the cases where significant adverse impacts are identified, it would be possible to implement mitigation strategies to mitigate these impacts. This would be expected to occur through the rezone process and subsequent City decision-making processes.

"Core" area:

In the Pioneer Square "core" area, the range of zoning proposals in the alternatives would not be expected to generate significant adverse height, bulk and scale impacts. Protections afforded by the existing PSM zone and special review district processes, the limited extent of change, and the targeting of height increases (in Alternatives 1, ~~and~~ 2 and the Preferred Alternative) to vacant and non-historic contributing properties would help avoid significant adverse height/bulk/scale impacts. Alternative 3's height limit at 100 feet would generate the least potential for significant impacts.

Qwest Field north parking lot:
Under Alternatives 1 and 2, maximum height limits would reach 180 feet and 240 feet respectively (see Figure 3-3). Compared to surrounding building scale and zoned height limits, these maximum building heights would represent "moderate-to-large" and "large" differences in scale, respectively. Even though bulk controls are assumed present ~~included~~ in these alternatives, significant adverse height/bulk/scale impacts could result with future development, if ~~those~~ controls such as those described for the Preferred Alternative are not specified in sufficient detail. Alternative 3's maximum height limits would reach 150 feet, a "moderate" difference in scale from nearby Pioneer Square buildings, which is assessed as generating potential "adverse" impacts but not "significant adverse" impacts related to height, bulk and scale (see Figure 3-4). This relates to the 150-foot maximum height leading to future building development that would be closest in scale to the prevailing Pioneer Square building scale. Under the Preferred Alternative, maximum height limits would reach up to 240 feet (which is interpreted as a "large" difference in scale from surroundings) and a greater amount of building bulk at higher heights is contemplated compared to the other alternatives. However, due to the inclusion of bulk controls including but not limited to setbacks and lot coverage limits at various heights, the building bulk would not maximally cover the entire property (see Figure 3-4.A). This would help limit the potential for significant adverse height, bulk and scale impacts. Review processes of future development proposals would also influence arrangement of buildings in ways that would help avoid such impacts. It is also noted that the Preferred Alternative would appear to necessitate adjustments to previously assumed property agreements that discussed limitations on building bulk near the 2nd Avenue S. corridor.

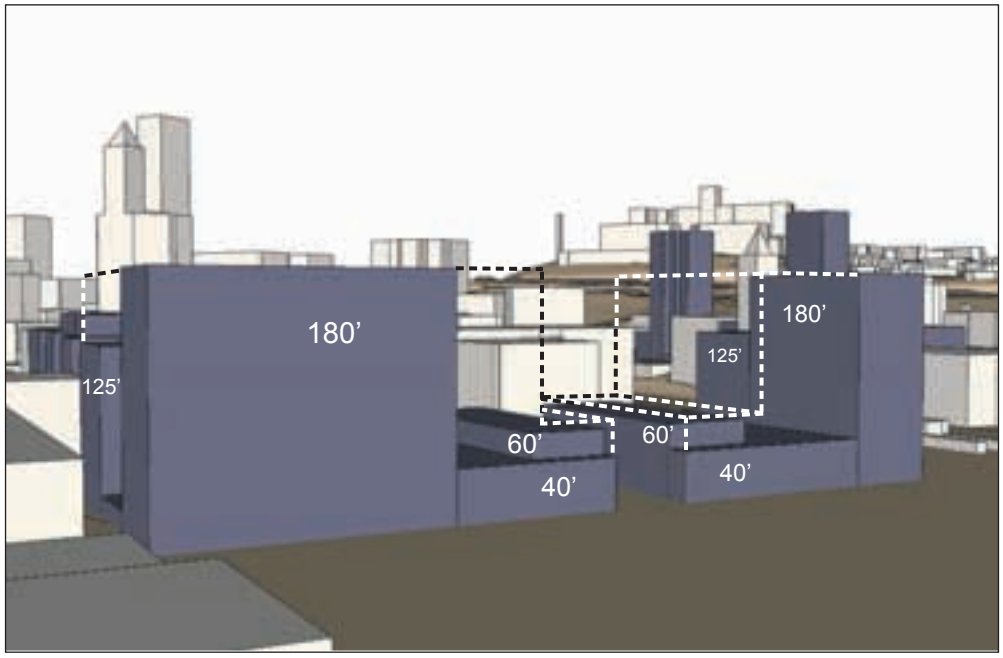
For Alternatives 1 and 2, mitigation strategies to further influence the height, bulk and scale of future development should be implemented to protect against such adverse impacts. Under Alternative 3, mitigation strategies would not be needed due to a lack of identified significant adverse impacts. With bulk controls incorporated into the Preferred Alternative, significant adverse height, bulk and scale impacts likely would be avoided.

"Over-tracks" properties:
Based on a rationale similar to that stated above for the Qwest Field north parking lot, Alternatives 1, 2 and 3 in the worst case could result in significant adverse impacts related to height, bulk and scale with future development. Proposed height limits under these alternatives would be 150 feet under Alternative 1 (see Figure 3-5), and 180 feet under Alternatives 2, ~~and~~ 3 and the Preferred Alternative (see Figure 3-6, ~~and~~ 3-7, and 3-7A). These conclusions indicate the importance of defining bulk controls in sufficient detail so that building designs avoid arrangements of bulk that might relate poorly to the 4th Avenue S. corridor, King Street Station, Qwest Field and the Qwest Field north parking lot. This means that mitigation strategies to further influence the height, bulk and scale of future development should be implemented to protect against such impacts. Under the Preferred Alternative, setbacks, bulk control strategies and other zoning choices would be able to influence building location and design such that the worst-case potential for significant adverse height, bulk and scale impacts, as indicated by analysis for the other EIS alternatives, would be avoided.

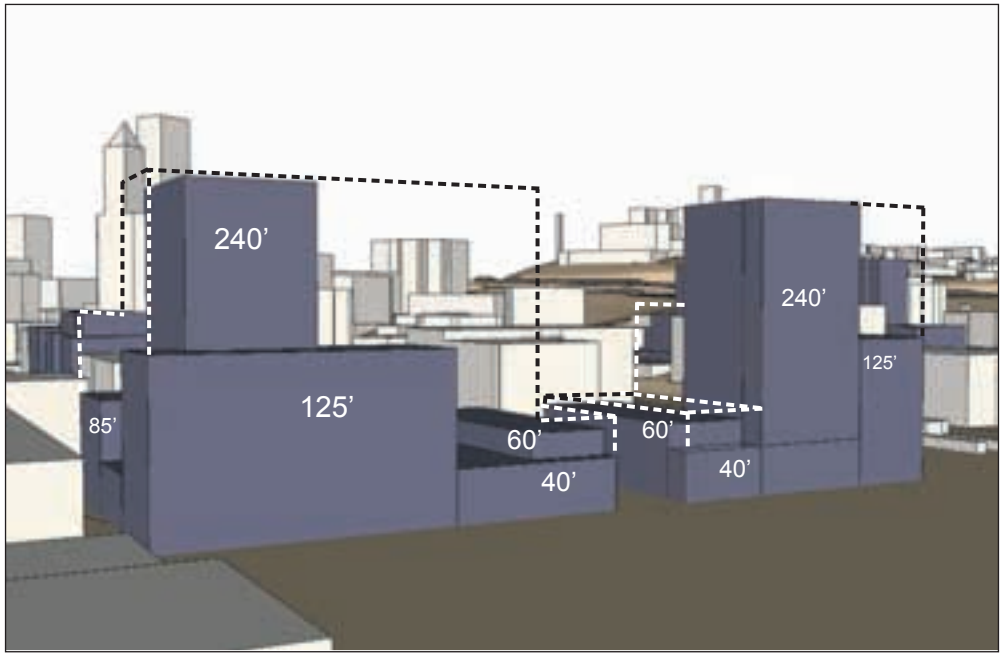
"Railroad gap" properties north of S. Jackson Street:
In this area at the edge of the Pioneer Square historic core along 4th Avenue S., Alternatives 1 and 2 identify increased height limits to 180 feet and 150 feet, respectively. No changes in this area are proposed under Alternatives 3 and 4.

Under Alternative 1, future development rising to a maximum of 180 feet would present a relatively large contrast to the surrounding lower-scaled building pattern. Due to the magnitude of this difference and the sensitivity of the historic district context, significant adverse height/bulk/scale impacts could occur with future development (see Figure 3-8).

Alternative 1



Alternative 2

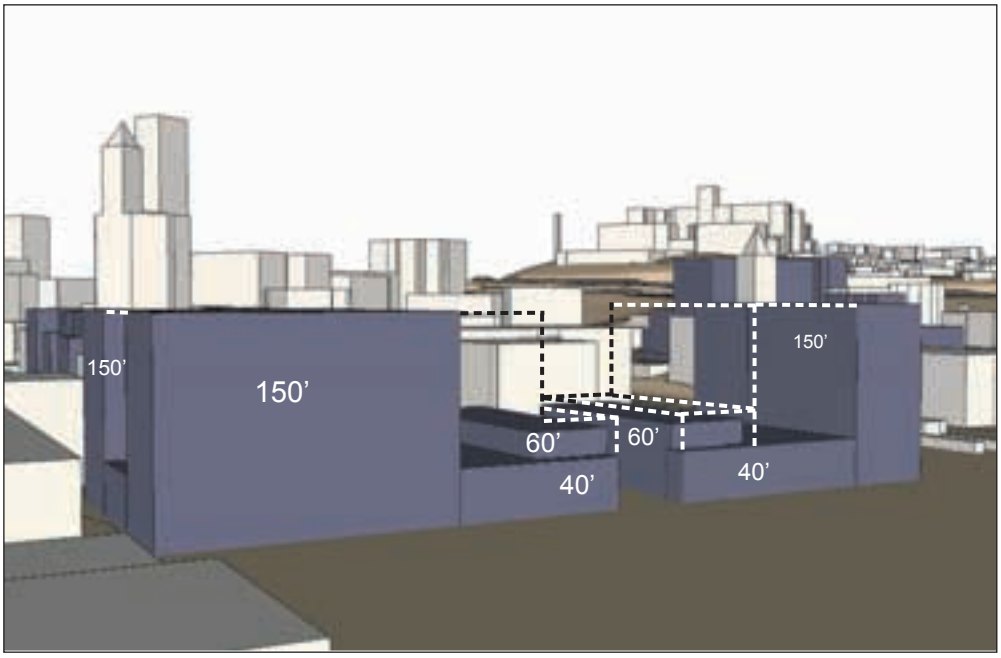


Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario. Density limits and bulk controls would influence how building bulk is arranged. Dotted lines indicate a probable maximum “building envelope” defined by height limit and property agreements.

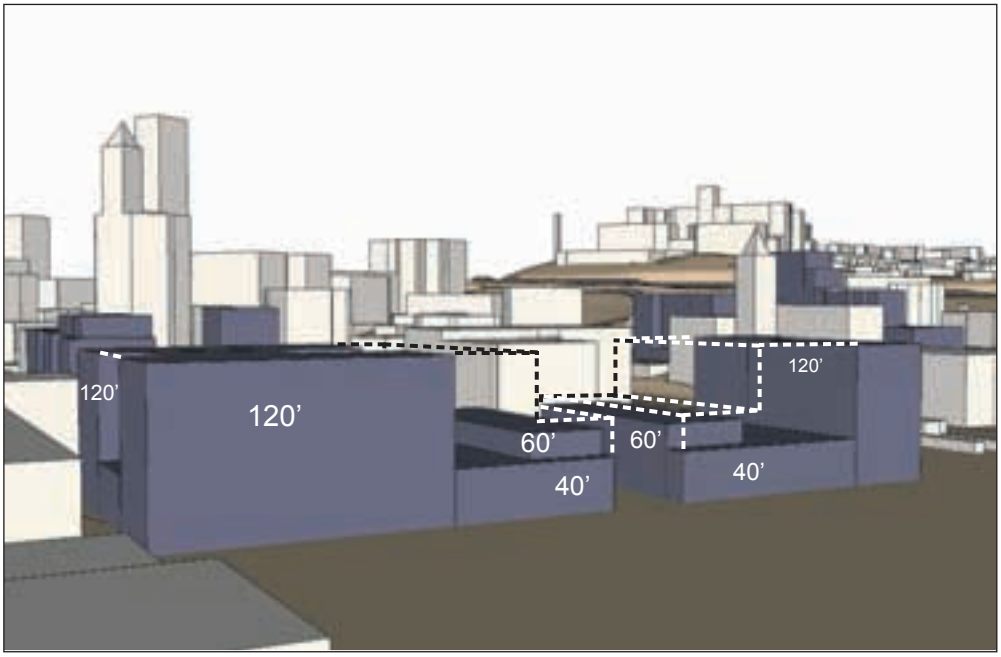
Figure 3-3

Hypothetical Height and Bulk at North Parking Lot, Alternatives 1 and 2

Alternative 3



Alternative 4



Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario. Density limits and bulk controls would influence how building bulk is arranged. Dotted lines indicate a probable maximum "building envelope" defined by height limit and property agreements.

Figure 3-4

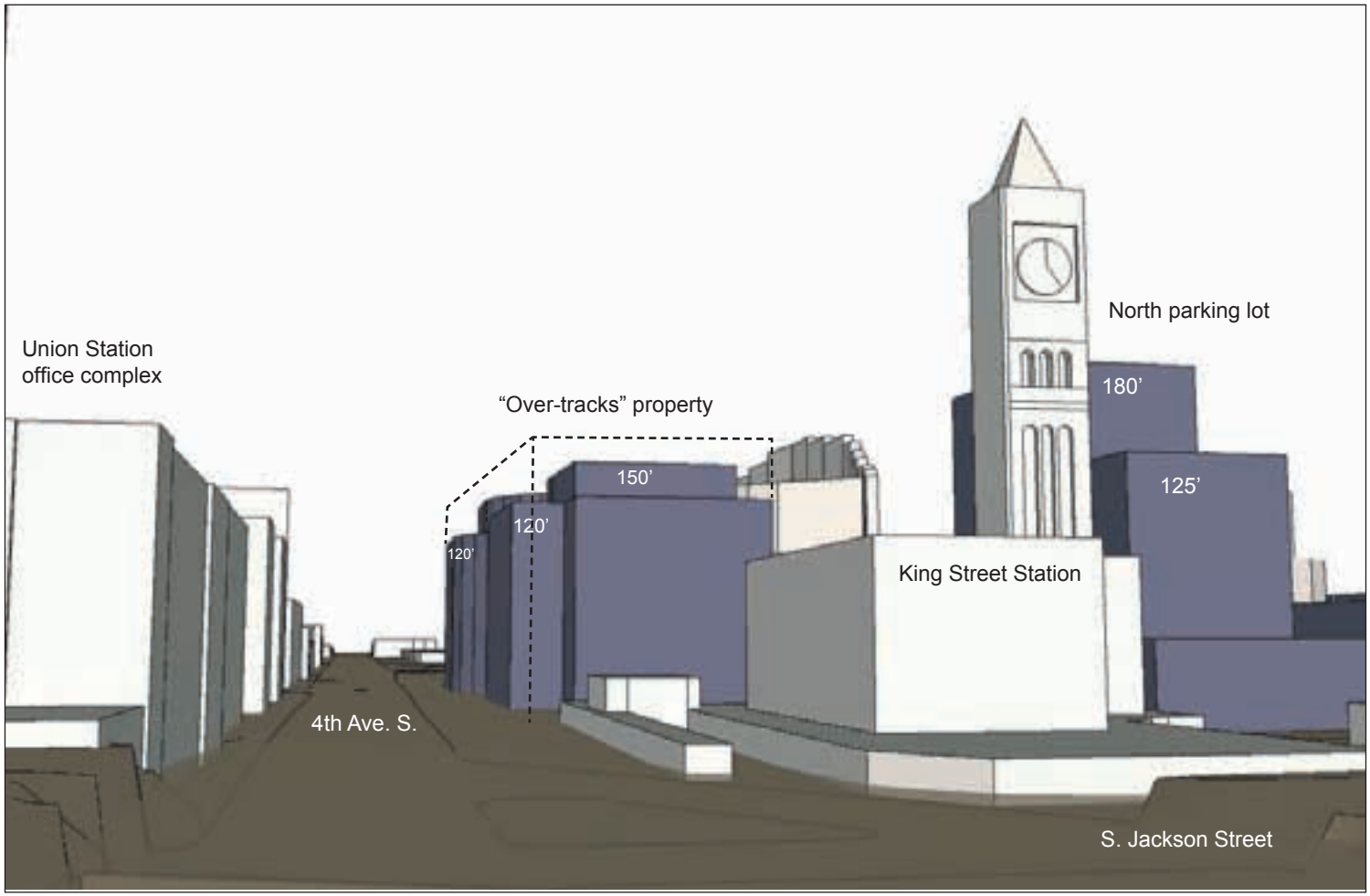
Hypothetical Height and Bulk at North Parking Lot, Alternatives 3 and 4

Preferred Alternative

Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario. Density limits and bulk controls would influence how building bulk is arranged. Dotted lines indicate a maximum theoretical “building envelope” per maximum height limit. This depiction assumes changes in property agreements would occur as to the location of bulk near the extended 2nd Avenue S.

Figure 3-4.A
Hypothetical Height and Bulk at North Parking Lot, Preferred Alternative

Alternative 1

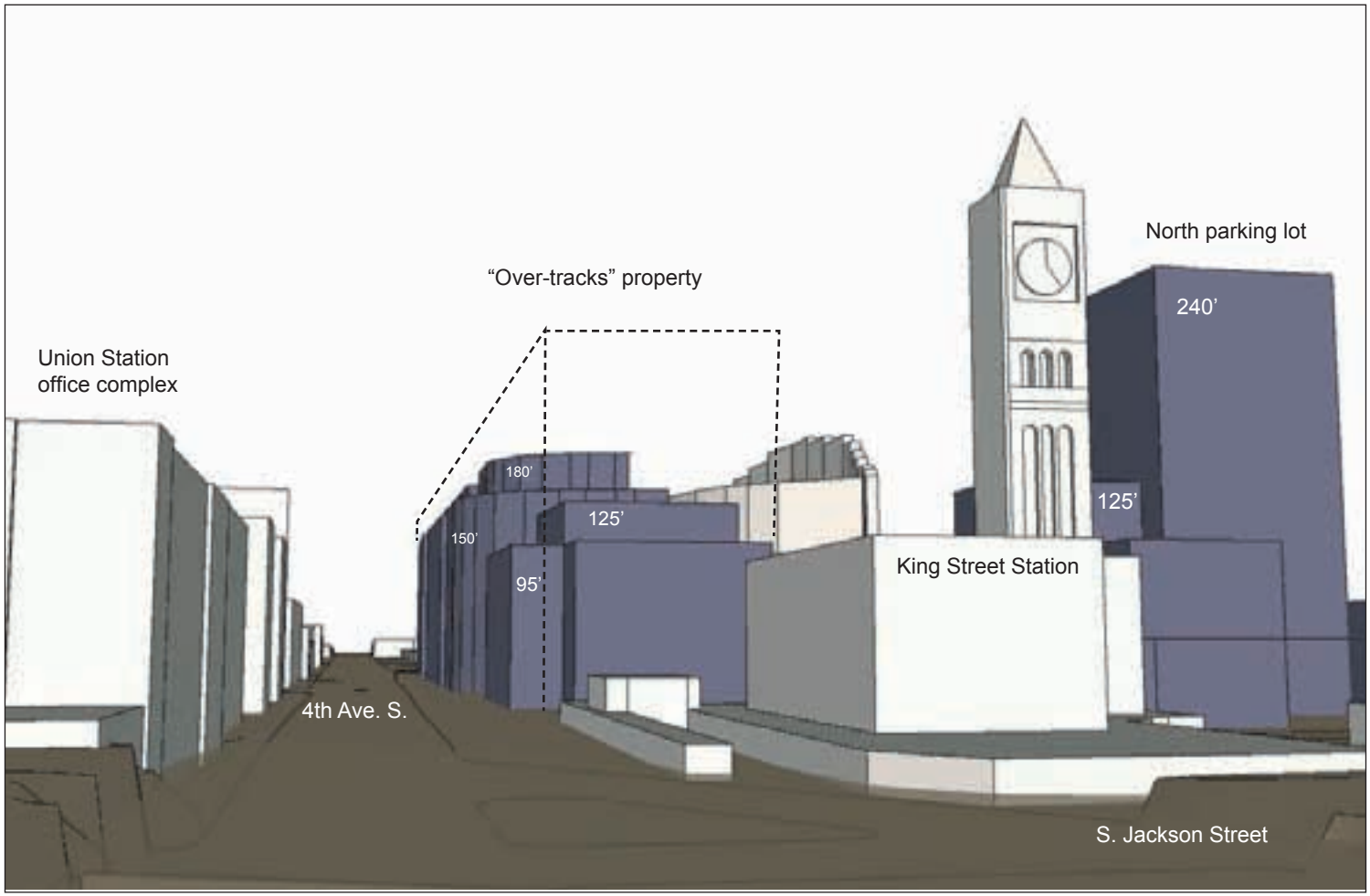


Note: Buildings shown represent a hypothetical development that matches the growth assumed per the EIS growth scenario. Dotted lines indicate a possible maximum "building envelope" defined by the height limit. Density limits and bulk controls would prevent filling the entire building envelope.

Figure 3-5

Hypothetical Height and Bulk at "Over-Tracks" Property, Looking South on 4th Ave. S. from S. Jackson St., Alternative 1

Alternative 2

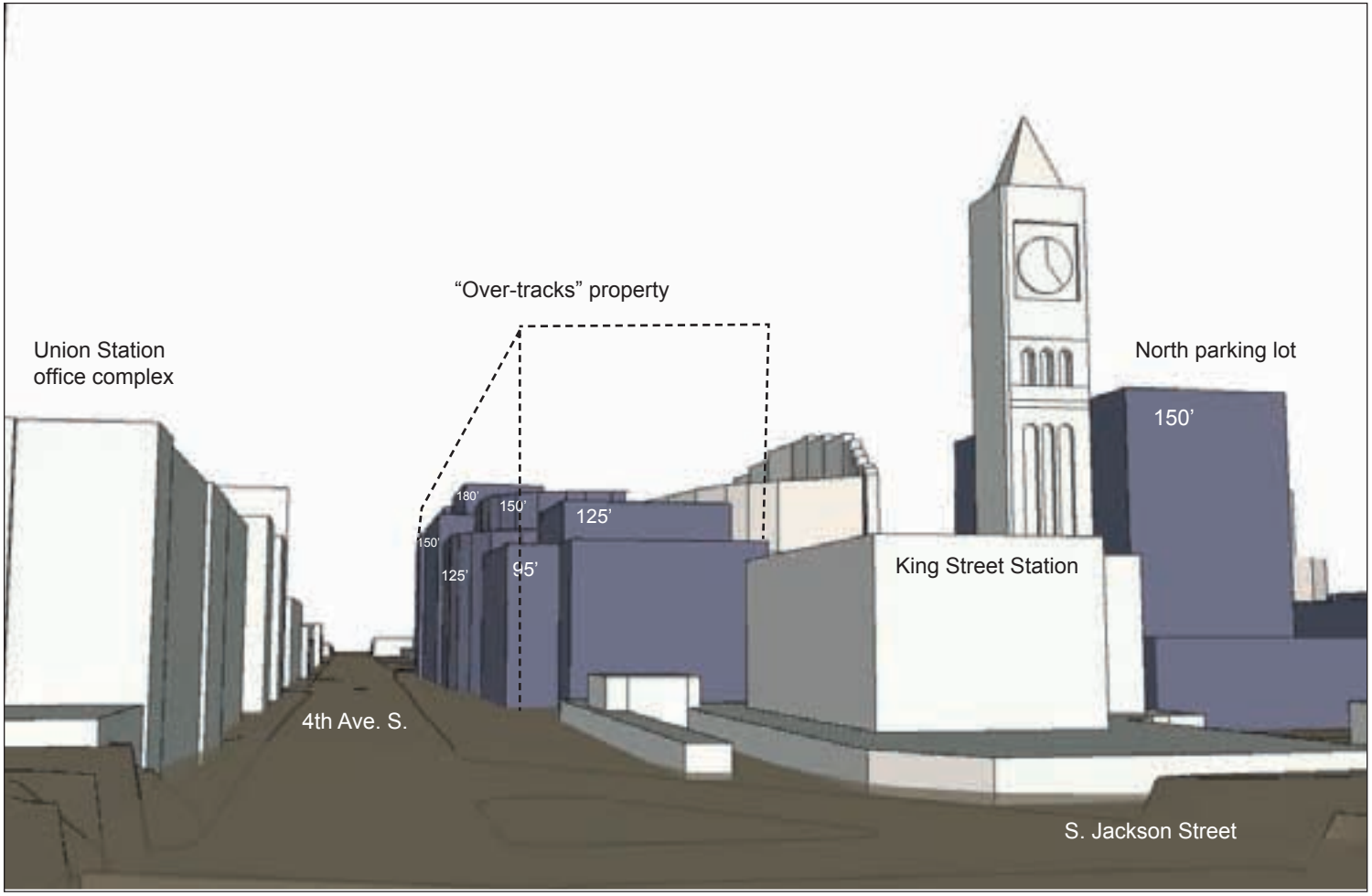


Note: Buildings shown represent a hypothetical development that matches the growth assumed per the EIS growth scenario. Dotted lines indicate a maximum possible "building envelope" defined by the height limit. Density limits and bulk controls would prevent filling the entire building envelope.

Figure 3-6

Hypothetical Height and Bulk at "Over-Tracks" Property, Looking South on 4th Ave. S. from S. Jackson St., Alternative 2

Alternative 3

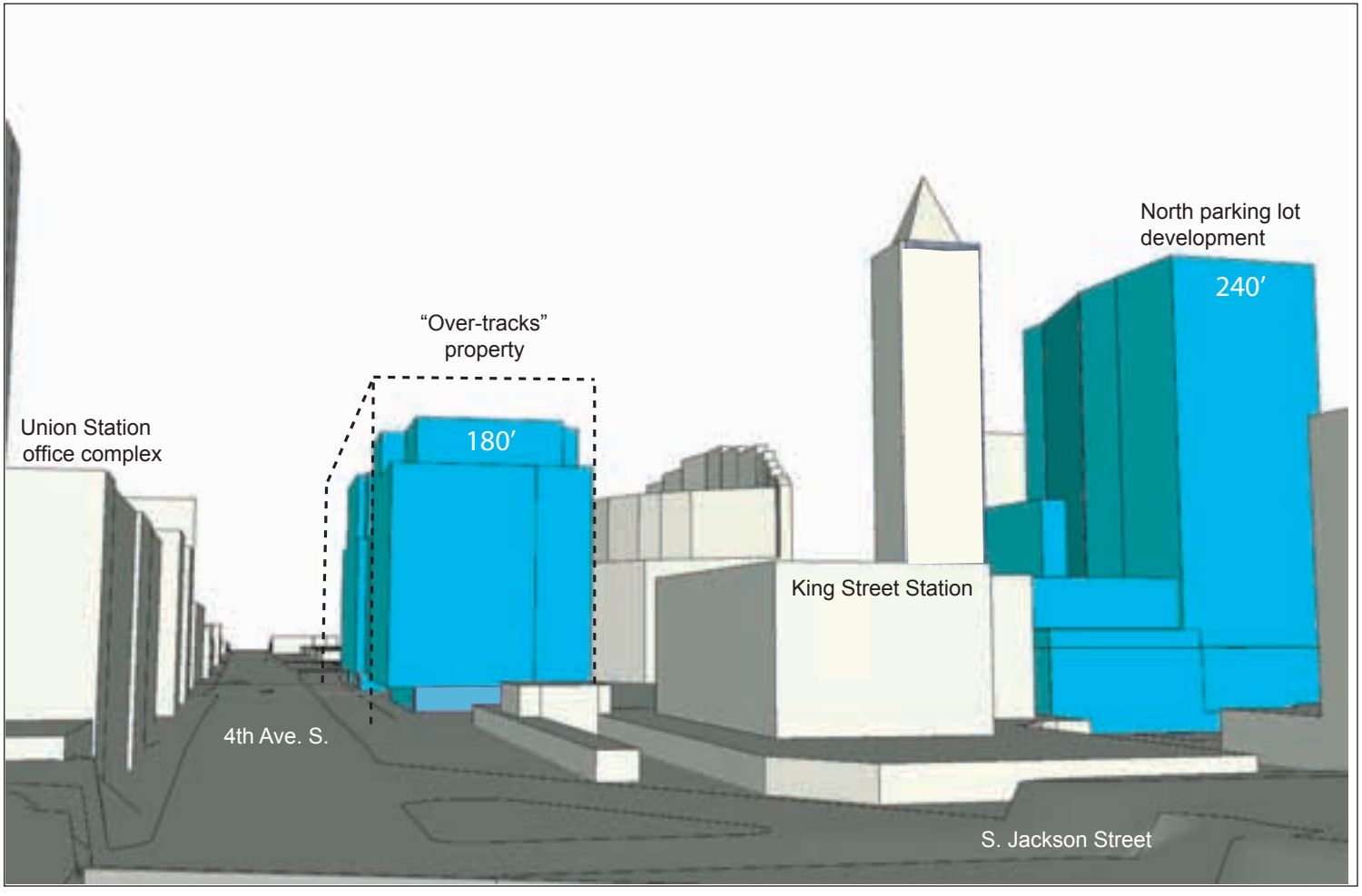


Note: Buildings shown represent a hypothetical development that matches the growth assumed per the EIS growth scenario. Dotted lines indicate a possible maximum "building envelope" defined by the height limit. Density limits and bulk controls would prevent filling the entire building envelope.

Figure 3-7

Hypothetical Height and Bulk at "Over-Tracks" Property, Looking South on 4th Ave. S. from S. Jackson St., Alternative 3

Preferred Alternative

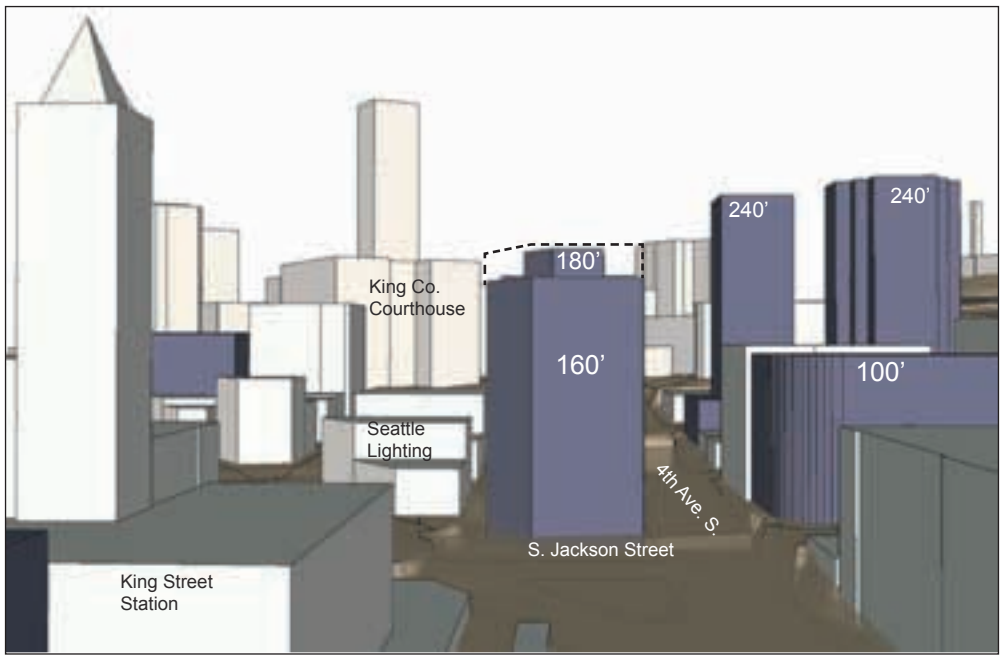


Note: Buildings shown represent a hypothetical development that matches the growth assumed per the EIS growth scenario. Dotted lines indicate a possible maximum "building envelope" defined by the height limit. Density limits and bulk controls would prevent filling the entire building envelope.

Figure 3-7.A

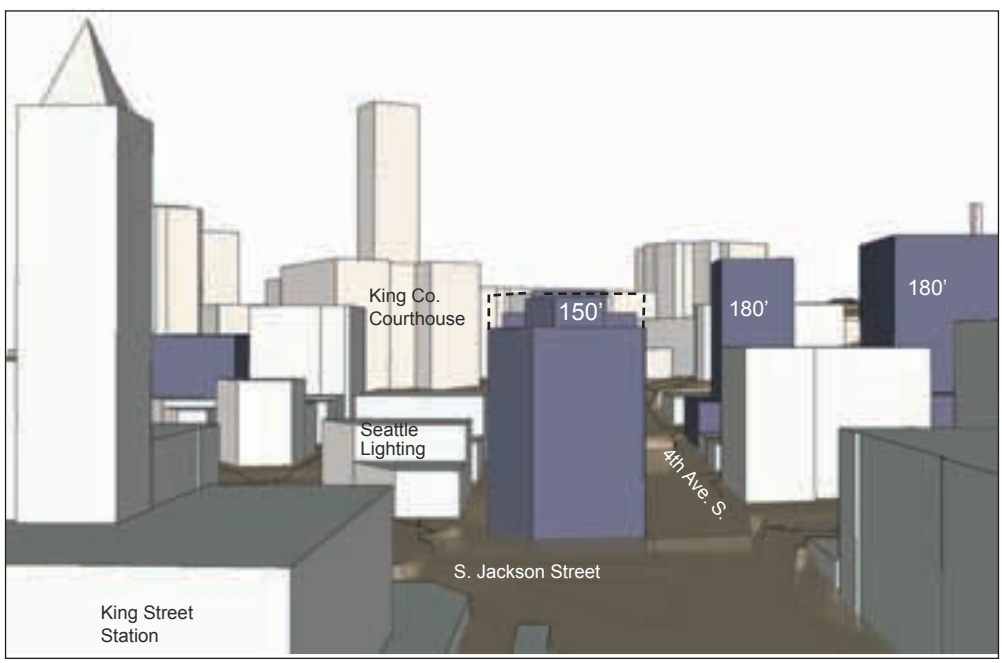
Hypothetical Height and Bulk at "Over-Tracks" Property, Looking South on 4th Ave. S. from S. Jackson St., Preferred Alternative

Alternative 1



Note: Buildings shown represent hypothetical development. Dotted lines indicate a possible maximum "building envelope" defined by the height limit. Density limits and bulk controls would prevent filling the entire building envelope.

Alternative 2 and Preferred Alternative



Note: Buildings shown represent hypothetical development. Dotted lines indicate a possible maximum "building envelope" defined by the height limit. No further density limit or bulk controls are proposed. Depiction is comparable to the Preferred Alternative, except buildings to 240 feet could be present east of 4th Ave. S., as shown in the depiction of Alternative 1 above.

Figure 3-8

Hypothetical Height and Bulk at "Railroad Gap" Properties North of S. Jackson Street

Under Alternative 2 and the Preferred Alternative, the proposed zone would define a 150-foot maximum height limit for an area east of 3rd Avenue S. that includes the "railroad gap" properties but also other historically-contributing properties in the Pioneer Square historic district (see Figure 3-8). This larger area with an increased height limit would mean an increased amount of total building bulk in future development that could contrast with nearby historic properties in Pioneer Square, such as the Union Gospel Mission. In the worst-case under Alternative 2, if such changes were applicable to properties with historic-contributing structures, this could generate significant adverse height/bulk/scale impacts with future development, given the sensitivity of the historic context. However, limiting the 150-foot zoned height limit only to the "railroad gap" areas or otherwise ensuring that zoning changes do not significantly threaten the demolition of historic buildings ~~as a mitigation strategy,~~ would help avoid these significant adverse impacts. With the Preferred Alternative's specific assumption that the maximum height limit would not be applicable to properties with historic-contributing structures, the worst-case potential for significant adverse impacts would be avoided. ~~due to its avoidance of zone changes on properties with historically contributing structures, a building scale that is closer to what is permitted in the adjacent Pioneer Square Mixed zone, and also due to the transitional nature of the "railroad gap" areas to the Japantown vicinity properties (see Figure 3-8).~~

Variable height limit:

Part of all ~~three~~ four zoning "action" alternatives, including the Preferred Alternative, is to discontinue the variable height limit, because it would conflict in intent with other zoning strategies addressing height. The variable height limit conceptually appears beneficial. However, the standard does not guarantee predictable or equitable outcomes in its regulation of building heights. The net result of discontinuing this regulation would be the accommodation of building heights potentially reaching 130 feet on non-historically-contributing properties, and potentially reaching 100 feet on a variety of properties with historic structures.

Alternative 4 – No Action Alternative

Under Alternative 4, with no regulatory changes there would be no potential for significant adverse height/bulk/scale impacts. Future development, including in the Qwest Field north parking lot, would be assumed to occur according to the existing zoned height limits and other provisions of the Land Use Code (refer to Figure 3-4).

Chinatown/I.D. West of I-5

In the Chinatown/I.D. neighborhood west of I-5, the range of alternatives addresses height limits for residential development in the IDM zone, ranging from 180 feet for Alternatives 2 and 3 to 240 feet for Alternative 1 and the Preferred Alternative in the Japantown vicinity. This vicinity is located generally north of S. Jackson Street, south of Yesler Way and east of 4th Avenue S. In the core of the Chinatown neighborhood west of I-5, the range of alternatives addresses height limits for residential development in the IDM zone, up to 150 feet under the Preferred Alternative or 125 feet ~~in~~ under Alternatives 1 and 2. These alternatives also include a few possible variations that include extending the 125-foot or 150-foot height limit as far north as S. King Street for the block between 5th and 6th Avenues S. (Alternative 2 and the Preferred Alternative, respectively), and the potential for residential uses at street level in portions of the vicinity south of S. Weller Street. No zoning changes are proposed in Alternative 3 in the core of Chinatown.

Japantown

The Alternative 1 and Preferred Alternative proposals for a 240-foot height limit extending as far east as 6th Avenue S. could result in 240-foot buildings located at upper elevations on the hill in this vicinity (see Figure 3-9). A building of this height on the hill, adjacent to 6th Avenue, in the worst case, could result in significant adverse impacts of height, bulk and scale with future development. However, no ~~other~~ such

impacts are identified for the alternatives in this vicinity, because building bulk controls included in the alternatives would contribute to a moderation of building bulk and scale. Also, the 180-foot height limits associated with Alternatives 2 and 3 would generate less potential than Alternative 1 for adverse height/bulk/scale impacts (see Figures 3-9 and 3-10). These conclusions extend to locations as far south as 5th Avenue S./S. Jackson Street. Despite the relatively tall potential 240-foot maximum height that would contrast with the scale of other existing buildings near 5th and Jackson (including the cluster of Japantown landmark buildings to the northeast), the positive influence of recommended bulk controls (such as probable upper-level setbacks, and other limits as noted in Chapter 2 of this FEIS) ~~along S. Jackson Street)~~ would help future development at this location to avoid significant adverse height/bulk/scale impacts.

Under Alternative 1 and the Preferred Alternative, a potential for a 240-foot building located near 6th Avenue/Yesler Way is also identified as generating a "potential adverse height-related impact" because it could potentially intrude slightly into airspace preferred by emergency service providers for emergency helicopter flightpaths to Harborview Hospital. (This airspace is not specifically mandated by federal rules). Because this intrusion could be avoided through future design of such a building, it is not characterized as a significant adverse impact. Proponents of development projects in or near this vicinity would likely need to complete a Federal Aviation Administration form (#7460-1) that provides notification of proposed construction or alteration.

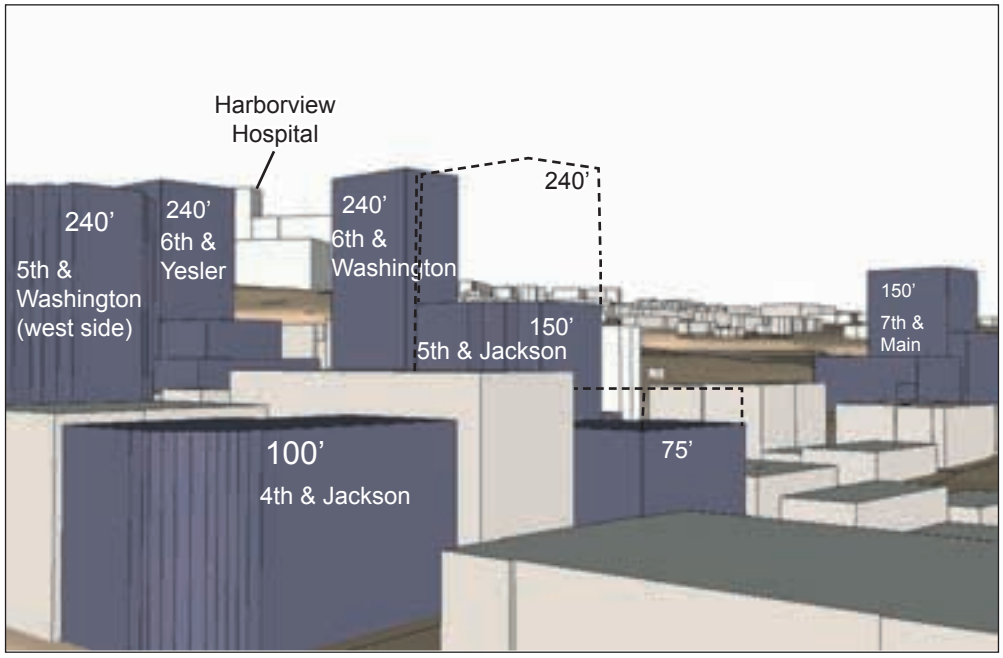
Chinatown

In the Chinatown core vicinity, the Alternative 1 and 2 proposals are for IDM zoning with a maximum height limit of up to 125 feet, 40 feet greater than the existing IDM zoning (see Figure 3-11). The Alternative 1 proposal also includes provisions that would shape the bulk of future development in this vicinity – likely including coverage limits or 15-foot setbacks at a building elevation of 45 feet. This level of change is interpreted to represent a moderate increase in building height and scale—it is higher than the predominant Chinatown height and scale context, but is not considered a "high-rise" scale.

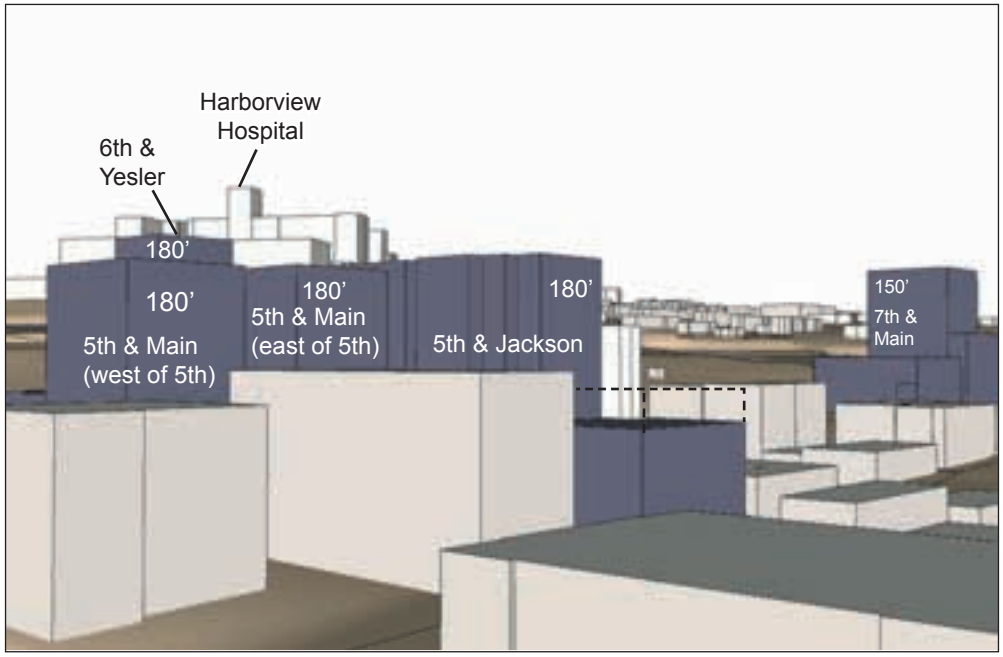
Under Alternatives 1 and 2, within the relatively lightly developed context of blocks south of S. Weller Street, the alternative proposals are not likely to generate significant adverse height, bulk and scale impacts. A similar conclusion applies to the adjacency of that vicinity with the National Register Historic District immediately north of S. Weller Street. However, Alternative 2 also includes an extension of the 125-foot height limit to S. King Street in the "old Uwajimaya grocery" block west of 6th Avenue S (see Figure 3-11). In this block, only the Publix Hotel is located within the National Register Historic District, but this block does abut that District on S. King Street and 6th Avenue S. block faces. Due to the combination of increased development scale and sensitivity to maintaining compatibility of development character within and adjacent to the National Register Historic District, Alternative 2's extension of a 125-foot height limit to this particular block could result in significant adverse height/bulk/scale impacts with future development, depending on the design and siting of new buildings. Mitigation strategies to further influence the height, bulk and scale of future development should be implemented to protect against such impacts.

Based on a similar rationale to the Alternative 2 discussion above, the Preferred Alternative that includes maximum height limits up to 150 feet for the "old Uwajimaya grocery" block in the worst-case potentially could result in significant adverse height/bulk/scale impacts depending on the design and siting of new buildings (see Figure 3-11.A). However, with the proposed bulk controls included in the Preferred Alternative and the anticipated level of project-specific review, such significant impacts would be avoided.

Alternative 1 and Preferred Alternative



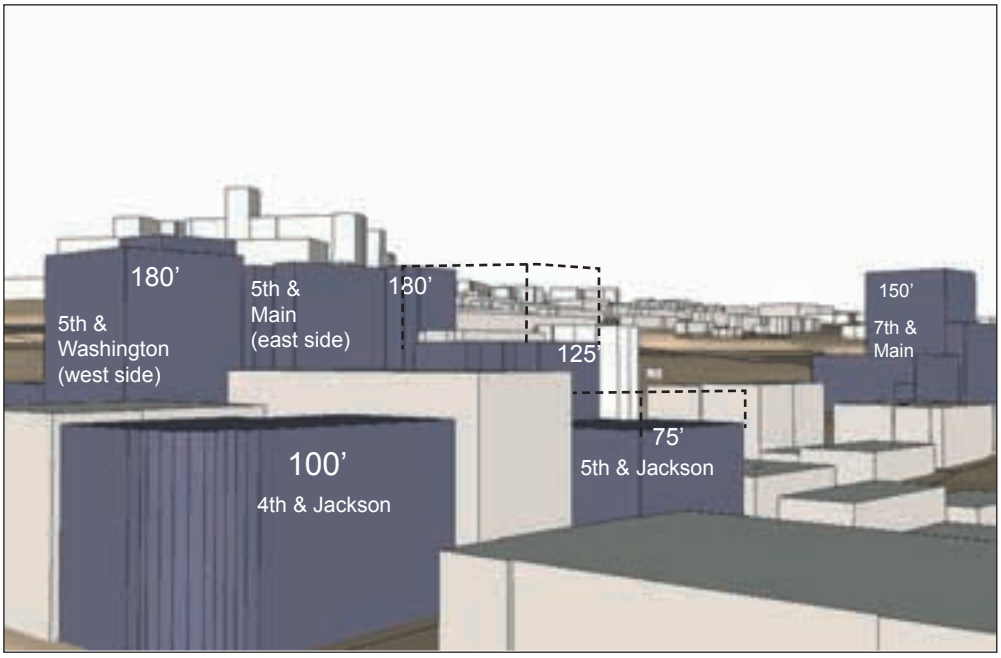
Alternative 2



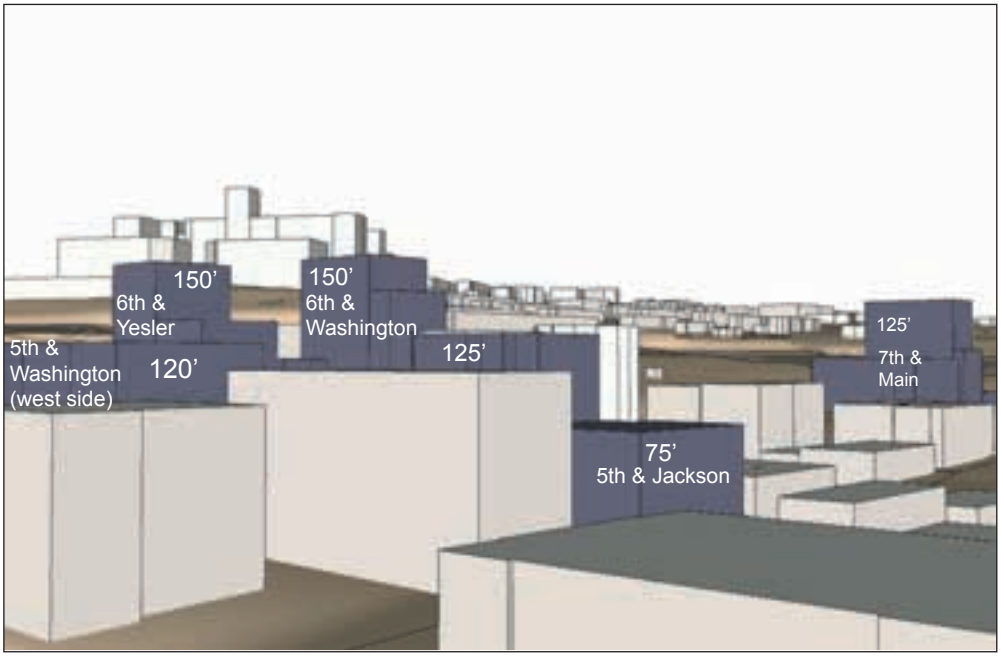
Note: Hypothetical buildings shown, per the EIS growth scenario, except one additional building shown at 6th & Yesler. Dotted lines show a possible maximum “building envelope” only at 5th & Jackson, for illustrative purposes.

Figure 3-9
Hypothetical Height and Bulk of Future Development, Japantown, Alternatives 1 and 2, Looking Northeast Across S. Jackson Street

Alternative 3



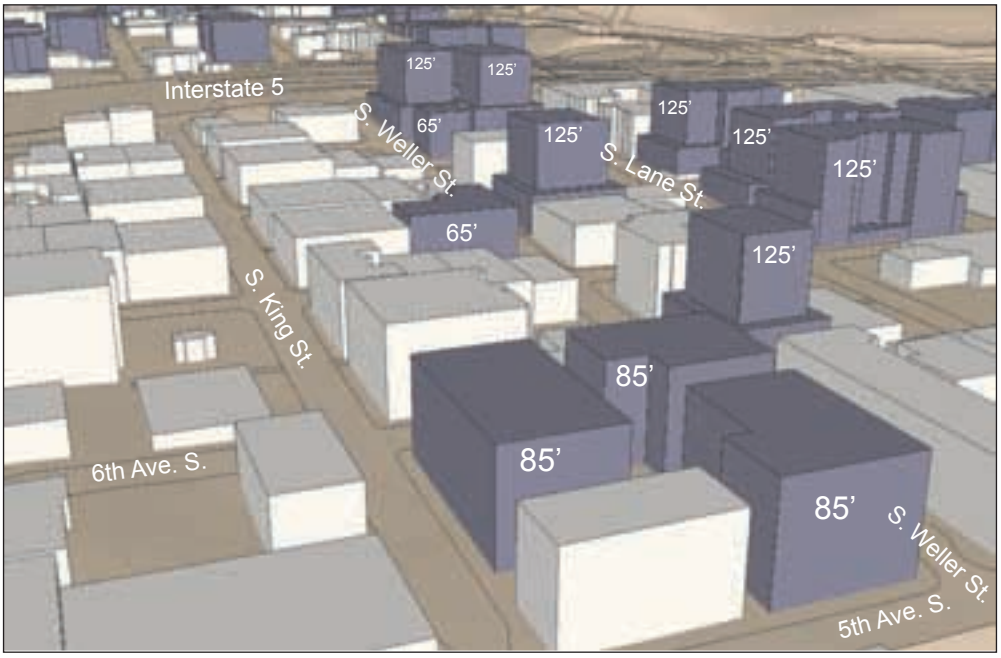
Alternative 4



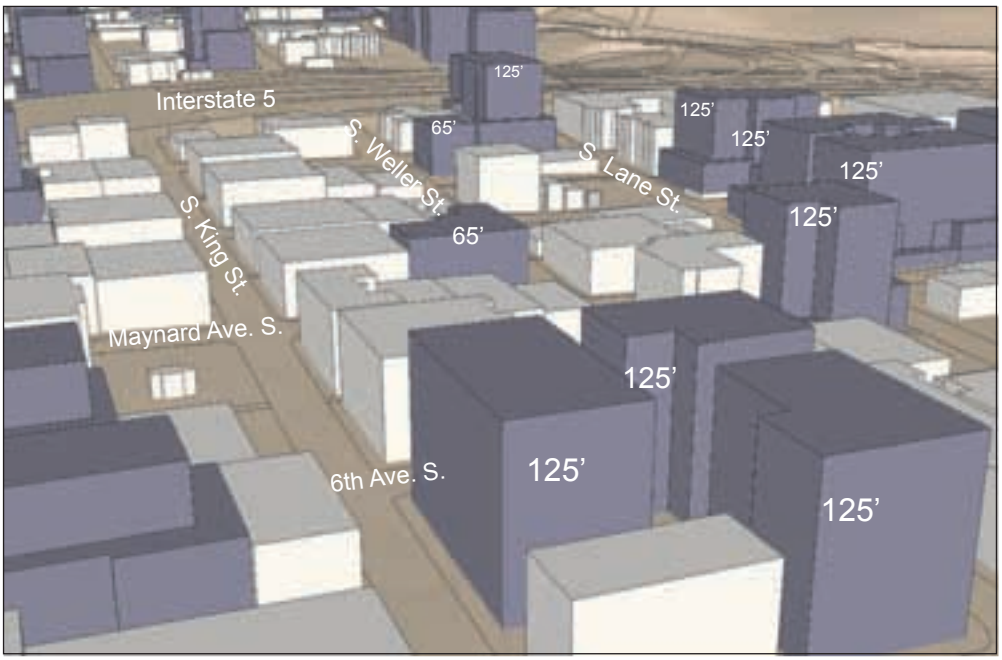
Note: Hypothetical buildings shown, per the EIS growth scenario, except one additional building shown at 6th & Yesler. Dotted lines show a possible maximum “building envelope” only at 5th & Jackson, for illustrative purposes.

Figure 3-10
Hypothetical Height and Bulk of Future Development, Japantown, Alternatives 3 and 4, Looking Northeast Across S. Jackson Street

Alternative 1



Alternative 2

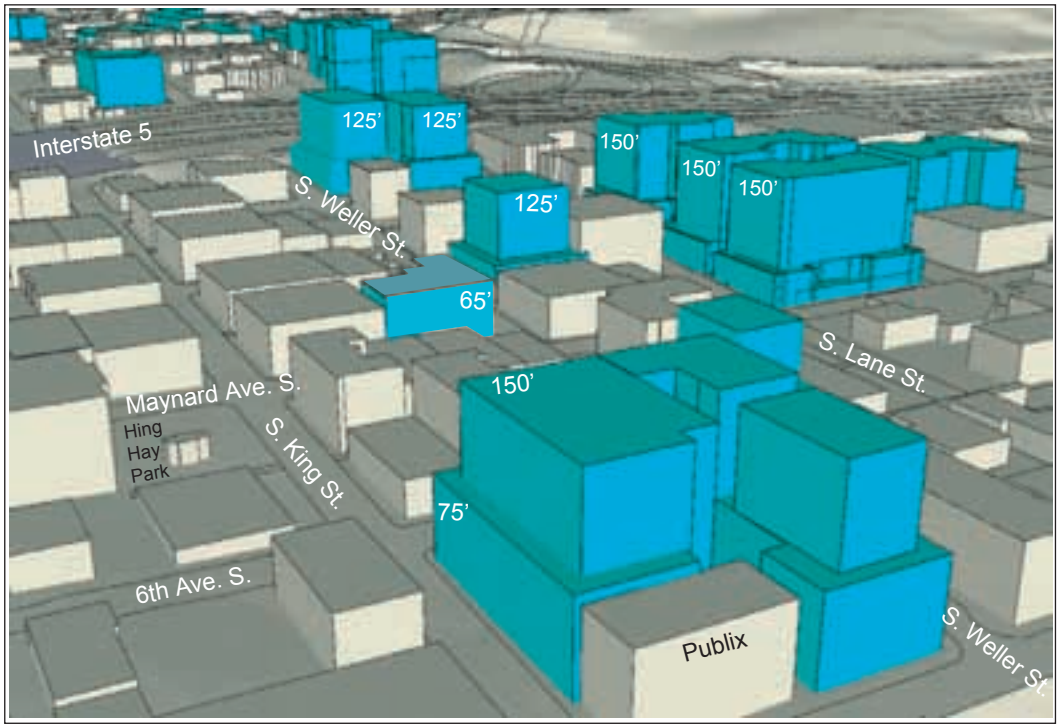


Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-11

Hypothetical Height and Bulk of Future Development, Chinatown, Alternatives 1 and 2

Preferred Alternative



Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario. The 150-foot buildings in foreground illustrate the proposed setback at 75-foot elevation in the Preferred Alternative, and its relationship to the scale of the existing Publix building.

Figure 3-11.A
Hypothetical Height and Bulk of Future Development, Chinatown, Preferred Alternative

Under Alternatives 3 and 4 with no zone changes, there would be no potential for height, bulk and scale impacts.

Little Saigon

In the Little Saigon neighborhood east of I-5, the range of alternatives includes height limits up to 85 feet under Alternatives 1 and 3, and height limits up to 125 feet under Alternative 2 (refer to Chapter 2 for other details). The Preferred Alternative includes similar maximum height limits up to 125 or 150 feet for residential towers in areas north of S. Lane Street, and up to 160 feet for residential towers in properties along the S. Dearborn Street corridor south of S. Lane Street in Little Saigon. The increases to 85 feet in Alternatives 1 and 3 represent a minor increase in building height and scale that would not generate significant adverse height, bulk or scale impacts with future development (see Figures 3-12 and 3-13). Under Alternative 2, applying a 125-foot height of future development to the proposed area would result in a somewhat larger contrast in building scale with surrounding zones and existing buildings than zoning under Alternatives 1 and 3. However, the recommended bulk controls included in Alternative 2, as well as the design review process, would help future development to avoid significant adverse height/bulk/ scale impacts by moderating the effects of height and bulk.

The potential for adverse impacts under the Preferred Alternative would be somewhat greater than under Alternative 2, because the area where 125- or 150-foot towers could conditionally occur would be larger, newly including the Jackson Street retail corridor properties (see Figure 3-13.A). Also under the Preferred Alternative, possible future taller residential towers to 160 feet in height along the S. Dearborn Street corridor would contribute to increased potential for added building bulk and adverse impacts. Proposed bulk controls and improved pedestrian/open space amenities would provide a degree of moderation to the potential magnitude of bulk impacts and would also be beneficial to the "shape" of the neighborhood at street level and upper building levels, compared to the potential worst-case conditions. Based on the Preferred Alternative's recommended inclusion of bulk and density controls for Little Saigon, this alternative would likely result in "adverse" but not "significant adverse" height, bulk and scale impacts.

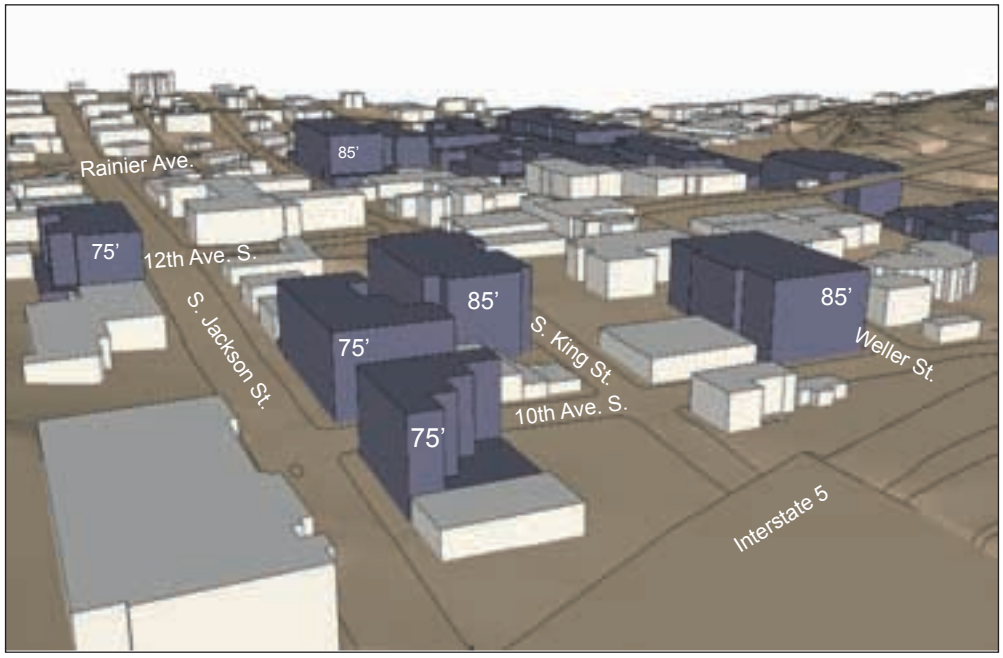
Under all alternatives, the study area portion east of Rainier Avenue S. in the Jackson Place vicinity would have minimal potential for significant adverse height/bulk/scale impacts due to no increase in the proposed height limits and a density increase of less than 2 FAR compared to existing zoning. Under the Preferred Alternative, the recommended zone of NC2 further reduces the potential for bulk impacts compared to the other "action" alternatives. Also, sloping topography in most of this vicinity would help moderate the potential effects of future development. Under Alternative 4, there would be no potential for height, bulk and scale impacts due to no zoning changes.

South-of-Dearborn

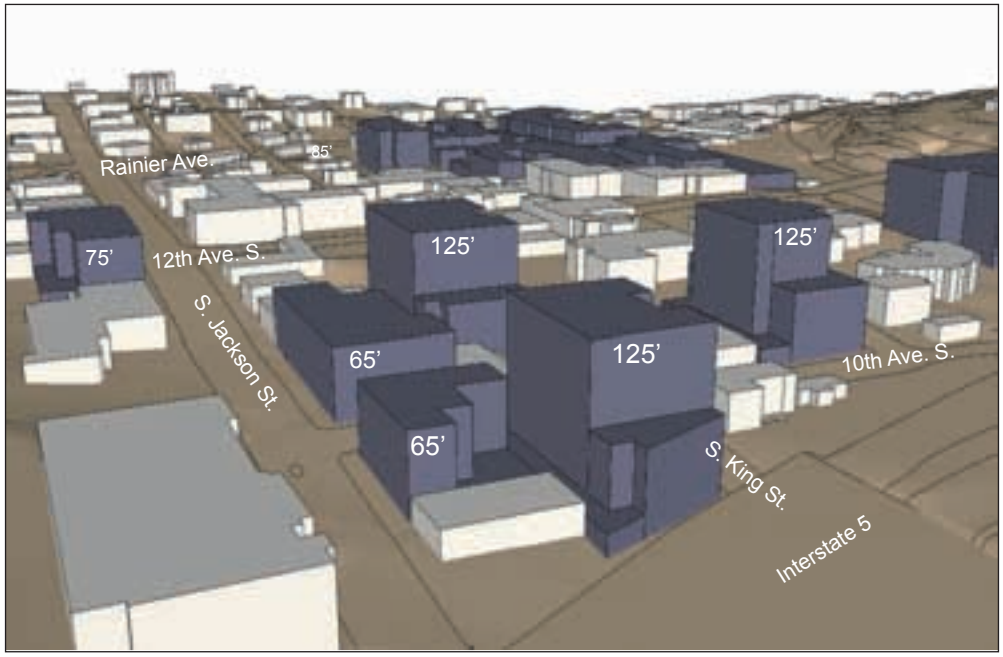
Under Alternatives 1, 2 and 3 the height, bulk and scale implications of future development in this vicinity are influenced by the relationship between height and density regulations and the pattern of single-ownership for several properties along 6th Avenue S. Alternative 1 zoning would increase maximum height limits to 125 feet, while Alternatives 2 and 3 zoning would increase height limits to 160 feet (see Figures 3-14 and 3-15). The Preferred Alternative recommendation is similar to Alternative 2, with an Industrial Commercial zone, a 160-foot height limit and recommended bulk controls (see Figure 3-15.A).

Assuming commercial office uses would be the favored future use, zoning under any of these alternatives may result in the development of fewer but taller buildings that consolidate development capacity from many properties into a single large commercial office-use project. Under Alternative 1, this probable

Alternative 1



Alternative 2



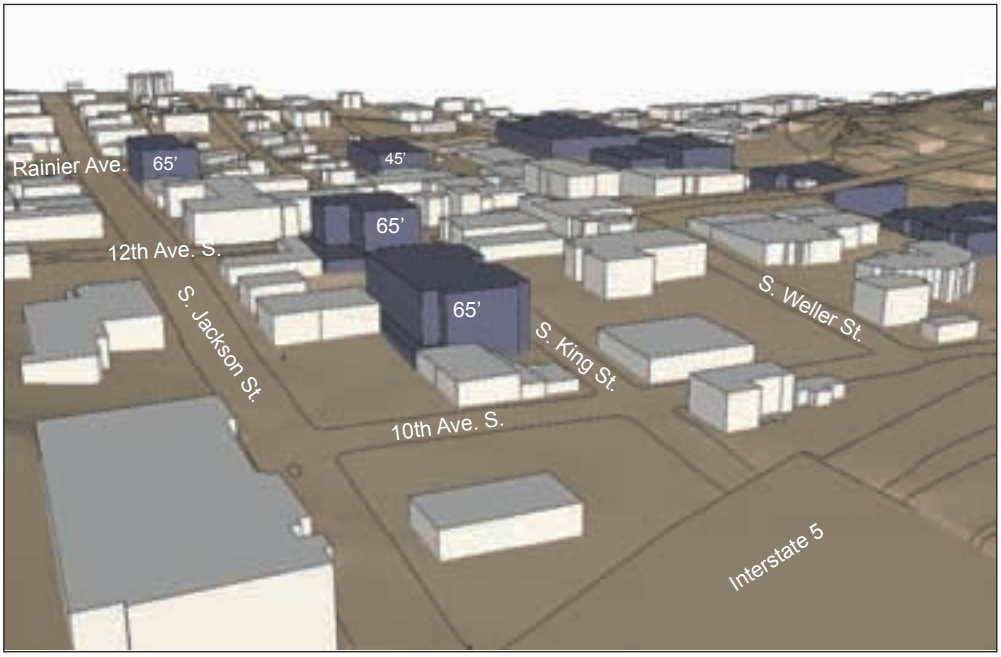
Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-12

Hypothetical Height and Bulk of Future Development, Little Saigon, Alternatives 1 and 2

Alternative 3

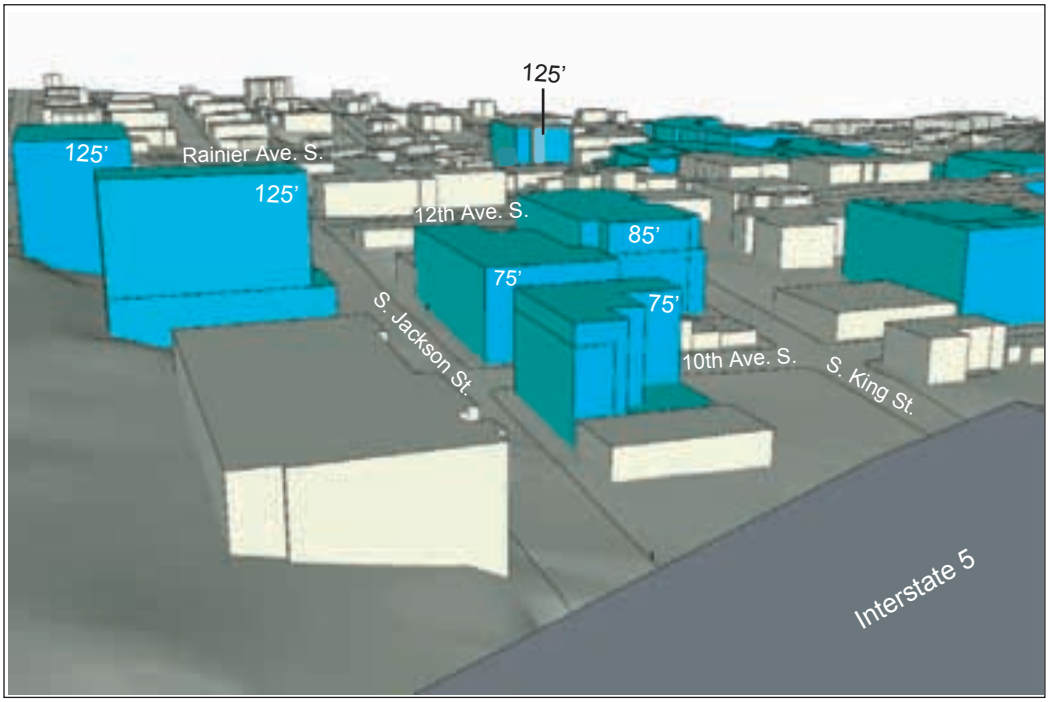
Alternative 4



Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-13
Hypothetical Height and Bulk of Future Development, Little Saigon, Alternatives 3 and 4

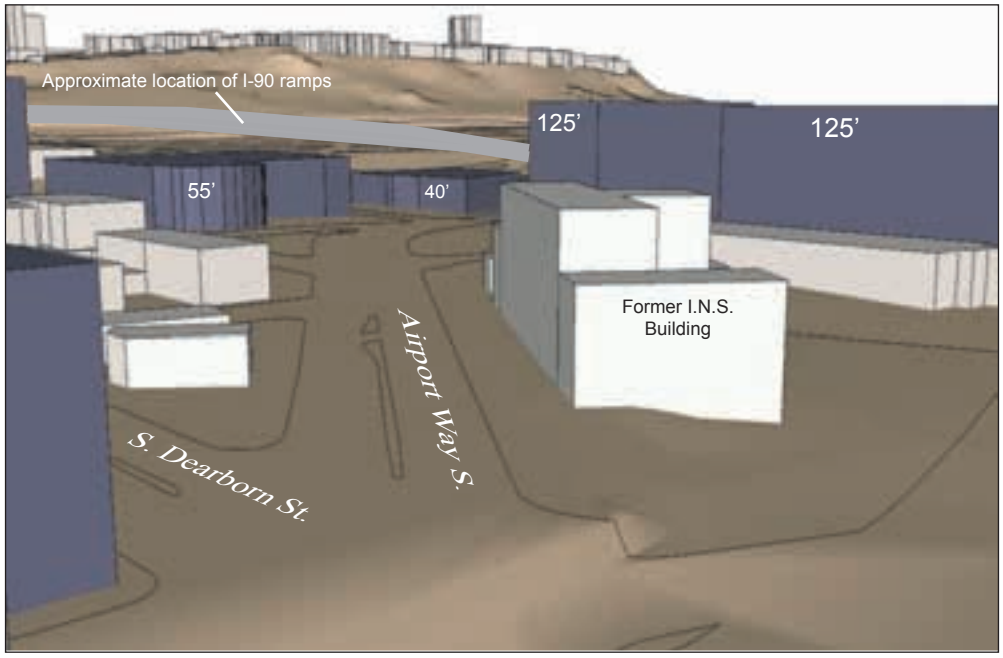
Preferred Alternative



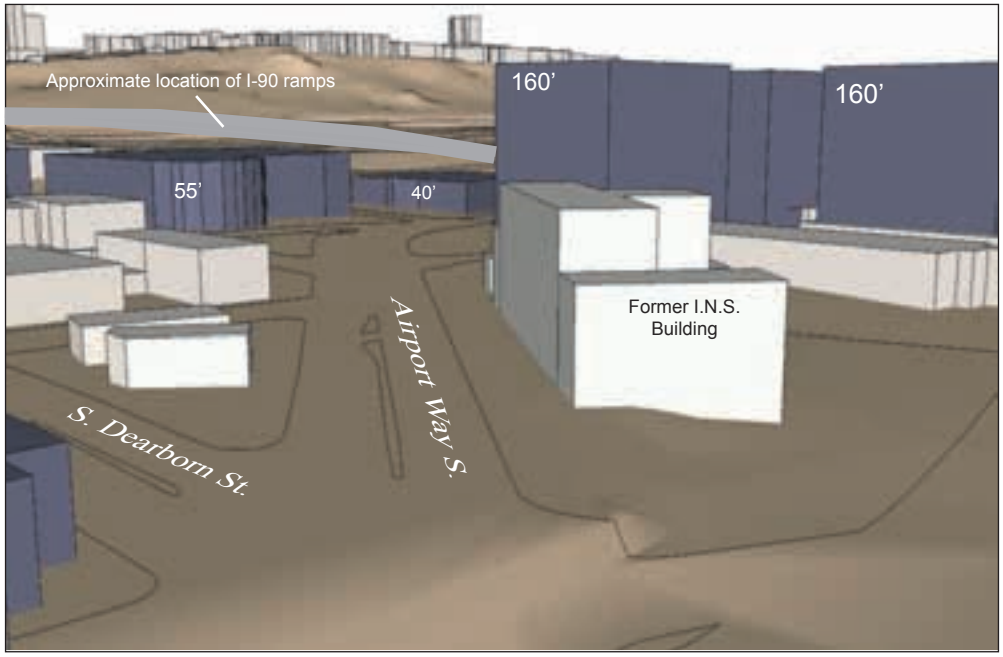
Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-13.A
Hypothetical Height and Bulk of Future Development, Little Saigon, Preferred Alternative

Alternative 1



Alternative 2

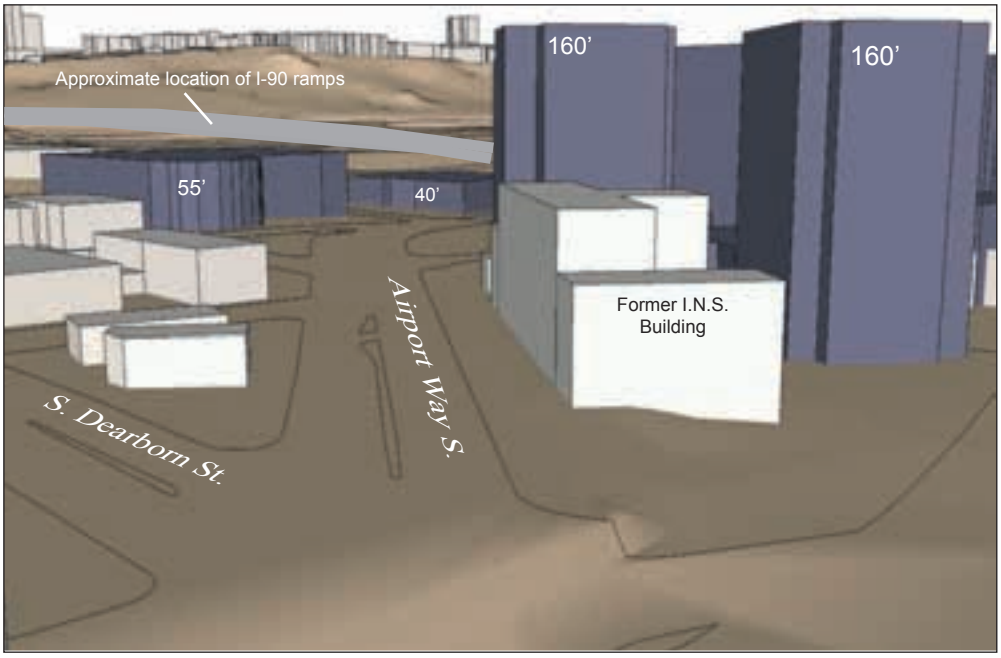


Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

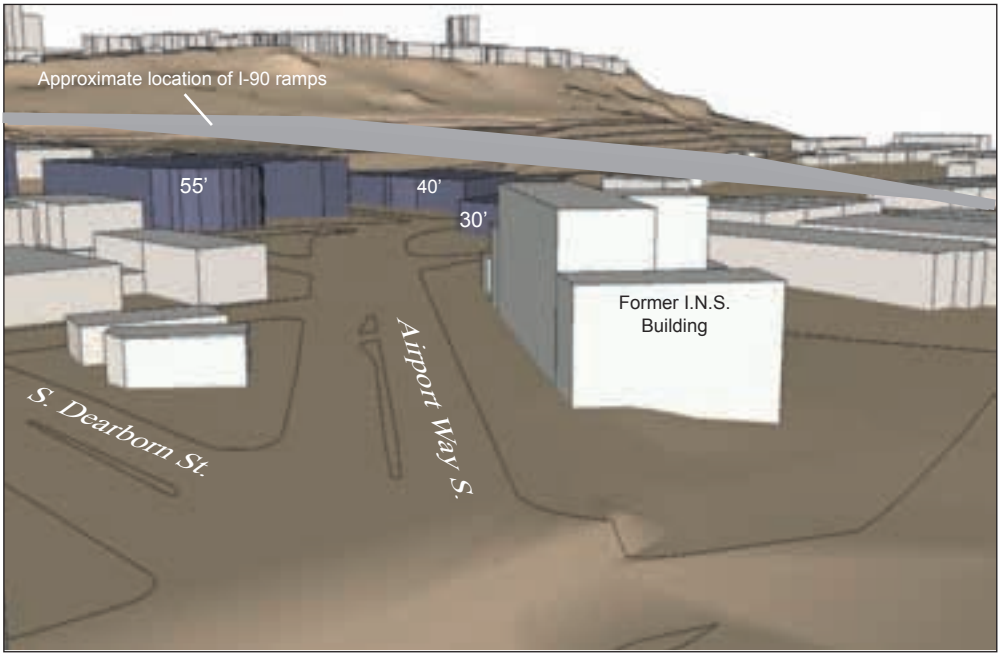
Figure 3-14

Hypothetical Height and Bulk of Future Development, South-of-Dearborn, Alternatives 1 and 2

Alternative 3



Alternative 4

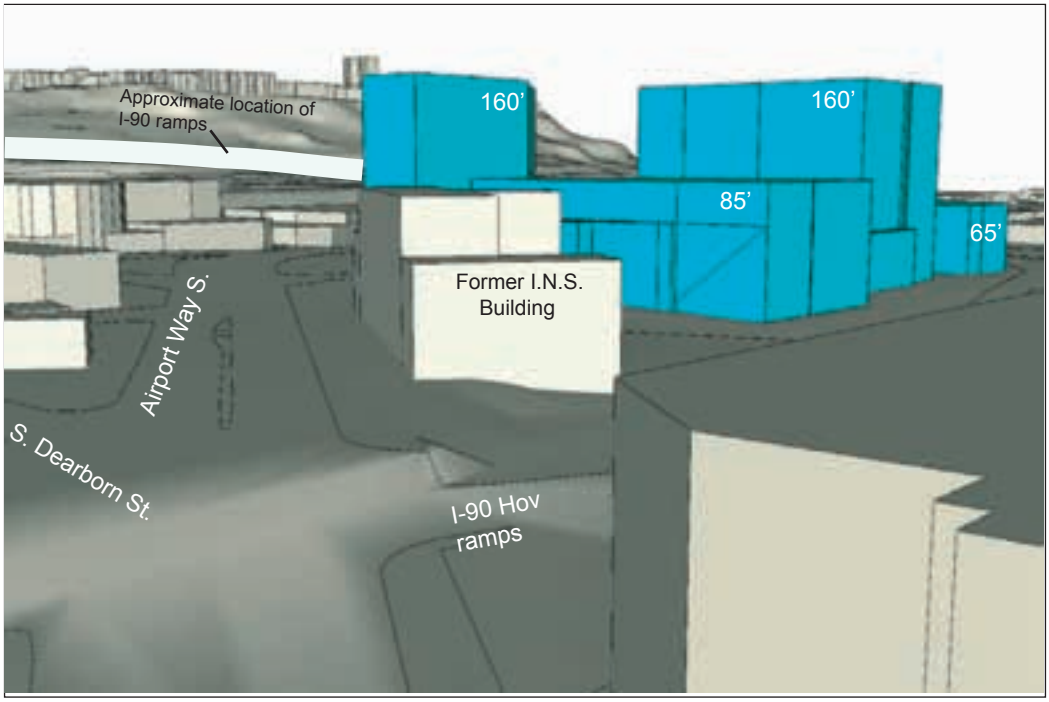


Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-15

Hypothetical Height and Bulk of Future Development, South-of-Dearborn, Alternatives 3 and 4

Preferred Alternative



Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-15.A
Hypothetical Height and Bulk of Future Development, South-of-Dearborn, Preferred Alternative

pattern of future development and the proposed density limits would limit the potential total amount of building bulk that could be added to this vicinity. Smaller properties, with fewer options in siting, might be designed in buildings ranging from 40 to 70 feet in height if they fully used the maximum possible density. Future possible development in adjacent zones, proposed with height limits of 125 feet or higher, and the presence of the elevated freeway ramps and sloping topography are factors that would moderate the perceived building scale. Under Alternative 1, the additional height and bulk of future development would likely represent an "adverse" impact, but it would not likely result in "significant adverse" height, bulk and scale impacts.

In contrast, under Alternatives 2 and 3, the proposed 160-foot height limit and higher densities (and mixed-use development under Alternative 3) could result in significant adverse height/bulk/scale impacts, based on a worst case scenario of poor design and siting decisions and insufficient controls on building bulk and scale. Under Alternative 3 only, a special review process required by the SDM zone would help address such impacts. However, under either Alternative 2 or 3, mitigation strategies to further influence the height, bulk and scale of future development should be implemented. Based on the Preferred Alternative's inclusion of recommended bulk and density controls, the Preferred Alternative is interpreted to result in "adverse" but not "significant adverse" height, bulk and scale impacts (see Figure 3-15.A).

Alternative 4 – No Action

In this vicinity, no changes from existing zoning would mean no potential for significant adverse height/bulk/scale impacts.

Stadium Area

The Stadium Area as defined in this analysis includes the 1st Avenue S. and 4th Avenue S. corridors, the latter covering the area south of Pioneer Square zoned area.

- Along the 1st Avenue S. corridor, Alternative 1 includes height limits of 85-160 feet, Alternative 2 includes height limits of 65-100 feet, and Alternative 3 includes height limits of 85-120 feet. The Preferred Alternative includes height limits ranging from 85 feet to 160 feet but with somewhat greater height permitted along a greater extent of the west side of 1st Avenue S. than Alternative 1.
- Along the 4th Avenue S. corridor extending north of S. Royal Brougham Way, the alternatives include height limits of 125 feet, 240 feet, ~~and~~ 85 feet and 65 feet for Alternatives 1, 2, ~~and~~ 3, and the Preferred Alternative, respectively. (Also, see the discussion for the "over-tracks" properties under Pioneer Square above for more information about zoning along 4th Avenue S. north of the Interstate 90 ramps.)

The location, land uses, zoning and building patterns in the Stadium Area define its role as a transition between the Downtown Urban Center to the north and the Greater Duwamish Manufacturing and Industrial Center to the south. Building density and scale (except for the athletic stadia) gradually decreases from north to south, illustrating past development history and the greater development capacity afforded through Downtown zoning. Also, the SR99 Alaskan Way Viaduct is immediately adjacent to and west of this vicinity, forming a fence-like edge roughly 60 feet tall, while the large-scale athletic stadia are nearby to the east. Nearby to the west are the Port of Seattle terminal facilities. These physical patterns and features form the context for evaluation of height, bulk and scale impacts. This area's orientation along a corridor and the presence of a few large properties influences the potential arrangements of building bulk in future development. In contrast to smaller single-parcel properties, larger properties may allow for more flexibility in locating and arranging the amount of building bulk permitted by density limits. For the WOSCA property, the use of the western half of the WOSCA property by SR99 construction would ~~further~~ also influence the location and design of buildings, limiting

future development to an area roughly one-half block in width (around ~~120~~ 130 feet wide)~~in width~~, abutting the west side of 1st Avenue S.

1st Avenue S. corridor

Along the 1st Avenue S. corridor north of S. Royal Brougham Way, if not positively influenced by regulatory or design review guidance, the worst-case shape of potential future buildings under Alternatives 1, ~~and~~ 3 and the Preferred Alternative could be long in the north-south dimension, potentially interrupted only by vehicle access drives. Similarly, worst-case architectural designs might consist of monotonous and minimally-shaped treatments of an entire street-facing façade. Resulting buildings could be long rectangular forms with minimal architectural treatments that would not respond well to neighborhood context, and would negatively affect the pedestrian environment along 1st Avenue S., even though regulations under the current zoning could help avoid worst-case outcomes. Proposed density limits would play a role in constraining total building bulk, but would not ~~by themselves~~ ensure that optimal arrangements of building bulk would occur in future development. This type of development in the worst case scenario could potentially result in significant adverse height, bulk and scale impacts on the 1st Avenue S. corridor under Alternatives 1, ~~and~~ 3 and the Preferred Alternative. Under Alternative 2, ~~the lower~~ with height limits ranging from 65 feet to 100 feet and no increase in permissible density, could result in "adverse" but likely not "significant adverse" height, bulk and scale impacts (see Figures 3-16, 3-17 and 3-17.A).

Alternative 1 and 3 would avoid the worst case potential outcomes north of S. Royal Brougham Way through density and bulk controls, minimum specifications for open spaces, the use of a special review process mandated by the proposed South Downtown Mixed (SDM) zoning, ~~as well as~~ and a design review process. The expected result would be building design treatments that would include façade modulation, use of context-appropriate façade materials, shaping of building bulk, and pedestrian features along 1st Avenue S. These would improve overall design quality and help avoid potential significant adverse height/bulk/scale impacts on the immediate built environment, including on the probable future street environment along the west edge of the WOSCA property near SR 99. Under Alternative 2 and the Preferred Alternative, the likely-required design review process per the Stadium Transition Area Overlay District, as well as recommended provisions in the zones described by the Preferred Alternative, would be expected to help avoid worst case significant adverse design and height/bulk-related impacts. ~~outcomes.~~

South of S. Royal Brougham Way, under Alternatives 1 and 3, the proposed 85-foot height limit on the "Pyramid Brewery block" would mean that buildings could reach 20 feet higher than height limits allow today, and 20 feet higher than the nearby Safeco Field concourse's floor height of 65 feet. The retention of a 3 FAR density limit under Alternatives 1 and 3 means that future buildings would gain more room within a taller building envelope where building bulk could be located. This would lead to a building pattern where future buildings would less likely be a uniform 85-foot high structure across the entire block north-south and could be varied in heights across multiple structures. However, the likely distribution of building bulk across the site is not reasonably predictable at this time. In terms of height/bulk/scale impacts, the 20-foot increase in heights with no increase in density limits under Alternatives 1 and 3 can be interpreted as generating an "adverse" but not a "significant adverse impact" on the 1st Avenue S. corridor based on the relatively low amount of change in the height and scale of future development. The added potential for the 20-foot taller buildings' heights to alter westward views from the Safeco Field concourse is noted, but this does not change the conclusion with respect to significance of the impacts.

South of S. Royal Brougham Way, under Alternative 2 and the Preferred Alternative, no change to the 65-foot height limit is proposed on the "Pyramid Brewery block" and therefore no impacts with respect to height/bulk/scale relationships to the 1st Avenue S. corridor or Safeco Field are identified.

Alternative 1

Alternative 2

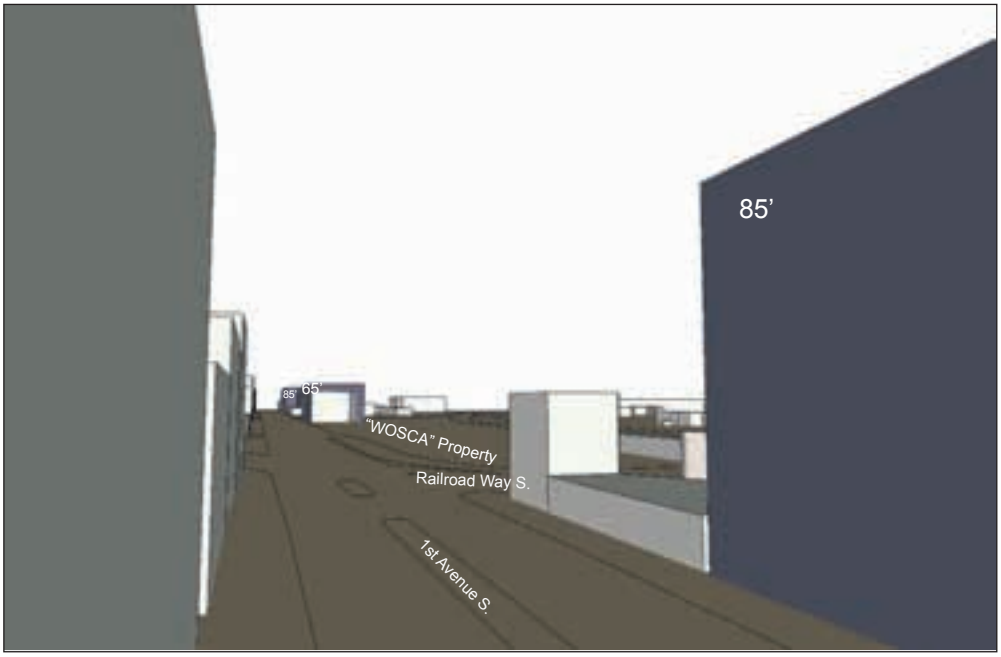
Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-16

Hypothetical Height and Bulk of Future Development, 1st Avenue S., Alternatives 1 and 2

Alternative 3

Alternative 4

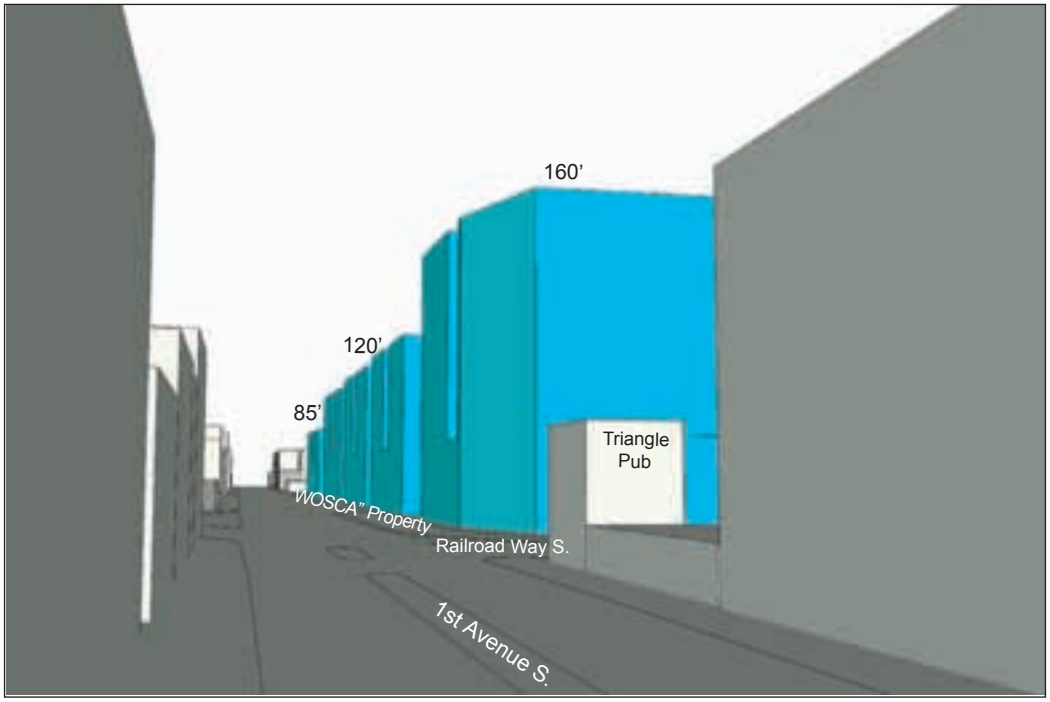


Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-17

Hypothetical Height and Bulk of Future Development, 1st Avenue S., Alternatives 3 and 4

Preferred Alternative



Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-17.A

Hypothetical Height and Bulk of Future Development, 1st Avenue S., Preferred Alternative

4th Avenue S. corridor

On the east side of Qwest Field, future development could occur over or near the railroad tracks within roughly 100 to 200 feet of the stadium. In the portion of this corridor within the Stadium Area approximately south of S. Dearborn Street and north of S. Royal Brougham Way, the maximum height limits considered are:

- Alternative 1: 125 feet
- Alternative 2: 240 feet
- Alternative 3: 85 feet, but stepping up to 180 feet north of approximately S. Charles Street
- Alternative 4: 65 feet (no change)
- Preferred Alternative: 65 feet at the Interstate 90 off-ramp and points south, but stepping up to 160 feet north of the off-ramp to S. Dearborn Street.

The effects of these limits on projected future building development are shown on Figures 3-18, 3-19 and 3-19.A.

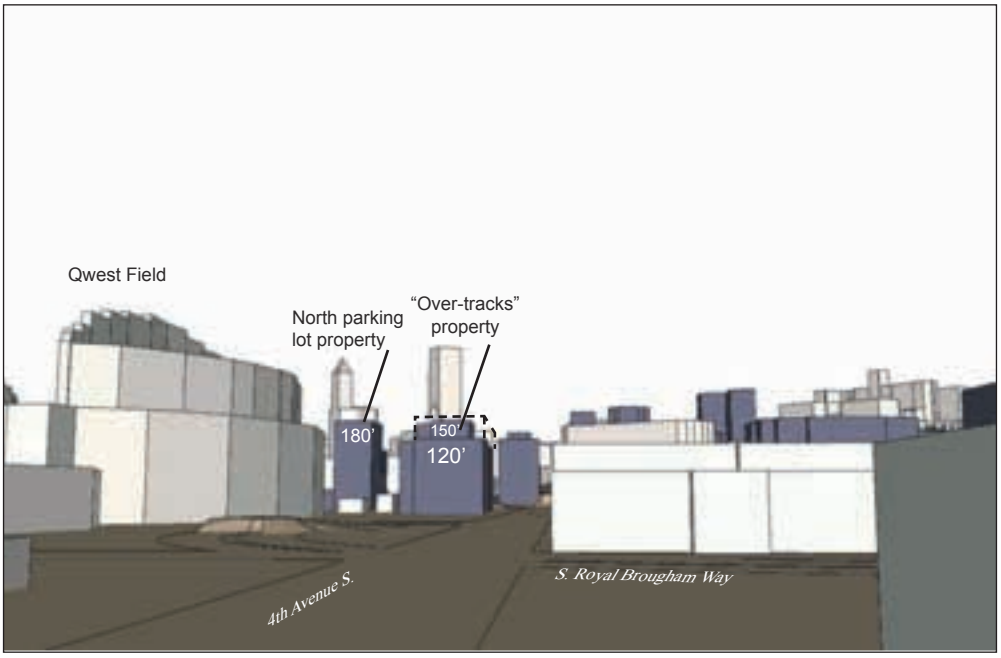
Along the 4th Avenue S. corridor north of S. Royal Brougham Way and south of S. Dearborn Street, Alternative 2 in the worst-case scenario could result in significant adverse height/bulk/scale impacts with future development ~~in a worst case scenario~~, due to the proposed height of 240 feet, increased density limits, and the resulting potential bulk and scale of development (see Figures 3-18 and 3-19). A related potential light/glare impact is also identified later in this section for Alternative 2, but not for the other alternatives.

For the other alternatives including the Preferred Alternative, no significant adverse height/bulk/scale impacts are identified along the west side of the 4th Avenue S. corridor south of S. Dearborn Street (see Figure 3-19.A). This conclusion is based on the lead agency's judgments, at a programmatic level of analysis, about how potential future buildings could physically and visually fit in along this corridor, in terms of the transition in building heights along the corridor, and the relationship to the scale of nearby existing buildings, most notably including Qwest Field. For the Preferred Alternative, the conclusion also considers the probable effect of bulk and density controls that are included in the proposal.

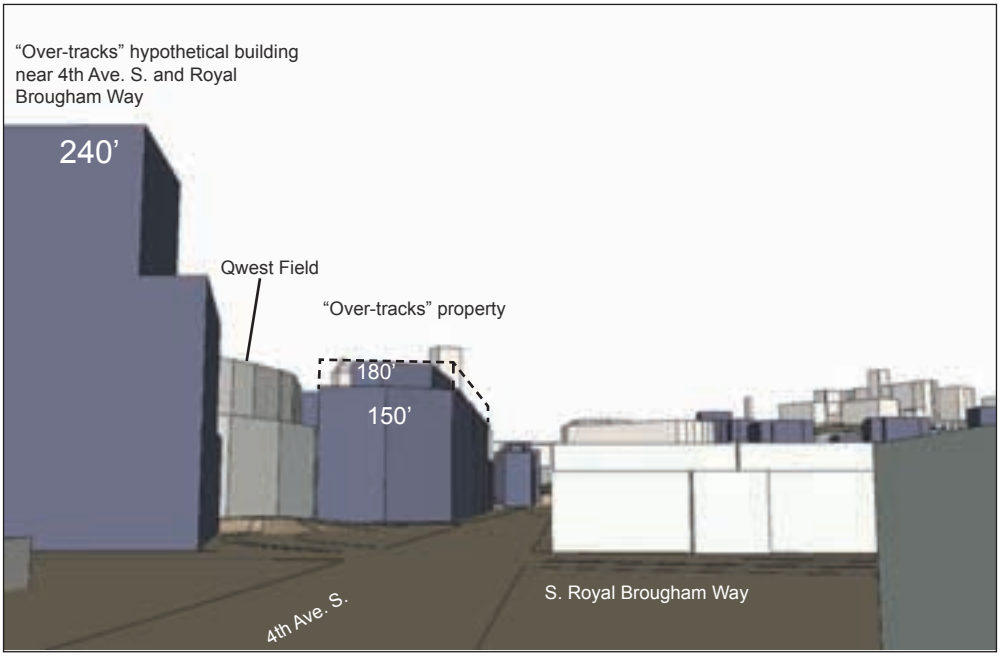
Alternative 4 – No Action

Under the No Action Alternative, with no changes in the regulatory environment, there would be no potential for height, bulk and scale impacts. Future potential development in the affected area would be required to fit within the current requirements of IC 65' zoning, or IC 85' zoning south of S. Atlantic Street. Many but perhaps not all possible future developments would undergo design review processes.

Alternative 1



Alternative 2



Note: Buildings shown represent hypothetical development. Dotted lines indicate a possible maximum "building envelope" defined by the height limit. Density limits and bulk controls would prevent filling the entire building envelope.

Figure 3-18

Hypothetical Height, Bulk at "Over-Tracks" Property, Looking North, Alternatives 1 and 2

Alternative 3

Note: Buildings shown represent hypothetical development. Dotted lines indicate a possible maximum "building envelope" defined by the height limit. Density limits and bulk controls would prevent filling the entire building envelope.

Alternative 4

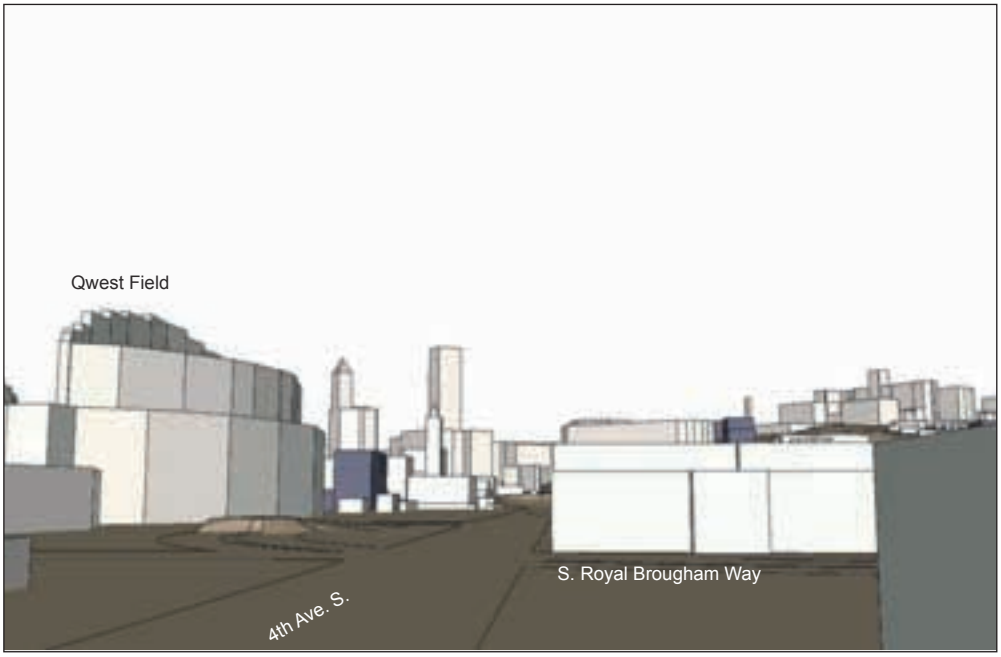
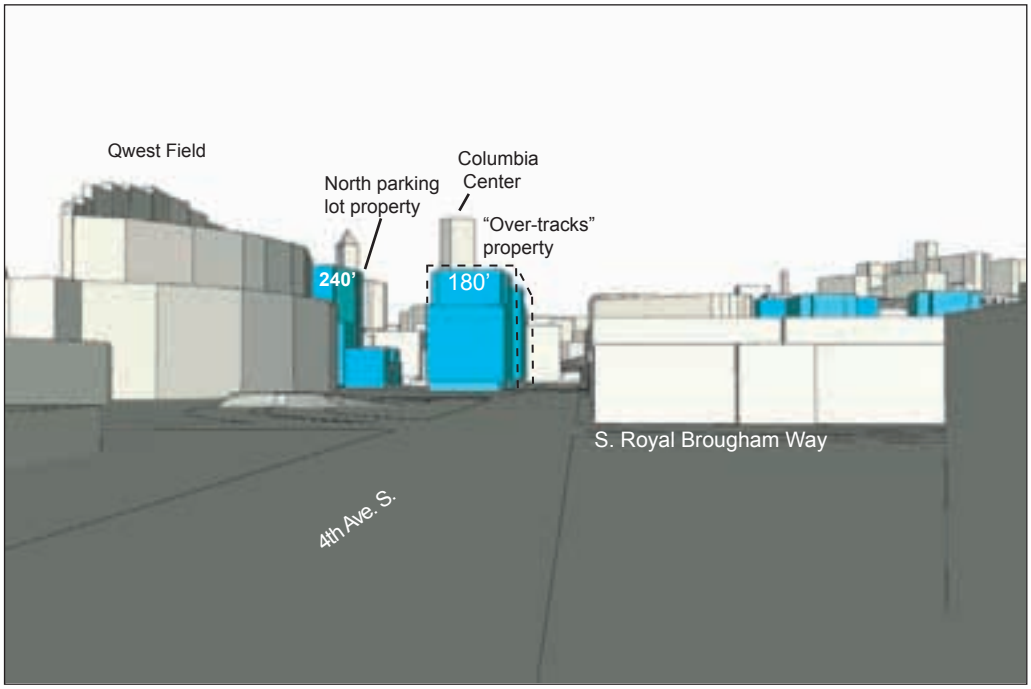


Figure 3-19

Hypothetical Height, Bulk at "Over-Tracks" Property, Looking North, Alternatives 3 and 4

Preferred Alternative



Note: Buildings shown represent hypothetical development. Dotted lines indicate a maximum worst-case "building envelope" defined by the height limit. Density limits and bulk controls would prevent filling the entire building envelope.

Figure 3-19.A

Hypothetical Height, Bulk at "Over-Tracks" Property, Looking North, Preferred Alternative

COMPATIBILITY

Land Use Patterns and Height Transitions

The evaluations of land use and height, bulk and scale impacts in Chapter 3 and Appendices A and B thoroughly describe several aspects of potential land use and zoning impacts that relate to compatibility. Please review those analyses for further discussion of compatibility topics.

Light, Glare and Shadows

Pioneer Square
No significant adverse light, glare or shadow impacts are identified for this vicinity under any of the alternatives. It is noted that event lighting for nighttime events at Qwest Field would continue to affect overall light levels in locations where existing and future residents would be located nearby to the north. While some residents nearby might find such lighting to be annoying, it is not known to be a source of complaints from other residents across the street from the north parking lot, and is interpreted to not represent a probable significant adverse compatibility impact. This vicinity does not contain any of the locations where shadow impacts may be mitigated in Downtown.

Chinatown/Japantown
There is minor potential for adverse glare and shadow impacts with future development in a few locations in this vicinity. However, due to the expected effectiveness of the neighborhood's special review processes, these potential impacts would not likely rise to a level of significant adverse impacts. Under any of the alternatives, new buildings in proximity to Interstate 5 could potentially be designed with glass and reflective surfaces that would generate glare in passing motorists' eyes at certain times of day. The areas where this might occur include: properties in Chinatown, Little Saigon and south-of-Dearborn nearest Interstate 5 and I-90 ramps, and the 6th/Yesler Way vicinity that is visible to southbound I-5 traffic. Adverse shadowing impacts could potentially occur on a segment of Danny Woo Gardens under any alternative if future development occurs on a property west of 6th Avenue S. and south of S. Washington Street. Also, due to proposed adjustments in the IDR 150' zone development regulations, there is a minor possibility of an additional adverse shadowing impact on Danny Woo Gardens if development occurs on one particular parcel at the southwest corner of 7th Avenue S. and ~~along~~ S. Main Street (see the response to comment #11 of Letter 13 in Chapter 4 of this Final EIS for further discussion). However, because the garden is already protected from adverse shadow impacts by city policy and special review processes, the potential for additional significant shadow impacts would either be avoided altogether or minimized by these future development review processes. No significant adverse light impacts are identified anywhere in this vicinity under any of the alternatives.

Little Saigon
No significant adverse light, glare or shadow impacts are identified for this vicinity under any of the alternatives. There is minor potential for adverse glare impacts, as identified in the discussion above on Chinatown/Japantown glare impacts. Also, under the Preferred Alternative, given a higher height limit along the S. Dearborn Street and S. Jackson Street corridors, there would be added potential for adverse but not "significant adverse" light, glare and shadow impacts. This ~~vicinity~~ study area does not include any identified significant shadow impact issues, nor any of the locations where shadow impacts may be mitigated in Downtown.

South-of-Dearborn
No significant adverse light, glare or shadow impacts are identified for this vicinity under any of the alternatives. There is minor potential for adverse glare impacts, as identified in the discussion above on Chinatown/Japantown glare impacts. This could potentially occur, depending upon the design of future

development on properties in general proximity to Interstate 5 or the Interstate 90 highway ramps. Future design review processes on project-specific development proposals could help avoid this potential glare impact. This vicinity, currently located outside the Downtown Urban Center, does not contain any identified significant shadow impact issues.

Stadium Area

Under Alternatives 1 and 3, the proposed zones would allow residential uses in the northern portion of the WOSCA property. Newly allowing such residential uses in an area subject to nearby port/industrial uses' light/glare could result in adverse compatibility impacts. Port facilities, located just to the west across SR 99 and Alaskan Way, include high-volume container transfer facilities that have the potential to contribute to adverse light/glare conditions if residential uses are present in this location. Night-time lighting and activities would be of most concern, as Port lighting would contribute to illumination levels that could affect residences facing toward the west. The severity of this impact would therefore depend on how residential uses would be situated on the affected property. If shielded by other buildings or other uses within the same building, the severity of the potential impact on residential uses would be lessened.

Other adverse glare impacts from passing vehicles on SR99 would be possible along this corridor, similar to those identified in the Chinatown/Japantown discussion above, under any alternative.

With respect to potential light/glare impacts affecting Safeco Field, the most important relationship for the functioning of the ballpark is the view from home plate toward center field (northeasterly) approximately toward a "gap" location where the left field stands end and the scoreboard-related structure begins. Through this gap is a view toward a stairwell on the parking garage to the north across S. Royal Brougham Way, but above this stairwell is sky area that potentially could be affected by tall buildings in the southern portion of the "over-tracks" vicinity. If a building was proposed above approximately 160 feet in height south of the current Interstate 90 off-ramp intersection with 4th Avenue S., there could be a worst-case potential for reflective glare. This might occur if building walls were glassy and directionally oriented such that late afternoon or early evening sunlight is reflected back toward home plate. Such a scenario could be possible under the zoning of Alternatives 1 and 2, which contemplate the possibility of buildings either 125 or 240 feet, respectively, but would not likely be possible under Alternatives 3, 4 or the Preferred Alternative due to lower proposed height limits. For the Preferred Alternative, analysis indicates that buildings at heights 160 feet or lower north of the Interstate 90 ramps would not likely be visible from the home plate area. Therefore, significant adverse light/glare compatibility impacts would not be probable under the Preferred Alternative. This considers the worst-case potential in building design and location under the Preferred Alternative. Under Alternatives 1 and 2, if such zoning is adopted south of the I-90 off-ramp, it would be logical for future site-specific SEPA reviews and design review processes to occur to prevent light/glare impacts from affecting sightlines from the homeplate area of Safeco Field. This would be an example of phased SEPA review. This is noted as a mitigation strategy for Alternatives 1 and 2, for which the identified impact is characterized as a "potential significant adverse light/glare impact."

No significant adverse shadow impacts are identified for this vicinity under any of the alternatives.

MITIGATION STRATEGIES

Pioneer Square

Alternatives 1 and 2

- For the Qwest Field north parking lot and "over-tracks" properties, to avoid potential significant adverse height/bulk/scale impacts, define bulk controls in greater detail for future possible development. Also, future development proposals should be evaluated according to Pioneer Square Preservation District guidelines that address building bulk.

Alternative 1

- In Pioneer Square, to mitigate potential significant adverse impacts on nearby historic-contributing structures under Alternative 1, define bulk controls in greater detail for future possible development to 180 feet on the "railroad gap" properties on the west side of 4th Avenue S. north of S. Jackson Street.

Alternative 2

- In the vicinity between 3rd and 4th Avenues S., rezones to a 150-foot maximum height could be limited only to the "railroad gap" areas abutting the west side of 4th Avenue S., or making the maximum height limit applicable only to properties without historic-contributing structures (as under the Preferred Alternative), would help to avoid direct impacts to properties with historic-contributing structures.

Alternative 3

- For the "over-tracks" property within the proposed SDM zone, the public process and subsequent design review process associated with the SDM zone should incorporate strategies to influence the arrangement of building bulk to avoid significant adverse height/bulk/scale impacts from the worst-case scenario.

Chinatown/Japantown

Alternative 1

- In the hilly vicinity along 6th Avenue south of Yesler Way, to avoid potential significant adverse height/bulk/scale impacts, define bulk controls in greater detail for future possible development (such as those recommended under the Preferred Alternative), or select a lower height limit than 240 feet.

Alternative 2

- In Chinatown, for an extension of a 125-foot height limit to the block bounded by 5th and 6th Avenues S. and S. King and S. Weller Streets, which is partly within the National Register Historic District, define bulk controls, relationships to the street-level environment and strategies to maintain compatibility with historic character in greater detail (such as those recommended under the Preferred Alternative).
- In Chinatown, consider avoiding rezone of properties, such as the Publix Hotel, that are currently within the National Register Historic District.

South-of-Dearborn

Alternative 2

- In order to avoid significant adverse height/bulk/scale impacts, rezones to an IC 160' zone could be avoided, the bulk control requirements applicable to future development could be specified in greater detail (such as those recommended under the Preferred Alternative), and/or design review processes could be better specified.

Alternative 3

- For the South-of-Dearborn vicinity within the proposed SDM zone, the public process and subsequent design review process associated with the SDM zone should incorporate strategies to influence the arrangement of building bulk to avoid significant adverse height/bulk/scale impacts from the worst-case scenario.

Stadium Area

Alternatives 1 and 3

- For the WOSCA property vicinity within the proposed SDM zone, the public process and subsequent design review process associated with the SDM zone should incorporate strategies to influence the arrangement of building bulk to avoid significant adverse height/bulk/scale impacts from the worst-case scenario.

Alternative 2

- In order to avoid significant adverse height/bulk/scale impacts, rezones to an IC 240' zone along the west side of 4th Avenue S. north of S. Royal Brougham Way could be avoided, the bulk control requirements applicable to future development could be specified in greater detail, and/or design review processes could be better specified.

Alternatives 1 and 2

- To address the potential for a significant adverse light/glare compatibility impact on baseball players' views from Safeco Field's home plate, related to potential glare from potential "over-tracks" building development locations south of the Interstate 90 off-ramp at 4th Avenue S., project-specific SEPA review for light/glare should be conducted if future development proposals are made at this location.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

With implementation of mitigation strategies to address the identified significant adverse height/bulk/scale and compatibility impacts of the alternatives, no significant unavoidable adverse impacts are expected to occur.

LAND USE—BUSINESS AND ECONOMIC IMPACTS

AFFECTED ENVIRONMENT

INTRODUCTION

A key issue identified during the South Downtown EIS scoping process involved the potential vulnerability of small businesses operating within the culturally-distinct neighborhoods of Chinatown/ I.D. and Little Saigon. Businesses throughout the Livable South Downtown study area (including in Pioneer Square and the Stadium Area) are important to the future vitality of South Downtown, and should be nurtured through private and public-sector efforts. However, small businesses in Chinatown/I.D. represent a unique economic and cultural resource that is potentially more susceptible to impacts related to Livable South Downtown zoning proposals and future development. Chinatown/I.D. business districts also face a number of challenges, such as language barriers, that are not present in other business areas of the city, as described below.

Project staff contracted with Strategic Economics and Trang D. Tu Consulting to examine potential business impacts associated with future zoning changes and impacts associated with development of the proposed Dearborn Street project (e.g., the proposed development on the Goodwill property). A copy of the consultant report can be found in Appendix C.

The consultants' business/economic study included three distinct business areas: the traditional Chinatown/I.D. core neighborhood area, Japantown businesses, and Little Saigon businesses located east of Interstate 5. Data were collected from public records, inventories and interviews in native languages. The study included the following evaluations:

- inventory of existing businesses
- impacts associated with alternative zoning proposals
- impacts relating to the prospective retail/mixed-use center on Dearborn Street
- case studies to learn from the experiences of comparable business districts in other cities, and
- identification of tools for strengthen the business districts

This section summarizes study findings and discusses mitigation strategies described by the consultants.

SUMMARIZED EVALUATION OF EXISTING CONDITIONS

Chinatown/International District, West of Interstate 5

The Chinatown/I.D. business district west of Interstate 5 is a diverse mix of over 300 business and 40 non-profit organizations in a ten-block area. The area features concentrations of Chinese and other Asian restaurants, alternative medicine shops, and key anchors such as Uwajimaya that create specialty niches with a regional draw.

- Approximately 79 restaurants, bakeries and cafés compose about 21% of the surveyed businesses.
- Approximately 15 or more Chinese medicine practitioners, acupuncturists, herbalist and herbal supplies stores comprise a second significant business cluster.

Decline of consumer-oriented businesses. Over the past ten years, inflation-adjusted revenues of consumer-oriented shopping district businesses have declined from $66 million to $41 million in 2006 dollars. Restaurant sales shrank by nearly a third of total revenues, while miscellaneous retail outlets lost

over $6 million in revenues.[1] The average tenure of existing restaurants and retailers is 12 years and 11 years respectively, which are lengthy life spans in these business sectors. While this testifies to the owners' tenacity, it also indicates that new Asian-American owned restaurants and retailers are not choosing to locate in Chinatown. While the 79 existing restaurants and 58 retailers are a regional attraction and major asset to the district, the ten-year declining revenue trend and the growth of other outlying Asian-American business districts poses a risk to the ongoing health of Chinatown's traditional businesses.

Growth in service sector businesses. Total inflation-adjusted business revenues in Chinatown grew from $202 million in 1997 to $358 million in 2006, with an average 8% annual growth rate. Service sector business revenues almost tripled between 1997 and 2006, growing from $88 million to $242 million. This growth was driven by business, legal and professional services' revenues, mainly reflecting office users near Union Station. The growing daytime office worker population provides the district's restaurants with lunch-time customers and could provide daily- or weekly-needs retailers with new local patrons, but also complicates the district's identity as a regional specialty shopping district. The health services sector also grew modestly but steadily. Eleven percent of surveyed commercial spaces were vacant.

Relatively low lease rates. Commercial lease rates vary widely, reflecting the diversity of age and condition of spaces in the Chinatown vicinity west of Interstate 5. Approximately one-quarter of surveyed businesses pay less than $1.00 per square foot per month, while one-third pay $1.00 - $1.50, one-quarter pay $1.50 - $2.00 and the remainder over $2.00. On average, retailers and consumer service providers currently pay lesser rent levels than it would take to occupy space in new storefronts created by new mixed-use development. Existing restaurants on average pay the minimum amenity rent ($1.50/SF/month). However, additional losses in restaurant revenues, if they occur over time, could undermine this.

Diverse customer base. Chinatown/I.D. businesses have diverse market orientations. Approximately two-thirds have a citywide, regional or extra-regional customer base. This includes restaurants that serve Downtown workers at lunch-time. The remaining one-third of businesses serve residents of the district and adjacent neighborhoods. The customer base also shifts from being more local-serving during the week to more regional-serving on the weekend. The majority of businesses serve customers of all ethnicities, with approximately 20% serving a pan-Asian customer base and another 20% serving specifically Chinese, Chinese-American, or Japanese-American clientele.

Examples of existing successful businesses. Businesses such as Uwajimaya and the Panama Hotel and Teahouse that have both specialty and mass appeal are well positioned to handle business trends over time, while maintaining neighborhood identity and regional appeal. Niche businesses that offer special goods or services unavailable elsewhere, such as the alternative health service practitioners and suppliers, and that excel at cultivating and serving their customer base should also continue to do well.

Little Saigon (East of Interstate 5)

Little Saigon is a specialty ethnic shopping district with approximately 175 businesses and 25 non-profit organizations, many clustered near S. Jackson Street and 12th Avenue S. The mainstays of the vicinity are its retail, restaurant, personal services and small office uses. Other businesses include industrial and wholesale businesses on S. King Street and S. Weller Street.

Business revenues increase. Total inflation-adjusted business revenues in Little Saigon increased from $76.5 million in 1997 to $96 million in 2006. The Little Saigon vicinity has a growing retail sector, with revenues growing modestly but steadily from $22 million in 1997 to $33 million in 2006. Retail growth was led by the expansion of groceries and specialty groceries in the area.

[1] Uwajimaya's revenues were likely not included in these sales data. While this negatively skews the retail trend, it also clarifies the trends in other area retailers' business.

By 2006 there were approximately 12 food stores in Little Saigon. The restaurant sub-sector, comprised of 35 restaurants, 24 of which are Vietnamese, has also grown steadily, doubling in revenues over the past ten years. Other sizable retail and personal service clusters, including jewelry (12 outlets) and hair and nail salons (19 outlets), grew steadily in total revenues from 1997 to the early 2000s, but then began to decline due to larger economic shifts, competition from other outlying districts, and possibly Little Saigon businesses undercutting each other due to increased competition.

Typical lease rates. Retail lease rates are at approximately $1.50 to $2.00 per square foot per month. This range of lease rates is both higher and more tightly defined than Chinatown, relating to greater similarity among spaces in type and age, largely within one and two-story strip commercial buildings. The business inventory identified that 19% of commercial spaces were vacant, but these were found mostly in the mixed industrial and residential blocks off of S. Jackson Street and do not necessarily reflect demand for retail and office space in the heart of the Little Saigon vicinity.

Diverse customer base. The customer base varies both ethnically and geographically by the type of business, a business' degree of mainstream exposure, and the proprietor's intentions regarding target market. Restaurants are split between those that have targeted a mass market audience versus older establishments that have continued to serve a largely Vietnamese-American clientele. Some business owners have observed that their customer base has become increasingly varied over time and that the regional Vietnamese-American clientele is now focused on weekends, similar to Chinatown's regional weekend draw.

Business decisions. Most businesses interviewed chose their Little Saigon location due to the low rents, proximity to other Vietnamese-American enterprises and a desire to serve a Vietnamese-American clientele. The majority of owners wish to expand their businesses and remain in Little Saigon, and several would prefer to own and develop property. Capacity for expansion varies depending on family and financial resources, level of business experience, strategic planning skills and training, and attitude toward risk.

In interviews with business proprietors, a majority of proprietors expressed concerns about several current issues they perceive as adversely affecting their customer base, including:

- Narrow profit margins, leading to an inability to raise prices due to neighborhood competition;
- Parking limitations and traffic volumes (regarding peak hours, stadium game days, lunchtime, ineffective management of private lots, public construction periods);
- Public safety and security (panhandling, employees' safety at night, break-ins, drug dealing);
- A need for physical improvements in the neighborhood (street and sidewalk repairs and improvements, sanitation, pedestrian amenities, more street lighting).

ENVIRONMENTAL IMPACTS

The consultants' study in Appendix C to this Draft EIS provides an assessment of business and economic-related impacts resulting from the Dearborn Street Project and from potential Livable South Downtown rezones. The study also addresses related mitigation strategies. The overall approach is meant to more broadly address community development concerns and needs, rather than being strictly confined to an EIS impact analysis methodology. This yields results that should be helpful to all parties seeking long-term enhancement of the business districts in the Little Saigon and Chinatown/I.D. neighborhoods.

The consultants divided potential impacts into three categories:

- High Probability Impacts
- ~~Low Probability "Speculative"~~ Less Probable Impacts
- Issues of Note raised by DPD staff and/or community stakeholders.

The terminology suggests differing levels of certainty about impact conclusions and their relative level of significance. While an emphasis is placed on identifying adverse impacts in this discussion, the consultants also identified potentially positive impacts. Positive outcomes would be influenced by future decisions by businesses and public entities.

High Probability Impacts

Four high probability impacts are expected to affect local business. While the consultants determined that these future scenarios are probable, they may not immediately affect business operations. The consultant study organizes the potential business impacts into four categories:

- *Direct* – immediately intervening in the normal conduct of business;
- *Indirect* – impelling some further change that affects businesses;
- *Exacerbating* – contributing to a change that is already taking place.

Further, the consultant study acknowledges differing levels of magnitude for the potential changes. The consultants describe the impacts by levels of severity – "*low*", "*medium*" or "*high*" – to indicate intensity of impact on affected businesses.

1) "High Probability" impacts on light industrial businesses in Little Saigon from the Dearborn Street project and proposed rezones: Inconvenience to and eventual displacement of production, distribution and repair businesses along north side of S. Weller Street and on S. King Street between 12th Avenue S. and Rainier Avenue S.

Rezones to either NC3 85' or DMR 125', and the 550 dwelling units associated with the Dearborn Street project, would open the area to residential development and result in the likely displacement of existing light industrial businesses. This represents the most direct and severe impact likely to result from the Livable South Downtown and Dearborn Street proposals.

Proposed zoning would likely result in higher land values and encourage redevelopment of existing industrial parcels to residential or mixed use. Development of the proposed Dearborn Street project would hasten this change on S. Weller Street by introducing housing units and small-scale retailers that would begin to change the overall character of the street from industrial to a residential and retail shopping neighborhood. The new pedestrian and vehicular activity generated by the Dearborn Street project would likely impede truck traffic in and out of the industrial businesses, which is a critical aspect of distribution, and residents living in units facing S. Weller Street would likely express a desire to minimize or remove adverse industrial business externalities such as noise and diesel fumes.

Over time, the repair businesses on S. King Street would likely relocate out of the area, although this transition would be more gradual, given that the area is already mixed and these businesses are already accustomed to coexisting with residential and retail uses. The change in the land value and its development potential, however, is likely to result in the movement of these businesses over time.

The severity of the impact to existing businesses is designated as "high" due to the high cost of business relocation. For tenant businesses, relocation would depend on the availability of appropriate industrial space elsewhere and, for distribution businesses, the proximity to customers. For example, two of the

active businesses on S. Weller Street appear to be Asian food suppliers that may supply local restaurants and benefit from this property's proximity in the neighborhood.

EIS Alternatives Comparison: Alternatives 1, 2, ~~and~~ 3, and the Preferred Alternative represent a similar type and severity of impacts. Under the No Action Alternative, if the Dearborn Street project site was rezoned to a non-industrial zone, the impacts also would be similar. Under the existing IC zone, trends away from the existing business patterns could still occur over time.

Table 3-1
Overview Summary of Impact #1

Direct Impact Pedestrian and vehicular traffic interference with conduct of production and distribution businesses; new residents would object to industrial business activity; major change in land value would encourage land sale for mixed use/residential development	Number of businesses: 7 to 8 Severity: High Displacement of industrial uses over time. Relocation would be expensive and inconvenient. For businesses that own property, the financial benefits of a significant increase in land value would mitigate the disturbance of moving; for tenants, the level of negative impact depends on availability of industrial land or space elsewhere.	Timeframe: 6 to 12 years Residential occupation of the Dearborn project is likely to take at least 2 to 3 years; development of other nearby rezoned properties is likely to wait for signs that the Dearborn Project is financially successful.

2) "High Probability" impacts on businesses in Little Saigon from potential rezones: Increased height limit from 65 feet to 85 feet or 125 feet would modestly increase the potential value of land. This could speed new development, resulting in displacement of existing businesses.

Due to existing zoned development capacity, businesses in other portions of Little Saigon (those not addressed by Impact #1 discussed above) already face potential displacement from future mixed-use development. The prospective increase in zoned development capacity would play only a modest role in spurring new development in the area. This is based on a comparison of the considerable amount of unused existing development potential under current zoning and the limited degree to which proposed zoning alternatives would improve development feasibility.

The emergent residential market in Chinatown, prospective Yesler Terrace redevelopment, streetcar expansion, and the proposed residential uses in the Dearborn Street project would begin to change a perception of Little Saigon as unable to support housing. As adjacent mixed-use and residential projects proceed and generate market momentum, Little Saigon's development potential and proximity to Downtown should increase its attractiveness to real estate equity investors and, over time, the area should see increased development interest. It is the confluence of these factors above and beyond the alternative zoning changes that would likely create a transformation of the area over time.

The current lease rates in Little Saigon are at a sufficient rent level to support the development cost of new ground-floor retail space in mixed-use buildings, particularly if the retail is regarded as an amenity to residential units in upper stories. New development may or may not seek to retain existing small businesses in new space. Regardless, displaced businesses would have to relocate during demolition and construction, a considerable business interruption that often leads small businesses to permanently relocate elsewhere. Because the majority of shopping district businesses do not own their properties, many businesses would likely relocate as the area redevelops unless retention strategies are pursued. While this overall redevelopment dynamic may have significant consequences for existing businesses, proposed rezones are likely to play only a small role in spurring this transition. Because the existing

zoned development capacity and general market momentum are more important factors, the severity of the impact of the proposed alternative height changes is identified as "low."

EIS Alternatives Comparison: The role of the proposed zoning changes in attracting development is likely to be modest, "contributing" to development momentum rather than "spurring" it. Under Alternative 1 and 3 height increases to 85 feet, there could be increases in development feasibility of about 1% to 7% in returns on cost, resulting in returns of 15% and 38% for apartments and condominium projects, respectively. Under Alternatives 2 and the Preferred Alternative, a concrete-and-steel development to 125 feet would result in a lesser return on cost (29-30%) than what is possible with current zoning. The additional height provided in Alternative 2 and the Preferred Alternative therefore might not act as a sufficient incentive for the additional investment that would be required for taller development. The zoning changes for Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative thus would, at most, modestly increase the profitability of potential development. Given that market momentum is the more critical factor for spurring development, this is designated as an "exacerbating" impact.

Table 3-2
Overview Summary of Impact #2

Exacerbating Impact Existing businesses in Little Saigon would likely be displaced by multi-story mixed-use development over time. Residential and office uses are currently allowed in existing C1 and NC3 zones. All areas of Little Saigon proposed for rezone already have significant additional development potential under current zoning and will develop in the future based more on market momentum than allowance of modest additional development envelope.	Number of businesses impacted: 65 to 130, depending on alternative Severity: Low The role of the proposed rezone, in and of itself, in spurring new development would be modest.	Time frame: 6 to 12 years; 13+ years

3) "High Probability" impact of ethnic niche retailers and restaurants in Little Saigon exposed to mass market customer base.

The Dearborn Street project would bring an expanded volume and diversity of central city mass market customers into the area. The proposed project includes an approximately 650,000 square foot daily/weekly needs shopping center, which would bring a new mass-market central city shopper demographic into the vicinity. Little Saigon businesses that currently cater to a largely Vietnamese-American and Asian-American sub-market would be exposed to both vehicular and pedestrian traffic generated by the project, and would have an increased potential for a mass market customer base. This offers businesses an opportunity for expansion but could also dilute the district's existing niche orientation and displace specialty businesses that do not adapt.

As an indirect effect, the Dearborn Street project would bring many new shoppers into the Little Saigon vicinity, with potential "spillover" effects, positive or adverse, influenced by the following factors.

A. *Consumer behavior of existing customers.* Little Saigon currently has limited parking capacity particularly during weekends that probably affects total customer volumes. Perceived or actual increases in traffic congestion and parking constraints could further affect customer choices, including regional shoppers. Given competition from outlying business districts, these sensitivities to parking availability mean Little Saigon is vulnerable to customer loss with added parking pressures.

B. *Consumer behavior of potential new customers.* If potential new customers travel from the Dearborn Street project to Little Saigon, this could create a positive impact on area businesses. However, this would depend on whether customer preferences and needs are aligned with Little Saigon offerings, as well as walkable, pleasant streetscapes and pedestrian connections. The garage availability and the range of likely consumer purchases at the Dearborn Street shopping center reduce the likelihood of parking on-street in Little Saigon.[2] More likely, Dearborn center shoppers would need to walk to Little Saigon while leaving cars parked at the Dearborn shopping center, or park a second time in Little Saigon. Both of these patterns are considered to be a challenge by the retail industry.

C. *Capacity and interest of individual businesses.* Whether Little Saigon businesses would benefit from increased mass market customers depends on both the capacity and interest of individual businesses. The consultants' business survey of Little Saigon businesses provides some insight. Three of 14 interviewees currently serve a highly diverse customer base, and the majority (10) expressed a strong desire to expand. However, based on the interviews, nearly all businesses lacked sufficient "capacity" (defined by a business possessing the financial resources, human resources, and technical abilities) to align their business model to serve a mass market clientele. Additionally, for some businesses, it may not be possible to both serve existing ethnic markets and a broader audience. See Appendix C for further discussion of this topic.

Based on the foregoing analysis, the impact is considered to be "indirect" and the overall impact of increased mass market customers on Little Saigon businesses is likely to be "low to moderate." If a reduction in the availability of the limited parking capacity in Little Saigon occurred, it would be a probable significant driver of decline in patronage by existing customers. However, it is unlikely that Dearborn Street project shoppers would park in Little Saigon, so the potential overall impact on current customer traffic is identified as a "low negative effect." At the same time, the overall new customers generated by the Dearborn Street project are likely to provide "low to moderate positive effects" on Little Saigon businesses—limited by current barriers to pedestrian travel between the project and the core of the Little Saigon business district, and a mis-alignment between current Little Saigon businesses' offerings and probable preferences of the new shopping center's customers. Finally, Little Saigon businesses currently have low capacity overall to effectively cater to a broader market.

EIS Alternatives Comparison: This impact would occur at similar levels for Alternatives 1, 2, ~~and~~ 3, and the Preferred Alternative. For the No Action Alternative, a shopping center is not assumed to be built. Therefore, the variety of impacts identified in this discussion would not likely occur.

Table 3-3
Overview Summary of Impact #3

Indirect Impact	Number of Businesses: Uncertain Severity: Low to moderate severity with a potential for adverse or positive impact	Time frame: 1 to 5 years
The Dearborn Street project would create a greater mass market opportunity for local businesses. Businesses may change to cater to an expanded local market or remain focused on a regional niche. The impact could be positive or negative depending on the individual business.	The number of businesses affected and severity of impact would depend on behavior of existing and potential customers, and capacity and interest of individual businesses. Businesses would have to actively pursue and target mass market in order to yield positive impacts.	

[2] The retail component of the Dearborn Street project is a daily/weekly needs shopping center anchored by a mass merchandiser, hardware chain, and supermarket. Shopping trips to the center would most typically involve purchase of items transported in a shopping cart, or even dolly, and customers would shop elsewhere rather than park multiple blocks away and carry multiple heavy or awkward items back up-hill to their vehicles on a regular basis.

4) "High Probability" impact of increased property values in Japantown area as a result of potential rezones: An increase in the potential value for new residential development with additional allowable height in Japantown (S. Jackson St. to Yesler Way, and near 4th Ave. S. and 5th Ave. S.).

Existing businesses in older buildings not within the National Register Historic District, in the three-block area between S. Jackson Street and Yesler Way, and between 4th and 5th Avenues S. would likely be displaced by redevelopment, spurred by the proposed increase in allowable heights from 120 feet to 180 or 240 feet (varies by alternative, with the highest under Alternative 1 and the Preferred Alternative). These include a few small-scale lounges, food stores, and restaurants. Alternative zoning changes would improve development feasibility sufficiently to spur new development.

Increased height limits would improve returns on cost for a prototypical condominium development, from 30% up to 35% or 43% for 180-foot and 240-foot development, respectively. Given existing market momentum in the vicinity, additional development could occur. The single-story concrete buildings at 4th Avenue S. and S. Main Street are likely to redevelop under proposed zoning alternatives. These businesses would likely be permanently displaced given the inconvenience of relocation. The degree of impact on the businesses depends on the availability of other viable space nearby.

EIS Alternatives Comparison: Alternative 1 and the Preferred Alternative include increases to a maximum of 240 feet in height; Alternatives 2 and 3 include increases to a maximum of 180 feet in height. Impacts would be similar, with a higher height limit potentially providing a greater incentive for redevelopment.

Table 3-4
Overview Summary of Impact #4

Direct Impact A height change to 240 feet increases development's return on cost by approximately 13%; a change to 180 feet increases return by 5.4%. This would be enough of an increase to spur new development given current favorable market conditions.	Number of Businesses: 4 to 8 Severity: Medium Businesses in existing buildings that are redeveloped would likely be displaced permanently. Impact on business depends on availability of space elsewhere in Chinatown.	Timeframe: 6 to 12 years Current issues with condominium liability may delay residential development activity.

~~Low Probability "Speculative"~~ Less Probable Impacts

Additional potential impacts cannot be predicted with certainty, or the outcome is difficult to predict. These are identified, with a greater level of uncertainty, as ~~"speculative"~~ impacts with a lower probability of occurring than other identified impacts.

1) Greater amount of non-ethnic retail Chinatown/I.D./Little Saigon as a result of rezones and general market expansion: Proposed land use changes and an increase in allowed height attract new development, leading to new residents and workers that create demand for non-ethnic local-serving retailers. Non-ethnic retailers either dilute or revitalize existing businesses.

Depending on the subarea, the alternative zoning changes would have either a modest or a more significant role in attracting residential development to the study area. Over time, new residential projects in both parts of the Chinatown/I.D. neighborhood are likely to result in sufficient local population to

support non-specialty neighborhood-serving retailers. Demand for space from neighborhood-serving retailers could result in either increased lease rates or development of new retail space. The presence of new neighborhood-serving retailers could invigorate the districts, expanding the customer base and creating additional opportunity for existing retailers, or it could dilute their uniqueness and ability to draw customers shopping for specialty goods from across the region. The ~~speculative~~ potential for this impact is somewhat different for Chinatown/Japantown and Little Saigon due to the differences in business conditions.

Chinatown/Japantown: Ten-year downward revenue trends in food stores, restaurants and miscellaneous retail (except for Uwajimaya) pre-date recent residential development. This suggests that existing ethnic niche stores may be struggling. The most important likely cause is other Asian specialty districts outside of central Seattle that have newer space, cheaper rent and easier access. Given the changing role of the Chinatown/I.D. shopping district in the region, an increased neighborhood resident population and associated customer base may be an opportunity that would help existing businesses. Serving local resident needs would probably require adjustments in Chinatown/Japantown businesses' strategies.

Little Saigon: In contrast to Chinatown/Japantown, Little Saigon's retail sector has expanded since 1997, in particular, food stores and restaurants. While the area also faces competition from outlying Asian business districts, the district as a whole seems to be succeeding as a regional destination. A local, diverse customer base, and its potential for supporting non-specialty stores, may therefore have more potential for negative business effects in Little Saigon than in Chinatown/Japantown.

2) More regional retailers on Rainier Avenue S. as a result of the Dearborn Street Project: Success of the proposed Dearborn Street project could attract additional major retailers to undeveloped properties on Rainier Avenue S. Additional mass market retailers adjacent to Little Saigon could increase retail rent and/or the rate of property development in the area.

Currently industrially zoned parcels between the Dearborn Street Project and Little Saigon could potentially attract medium- or large-format mass-market retail uses. If this occurred, it could place additional rent and development pressure on properties near Rainier Avenue S. and S. Jackson Street in the immediate vicinity. Access and visibility factors for major retailers may mean that such retailers would be attracted to sites on Rainier Avenue S., given its daily traffic and accessibility to I-90, or on S. Dearborn Street, given its accessibility to I-5 (although viable sites on this street may be limited). Slopes on Rainier Avenue S. properties might detract from their development prospects, however.

3) Modest increase in property values in the S. Jackson Street business area as a result of rezones: Proposed rezoning could increase property values modestly, making it slightly more difficult for existing business owners to purchase properties as desired.

Proposed changes in height limits, to 85 feet along S. Jackson Street and/or to 125 feet south of S. Jackson Street (in Alternative 2 and the Preferred Alternative), and along the S. Jackson Street corridor under the Preferred Alternative, would have a modestly positive effect on the feasibility of development in that area. This slight increase in profitability may also translate into higher property owner expectations regarding land value. Currently, interviews suggest the asking price for properties may be too high for most business owners to purchase.

Issues of Note

Input from community stakeholders and DPD staff suggested review of two "issues of note." The consultants evaluated these potential impacts and determined that, in and of themselves, they are not likely to adversely affect existing businesses.

1) Impact of up-zones in the Chinatown core vicinity

The area south of S. Weller Street in the core of Chinatown west of I-5 is currently zoned IDM 75'/85', with alternative proposals for increases in height up to 125 feet, or up to 150 feet under the Preferred Alternative. A number of properties are underutilized in this vicinity under current zoning, and some mixed use developments to approximately 85 feet in height have occurred in the recent past.

According to the financial analysis performed by Property Counselors and BHC Consultants, a project developed under existing zoning would provide a higher percent return on costs than would a building built to 125 feet. This is due to more expensive building materials and construction methods, and projected sales prices. While a 125-foot development project would be financially feasible, according to the projections provided in this analysis, the return on costs would not likely justify the increased investment required to build the taller building. This would mean the zoning alternatives to 125 feet would be relatively unlikely to result in a future development condition that is maximized to 125 feet. Accordingly, there is only a low potential for significant secondary adverse impacts on existing local businesses per the consultants' analysis. With a 150-foot height limit under the Preferred Alternative, future development would likely become feasible more quickly than under a 125-foot scenario. This might hasten the pace of future infill development outside the Chinatown National Register historic core, such as in the area south of S. Weller Street, although the extent of quickened development is not predictable and would depend upon broader citywide and Downtown economic trends. In the worst case, there would be only a slight potential for a secondary and indirect effect of that development on nearby rent levels in storefronts in the Chinatown historic core. Many other factors would play a more important role in determining whether rent increases in the Chinatown historic core could occur, such as ownership capacity, general market trends, willingness-to-pay and interest of tenants, and ability to make needed investments in storefront space. Due to a scarcity of evidence, no finding of an adverse impact is made.

2) Impact of the Dearborn Street project on Chinatown businesses west of I-5, in light of Chinatown business revenue trends

Potential impacts of the Dearborn Street project on Chinatown businesses were cited as a concern by stakeholders, given a ten-year downward retail revenue trend. However, the product offerings and the market orientation of existing Chinatown businesses are markedly different than those of the Dearborn Street project. The Chinatown shopping district is dominated by Asian restaurants, with significant clusters in grocery, specialty gifts and alternative medicine. Additionally, two-thirds of all business owners surveyed described their market orientation as citywide, regional or supra-regional. In contrast, the retail component of the Dearborn Street project is intended to be a central city-serving mass market daily and weekly needs shopping center anchored by a general merchandiser, hardware and building material supplier, and major mid-market supermarket. This means there is little competitive overlap between the Chinatown district and the proposed shopping center. It is therefore unlikely that the center would negatively affect existing retailers' business in Chinatown.

3) Competitive overlap between Little Saigon and the Dearborn Street Project

The consultant team assessed the likely overlaps and distinctions between the types of goods and services in the proposed Dearborn Street project and existing businesses in Little Saigon. Overall, the range of retailers at the proposed Dearborn Street project would be complementary to Little Saigon, with few that would directly compete with offerings in the Little Saigon business district. The Dearborn Street project's shopping center would draw upon a broader market than Little Saigon due to its retail mix of large anchor stores with national reputations and diverse mix of goods and services. In a few product

areas there would be some overlap: jewelry, general merchandise, grocery, electronics and clothing. However, the product lines and brands offered would be quite different. Store format and customer service provided by Little Saigon businesses target an Asian American and Pacific Islander clientele, particularly Vietnamese-Americans. The majority of businesses at the Dearborn Street project would serve a different target market. See Appendix C for additional details of the competitive overlap.

MITIGATION STRATEGIES

The analysis describes a variety of adverse impacts with differing levels of significance, as well as some potentially positive implications of growth and change over time. Some of the potential adverse impacts are more likely to be attributable to broad changes in development trends over time, with only indirect or ~~speculative~~ tenuous relationships to the alternative zoning proposals. This programmatic EIS notes the relative lack of firmly-concluded significant adverse impacts that would require implementation of mitigation strategies. At the same time, the relative sensitivity to change of the business communities in this neighborhood is noted, as well as their value in establishing a foundation for community life.

The consultants identified mitigation strategies that can be pursued by both public and private entities. The following discussion summarizes a mix of such strategies tailored to the needs and opportunities within the Chinatown/I.D. and Little Saigon vicinities. Strategies are organized according to their effect on the entire neighborhood, areas west of Interstate 5, and areas east of Interstate 5. A more complete discussion of the strategies can be found in the consultant report in Appendix C to this DEIS.

POSSIBLE MITIGATION STRATEGIES

Strategies for the Entire Neighborhood

1) Asian-Pacific Islander Small Business Technical Assistance Initiative

Existing ethnic businesses in Chinatown/I.D. and Little Saigon could benefit from assistance to adapt to the challenge of competition from outlying Asian-Pacific Islander business districts. Assistance could help businesses to either take advantage of prospective new customer base in the area, or sharpen existing regional niches. Business technical assistance takes many forms, such as: business planning, procuring financing, tax and labor laws advice, book-keeping skills, merchandising, and marketing and window display design.

2) Regulatory Mechanisms

Three categories of regulatory mechanisms could support community-oriented objectives:

A. *Zoning and land use regulatory protections.*

Development standards could contribute to business district character, walkability and pedestrian appeal in the following ways:

- Tailor the physical dimensions relating to street frontages, ground-floor retail requirements, minimum ground-floor ceiling heights, maximum size of individual retail uses, and location and size of vehicle accesses, in targeted areas such as near 12th and Jackson.
- Create or refine signage districts
- Restrictions on businesses with multiple outlets or formula business plans

B. *Code enforcement*

These areas are often subject to code violations related to garbage disposal, dumpster location, cleanliness of sidewalks, inappropriate uses, and sidewalk vending that is not fully City-authorized

and without uniform guidelines. These may weaken attractiveness to customers and neighborhood vitality.

- A combined approach with creative, targeted outreach for stakeholder education and buy-in to code intent, and increased code enforcement
- Address inappropriate uses on vacant and underutilized properties (e.g. storing old cars)
- Develop guidelines to provide uniformity and organization to vending activity in street rights-of-way.

C. *Public safety*

- Increased policing to improve public safety and security
- Unification of Little Saigon and Chinatown/I.D. areas under one police precinct

3) Community Development Financing Tools

Community development financing tools could be applied to Chinatown/I.D. and Little Saigon such as local improvement assessment districts (LIDs), impact fees, tax increment financing, community renewal designations, Preservation and Development Authorities (PDAs), and Business Improvement Areas (BIAs). See Appendix C (Phase III) for additional discussion of these tools.

4) Philanthropic Resources

Explore philanthropic resources for their potential support. These might, for example, provide seed funds for organization-building purposes.

Strategies for Chinatown/I.D.

1) Retail Tenant Strategy

New retail tenants could be recruited for future mixed-use development to help maintain the cultural integrity and independent business character of Chinatown/I.D.

2) Community Identity and Promotions

Efforts to promote the district could be honed and expanded to better target and reach broader audiences. Support could be provided to the CIDBIA to carry out a program of community branding.

3) Historic TDRs

Proceeds from TDR programs could support historic buildings within the International Special Review District (see the Housing section in this chapter for further discussion).

Strategies for Little Saigon

1) Inter-agency Initiative

The Little Saigon business district would benefit from collaboration among various agencies to conduct economic planning in Little Saigon. Further discussion on this topic can be found in the appendices to this report.

2) Targeted Outreach and Vision Building

In concert with Little Saigon Strategy 1, a targeted outreach and vision building effort is recommended for Little Saigon, seeking to build organizational capacity and support for economic planning initiatives.

3) Business Ownership Initiative

Exploration of a "commercial-condominium" form of business development could facilitate property ownership opportunities for local businesses.

4) Community Financing Tools
Business Improvement Associations (BIAs) and Public Development Authorities (PDAs) are among the financing tools that could apply to Little Saigon.

5) Business Incentives
The impact analysis notes the potential for existing businesses in Little Saigon to experience adverse impacts from various sources of future change. Adverse impacts could include temporary or permanent increases in rent, and possibly displacement by future development. Programs to support businesses in the face of potential challenges could include waiving business and occupancy taxes during critical periods of adverse impacts on businesses, and renewing the City's façade improvement program.

6) Physical Improvements
Improvements to the physical environment of Little Saigon would significantly contribute to the customer appeal of the business district, and enhance the livability and workability of the area. Among a wide-ranging set of possibilities, two specific strategies are described as:

- Follow through with Sound Transit trolley plans on S. Jackson Street, connecting to Broadway.[3]
- Explore urban design concepts, perhaps informed by San Francisco's "Living Streets" streetscape improvements, including significant sidewalk widening; adding pocket parks, plaza spaces, decorative paving, lighting, seating, and trees; and exploring urban design options for breaking up large block sizes.

7) Leverage Private Investment
- Several potential private and public developments in and near Little Saigon provide leveraging opportunities for community-oriented development, including the proposed Dearborn Street Project and the redevelopment of Yesler Terrace.

8) Asian-Pacific Islander-Oriented Senior Housing
The development of senior housing could provide a social, cultural, and economic foundation for the neighborhood. Within ethnic communities, elders often have the strongest affinities for proximity to ethnically-based stores, services, and community social and cultural activities. These affinities arise from attachments to cultural traditions, language barriers and mobility limitations. Community elders also provide connections to authentic culture and traditions.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Inconvenience to and eventual displacement of production, distribution and repair businesses along the north side of S. Weller Street and on S. King Street between 12th Avenue S. and Rainier Avenue S. is the most probable and severe impact to existing businesses in the Little Saigon neighborhood.

[3] Sound Transit. "First Hill Transit Connector Alternatives Summary Report." Seattle: April 17, 2007.

RELATIONSHIP TO PLANS AND POLICIES

OVERVIEW OF KEY PLANS, POLICIES AND CODES

Seattle's **Comprehensive Plan**, *"Toward a Sustainable Seattle,"* was initially adopted in July 1994. The Plan is amended annually and was updated in 2004. It is a 20-year policy plan that articulates a flexible framework for adapting to real conditions over time, and includes 20-year growth targets for urban centers and villages. The Comprehensive Plan satisfies requirements of the State's Growth Management Act and fits within King County's framework of Countywide Planning Policies. The Urban Center designation for Downtown, which includes the Pioneer Square and Chinatown/I.D. Urban Center Villages in South Downtown, is part of the regional growth strategy outlined in the Countywide Planning Policies calling for the concentration of a significant share of the region's employment and housing growth within a limited number of urban centers linked together by high capacity transit service. Some areas on the southern periphery of the South Downtown study area are within the Greater Duwamish Manufacturing and Industrial Center (MIC), another Comprehensive Plan designation intended to promote the economic viability of Seattle's industrial areas. The City's Comprehensive Plan also includes numerous land use policies that help define the basis for the City's zoning and Land Use Code regulations.

Following adoption of the City's Comprehensive Plan, approximately 37 **neighborhood plans** were prepared in the late 1990s to address future conditions in and around urban centers and villages. Neighborhood plans were prepared for two areas within South Downtown: Pioneer Square and Chinatown/International District. Portions of the South Downtown study area are also addressed in the Greater Duwamish Manufacturing and Industrial Center Plan, and the Central Area's neighborhood plan (east of Rainier Avenue S.). For each neighborhood, recommendations were formulated into land use policies that are expressed in the City's Comprehensive Plan.

The **Land Use Code** contains land use regulations organized through zone designations. Requirements for future development are associated with each zone. These include types of uses allowed or prohibited, setbacks, allowable heights and densities, and parking requirements among others. In some cases, overlay areas are established to modify the standards of the base zoning to better address development objectives in a specific area. Applications for development are reviewed through the City's Master Use Permit (MUP) process, and often go through a design review process that provides for public input on project design. In South Downtown, two special review districts—the Pioneer Square Preservation District and the International Special Review District—provide additional requirements and require additional project review by a volunteer review board. The intention of these additional requirements is to protect and promote the special historic, architectural and cultural qualities of these areas.

SEATTLE'S COMPREHENSIVE PLAN

Core values upheld by the Comprehensive Plan are: community, environmental stewardship, economic opportunity and security, and social equity. The unifying goal of the Comprehensive Plan is: "to preserve the best qualities of Seattle's distinct neighborhoods while responding positively and creatively to the pressures of change and growth."

The Plan's overarching growth theme is the Urban Village strategy that directs most new development to several defined growth centers of various sizes. The Urban Village growth strategy indicates four categories of growth centers:

- ***Urban Centers***—regional centers that are the densest neighborhoods, with diverse mixes of uses
- ***Manufacturing/Industrial Centers***—regional centers of industry

- ***Hub Urban Villages***—neighborhoods with balanced housing and employment, less dense than and located away from urban centers
- ***Residential Urban Villages***—neighborhood growth areas that are a focus of goods and services for residents and local vicinities, but may not provide employment concentrations

RELATIONSHIP OF LIVABLE SOUTH DOWNTOWN PLANNING

Comprehensive planning requires a big-picture perspective, examining how actions relate to a citywide growth strategy, how the functionality of many city systems can be assured, and how the citizens' needs will be served as growth occurs. The relationship of Livable South Downtown planning to the Comprehensive Plan can be examined from a big-picture perspective. For example: how does it relate to the City's overall growth strategy, the economy, infrastructure needs, citizen needs, and environment?

Growth Strategies and Definition of Growth Centers

Observations:

- Livable South Downtown planning's EIS alternatives and the broad directions of its recommendations are supportive of the city's Urban Village growth strategy, with caveats as noted in the following observations and accompanying bullet points:
  - Recommended zoning would provide for greater land use efficiency within the Downtown Urban Center through denser future infill growth
  - Recommended zoning would provide for more efficient use of utility and transportation systems, which can accommodate projected growth assuming that transportation systems are expanded as planned and that further impact-mitigating actions are taken if or when significantly adverse impacting transportation conditions would be present.
  - Recommended zoning and denser future infill growth patterns would result in fewer overall impacts of growth on the natural environment than comparable amounts of growth distributed in the broader suburban region

- Livable South Downtown's EIS alternatives and the overall land use planning and zoning recommendations ~~would be~~ are consistent with the broad housing, growth and community development objectives of the Pioneer Square and Chinatown/I.D. neighborhood plans (see the Housing section in this chapter for further discussion).
  - Provides additional development capacity through rezones, with height and density limits scaled to maintain development's compatibility with uses in surrounding vicinities
  - Provides additional strategies to encourage housing growth, and generates additional affordable housing and/or resources for affordable housing
  - Contributes to strengthened residential and economic base of neighborhoods
  - Risks of adverse impacts on housing can be mitigated through actions recommended as part of this EIS and the planning process.

- Certain zoning changes in Industrial zones west of I-5 under Alternatives 1 and 3 (e.g., those from Industrial zones to a "South Downtown Mixed" zone) would represent a change from ~~be inconsistent with~~ the industrial-preservation themes of the Greater Duwamish Manufacturing & Industrial Center (MIC) Plan because they would rezone away from Industrial zones. However, if such changes were favored, analyses for Livable South Downtown planning support a conclusion that a limited area at the northern margins of the MIC can be re-designated from Industrial to Commercial or Mixed Use and into the Downtown Urban Center without significant harm to the preservation of Industrial use patterns in the balance of the MIC.

- The range of ~~recommended~~ possible land use and zoning changes addressed by the alternatives (including Alternatives 1, 2, 3 and the Preferred Alternative) can be accomplished while maintaining compatibility with ~~the~~ land use and activity patterns, and maintaining the effective economic functioning of the Port of Seattle operations west of the study area. This suggests that land uses and activities in the study area can coexist with nearby industrial users, including the ability for continued Port operations at Terminal 46 and related flows of freight. One exception to the overall conclusion of compatibility is noted. Under Alternatives 1 and 3, due only to possible residential uses west of 1st Avenue S. and south of Railroad Way S., there would be probable significant adverse land use compatibility impacts related to exposure of future possible residents to activity levels and noise of nearby Port and railroad operations. Such impacts would need to be mitigated through specifications on residential location and construction quality if such residential uses are to be present there. Under the Preferred Alternative, with no residential uses on the WOSCA property nearest Terminal 46, no such impacts are identified. To maintain freight mobility over the long-term, the City and other agencies should also continue planning and implementing street network and other system improvements to maintain and improve freight movement capabilities.
- ~~The~~ Livable South Downtown planning recommendations (e.g., the Preferred Alternative) include no recommended changes to the Stadium Area south of S. Royal Brougham Way ~~are relatively limited in the Stadium Area~~ to avoid potential growth-related congestion conflicts with Port activities and freight traffic.

Economy

- A wide range of possible zone changes evaluated within the EIS alternatives and the recommended changes of the Preferred Alternative can be accomplished without significantly impairing the important economic functions provided by Port of Seattle operations. Based in part upon identified compatibility impacts of possible residential uses west of 1st Avenue S. and south of Railroad Way S. under Alternatives 1 and 3, the Preferred Alternative does not recommend changes that would authorize such residential uses in that location.
- With implementation of mitigation strategies and/or continuing cooperative public- and private-sector efforts with respect to community and economic development strategies in the Chinatown/I.D. neighborhood, a wide range of possible zone changes evaluated within the EIS alternatives and the recommended zoning changes of the Preferred Alternative can occur without probable significant adverse effects on the economic and business character of the Chinatown and Little Saigon vicinities.
- Future development, investment and additional resident populations in the study area would provide net economic benefits within the affected neighborhoods, primarily addressing the entirety of the Pioneer Square and Chinatown/I.D. neighborhoods. This is a broad observation offered at the programmatic level that assumes that future development would occur in the manner encouraged by the recommended zoning changes of the Preferred Alternative.

Infrastructure

- Technical review of the zoning alternatives indicates that future expected growth to 2030 can be served by utility infrastructure systems, although it is possible that localized improvements to meet service hookup needs of individual future development projects might be needed.
- This EIS discusses a range of possible mitigation strategies that can be pursued to address potential significant adverse impacts on transportation systems. Also, see observations about

transportation systems made above, under the first bullet point for "Growth Strategies and Definition of Growth Centers."

Citizen Needs

- The recommendations of Livable South Downtown planning are consistent with neighborhood plans' representations of citizen needs, addressing topics including affordable housing, open space/streetscape improvements, economic and residential vitality.
- Historic and cultural character of the Pioneer Square and Chinatown/I.D. neighborhoods would be maintained even as additional growth would occur in the coming decades.

Environment

- More efficient growth within the Downtown Urban Center would contribute to an enhanced quality of the built environment in affected neighborhoods, and would result in fewer adverse natural environmental impacts than would occur with the same amount of growth if it occurred elsewhere in the region.
- Livable South Downtown planning incorporates recommendations that would aid in environmental sustainability and climate protection efforts.
- Attention should be given to strategies that would reduce the potential for economic and physical damage from major seismic events in this area that has documented seismic hazards.

NEIGHBORHOOD PLANS

PIONEER SQUARE NEIGHBORHOOD PLAN

The 1998 Pioneer Square Neighborhood Plan promotes coordinated and collaborative "*action planning*" efforts that will "*embrace change while maintaining historic character and diverse identities*." Action planning "*focuses on implementation of key projects facilitating the physical and economic development of the Pioneer Square Historic District*." The top seven topics of action for plan implementation are defined as:

- *Catalyzing housing development*
- *Developing the North Lot of the football stadium property*
- *Improving public safety, cleanliness and behavior standards*
- *Strengthening the economic base*
- *Building pedestrian linkages*
- *Improving access during stadium events and securing a community parking facility*
- *Developing the parking lots on the east side of Occidental Park.*

The plan also notes five "critical areas" that need additional investment to improve public spaces:

- Occidental Corridor
- Second Avenue and Yesler Way (Fortson Square)
- Fourth Avenue S. and S. Jackson Street
- Central Waterfront
- Pioneer Square Park (at First Avenue and Yesler Way).

The neighborhood plan encourages growth of affordable and market rate housing to broaden the availability and range of housing in the neighborhood. Incentives, promotion of the area, and partnerships for development of targeted properties are encouraged, as are strategies to preserve and expand artist live/work housing. Protecting the historic character and encouraging new resident-serving business types (grocery, pharmacy, hardware and other services) are high priorities. Maintaining cleanliness of public areas, as well as public safety and civil behavior, are also recognized as important components for success. The plan describes strategies for addressing several dimensions of economic vitality, including the neighborhood's image, accessibility and opportunities for synergies. By recognizing and addressing the many interwoven issues and opportunities, the Pioneer Square Neighborhood Plan is a good example of an integrated approach to planning for the neighborhood's future.

Relationship to Livable South Downtown Planning

Livable South Downtown planning addresses several high priorities of the Pioneer Square neighborhood plan, including actions that address housing, development of Qwest Field's north parking lot, development near Occidental Park, strengthening the economic base and building pedestrian linkages. Livable South Downtown planning shares the neighborhood plan's primary interest in actions that will encourage additional housing for households of all income levels. Actions supported by both planning efforts include zoning amendments to the Land Use Code, tools to encourage renovations of existing buildings for residential use, strategies to encourage new infill development, and zoning that will accommodate residential/mixed-use development in a portion of Qwest Field's north parking lot.

Recommended land use actions, per the Preferred Alternative, that serve City and neighborhood goals will ensure reasonable compatibility of height, bulk and scale, and sensitivity to historic character (see other sections of this chapter for further discussion). Directions pursued by Livable South Downtown planning are consistent with the themes and recommendations of the Pioneer Square Neighborhood Plan. Other neighborhood plan recommendations are not directly related to land use and zoning, but are important factors in the planning area. These include parking, accessibility, public safety, cleanliness and behavior standards.

Urban design proposals include elements consistent with special area recommendations of the neighborhood plan, and some elements that are complementary and additive. The Livable South Downtown urban design recommendations apply to Occidental Avenue S. south of S. King Street as mentioned in the neighborhood plan. They also include recommendations for Second Avenue S. and S. Washington Street that are complementary to the neighborhood plan's intentions for Fortson Square. Livable South Downtown recommendations include attention to the 4th Avenue S./S. Jackson Street vicinity, recognizing its key location as a link between the neighborhoods and as a transit hub. Current recommendations support design themes expressed in the neighborhood plan.

Table 3-5 summarizes the relationship of alternatives to the neighborhood plan.

Table 3-5
Relationship of Alternatives' Zoning Proposals to Pioneer Square Neighborhood Plan

LAND USE AND ZONING CONCEPT IN ALTERNATIVES	CONSISTENT	NOT CONSISTENT	NOT ENOUGH PLAN INFO TO JUDGE
Alternative 1			
▪ ***Target increased height limit of 130 feet to non-historic-contributing properties in PSM 100'***	√		
▪ ***Changes to or elimination of the variable height limit***	√		
▪ ***Height increases to 180 feet for housing on the North Lot***	√		
▪ ***Height increases to 180 feet in the 4th Avenue S. vicinity***			√
▪ ***TDR strategy supporting renovation***	√		
Alternative 2 <u>and the Preferred Alternative</u>			
▪ ***Target increased height limit of 130 feet to non-historic contributing properties in PSM 100'***	√		
▪ ***Subarea-specific height limit adjustments to fine-tune the current PSM 100'***	√		
▪ ***Changes to or elimination of the variable height limit***	√		
▪ ***Height increases to 240 feet for housing on the North Lot <u>(with this maximum height applicable to the approximate north half of the North Lot in the Preferred Alternative)</u>***			√
▪ ***Height increases to 150 feet in the <u>3rd/4th</u> Avenue S. vicinity***	√		
▪ ***TDR strategy supporting renovation***	√		
Alternative 3			
▪ ***No maximum height change above 100 feet in the PSM 100', with a TDR strategy supporting housing renovation***	√		
▪ ***Changes to or elimination of the variable height limit***	√		
▪ ***Height increases to 150 feet for housing on the North Lot***	√		
▪ ***No height changes in the 4th Avenue S. vicinity***	√		
Alternative 4/No Action			
▪ ***No Changes***		√	

The finding of the "no action alternative" being inconsistent with the neighborhood plan reflects that plan's emphasis on taking actions to encourage positive changes in the neighborhood.

CHINATOWN/I.D. NEIGHBORHOOD PLAN

This 1998 neighborhood plan builds upon past planning work by the neighborhood. It encourages taking action to make positive, tangible improvements in the neighborhood. Its primary planning themes are:

- Cultural and economic vitality
- Housing that is affordable and diverse
- Public spaces that are safe, dynamic and pedestrian-friendly
- Accessibility both within and to the neighborhood for all modes

The plan describes the interwoven nature of issues related to growth, safety, public amenities, and the social and economic vitality of the neighborhood. The plan acknowledges the social fabric of the neighborhood, its cultural resources and its demographic mix, which includes elderly residents, low-income and immigrant households. It identifies many desirable community improvements, such as lighting, park and sidewalk improvements. It recognizes the potential negative impacts of external forces on the neighborhood, including those related to population growth, real estate market influences on land value and rents, and the potential for displacement of residents and businesses.

The plan includes numerous action strategies addressing each planning theme, with supporting details for each topic. Strategies on economic vitality address the following topics:

- Neighborhood marketing and promotional activities
- Developing new business markets, such as night-time activities
- Business improvement strategies, resources and assistance
- Community recreation center
- Ensuring utility infrastructure is sufficient to support community needs

Strategies on accessibility and safe, dynamic public spaces address the following topics:

- New open space
- Improved maintenance and activation of park spaces
- Public safety, crime prevention and police presence
- Control of stadium event crowds and parking
- Parking—expand off-street and maximize on-street parking opportunities to address needs
- Lighting improvements for safety
- Pedestrian safety and amenities

Strategies addressing housing and rehabilitation of existing buildings include the following concepts:

- Transfer of development rights (TDR) and bonus programs;
- Inclusionary zoning for affordable housing;
- Leveraging of funds for rehabilitation of vacant or substandard buildings;
- permit streamlining; and
- property tax exemption for low-income residential projects

Relationship to Livable South Downtown Planning

Livable South Downtown planning recommends changes to encourage growth consistent with this neighborhood plan in ways that will stimulate greater economic vitality, diversify housing opportunities, and improve public safety and accessibility. Recommended actions and strategies would update land use, urban design and zoning regulations to promote consistency of future development with the neighborhood plan and consistent with today's community expectations, including:

- recommending actions and mitigation strategies meant to retain and enhance existing affordable housing resources, and encouraging infill development of a mixture of affordable and market-rate housing (see the Housing section in this chapter for further evaluation);
- encouraging growth in locations that will complement the neighborhood with additional residents and customers while sustaining existing business and residential communities;
- maintaining appropriate relationships of building bulk and scale;
- respecting and protecting the area's cultural, historic and architectural character;
- encouraging the achievement of improved public open spaces, recreation opportunities and pedestrian connections within and between neighborhoods.

Livable South Downtown planning recommends several adjustments to zoning, height limits and other standards that govern the size and shape of future buildings. These would encourage additional residential and business growth within the central Chinatown and Little Saigon vicinities and the neighborhood's periphery. Rezoning in Little Saigon east of 12th Avenue S. would change that area's intended future development pattern from an industrial and commercial mix of uses to a likely mix of commercial and residential uses.

None of the Livable South Downtown zoning proposals are directly related to specific neighborhood plan recommendations because that plan did not identify specific rezone requests. The neighborhood plan does support inclusionary zoning, density bonus and TDR programs. Livable South Downtown proposals will be consistent with the Chinatown/I.D. neighborhood plan if they provide for affordable housing retention and growth in supply, and retain good scale and height relationships with the existing neighborhood building character. See the Housing section in this chapter for further evaluation.

Table 3-6 summarizes the relationship of alternatives to the neighborhood plan.

Table 3-6
Relationship of Alternatives' Zoning Proposals to Chinatown/I.D. Neighborhood Plan

LAND USE AND ZONING CONCEPT IN ALTERNATIVES	CONSISTENT	NOT CONSISTENT	NOT ENOUGH PLAN INFO TO JUDGE
Alternative 1			
▪ ***Extension of IDM zoning one block south of S. Dearborn, between I-5 and 12th Ave. S.***	√		
▪ ***More intensive development, up to 240-foot height limits north of S. Jackson St. near 4th, 5th Aves. S.***			√
▪ ***40-foot increase in height limit in Chinatown core, south of S. Weller Street***	√		
▪ ***20-foot increase in height limit in Little Saigon including NC3-85' east of 12th Ave. S.***	√		
Alternative 2			
▪ ***Downtown Mixed Commercial and Mixed Residential zoning east of I-5, and one block south of S. Dearborn St.***	√		
▪ ***Height limits as high as 125 feet in Little Saigon***			√
▪ ***More intensive development, up to 180 foot height limits north of S. Jackson St. near 4th, 5th Aves. S.***	√		
▪ ***40-foot increase in height limit in Chinatown core, south of S. Weller St.***	√		
Alternative 3			
▪ ***More intensive development, up to 180-foot height limits north of S. Jackson St. near 4th, 5th Aves.***	√		
▪ ***No height increase in Chinatown core***	√		
▪ ***NC3-85' zoning throughout Little Saigon***	√		
▪ ***South Downtown Mixed zone south of S. Dearborn St***			√
Alternative 4/No Action			
▪ ***No Changes***		√	
<u>Preferred Alternative</u>			
▪ ***<u>IDM zoning one block south of S. Dearborn, and between I-5 and 12th Ave. S.</u>***	<u>√</u>		
▪ ***<u>More intensive development, up to 240-foot height limits north of S. Jackson St. near 4th, 5th Aves. S.</u>***			<u>√</u>
▪ ***<u>Up to 65-foot increase in height limit in Chinatown core, outside Nat. Register Historic District</u>***			<u>√</u>
▪ ***<u>Downtown Mixed Commercial and Mixed Residential zoning east of I-5</u>***	<u>√</u>		
▪ ***<u>Height limits up to 125 feet in Little Saigon, and up to 160 feet near S. Dearborn St.</u>***			<u>√</u>

The finding of the "no action alternative" being inconsistent with the neighborhood plan reflects that plan's emphasis on taking actions to encourage positive change in the neighborhood.

GREATER DUWAMISH MANUFACTURING AND INDUSTRIAL CENTER PLAN

The MIC Plan urges long-term support for and protection of industrial uses and family wage jobs in the Greater Duwamish area via land use and zoning regulations and policies, transportation investments and economic development strategies. The Plan indicates the following objectives:

- Restrict incompatible or competing land uses within the MIC;
- Encourage manufacturing and industrial job retention and growth;
- Establish a growth target of 10,860 new family wage industrial jobs [current 20-year growth target is for 9,750 new jobs by 2024];
- Retain and improve access to industrial areas and transportation routes within the MIC;
- Retain existing businesses and encourage new manufacturing and industrial development within the MIC.

The MIC Plan prefers protection of industrial uses to encourage retention of quality jobs and economic growth in industrial and manufacturing sectors, and preservation of industrially suited land for those uses rather than competing or incompatible uses. According to the Plan, non-industrial uses tend to be accompanied by pedestrian and automobile traffic that compete for street capacity and create accessibility conflicts that can impair industrial operations. Non-industrial uses can also lead to higher lease rates and land values that can negatively affect the financial viability of industrial uses (which can also be considered a factor in assessing overall compatibility among industrial and non-industrial uses).

Zoning amendments with the MIC Plan's adoption in 2000 strengthened the industrial emphasis of land use regulations in the Industrial zones while specifying standards applicable to non-industrial uses. The Plan's zoning changes also included establishment of an Industrial Commercial (IC) zone and Stadium Transition Area Overlay District overlay zone that provided more flexibility for a mixture of commercial and industrial uses north of S. Holgate Street primarily along the 1st Avenue S. corridor, and defined development standards related to building density, facades, setbacks and the pedestrian environment. This stadium transition area represents the northern edge of the MIC and the southern edge of the Livable South Downtown study area.

Relationship to Livable South Downtown Planning

Livable South Downtown planning recognizes the MIC Plan's emphasis on retaining and protecting industrial areas, industrial jobs and their economic benefits, maintaining and improving accessibility for commerce and industry, minimizing conflicts between industrial and non-industrial uses, and avoiding land value pressures that can discourage industrial users. The current planning effort also recognizes the conjunction of these influences in the Stadium Area vicinity, and this area's proximity to the Downtown Urban Center. In terms of geography, land use patterns, and daily functions, the Stadium Area vicinity serves as a transition area between Downtown and the MIC, and a conduit for port-related traffic, commuting traffic, entertainment event traffic, local commerce and other neighborhood traffic.

A range of land use and zoning options are considered that recognize the possibility of intensifying development potential and possibly introducing residential uses in portions of this area north of S. Royal Brougham Way. Along the west side of 1st Avenue S. north of S. Royal Brougham Way, and the "south-of-Dearborn" vicinity north of the I-90 ramps, a potential transitional area is identified that could include commercial uses (such as offices) and potentially residential uses as well under Alternatives 1 and 3. Proximity of these areas to the Pioneer Square and Chinatown/I.D. neighborhoods means they could

accommodate additional growth that would activate them with more intensive uses and support the adjacent neighborhoods' vitality. The Alternative 1 and 3 zone proposals for the area north of S. Royal Brougham Way ~~is~~ are not consistent with the industrial-use-preservation intent of the MIC Plan, and would represent a change in the basic land use intent for these locations in immediate proximity to the Downtown Urban Center, especially for residential uses included in portions of Alternatives 1 and 3. In order to proceed with changes away from Industrial zones and Comprehensive Plan land use designations, these locations ~~should~~ would need to be moved out of the MIC and into the Downtown Urban Center by decision of the City Council. Under Alternatives 2, 4, and the Preferred Alternative, such changes are not proposed, with no associated change in land use intent.

For the portion of the study area south of S. Royal Brougham Way, introducing residential uses into the range of permitted uses is not recommended by DPD, due to the current industrial and commercial land use patterns, the potential for incompatibilities among land uses, the convergence of transportation facilities and the magnitude of traffic volumes (of all modes) that influence this area. Therefore, the zoning recommendations of the Preferred Alternative retain Industrial Commercial zoning with ~~few if any~~ minimal or no other changes to land use regulations south of S. Royal Brougham Way. In these areas, ~~retaining~~ the Industrial Commercial zoning with a Stadium Transition Area Overlay District overlay zone would continue to accommodate a range of future development and uses likely to remain compatible with current industry and port-related activities in this vicinity. These elements of the proposal are consistent with the intent of the MIC Plan.

Table 3-7 summarizes the relationship of alternatives to the neighborhood plan.

Table 3-7
Relationship of Alternatives' Zoning Proposals to Greater Duwamish Manufacturing and Industrial Center Plan

LAND USE AND ZONING CONCEPT IN ALTERNATIVES	CONSISTENT	NOT CONSISTENT	NOT ENOUGH PLAN INFO TO JUDGE
Alternative 1			
▪ ***S. Downtown Mixed zone of 100-160 feet west of 1st Ave. S. (north of S. Royal Brougham Way)***			
o ***Increased height limit to 100-160 feet***			√
o ***Residential uses in 160-foot zone***		√	
o ***Increased density limits for mixed uses (including residential)***		√	
▪ ***Height limit in IC zone increased to 85 feet on Pyramid Brewery block***			
o ***Increased height limit to 85 feet***	√		
o ***No increase in density limit***	√		
o ***Rezone from IG2 to IC in corner of this block***			√
▪ ***New IC zone and height limit increased to 125 feet in Qwest Field vicinity and in south-of-Dearborn vicinity***			
o ***Increased height limit***			√
o ***Increased density limit for non-industrial uses***			√
o ***Rezone from IG2 to IC***			√

LAND USE AND ZONING CONCEPT IN ALTERNATIVES	CONSISTENT	NOT CONSISTENT	NOT ENOUGH PLAN INFO TO JUDGE
Alternative 2 ▪ ***IC zones west of 1st Ave. S. ranging from 65 to 100 feet*** o ***Increased height limit to 100 feet*** o ***No increase in density limits for commercial uses*** ▪ ***IC zone east of Qwest Field to 240 feet, density to 5 FAR*** o ***Increased height limit to 240 feet*** o ***Density increase*** ▪ ***IC zone south of S. Charles St. to 160 feet, density to 3 FAR in "south-of-Dearborn"*** o ***Increased height limit*** o ***Increased density limit for non-industrial uses*** o ***Rezone from IG2 to IC***	√ √		√ √ √ √ √
Alternative 3 ▪ ***S. Downtown Mixed zone south of S. Dearborn St. to 160 ft.*** o ***Increased height limit*** o ***Increased density limit for non-industrial uses*** o ***Rezone from IG2 to SDM*** ▪ ***S. Downtown Mixed zone ranging from 100 to 120 feet west of 1st Ave. S.*** o ***Increased height limit to 100-120 feet*** o ***Residential uses in 120-foot zone*** o ***Increased density limits for mixed uses*** ▪ ***S. Downtown Mixed zone over the railroad tracks west of 4th Ave. S. (e.g. south of S. Dearborn St.) to 180 feet*** o ***Increased height limit*** o ***Increased density limit for non-industrial uses*** o ***Rezone from IC to SDM*** ▪ ***Height limit increased to 85 feet on Pyramid Brewery block*** o ***Increased height limit to 85 feet*** o ***No increase in density limit*** o ***Rezone from IG2 to IC in corner of this block***	√ √	√ √ √ √ √ √ √ √ √ √	√
Alternative 4/No Action ▪ ***No Changes***	√		

LAND USE AND ZONING CONCEPT IN ALTERNATIVES	CONSISTENT	NOT CONSISTENT	NOT ENOUGH PLAN INFO TO JUDGE
Preferred Alternative			
▪ ***IC zones west of 1st Ave. S. ranging from 85 to 160 feet***			
o ***Increased height limits to 85, 120 and 160 feet***			√
o ***Increase in density limits for commercial uses***			√
▪ ***IC zone east of Qwest Field to 160 feet***			
o ***Increased height limit to 160 feet***			√
o ***Density increase***			√
▪ ***IC zone south of S. Charles St. to 160 feet, in "south-of-Dearborn"***			
o ***Increased height limit***			√
o ***Increased density limit for non-industrial uses***			√
o ***Rezone from IG2 to IC.***			√

RELATIONSHIP TO CENTRAL AREA NEIGHBORHOOD PLAN

The Central Area's neighborhood plan encompasses a large area extending as far north as E. Madison Street and as far south as Interstate 90. Included are several neighborhood business districts, most notably including the 23rd/Union and 23rd/Jackson and 12th Avenue S. corridor (north of Yesler Way) vicinities. Much of the Central Area plan's content is directed to these areas, but a few elements address areas in proximity to the Little Saigon neighborhood. These include the vicinity east of Rainier Avenue S. and south of S. Dearborn Street (described as "Hiawatha") and the vicinity near the Rainier Avenue S./S. Jackson Street intersection.

The plan promotes the revitalization of Central Area neighborhood business districts in a manner that will reflect the area's heritage and values. It advocates for quality open space and streetscapes, including various urban design elements such as landscaping, public art, gateway elements, banners and signage, and land use principles such as street-level uses oriented to the sidewalk rather than parking lots separating buildings from the sidewalks. Gateway elements recommended by the plan would use the urban design elements listed above to define entries into the neighborhood that celebrate its heritage, its identity and related themes, linking the neighborhoods and also contributing to an enhanced visual environment and streetscape. Gateway locations are defined at the Rainier Avenue S./S. Jackson Street intersection vicinity, and at the Rainier Avenue S./S. Dearborn Street intersection.

In the Hiawatha area, the plan recommended several rezones to encourage future residential development and a more walkable district near Rainier Avenue S. These efforts have been relatively successful, as new multifamily residential development has occurred in this vicinity, although few changes have occurred on properties abutting Rainier Avenue S.

Relationship to Livable South Downtown Planning

The Central Area Neighborhood Plan supports mixed-use development and improved pedestrian-oriented streetscapes throughout the neighborhood in a manner that is generally supported by Neighborhood Commercial zoning. These themes are consistent with the goals of the Livable South Downtown zoning recommendations for the vicinity east of Rainier Avenue S. that is in the Central Area's Jackson Place vicinity. Also, by recognizing the "gateway" functions of the Jackson and Dearborn Street intersections with Rainier Avenue S. and advocating for aesthetic improvements, the neighborhood plan is in accord with Livable South Downtown urban design objectives.

RELATIONSHIP TO SELECTED LAND USE CODE PROVISIONS

STADIUM TRANSITION AREA OVERLAY DISTRICT (SMC 23.74)

This is an overlay zone applicable to the western and southern portion of the EIS study area (refer to Figure 2-1), for which the stated purpose, intent and description of the zone are reproduced below from SMC 23.74.002.

23.74.002 Purpose, intent and description of the overlay district—Rezone requirement—Rezone criteria

A. Purpose and Intent. The purpose of this chapter is to implement the City's Comprehensive Plan, including the neighborhood plan for the Greater Duwamish Manufacturing/Industrial Center, by establishing a Stadium Transition Area Overlay District for the area shown on Exhibit 23.74.004A. The Stadium Transition Area centers on large sports facilities and allows uses complementary to them. It is intended to contribute to a safer pedestrian environment for those attending events and permits a mix of uses, supporting the pedestrian-oriented character of the area as well as the surrounding industrial zone, while minimizing conflicts with industrial uses. Within the overlay district, use provisions and development standards are designed to create a pedestrian connection with downtown; discourage encroachment on nearby industrial uses to the south; and create a pedestrian-friendly streetscape. Allowing a mix of uses, including office development, is intended to encourage redevelopment and to maintain the health and vibrancy of the area during times when the sports facilities are not in operation.

B. Relationship to Surrounding Activity of Areas Located Within the District. The District is an area where stadiums and similar major, regional attractions are located, in which transportation and other infrastructure can support additional development. It is an area surrounded by land with widely varying development patterns and land use characteristics including the mixed use urban development of south Downtown, Pioneer Square, the working waterfront, and the industrial area. The desired relationship of the Stadium Transition Area is with Pioneer Square and First Avenue, permitting strong pedestrian and transit links to the north. There should be well-defined edges between the pedestrian activity of the Stadium Transition Area and industrial activity surrounding it. The portion of Fourth Avenue South that is north of Royal Brougham and the main line railroad tracks create a strong edge to the east and should be the eastern boundary. South Holgate Street, the first major cross street to the south of Safeco Field, should be the southern boundary. Boundaries should not be shifted farther into the industrial area.

C. Rezones resulting in Boundary Changes to the Stadium Transition Overlay Area District [sic]. A rezone pursuant to Chapter 23.34 shall be required to change the established boundaries of the Stadium Transition Area Overlay District. A rezone shall be subject to the provisions of Chapter 23.76, Procedures for Master Use Permits and Council Land Use Decisions. Areas to be included within the District boundaries shall be compatible with the purpose and intent as stated in this

section, and shall either be areas developed as major spectator sports facilities, or areas that meet the criteria for Industrial Commercial zoning and are along preferred pedestrian routes that can provide safe and attractive passage for pedestrians between the stadiums and retail areas and transit service.

23.74.006 Application of Regulations

Land located within the Stadium Transition Area Overlay District, as shown on Exhibit 23.74.004A, is subject to the regulations of the underlying zone except as otherwise expressly provided in this chapter. In the event of a conflict between the provisions of this chapter and the underlying zone, the provisions of this chapter apply. Where the provisions of the underlying zone are more restrictive, that is not considered a conflict and compliance with the provisions of the underlying zone is required, except as specifically provided in this chapter. Where the provisions of this chapter are more restrictive, compliance with those provisions is required, subject to any departures that may be authorized pursuant to design review under Section 23.41.012 and to provisions for nonconforming uses and structures in Sections 23.50.008 and 23.50.010. (Ord. 119972 section 10 (part), 2000.)

The Stadium Transition Area Overlay District sections 23.74.008, 23.74.009, and 23.74.010 describe "uses" permitted and prohibited, "height," and "development standards" respectively.

- In addition to uses allowed by the underlying IC zone, the Overlay District allows for medical services, museums, community centers, clubs and religious facilities. Prohibited uses include heavy manufacturing uses, high-impact uses, recycling uses, airports, hospitals, schools, bus bases, animal-related uses, lodging uses, and principal use parking (except parking allowed for spectator sports facilities or exhibition halls).
- The height provisions merely note that the underlying zone's maximum height limits are not applicable to spectator sports facilities and also provide more details regulating parking garages.
- Development standards in section 23.74.010 describe details about accessory parking, outdoor storage, curb cut locations, a density limit of 3.0 floor area ratio (FAR) with the first 75,000 square feet of street-level uses of various kinds exempt from the density limit, street façade requirements, screening and landscaping, blank façade limits, transparency requirements, principal pedestrian entrances, and a provision in section 23.74.010C that describes a "pedestrian environment" within a 40-foot radius at intersections along 1st Avenue S. and Occidental Avenue S.

Relationship to Livable South Downtown Planning

The purpose and intent of the Stadium Transition Area Overlay District overlay zone, as described verbatim above from SMC 23.74.002, inform and define the current overlay zoning. As indicated, it is an area that has transportation and other infrastructure capable of supporting additional development, it supports uses complementary to the stadiums, and contributes to an improved pedestrian safety and pedestrian-oriented character of the area, while minimizing conflicts with industrial uses. Allowing a mix of uses including office development is intended, to encourage redevelopment to maintain the health and vibrancy of the area during times when the sports facilities are not in operation.

The relationship to the EIS alternatives can be briefly summarized as follows.

- Alternatives 1 and 3 contemplate a new South Downtown Mixed (SDM) zone that would contain provisions that achieve the same or similar purposes as those achieved by the Stadium Transition Area Overlay District, for locations north of S. Royal Brougham Way and west of 1st Avenue S. The SDM zone could, however, allow for the possibility of residential uses in the approximate northern third of the "WOSCA property" as part of a mix of uses including commercial uses. That use would vary from the current overlay zone's list of permissible uses.

- Alternatives 1 and 3 also suggest (but do not necessarily require) that the SDM-zoned portion of the study area along 1st Avenue S. would be removed from the Overlay District, which if pursued would entail a change in the boundaries of the Stadium Transition Area Overlay District.
- A similar change in the boundary of the Overlay District would be assumed to occur under Alternative 3 for the portion of the proposed SDM 180' zone extending south of S. Dearborn Street on the west side of 4th Avenue S.
- Under Alternative 2, no changes would be assumed to occur to the Overlay District boundaries because the zones would remain in Industrial Commercial zones. However, maximum height limits and other regulations such as development standards would change.
- Alternative 3 also contemplates the possibility of adding lodging (hotel) uses as a permissible use in the Overlay District.
- The Preferred Alternative recommends IC zoning north of S. Royal Brougham Way on the west side of 1st Avenue S. that would likely retain the Overlay District. The IC zoning would, however, make changes to height limits, density limits and other probable bulk controls and development standards that would influence the ultimate size and configuration of future buildings developed on the west side of 1st Avenue S.

RELATIONSHIP TO PIONEER SQUARE PRESERVATION BOARD DESIGN GUIDELINES FOR NEW CONSTRUCTION ON THE "NORTH LOT"

The City's Department of Neighborhoods (DON) approved design guidelines in May 2007 to express preferences for the qualities of future development at the Qwest Field north parking lot. The introduction to the guidelines identifies that the north parking lot is a "*transition area*" and "*as such, creative interpretation of materials and architectural elements can be used for new construction…when it is visually compatible with, and does not detract from or overwhelm, the character of the District*."

The goals of the guidelines include articulating how new development can be compatible, and encouraging the design of new development that:

- adds vitality to the District;
- fits in the context of its site;
- contributes to the quality building stock of Pioneer Square;
- provides comfort and safety;
- is welcoming to pedestrians;
- reinforces the neighborhood's unique character;
- provides design variety within the site;
- provides connectivity to its surroundings; and
- incorporates crime preventive features.

The guidelines for the design of new construction address numerous features such as: massing, building heights, setbacks, scale, street walls, non-street wall elevations, building articulation and definition, floor-to-floor height, entrance orientation, display windows and storefronts, upper floor windows, balconies, pedestrian friendly design, environmentally responsible design, craftsmanship, materials, color, signs, awnings/canopies, building lighting, rooftop/mechanical elements, uses, parking, streets and sidewalk treatments, street lighting and public art.

Relationship to Livable South Downtown Planning

The draft guidelines are a detailed expression of how new building design, particularly as expressed in exterior elements, can maintain compatibility with Pioneer Square's neighborhood character. Full

conformance with design guidelines would be expected to ~~effectively extend the~~ improve the relative compatibility of building character with ~~of~~ Pioneer Square. ~~into the area south of S. King Street.~~ Partial conformance in proposed building designs ~~would tend to~~ could negatively affect ~~introduce a different~~ character. ~~that would be negatively influenced by the omission of particular architectural details.~~ In newer development, architectural designs risk being oversimplified ~~or having incompatible~~ in such detailing as ~~in~~ window dimensions and building materials, for example. Also, street-level use patterns may not correspond to historical use patterns in adjacent areas. These potential flaws can be avoided when sufficient attention is paid to the design guidelines during the design process.

Guidelines addressing massing, building height, street level uses, upper level uses, and location of parking uses are most relevant to Livable South Downtown planning. These elements are most directly affected by zoning. Livable South Downtown's zoning Alternatives 1, 2 and 3 study the continuation of Pioneer Square Mixed zoning, but with three different possible variations in the maximum height limits: 150, 180 and 240 feet. Accompanying these limits would be density limits and other probable requirements to define how building bulk may occur. Under the Preferred Alternative, this area could experience development up to 240 feet in height, but bulk and density controls are also defined as part of the Preferred Alternative.

The impact analyses in other sections of this chapter—most notably addressing height, bulk and scale—suggest that a height limit of 150 feet at the north parking lot would be able to maintain compatible height/bulk/scale relationships within the Pioneer Square context, while height limits of 180 and 240 feet could result in significant adverse impacts unless the particulars of height, bulk and scale controls are specified in more detail (see the Preferred Alternative description in Chapter 2 for more information about proposed height, bulk and scale controls). Such strategies ~~might~~ may relate to the massing of buildings on the site, transitions from lower height buildings to higher height buildings, the use of setbacks, and how the buildings are articulated both vertically and horizontally. Under the Preferred Alternative, the recommended controls would be able to influence development such that significant adverse height, bulk and scale impacts would not be expected.

Livable South Downtown zoning recommendations could either incorporate a number of the recommended prescriptions from the guidelines, or rely on the coverage provided by those recommendations as well as relying on the implementation of the guidelines through future Pioneer Square Preservation Board review of future specific development proposals.

OTHER LAND USE AND TRANSPORTATION PLANNING PROCESSES

SR 99/ALASKAN WAY VIADUCT PLANNING

The Seattle Department of Transportation (SDOT) and Washington State Department of Transportation (WSDOT) are engaged in evaluating options for future street and highway improvements associated with SR 99. This includes a "surface and transit" option that would not include either a tunnel or a viaduct in the immediate vicinity of the study area. This option has several implications for future street networks and traffic patterns that are being evaluated by SDOT. WSDOT has already acquired the western half of the "WOSCA" property for probable right-of-way purposes, and is expected to use the rest for construction staging purposes during the construction period. Safety, mobility and infrastructure improvements are planned for 2007. The Washington State Department of Transportation anticipates that viaduct removal will begin in 2012.

See Appendix G.1 and the Transportation and Parking sections in this chapter for evaluation of transportation impacts.

SR 519 PHASE 2 PLANNING

SR 519 planning proposes street and highway improvements meant to provide additional connections to and from Interstate 5, Interstate 90 and the Stadium Area vicinity. This includes an additional bridge connection from the interstates, a bridge at railroad tracks near S. Royal Brougham Way with a connection down to 3rd Avenue S., and improvements to the 1st Avenue S./S. Atlantic Street intersection. As of summer 2007, an Environmental Assessment ~~Impact Statement~~ was being prepared on this project (completed in 2008), to facilitate construction in a 2009-2012 timeframe. See Appendix G and the Transportation section in this chapter for evaluation of transportation impacts.

INDUSTRIAL LANDS STUDY

In 2006 and 2007, DPD planning staff engaged in a review of current industrial area land use policies, including documentation of existing conditions and issues. This study was spurred by development trends in the Manufacturing and Industrial Centers, the relationship to continued support for manufacturing and industrial economic sectors, and how these areas' plans and policies will be implemented. In conjunction, the Planning Commission hosted a series of public forums with presentations and discussion by speakers and interested citizens.

The Industrial Lands Study and Mayor's Recommendations were completed in summer 2007. The recommendations articulate that industrial zones are most appropriately located in the City's Manufacturing and Industrial Centers (MICs), and not within urban centers and villages or near dense residential uses. The recommendations proposed stricter controls on non-industrial activities, such as limits on size of use, in industrial zones in order to control conversion of industrial land and "[send] a clear message to industrial businesses about the City's continued support for their activities." The recommendations also offer language to clarify research and development laboratory uses, in order to discourage standard office uses within industrial areas.

Land Use Code amendments that ~~address~~ relate to the above issues ~~are anticipated~~ were approved by the City Council in late 2007. This included limits on size of use and a Comprehensive Plan policy that encouraged further examination of business expansion strategies. Additional formal review of industrially-zoned lands outside the MICs and at the edge of the Duwamish MIC is ~~planned~~ being conducted by DPD in 2008, including land located within the Livable South Downtown study area, in the

south-of-Dearborn area. Mayor recommendations also address programmatic actions, such as job training, City staffing, and industry marketing.

This EIS acknowledges the above as part of the existing planning and land use context. Even though the Preferred Alternative recommends retention of IC zoning in the affected MIC area, other EIS alternatives contemplate a change in the Comprehensive Plan designation on the Future Land Use Map of the MIC areas north of S. Royal Brougham Way from Industrial to Downtown, and associated rezones. Such action is permissible according to rules for rezones and Council Land Use Decisions contained in SMC 23.34 and 23.76, respectively. As noted in the Land Use—Zoning, Land Use and Development Patterns section (DEIS page 3-13), this would represent a significant shift in the City's land use policy for these locations.

HOUSING

AFFECTED ENVIRONMENT

INTRODUCTION

South Downtown's residential population has long been an important part of Seattle's urban center. Pioneer Square and Chinatown/International District feature many of Seattle's oldest apartment buildings and a large number of affordable housing units. South Downtown is expected to grow in the coming years under all land use scenarios, adding both jobs and residents.

A key objective of Livable South Downtown planning is to evaluate and protect existing housing resources, particularly those that serve households with below-median incomes. Analysis of housing issues should involve understanding how complex land use, zoning and housing policies and regulations can be guided to successfully maintain affordable housing supplies and historic preservation objectives while accommodating well-situated new developments with housing for a range of incomes. Other important factors include urban design, architectural quality, cultural preservation, public amenities and services and environmental challenges such as noise and air pollution.

HOUSING UNIT COUNTS AND GROWTH TRENDS

South Downtown contains 3,677 dwelling units, and comprises approximately 16% of Downtown's overall housing inventory. Approximately ~~1,151~~ 1,283 (35%) of these units are located in Pioneer Square and approximately ~~2,526~~ 2,394 (65%) are located in the Chinatown/I.D. neighborhood. Only about 25 dwelling units are currently located east of I-5 in the Little Saigon vicinity of Chinatown/I.D.

Prior to 1990, South Downtown had a low housing growth rate, with many units located in older historic buildings, and infrequent development of new buildings. However, between 1990 and 2005, housing growth occurred at a faster pace, leading to a 51% gain in housing unit totals throughout South Downtown. Table 3-8 summarizes the growth since 1990 for Pioneer Square and Chinatown/I.D. and compares it to the amount of growth in the Downtown Urban Center as a whole. These neighborhoods' housing growth only represented 1/8th of Downtown's overall housing growth, as illustrated in Tables 3-9 and 3-10.

Table 3-8
Total Housing Unit Count Per 2000 U.S. Census and DPD Permit Data

	1990	2000	2006	Total Growth, 1990-2006	Percent Increase, 1990-2006
Pioneer Square	635	797	1,022	387	61%
Chinatown/I.D.	996	1,641	2,230	1,234	24%
TOTAL, Downtown Seattle Urban Center*	7,432	12,852	17,819	10,387	140%

***The totals shown for the Downtown Urban Center include housing within Pioneer Square and Chinatown/I.D.

Many reasons underlie South Downtown's relatively slow pace of residential development. Limits on development capacity related to historic districts and low zoned height and density limits play a role, and industrial zoning in part of the study area prohibits nearly all forms of housing. Aside from regulatory limitations, demand for housing in South Downtown has been weak relative to other parts of Downtown,

as indicated by current market-rate sales prices that remain low. For example, rental rates in newer units in South Downtown are approximately $1.65 per square foot per month compared to $2.00 per square foot or more in Belltown (Easton, 2007). Interviews with developers indicate that some are reluctant to invest in South Downtown due to concerns about public safety and the condition of the physical environment. Further, while land costs have been historically lower in South Downtown, development costs in some areas may be higher due to high water tables and soil conditions associated with former tidelands.

Table 3-9
Housing Unit Growth in Downtown Urban Center Neighborhoods Per Half-Decade, 1991-2005

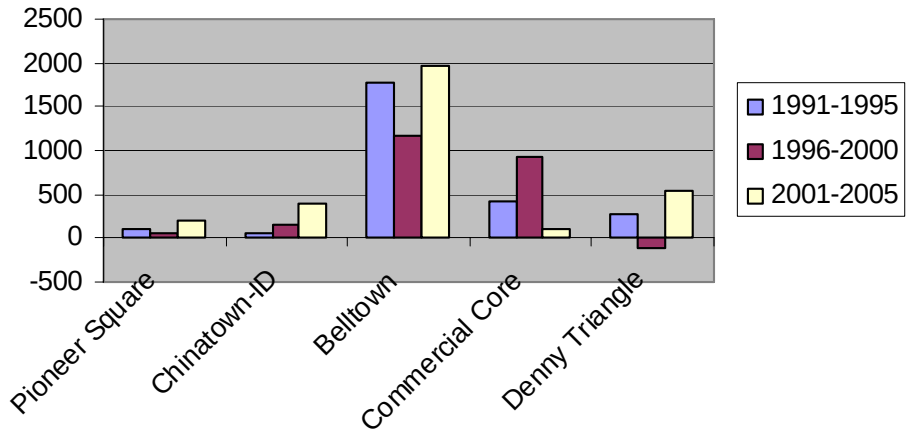


Table 3-10
Net Units Built and Permitted 1991-2005
Seattle Downtown Urban Center

Neighborhood	Percent of Downtown Growth
Pioneer Square	4.5%
Chinatown/I.D.	7.6%
Belltown	61%
Commercial Core	18%
Denny Triangle	9%
Downtown Urban Center (Total)	100%

Source: DPD, 2007

Interviews with developers also suggest that the area is potentially attractive for future residential and commercial growth, due to its proximity to Downtown amenities, regional transit services, and its historic and cultural neighborhood character. Recent trends in actual and possible development projects indicate an increased level of interest. These include a few conversions of apartments to condominiums, rehabilitation of existing buildings, and construction of new apartment buildings in different parts of Pioneer Square and Chinatown/I.D. west of I-5. No such trend is observed in Little Saigon, where industrial zoning east of 12th Avenue S. is one factor that has limited housing development.

COMPOSITION OF HOUSING IN SOUTH DOWNTOWN

Housing Unit Occupancy

Housing unit occupancy is often divided into three categories: owner-occupied units, market-rate rental apartments, and subsidized apartments. In the South Downtown study area:

- 13% are owner-occupied units
- 20% are market rate rental apartments
- 67% are subsidized rental apartments

As compared to Downtown overall, South Downtown neighborhoods have a higher percentage of subsidized rental units (56-60%) than other Downtown neighborhoods (38%). Also, condominiums account for just 13% of all South Downtown residential units, as compared to 23% of all units in other Downtown neighborhoods. Table 3-11 summarizes the amount and tenure of housing in South Downtown neighborhoods as compared to the other three Downtown neighborhoods.

Table 3-11
Downtown Housing Units by Tenure

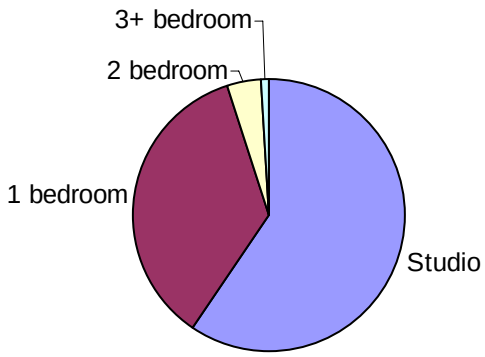
	Pioneer Square* 200~~6~~8	Chinatown/I.D.* 200~~6~~8	Other Downtown Neighborhoods (Belltown, Commercial Core, Denny Triangle) 2000**
Homeowner Units	244 (19%)	247 (10%)	2,366 (23%)
Market-Rate Rentals	~~136~~ 268 (21%)	~~584~~ 800 (34%)	4,069 (39%)
Subsidized Rentals	771 (60%)	~~1,695~~ 1,347 (56%)	3,979 (38%)
Total Units	~~1,151~~ 1,283 (100%)	~~2,526~~ 2,394 (100%)	10,414 (100%)

*South Downtown Housing Inventory, Office of Housing, ~~December 2006~~ February 2008
**Downtown Height and Density Changes Draft EIS, November 2004, p.3-14

Size of Units

Like much of Downtown, the majority of dwelling units in South Downtown are studio and one-bedroom units, tending to be occupied by single or two-person households rather than larger families (see Table 3-12). The low presence of three-bedroom or larger dwelling units in this study area (only 23 such units counted in the 2000 U.S. Census) reinforces the typical small household sizes.

Table 3-12
Housing Unit Size in South Downtown
2000 U.S. Census



Vacant Residential Buildings in the Chinatown/I.D. Neighborhood

Five historic buildings in the Chinatown/I.D. neighborhood have upper residential floors that remain vacant despite the presence of ground-floor retail uses. Many of these buildings contain single-room occupancy (SRO) units that previously housed working men in past decades. The 1998 *Chinatown/ International District Strategic Plan* (the neighborhood plan) identified rehabilitation of historic buildings in this neighborhood as a priority, including the buildings listed in Table 3-13.

Table 3-13
Partially Vacant Buildings in Chinatown/International District

Building	Number of Vacant Residential Units
Eclipse	80
Hip Sing	40
Louisa	149
Kong Yick	28
Milwaukee Hotel	150

Another 245 SRO dwelling units are present in four historic buildings that are in need of significant repairs: the Publix (75 dwelling units, not in use), the Republic Hotel (70 dwelling units), the New American Hotel (54 dwelling units) and the Atlas Apartments (46 dwelling units).

In 2002, staff from Seattle's Department of Planning and Development, Office of Housing and Office of Economic Development worked together to identify twelve residential buildings in Chinatown/I.D. that are in need of significant repair. Staff met with several property owners to address life safety issues and encourage investment and rehabilitation to active use. Staff had mixed results in working with property owners. Several buildings have family and multi-party ownership structures that complicate decision-making. Also, rehabilitation is costly due to seismic and other existing requirements.

Today, several buildings are now being redeveloped. The Freeman Hotel/Gong Dip Building is being transformed into the new Wing Luke Museum. This historic building contained 60 vacant SRO units. The Hong Kong Building and the Alps Hotel contained 72 and 110 SRO units, respectively, and are being rehabilitated to accommodate a total of 137 units of various sizes. Fifty percent of these units will be affordable to households earning 70% of median income or less for a period of ten years.

Several historic buildings in Pioneer Square also include upper floors that appear to be under-used. However, a survey by City staff and community members in 2006 indicated that, while rehabilitation of some historic buildings is needed, there are few vacant or uninhabitable spaces in Pioneer Square.

This range of existing housing conditions suggests that a Transfer of Development Rights (TDR) program for historic buildings could be a viable strategy. A TDR program is active for other portions of Downtown, and could conceivably be extended to the study area neighborhoods. This could allow owners to sell unused development rights from historic buildings and gain resources to support significant rehabilitation. The TDR program could apply to historic areas within the Chinatown/I.D. and Pioneer Square neighborhoods. This topic is discussed further later in this section and in Appendix E to the DEIS.

AFFORDABILITY

Despite its location adjacent to the Downtown office core, South Downtown remains an area where housing is still affordable across a broad range of income levels. A relatively higher number of units are affordable to people at lower income levels in South Downtown than for the Downtown Urban Center overall.

"Affordable housing" simply means housing that people can afford. That typically means a household's housing costs are no more than 30% of their monthly income if they rent, and no more than ~~40~~ 35% of their monthly income if they own. Within South Downtown, approximately thirty-two percent of all units are affordable to people with incomes below 30% of median income. Forty-five ~~two~~ percent of units within South Downtown are affordable to people earning between ~~50~~30% and 80% of median income. Twenty-three ~~six~~ percent of all units are affordable to people earning greater than 80% of median income. The U.S. Department of Housing and Urban Development (HUD) defines all housing that is affordable to people earning less than 80% of median income as "low-income," regardless of whether it is publicly subsidized or market-rate.

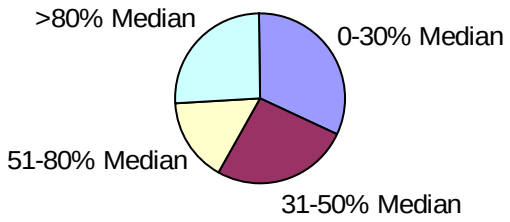
Many people have difficulty finding housing they can afford in areas near where they work. A few examples are retail salespersons, teachers, cashiers, loan officers, janitors, and administrative specialists. Others include retirees and those on fixed incomes or otherwise constrained in ability to earn income. Such individuals and households are common in these neighborhoods (see the Population and Employment section in this chapter for more discussion), which means that retention and rehabilitation of South Downtown's existing affordable housing stock and construction of additional affordable units is important. The following Table 3-14 and accompanying pie chart show the affordability breakdown of South Downtown's housing stock.

Table 3-14
Existing Affordable Units in South Downtown

Neighborhood	Number of Dwelling Units Serving Households at Income Level (% of Median Income)				
	0-30%	31-50%	51-80%	> 80%	Totals
Pioneer Square	425	201	180	345	1,151
Chinatown/I.D.	735	764	~~414~~ 520	~~613~~ 507	2,526
Total in study area	1,160	965	~~594~~ 700	~~958~~ 852	3,677
Percent of study area	(32%)	(26%)	(19%)	(23%)	(100%)

Median income = as defined by the Seattle-Bellevue HUD Metro Fair Market Rent Area (HMFA)
Source: South Downtown Housing Inventory, Office of Housing, ~~December 2006~~ February 2008

South Downtown Housing Affordability 2006



COMPREHENSIVE PLAN AND NEIGHBORHOOD PLAN HOUSING GUIDANCE

Seattle's Comprehensive Plan

The Comprehensive Plan's projections for Pioneer Square and Chinatown/I.D. are for approximately 1,000 new households in each neighborhood by 2024 (see the Population and Employment section in this chapter for further discussion).

Comprehensive Plan housing-related goals and policies promote:

- a mix of housing that appeals to a range of ages, incomes, household types and sizes, and cultural backgrounds;
- housing for children and seniors;
- home-ownership opportunities;
- public and private investment in housing resources;
- retention of existing housing units; quality design;
- safe and habitable housing conditions; and
- affordability for a diversity of households.

The Comprehensive Plan specifically states that future growth should accommodate the following affordability levels:

- At least 20% of expected residential growth should be affordable to households earning up to 50% median income.

- At least 17% of expected residential growth should be affordable to households earning between 51% and 80% median income.

Other goals and policies indicate:

- the City's commitment to "take a leadership role in regional efforts to increase affordable housing preservation and production in order to ensure a balanced regional commitment to affordable housing, while also maintaining the City's commitment to affordable housing." (Policy H3).
- the goal to "achieve a mix of housing types that are attractive and affordable to a diversity of ages, incomes, household types, household sizes, and cultural backgrounds." (Goal HG4).
- a policy of "encourag[ing] greater ethnic and economic integration of neighborhoods [without] displacement of existing low-income residents from their communities [and] allocat[ing] housing subsidy resources in a manner that increases opportunities for low-income households, including ethnic minorities, to choose among neighborhoods throughout the city." (Policy H16).

These policies articulate the City's commitment to preservation and production of affordable housing serving diverse populations, including existing low-income and ethnic minority households. The presence of numerous low-income and minority households in Pioneer Square and Chinatown/I.D. underscores the importance of making choices in Livable South Downtown planning that will preserve affordable housing, provide for future affordable housing production in the study area, and define how future development of all kinds will contribute effectively to affordable housing objectives.

It should be noted that land in Chinatown/I.D. and Pioneer Square is relatively affordable compared to other Downtown Urban Center areas. Chinatown/I.D. in particular has several properties that could be candidates for future affordable housing development. Future development could benefit by receiving funds available from City programs to support affordable housing. At the same time, property values would be influenced to some degree by zoning, which may be changed through Livable South Downtown recommendations. The dynamics of real estate markets, zoning and available funding could influence future housing types.

Neighborhood Plans

The Pioneer Square and Chinatown/I.D. neighborhood plans emphasize increased residential development within the neighborhoods. Both plans include goals relating to housing diversity, design and development opportunities.

- The Pioneer Square neighborhood plan promotes residential growth as a key theme for Pioneer Square, encouraging housing opportunities for all incomes while maintaining the area's historic character.
- The Chinatown/I.D. neighborhood plan supports the diversification of the area's housing stock with more moderate income and family house and the preservation of existing affordable housing resources.

ENVIRONMENTAL IMPACTS

The evaluation of housing impacts for this programmatic EIS addresses the following topics:

- Relationships between projected residential growth and development capacity for housing
- Housing supply and demand characteristics relating to future growth in the study area
- Potential impacts relating to affordable housing
- Existing programs and trends that will continue to support affordable housing development
- Housing-supportive and protective strategies of the proposed alternatives

Defining additional capacity for commercial and/or residential development is likely to increase demand for housing in South Downtown as future development occurs. Such demand would probably affect existing affordable housing availability and create a need for more affordable housing supply. Current and potential programs to address affordable housing impacts are outlined below. It is impossible to predict precisely how many units might be lost or gained through new housing-supportive programs. This means that "balance sheet" analytic approaches that quantify and compare units potentially gained or lost in future conditions are not advisable or reliable approaches for identifying adverse impacts. ~~Following the Impacts discussion is a listing of possible impact mitigation strategies that could be included to address adverse housing impacts of the alternatives.~~

RELATIONSHIPS OF PROJECTED HOUSING GROWTH AND ZONED CAPACITY

Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative assume that the amount of residential growth to year 2030 would be approximately 6,000 dwelling units in the study area. This would be a faster growth rate than has occurred in recent decades in this area, but is a plausible growth rate according to DPD's analysis of Downtown growth trends. In fact, it is consistent with other 2030 growth forecasts recently identified by DPD for this vicinity, derived from regional growth forecasts.

DPD's analysis of the capacity within the alternatives' zoning indicates the following total capacity for additional residential growth would result:

- Alternative 1: ~~7,142~~ 7,243 dwelling units
- Alternative 2: ~~8,319~~ 8,427 dwelling units
- Alternative 3: 6,640 dwelling units
- Alternative 4: 4,414 dwelling units
- Preferred Alternative: 9,300 – 9,400 dwelling units

This analysis suggests that zoning under Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative would provide a sufficient amount of additional capacity for future housing development to meet projected residential growth through 2030, and would also have enough capacity for additional residential growth after 2030. It also suggests that retaining the existing zoning pattern, under Alternative 4—No Action, would not provide enough capacity to be able to meet the projected growth of 6,000 additional dwelling units by 2030. These conclusions are not identified as impacts, but are provided to describe ~~planning assumptions and~~ the~~ir~~ relationship ~~to~~ of development capacity to EIS growth scenarios applicable to ~~that would be present in~~ the impact analysis for the alternative zoning options. Additional details on zoned capacity are provided in the Population and Employment section of this chapter.

CHARACTERISTICS OF FUTURE HOUSING SUPPLY AND DEMAND

Influences on Future Housing Development

Future housing production in the study area neighborhoods will depend on how market forces interact with zoning limits and the economic feasibility of developing new structures. Several observations can be made about these elements that will affect future outcomes.

- **Future housing likely will continue to favor small dwelling sizes.** The expected range will be from studios up to two-bedroom units. This may make it difficult for larger family households to obtain suitable housing in South Downtown.
- **Condominium housing would likely be more feasible than rental housing in new construction.** Recent pro-forma economic study of development conditions in South Downtown suggests greater profitability for condominium development rather than apartments. Recent conversions of a few buildings to condominiums in Chinatown/I.D., as an indication of the current status of the market, support this finding.
- **Zoned height limits to 125 feet may create uncertainties about building size and construction type.** The pro-forma economic study of development conditions suggests development is economically feasible and profitable for condominiums at 125 feet, and is less feasible for apartment construction. Building to 125 feet would require steel frame construction. However, when compared to a smaller and less costly wood frame building to 85 feet, the 85-foot development scenario is concluded to generate higher rates of investment return.

  The actual outcomes of future development will depend on the strength of market demand for new housing in the study area and the equation of costs, risks and returns. If housing prices for new dwelling units are higher than indicated by the pro-forma analysis, building to the maximum of 125 feet would become more feasible and profitable. The pro-forma analysis results might also indicate that additional higher height limits should be considered if the intent is to encourage the achievement of development to the maximum zoned heights.
- **Zone changes would likely increase property values, affecting the ability to realize new affordable housing construction by non-profit developers.** Non-profit developers that have constructed much new housing in the study area in recent years could be negatively affected by zoning with higher height limits. The increased development capacity on affected properties would increase the assumed property value. Due to this property value increase and higher development costs of taller steel-frame buildings, the increase in zoned development capacity could negatively impact feasibility of new development by non-profit developers in portions of the study area.
- **Planned development on the Qwest Field north parking lot would provide at least 400 units of new housing.** The proposed development at this location will include at least approximately 400 units of new housing, of which 100 are required by purchase and sale agreement to be affordable to households earning 100% of median income for owner-occupied units or 60% of median income for rental units. This amount of new housing in Pioneer Square would help satisfy a portion of the demand for housing in the study area.
- **In zones with higher height limits, hotel/condominium forms of development may be possible.** Areas zoned for allowable buildings heights of 180-240 feet might support a mixed use hotel/condominium form of development, in which residents would enjoy services and amenities available to hotel guests. These developments would be more likely to include higher-cost dwelling units.

Housing Demand Generated by New South Downtown Employment

Total Housing Demand from New Employment

Additional employment growth over time in South Downtown would generate new demand for housing. Analysis of Downtown commercial (office and hotel) jobs and their impact on housing was conducted in 2001 by Keyser Marston Associates. That analysis helps estimate the number of households likely to need housing, as shown in Table 3-15. Recent strong demand for housing Downtown appears due in part to the increasing desire of workers to live near their jobs. It is expected that a significant number of new workers in South Downtown will want to live near their jobs. However, firm estimates of this amount are not predicted by this analysis. ~~Past Downtown zoning analyses inform estimates of this added housing demand. For example, analysis of Downtown housing supply and demand determined an employment factor of approximately 1.65 workers per household (Keyser Marston Associates, 2001). A 1983 survey of Downtown employees indicated that 29% would choose to live Downtown if a dwelling unit was available at an acceptable price and size (Gruen & Gruen, 1983). Using these assumptions, an estimate of total housing demand and Downtown housing demand that could be generated by additional South Downtown employment is calculated for the alternatives, as shown in Table 3-15.~~

Table 3-15
Estimated Total Housing Demand Generated by New South Downtown Employment to 2030

Alternative	Projected Job Growth per EIS Alternative	Estimated Total New Demand for Housing Units in All Locales	~~Estimated Demand for Housing Units in the Downtown Area~~
1, 2, 3 and the Preferred Alternative	24,600	14,910	~~4,320~~
4 (No Action)	16,600	10,060	~~2,920~~

Source: DPD, 2007. Total new demand based on 1.65 workers per household figure for Downtown, identified by Keyser Marston Associates, 2001.

Table 3-15 illustrates the relatively similar impacts on total housing demand of Alternatives 1, 2, ~~and~~ 3, and the Preferred Alternative, and the lesser impacts under the No Action Alternative (Alt. 4) that would be approximately one-third lower.

New Demand for Affordable Housing

The employment and housing analysis done by Keyser Marston in 2001 also ~~A housing analysis for Downtown zoning~~ concluded that approximately 16% of all office worker households would earn less than 80% of the area's median income (Keyser Marston Associates, 2001). Applying this factor, an estimate of total demand for housing serving households earning 80% or less of median income is calculated for the alternatives, as shown in Table 3-16. These households would be among those that may need some subsidy to afford housing in South Downtown. ~~The table also shows the estimated demand that could be generated for such units in Downtown using the 29% factor explained above.~~

Table 3-16
Projected Total New Demand for Housing Units
Affordable to Households Earning Less Than 80% Median Income

Alternative	Projected New Total Demand For Affordable Dwelling Units	~~Downtown's Portion of the New Demand for Affordable Dwelling Units~~
1, 2, 3 and the Preferred Alternative	2,386	~~692~~
4 (No Action)	1,610	~~467~~

Source: DPD, 2007. Keyser Marston Associates, 2001.

Table 3-16 illustrates the relatively similar impacts on total housing demand of Alternatives 1, 2, ~~and~~ 3, and the Preferred Alternative, and the lesser impacts under the No Action Alternative (Alt. 4) that would be approximately one-third less.

POTENTIAL ADVERSE AFFORDABLE HOUSING IMPACTS

Potential Loss of Existing Affordable Housing in South Downtown

With or without zoning changes, South Downtown is likely to become a more active housing market in the future. This is due to the area's close proximity to the Downtown office core and transit hub and the resulting probable effects on real estate values. An active market for housing in South Downtown—characterized in part by low vacancies and rising property values—could increase the potential for rent levels to increase and become less affordable. Rent levels that are not guaranteed by regulatory agreement or loan conditions may increase over time. The City of Seattle Office of Housing considers affordable housing to be "at-risk" ~~at "medium" or "high" risk~~ of rent level changes if:

- A regulatory agreement that guarantees affordability associated with government subsidy will expire within the coming twenty years, or
- The unit is not subsidized by government funding and is therefore not regulated for affordability.

Using these criteria, approximately 1,048 ~~1,102~~ currently affordable dwelling units in Chinatown/I.D. and 310 ~~178~~ currently affordable dwelling units in Pioneer Square are at-risk ~~at medium risk or high risk~~ of potential rent increases within the next twenty years (City of Seattle Office of Housing , DPD, 2008). Tables 3-17 and 3-18 categorize these units according to their affordability to households at different income levels. Figure 3-20 illustrates the location of the at-risk housing resources. It is important to note that many of these buildings have been subsidized over many years and it difficult to predict what may happen in the future. These buildings could continue to remain affordable with additional or continued public subsidy.

According to 2008 data from the Seattle Office of Housing, approximately 847 ~~819~~ dwelling units in Chinatown/I.D. and 630 dwelling units in Pioneer Square ~~are classified as "low" risk for rent changes because they~~ have regulatory agreements to provide affordable housing for more than 20 years, or are in the SHA portfolio. The majority of these low-risk units in each neighborhood serve households earning 50% of area median income or less.

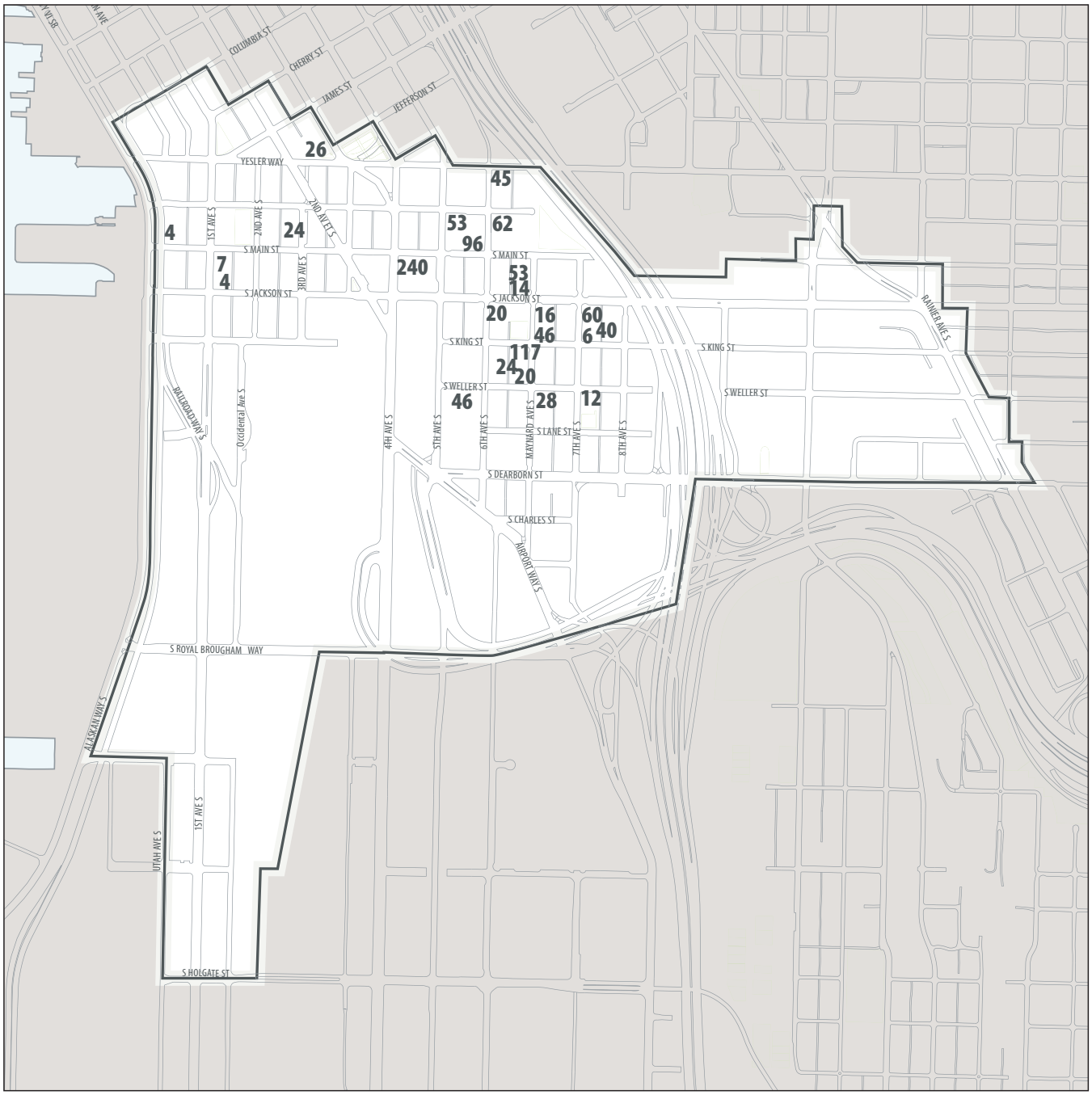


Figure 3-20

Affordable Housing Units At-Risk for Rent Increase by 2030

Livable South Downtown

Table 3-17
Chinatown/I.D. Housing Units At-Risk ~~Medium or High Risk~~ of Future Rent Level Changes

Reasons Units are At-Risk of Rent Level Change	Number of Dwelling Units Serving Households at Income Level (% of Median Income)				
	0-30%	31-50%	51-65%	66-80%	Total
~~**High Risk** (MFTE agreement needed or long-term funding needed)~~	~~0~~	~~364~~	~~26~~	~~104~~	~~494~~
Regulatory agreement or loan expiration under 20 years ~~Medium Risk~~	23	~~50~~ 386	0	~~5~~ 51	~~78~~ 460
Unsubsidized Rentals	237	176	55	~~62~~ 120	~~530~~ 588
Totals	**260**	**~~590~~ 562**	**~~81~~ 55**	**171**	**~~1,102~~ 1,048**

SHA = Seattle Housing Authority. MFTE = Multifamily Tax Exemption
Source: City of Seattle OH, 2008

Table 3-18
Pioneer Square Housing Units At-Risk ~~Medium or High Risk~~ of Future Rent Level Changes[9]

Reasons Units are At-Risk of Rent Level Change	Number of Dwelling Units Serving Households at Income Level (% of Median Income)				
	0-30%	31-50%	51-65%	66-80%	Total
Regulatory agreement or loan expiration under 20 years ~~Medium Risk~~	0	26	113	0	139
Unsubsidized Rentals	0	2	~~30~~ 162	7	~~39~~ 171
Totals	**0**	**28**	**~~143~~ 275**	**7**	**~~178~~ 310**

Source: City of Seattle OH, 2008

The majority of affordable units at-risk ~~medium or high risk~~ for rent changes are located within Chinatown/I.D. Many of these units are located within buildings where demolition and redevelopment is unlikely due to their contributions to Chinatown's National Register Historic District. Similarly, in Pioneer Square, the buildings identified as ~~having medium or high~~ at-risk are located within historic-contributing buildings that are unlikely to face a greater probability of demolition and redevelopment due to the alternative zoning proposals. Due to the alternatives' lack of direct effect on the zoning of these properties, no direct adverse housing impacts are identified at these locations. A potential indirect adverse impact of increases in rent levels ~~could~~ might be possible ~~anticipated~~ in some cases.

However, some properties with affordable units would more directly experience increases in zoned development capacity, which could contribute to loss of affordable housing units. This would affect approximately five buildings in the Japantown vicinity, as well as two buildings in the Chinatown core. These units could be subject to rent increases, conversion to other more expensive housing types, or future redevelopment. These are the most identifiable adverse housing impacts potentially generated by zoning changes under Alternatives 1, 2 and 3. The buildings and their current number of dwelling units are listed in Table 3-19.

Table 3-19
Affordable Housing on Properties Subject to Rezone Under the Alternatives ~~That is Directly Impacted by Zoning Changes~~

Japantown	Chinatown core	Pioneer Square
Downtowner Apts.: 240 units ~~(High risk)*~~	Uwajimaya Village: 46 units ~~(High risk)*~~	None (historically-contributing buildings not impacted)
Imperial House: 96 units (~~High risk)*~~	Weller Apts.: 12 units ~~(High risk)*~~	
Ascona Apts.: 53 units ~~(no risk rating)~~		
Metropolitan Park: 62 units ~~(no risk rating)~~		
Ticino Apts.: 45 units ~~(no risk rating)~~		
TOTAL: 496 units	**TOTAL: 58 units**	**TOTAL: 0 units**

Source: DPD, 2007. ~~* "High risk" refers to the rating assigned by the City's Office of Housing, briefly described in the written discussion above.~~

Alternative 1 and the Preferred Alternative zoning changes, with increased maximum height limits to 240 feet, would represent the largest potential zoning change in Japantown, with lesser increases to 180 feet under Alternative 2. It should be noted that the Metropolitan Park and Ticino Apartments (and the Imperial House under Alternative 3) would experience a somewhat lower potential for such impacts because the proposed zoning changes at these locations would only modestly adjust the existing IDR 150' zone's development capabilities. Also, the two locations listed in the Chinatown core have a somewhat lower potential for zoning-related impacts because they are buildings not likely to be redeveloped in the future.

EXISTING PROGRAMS AND TRENDS THAT WILL POTENTIALLY CONTINUE TO SUPPORT AFFORDABLE HOUSING DEVELOPMENT

The following programs will be available over the long term to continue to support the future development of affordable housing resources in the study area.

Direct funding for affordable housing construction and rehabilitation

Traditional government sources of low-income housing funds should be available to support the construction of units serving households earning up to 80% of area median income. The City awards capital subsidies for the construction and rehabilitation of affordable housing in Seattle twice a year. In the past decade, the City has helped fund rehabilitation of 9 buildings with 821 affordable housing units and new construction of 5 buildings with 311 units of affordable housing in South Downtown. In the future, project opportunities may continue to emerge and funding could be available for such projects. However, the potential levels of production cannot be reliably predicted, including the potential for production in the South Downtown study area. ~~If that trend continues, it is reasonable to assume that 2,800 units of affordable South Downtown housing could be funded over the coming 25 years through leveraging traditional housing funding sources. Approximately two-thirds of these projects are expected to involve substantial rehabilitation of existing housing and vacant residential buildings, and will serve~~

~~"extremely" and "very low" income households, which are those earning up to 30% and 30-50% of area median income, respectively.~~

Seattle Homes Within Reach Program (Multifamily Housing Tax Exemption)

Seattle Homes Within Reach, formerly known as the Multifamily Housing Tax Exemption (MFTE) Program was initiated in 1998 to stimulate construction of multifamily housing in weak market areas and, in strong market areas, to encourage some new construction units to be affordable to moderate-wage workers. Developers who take advantage of the program receive a 10-year property tax exemption on the improvements. For rental housing, this means the developer pays no taxes on the residential portion of the building. For homeowner housing, owners of affordable condominium units pay no property taxes. Pioneer Square and Chinatown/I.D. are "target areas" for this program. Four of the 17 rental developments that have taken advantage of the tax exemption are located in South Downtown, including the Tashiro Kaplan and Quintessa Apartments in Pioneer Square and the Uwajimaya Village and Weller Apartments in Chinatown/I.D.

Existing Downtown Incentive Programs

A number of incentive programs are currently part of Downtown zoning. Programs targeted to commercial developers are focused primarily in DOC1, DOC2, and DMC zones in the Downtown core and Denny Triangle. Resources generated by transfer of development rights (TDR) purchases and bonus contributions by office and hotel developments in those areas may be used in South Downtown. Three South Downtown residential projects (I.D. Village Square II, Legacy House and the Morrison Hotel rehabilitation) have been funded in part through sale of TDR or through the Commercial Bonus Program, using approximately $3.8 million in funds.

Contributions made by Downtown residential developers through the Residential Bonus Program adopted for portions of Downtown in 2006 may also be awarded to new construction projects in South Downtown. This has not yet resulted in new affordable housing construction in the study area.

Some of the existing housing supply may become more affordable over time

Local real estate research indicates that rental rates tend to become more affordable after five to ten years, due to wear and tear, and the presence of fewer amenities as compared to those provided in newer buildings. For example, a case study in the Seattle Office of Housing's *Seattle Housing Inventory* (2007) showed that the rents of 506 Belltown units became more affordable over time. Although rents increased 2% per year on average, all units became affordable to households in lower income categories within a five to ten year period. Rising housing prices through Downtown could reduce the assurance that this trend would definitely occur in South Downtown. However, it is reasonable to anticipate that some residential units not under affordable rent agreements will become more affordable over time, due to location, condition of the building, small unit size, and a variety of other factors. The total pool of such "unregulated" units currently in the study area includes approximately 580 dwelling units in Chinatown/I.D. and approximately 136 dwelling units in Pioneer Square.

HOUSING-SUPPORTIVE AND PROTECTIVE STRATEGIES OF THE ALTERNATIVES

Livable South Downtown planning proposes a number of strategies relating to development bonus and TDR programs. These programs are intended to <u>help maintain currently affordable units as well as add to the affordable housing supply.</u> ~~mitigate impacts of increased development potential on housing affordability.~~ They include commercial and residential bonus programs and a TDR program that would

encourage rehabilitation for housing within existing buildings in Pioneer Square and Chinatown/I.D. The approach is similar to strategies employed in other portions of Downtown. It is meant to respond to the City's housing and comprehensive plan policies that support the preservation and production of affordable housing serving diverse populations. The complexity of the housing-supportive strategies means there are many specific details that affect how the programs would work, how individual development projects could be affected, and how much affordable housing is ultimately achieved. Such details will be discussed in greater detail during later decision-making processes. The following discussion is ~~represents draft conclusions~~ based on the information available at the time of this Final ~~Draft~~ EIS analysis.

The Mayor has proposed legislation to City Council that could lead to a requirement that developers of ~~All~~ new construction projects in South Downtown that choose to exceed base development rights ~~would be required to~~ take part in housing bonus programs. For residential development, the incentive program would allow developers to achieve development capacity above base development rights by constructing affordable housing units on-site or by contributing a fee-in-lieu to support construction of affordable units off-site by purchasing TDR and/or by providing public amenities that mitigate non-housing development impacts. For commercial development, the incentive program would be similar to the one already in place in other parts of Downtown, whereby approximately 75% of development above the base FAR is achieved through housing TDR and/or commercial bonus for housing and child-care, and the other 25% is achieved through other public amenity bonus or TDR.

Impacts of the South Downtown Commercial Incentive Program

Table 3-20 illustrates the amount of ~~TDR~~ Bonus Program funding that could be generated by the commercial development incentive program.

Table 3-20
Livable South Downtown EIS Alternatives,
Estimated Commercial Bonus Program Workforce Housing Production

Alternative	Total Bonus Floor Area in New Construction Projects Through 2030 (square feet)	75% of the Total Bonus Floor Area Gained Through Housing Bonus and/or TDR (square feet)	Estimated Dollars Generated at a Sales Price of $18.75/sq.ft. (under current commercial bonus program)	Equivalent Number of Dwelling Units at $130,000 per Unit* (*assumes it requires about $130,000 to "gap-finance" an affordable housing unit)
1	820,703	615,527	$11,541,131	89 units
2	1,052,685	789,514	$14,803,387	114 units
3	1,015,033	761,275	$14,273,906	110 units
Preferred Alternative**	1,416,467	1,062,350	$19,919,067	153 units
4 (no change)	0	0	0	0 units

Source: DPD, 2008
**Larger amounts of total bonus floor area for the Preferred Alternative relate to the particulars of base and bonus levels defined in the preferred zoning scenario, and how growth is distributed within the hypothetical development scenario for this alternative.

Impacts of ~~the~~ a South Downtown Residential Density Bonus Program

New State law (RCW 36.70A.540) strengthens the City's ability to create ~~allows the City to include~~ affordable housing incentive programs that are directed at new residential development. It is likely that a ~~the~~ program, as applied to South Downtown, would allow a base development right without an affordable housing requirement. Any density above the base development right would need to be achieved through participation in ~~the~~ a South Downtown Residential Density Bonus Program. The program would require construction of affordable units on-site or nearby, or participation in a payment-in-lieu fee structure.

Depending upon final bonus program design, approximately ~~10-15~~ 11% of the gross square feet of bonus area within a residential project would need to be devoted to affordable workforce housing under a ~~the~~ new residential density bonus program. This percentage could yield the following amount of affordable workforce housing, per growth under the EIS Alternatives to 2030. ~~assuming that 75% of all new projects would take advantage of the potential bonus development capacity.~~ Table 3-21 identifies total residential bonus floor area estimated under each Alternative, and the potential number of units that could be generated.

Table 3-21
Livable South Downtown EIS Alternatives,
Estimated Residential Bonus Program Workforce Housing Production

Alternative	Residential Bonus Floor Area (square feet)	Estimated Affordable Housing Production (gross square feet)*	Number of Dwelling Units That Could be Generated** (~~700~~ 750 gross sq.ft. per unit)
1	1,147,611	~~94,677~~ 126,237	~~135~~ 168 units
2	1,015,033	~~83,741~~ 111,654	~~120~~ 149 units
3	907,739	~~74,888~~ 99,851	~~107~~ 133 units
Preferred Alternative	1,364,824	150,131	200 units
4 (No Action)	0	0	0

Source: City of Seattle DPD, OH, 2008.
*This calculation equivalent to 11% of the gross square feet of bonus area in projected residential development.
**One residential unit per 750 gross square feet (including hallways, etc.) is assumed, which translates to an actual assumed size of 600 square feet per residential unit.

Impacts of ~~the~~ a South Downtown Transfer of Development Rights (TDR) Program

Future commercial development in South Downtown could take advantage of ~~the~~ South Downtown TDR programs that would support the development of affordable housing resources. Two specific TDR programs could be available to developers in South Downtown that would result in dollars for: 1) retaining existing affordable housing resources and 2) renovating historic buildings, many of which contain existing affordable housing resources.

Several TDR programs are available to property owners in Downtown, as discussed previously in this section. However, only one of these programs—affordable housing TDR—is available for use by property owners in the South Downtown area. Since the inception of the affordable housing TDR program in 1985, only two affordable housing projects in South Downtown have used the program to sell development rights (Morrison Hotel, and I.D. Village Square I "Legacy House"). It is expected that new South Downtown bonus programs would increase the demand for TDR throughout South Downtown, stimulating the market for both sales and purchases of TDR.

South Downtown historic housing TDR is a proposed program that would allow TDR from historic-contributing buildings in Chinatown/I.D. and Pioneer Square. Dollars generated from the program could be used to contribute to the stock of affordable workforce housing in South Downtown and provide much-needed resources for rehabilitation of historic buildings.

Zoning Strategies Tailored to Support New Housing and Protect Existing Housing

In addition to programs described above, several aspects of the Livable South Downtown zoning strategies would help avoid potential housing impacts. These are briefly described below.

- Retain existing zoning and development capacity or recommend only modest regulatory changes affecting properties where sensitive historic resources and affordable housing resources exist, such as in the historic districts of Pioneer Square and Chinatown/I.D.

- Zone for taller and higher-density residential towers in areas where market forces may support and encourage the development of expensive new residential construction (areas where views are present, for example) near the edges of the core neighborhood areas. With this development, require participation in housing bonus programs to provide resources toward the construction of new affordable housing elsewhere in South Downtown.

- Zone for larger-scale future commercial development outside the core of South Downtown neighborhood areas, in order to avoid displacing affordable housing. With such development, require participation in the commercial bonus program in order to provide funding resources toward the construction of new affordable housing elsewhere in South Downtown.

- Provide targeted resources to support new and existing affordable housing in South Downtown by allowing affordable housing TDR to be sent to receiving sites outside of South Downtown. Require receiving sites in South Downtown to purchase South Downtown TDR from buildings that are historic-contributing and/or that contain existing affordable housing whenever possible.

MITIGATION STRATEGIES

Due to a lack of identified significant adverse housing impacts, no mitigation strategies are proposed or required.

~~Future development within the study area would be influenced by zoning choices that are represented by the EIS alternatives. With future development there is a potential for adverse impacts on certain housing that is currently affordable, either through rent increases, conversion to condominiums, or redevelopment of buildings. The possible mitigation strategies are provided to suggest actions that could be taken if decision-makers identify this adverse impact as something that should be addressed when zoning choices are made.~~

~~**POSSIBLE MITIGATION STRATEGIES**~~

~~**All Alternatives**~~

~~**Japantown vicinity**~~

- ~~In order to avoid potential adverse housing impacts related to rent increases, conversion or redevelopment of buildings with currently affordable housing units, the City could identify public or private sector actions that would encourage or achieve the long-term retention in affordable status of buildings most at risk for such impacts.~~

- ~~Affordable housing impacts could be considered as a factor in making specific zoning choices for different portions of Japantown.~~

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse housing impacts of the EIS alternatives are identified.

POPULATION AND EMPLOYMENT

AFFECTED ENVIRONMENT

SUMMARY OF GROWTH DATA AND TARGETS

Population and employment growth data and the City's growth targets are summarized in Table 3-22, followed by additional discussion. Demographic data results from analysis of the 2000 Census data. Growth targets, observed trends in growth, and estimated development capacity are provided by DPD staff analysis.

Resident Households

Demographics

As of 2005, approximately 1,000 households resided in Pioneer Square and approximately 2,000 households resided in Chinatown/I.D. Census data from 2000 further indicate:

- many single-person or two-person households
- a large segment of the Chinatown/I.D. population is older and born outside the United States
- average household incomes in both neighborhoods are considerably lower than the citywide household average income
- a majority of residents in both neighborhoods live in income-restricted subsidized housing
- a population segment that is either homeless or accommodated within group quarters such as shelters and transitional housing.

Within the past few years, building renovations and new construction are bringing additional residents that influence the demographics of these neighborhoods. The Tashiro Kaplan Building artist housing near Yesler Way and Prefontaine Place, the renovated Lowman Building apartments near First Avenue and Cherry Street, the new Quintessa apartments at Second Avenue and Yesler Way, and other new residential construction are increasing the overall residential presence in these neighborhoods, as well as broadening the age and income diversity. Apartment conversions to condominiums have also occurred, increasing the presence of homeowner households. At the same time, other new buildings such as the Nihonmachi Terrace and Washington Terrace continue to add to the population of senior citizens and families in the northern portion of Chinatown/I.D.

There is no known residential population in the industrially-zoned portion of the study area. Potential residents may include building caretakers or artists in live-work spaces. Just south of S. Dearborn Street at S. Maynard Street, the William Booth Center includes 48 units of transitional housing that is adjacent to the industrial area at S. Charles Street. Just outside the study area near S. Atlantic Street and Utah Avenue S., the Bemis Building provides live/work space for more than 30 tenants within a general industrial zone, although not all of the spaces may be residentially occupied.

Table 3-22
Summary of Residential and Employment Growth Data and Targets

Pioneer Square		
Demographics (2000 Census)	Approximately 755 households Average household size: 1.26 persons Relatively low population of children and seniors Average income (1999): $11,130	
Growth Targets (Comprehensive Plan)	For 2004 to 2024: Residential: 1,000 households Employment: 3,500 jobs	Prior target for 1994 to 2014: Residential: 2,100 households Employment: 4,800 jobs
Net Growth	For 1994 to 2005: Residential: Net gain of approx. 256 dwelling units Employment: Net loss of approx 1,040 jobs. Total emp. = 9,850 in 2004	
Current Development Capacity	Approx. 1,000 dwelling units*; and Approx. 1.1 million square feet of non-residential uses*	
Chinatown/International District		
Demographics (2000 Census)	Approximately 1,514 households Average household size: 1.54 persons Relatively large population over age 70 Average income (1999): $11,200	
Growth Targets (Comprehensive Plan)	For 2004 to 2024: Residential: 1,000 households Employment: 2,000 jobs	Prior target for 1994 to 2014: Residential: 1,300 households Employment: 2,800 jobs
Net Growth	For 1994 to 2005: Residential: Net gain of approx. 513 dwelling units Employment: Net gain of approx 2,500 jobs. Total emp. = 6,600 in 2004	
Current Development Capacity	Approx. 3,750 dwelling units; and Approx. 2.2 million square feet of non-residential uses	
Greater Duwamish Manufacturing & Industrial Center (whole center)**		
Demographics (2000 Census)	Not applicable to this study area	
Growth Targets (Comprehensive Plan)	For 2004 to 2024: Employment: 9,750 jobs Residential: None	Prior target for 1994 to 2014: Employment: 10,860 jobs Residential: None
Net Growth	For 1994 to 2005: Residential: Not applicable to this study area Employment: Net gain of approx 3,900 jobs. Total emp = 61,550 in 2004	
Current Development Capacity	Approx. 42 million square feet of employment uses, equivalent to approx. 28,500 jobs	

* Pioneer Square capacity levels assume that the Qwest Field north parking lot and vacant floor area in existing structures are available to accommodate a share of household and employment growth.

** Greater Duwamish data reflect the entire industrial center, not just the Livable South Downtown study area.

Residential Growth Trends

Over the past 15 years, the Chinatown/I.D. neighborhood has grown faster than Pioneer Square, adding about 1,000 new households since 1990, while Pioneer Square has added about 400 additional households (see Table 3-23). For both neighborhoods, half or more of the new residential influx since 1990 has occurred in the last five years. However, Pioneer Square has grown more slowly than the other Downtown neighborhoods—only half as fast as Downtown overall. This may reflect the limited availability of development sites in Pioneer Square. In contrast, Chinatown/I.D. grew in an amount and pace that was relatively steady and comparable to, though somewhat slower than the Downtown Urban Center as a whole.

Similar to other Downtown neighborhoods, the amount of residential growth appears related to economic cycles, with a peak approximately five years ago and a recent upsurge in residential construction activity. Newer residential growth is occurring where parcels are available, such as the Japantown hill vicinity east of 5th Avenue S. and Chinatown between S. Weller Street and S. Dearborn Street.

Table 3-23
Residential Growth Trends in South Downtown Neighborhoods, 1990-2005

Downtown Urban Center Villages	1990 HHs*	2000 HHs*	2005 HHs*	Percent Change 1990 to 2000	Percent Change 2000 to 2005	Percent Change 1990 to 2005
Pioneer Square	603	755	940	25%	25%	56%
Chinatown/I.D.	941	1,514	1,880	61%	24%	100%
Downtown Urban Center	6,661	11,361	15,406	71%	36%	131%

*HHs = Households. Source: Downtown Height & Density Draft EIS (Nov. 2003) and U.S. Census data (2000), Comp. Plan Urban Village Element Appendix, Net Housing Unit Growth spreadsheet, 2006. Dwelling unit to household conversion assumes an 8% vacancy rate based on PSRC data.

Employment

Current Employment

Employment data from 2004 indicate approximately 9,850 jobs in Pioneer Square and 6,600 jobs in Chinatown/I.D. These neighborhoods have the lowest employment totals of any neighborhood in the Downtown Urban Center. Total employment in the industrial zoned Stadium Area portion of the study area is estimated at roughly 1,000 jobs, including warehouse, office and a lesser amount of retail jobs (this does not include stadium-related jobs). Jobs in the Stadium Area appear oriented toward wholesale and retail trade, manufacturing, business services, and entertainment sectors. Immediately adjacent to and west of the stadium area, the Port's freight terminal complex is a major employment center and driver of regional economic activity.

Employment Growth Trends

Employment data from 1995 to 2004 illustrate a spike in employment in 2000 influenced by the "dot-com boom" economic cycle, and later a decline in employment levels with an economic slowdown. During the 1995-2000 period, total employment in the Downtown Urban Center expanded by 25%, while employment in Pioneer Square grew by about 29%, and employment in Chinatown/I.D. grew by 13%. However, from 2000-2004, overall Downtown employment declined by 16%, Pioneer Square declined by 30%, and Chinatown/I.D. in contrast rose by 42% (see Table 3-24). Pioneer Square employment was

likely affected by the downturn in Internet-related business, not only through loss of office jobs but also loss of other service, retail and tourism-related jobs. Job growth in Chinatown/I.D. over the past decade is likely attributable to growth in office employment at the Union Station complex as well as other economic activity in Little Saigon and Chinatown. The Stadium Area during this period maintained a diversity of industrial and commercial businesses (and construction employment as the stadiums were built), but trend data on the employment levels for this particular area are not available.

Table 3-24
Employment Growth Trends in South Downtown Neighborhoods, 1995-2004

Location	1995 Emp	2000 Emp	2004 Emp	% Change 1995 to 2000	% Change 2000 to 2004	% Change 1995 to 2004
Pioneer Square	10,887	13,995	9,848	29%	-30%	-10%
Chinatown/I.D.	4,099	4,646	6,588	13%	42%	61%
Downtown Urban Center	138,151	172,932	145,310	25%	-16%	5%

Source: City of Seattle comprehensive planning, 2006.

Residential and Employment Growth Targets

Seattle's Comprehensive Plan sets 20-year growth targets for Urban Centers and Urban Villages. These targets represent a minimum amount of growth for which the City plans. The citywide growth targets are the minimum amount of growth the City must plan for under requirements of the State Growth Management Act. These targets are derived from State forecasts and are determined through discussions among all King County jurisdictions through the Growth Management Planning Council. Due to this approach, these growth targets are different than the projections of the Puget Sound Regional Council.

~~These~~ The 20-year growth targets are planning estimates that describe how ~~projected~~ long-term growth (amounts determined as described above) could or should be accommodated in the city, within the framework of the urban village strategy. Individual growth targets are set for the neighborhoods within the Downtown Urban Center. These are currently set for the period of 2004 to 2024, during which the growth targets for the neighborhoods are as follows:

	Residential Growth Target	**Employment Growth Target**
▪ Pioneer Square:	1,000 additional households	3,500 additional jobs
▪ Chinatown/I.D.:	1,000 additional households	2,000 additional jobs
▪ Duwa. M&I Center:	No additional households	9,750 additional jobs

The 75-acre portion of the Greater Duwamish MIC within the study area represents approximately 1.5% of the land area in the MIC. The building area that could be built on properties likely to be redevelopable in this area is similarly limited—accounting for only about 2.2% of the possible growth in the MIC. By this measure, the industrial-zoned portion of the study area could be seen as proportionately responsible for accommodating 215 additional jobs to meet its share of the MIC growth target.

Development Capacity Estimates

The City's Comprehensive Plan is based on analyses of available capacity for additional development in neighborhoods around the city. For all properties, the City's method compares the relative value of a building (or other improvements) to the assessed value of the land. If a site is vacant or the building's assessed value is very low compared to the land, it is rated as more likely to be redeveloped in the future. A site's capacity for future growth is calculated, allocating proportional amounts to residential and non-residential uses depending on the site zoning. This tool is best used for evaluating capacity of large areas, but does suggest which properties may be more likely to redevelop over the long-term. Capacity for non-residential uses is shown in terms of additional jobs that could be accommodated, using standard assumptions about floor area per employee. See Table 3-27 later in this section for a comparison of existing capacity and capacity under the alternatives.

One unusual situation is Pioneer Square's shortfall in calculated development capacity compared to its 20-year growth target. In other urban villages, sufficient capacity to meet the 20-year growth target is identified using standardized assumptions about availability of property for future development. For Pioneer Square, the growth target does not rely on the standard assumptions about property availability. Rather, it anticipates that renovation of existing structures and the availability of the Qwest Field north parking lot for development can account for some of the capacity needed to meet the 20-year growth target.

ENVIRONMENTAL IMPACTS

POPULATION AND EMPLOYMENT

25-Year Growth Projections Assumed for this EIS

Livable South Downtown planning recommends actions that encourage improved livability and infill growth. Changes to zoning may stimulate more residential and employment growth than might otherwise occur if the existing zoning pattern is retained. This analysis assumes an amount of additional development will occur over a 20-25 year period, which allows for an impact analysis of future growth. Assumptions about growth align with growth projections of the Puget Sound Regional Council (PSRC) for 2030. The predicted geographic distributions of growth in the alternatives studied in this EIS represent a few hypothetical scenarios for how this amount of growth would or could be distributed throughout the study area.

The total amount of growth to be studied in Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative includes: approximately 6,000 dwelling units and nearly 24,600 additional jobs. Of these amounts, the EIS analysis projects that most of the residential growth and approximately 15,000-16,000 jobs would occur within new structures. Other projected employment growth is assumed to be accommodated within existing structures, some located within Downtown near Pioneer Square.

For the No Action Alternative (Alt. 4), the same amount of employment growth within existing structures is assumed as in the other alternatives. However, a lesser amount of employment and residential growth is assumed to occur within new structures than under the other alternatives. This describes a hypothetical growth scenario if zoning is not changed and lesser amounts of new development are stimulated due in part to assumed constraining effects of current zoning. With these assumptions, the total amount of growth to be studied in the No Action Alternative is approximately 3,400 dwelling units and 16,600 jobs by the year 2030.

Population and Employment Impacts on Neighborhood Subareas

Tables 3-25 and 3-26 illustrate the distribution of projected population and employment growth, per the hypothetical growth scenarios, that would occur in newly developed structures through 2030. This illustrates the portions of the projected growth that would most directly affect these neighborhoods.

Table 3-25
Projected Residential Growth Distribution Through 2030 (Dwelling Units)

Study Subarea	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Preferred Alternative
Pioneer Square north of S. Jackson St.	637	637	637	544	975
1st Ave. S. & Occidental Ave. corridor, north of Royal Brougham	286	69	633	69	69
1st Ave. S. corridor, south of Royal Brougham	0	0	0	0	0
Stadium North Lot and "Over-Tracks" property	956	956	956	956	650
Japantown: 4th, 5th Ave, Main St. vicinity (I.D.)	867	1,092	1,069	683	987
Central Chinatown (I.D.)	1,379	1,562	909	788	1,379
Little Saigon west of 12th Ave. S. (I.D.)	682	796	517	295	732
Little Saigon east of 12th Ave. S. (I.D.)	677	677	677	60	966
South-of-Dearborn St. vicinity	242	225	665	0	242
TOTALS	5,726	6,014	6,063	3,395	6,000

Notes: Distribution based on hypothetical growth scenarios within the study area, varying by zoning alternatives.

Commentary on All Alternatives

Review of the assumed growth amounts shows they are generally consistent with the overall themes defined for the alternatives, e.g.:

- Alternative 1 would concentrate more residential and employment growth toward 1st Avenue S. and Pioneer Square
- Alternative 2 would concentrate more residential and employment growth toward 4th Avenue S. and Chinatown/I.D.
- Alternative 3 would concentrate more residential and employment growth toward 4th Avenue S. and south of Dearborn Street, as well as residential growth concentrated in Chinatown/I.D.
- Alternative 4 would result in broader distribution of residential and employment growth around these areas
- The Preferred Alternative would concentrate residential growth in the neighborhood areas of Pioneer Square, Chinatown, Japantown and Little Saigon, with little expected residential growth

in the 1st Avenue S. and Occidental Avenue S. corridors or the area south of S. Dearborn Street near Chinatown. Employment growth would be concentrated most notably along the 1st Avenue S. corridor, in the south-of-Dearborn Street vicinity, and in the Qwest Field north parking and "over-tracks" property vicinity.

These differing growth alternatives would contribute to varied amounts of increased activity, increased traffic generation, and increased density of residential and employment density in the study area. It is worth noting that a significant proportion of the anticipated growth is expected to occur in or near the Chinatown/I.D. neighborhood under any of the alternatives, likely due to the greater availability of redevelopable properties when compared with Pioneer Square.

Table 3-26
Projected Employment Growth Distribution Through 2030, in Newly Developed Structures
(Number of Employees)

Study Subarea	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Preferred Alternative
Pioneer Square north of S. Jackson St.	0	0	0	0	22
1st Ave. S. & Occidental Ave. corridor, north of Royal Brougham	5,239	3,279	3,461	1,989	4,346
1st Ave. S. corridor, south of Royal Brougham	1,661	1,366	1,273	1,366	1,680
Stadium North Lot and "Over-Tracks" property	1,382	4,902	3,600	746	3,019
Japantown, 4th& 5th Ave. S. vicinity (I.D)	322	176	322	176	322
Central Chinatown (I.D.)	853	216	216	514	853
Little Saigon west of 12th Ave. S. (I.D.)	808	1,347	582	485	852
Little Saigon east of 12th Ave. S. (I.D.)	2,861	1,433	2,387	1,429	1,200
South-of-Dearborn St. vicinity	1,621	2,954	3,438	858	3,686
TOTALS	14,747	15,673	15,279	7,563	15,980

Notes: Distribution based on hypothetical growth scenarios within the study area, varying by zoning alternatives.

Demographic Trends in Future Growth

Residential Populations

Patterns of future development would probably result in a wider representation of households with different income levels in the study area, due to growth in housing resources affordable to more median-income and above-median-income households over time. The Pioneer Square neighborhood plan expressed a preference for this kind of residential growth trend, which the plan theorized would bring

improved stability to the neighborhood. The Chinatown/I.D. neighborhood plan does not explicitly express such a preference.

Livable South Downtown planning has identified probable benefits of increased residential development such as providing more people on the street that could increase activity levels, public safety, and result in an increase in customers for local businesses. There is some evidence that housing growth trends are already underway, with recent new family housing, senior housing and workforce housing in Chinatown/I.D. and Pioneer Square, and a conversion of apartments to condominiums at two Chinatown buildings. See the Housing and Historic and Cultural Preservation sections in this chapter for additional discussion of potential impacts related to this trend, such as the potential for displacement of affordable housing.

Employment Populations

Future employment growth would likely consist of primarily office workers with some complementary retail and service employment growth. Future mixed-use development in the neighborhoods would also be likely to generate additional retail and service employment growth. The Dearborn Street proposal would represent the largest such concentration of retail employment growth, centered near Rainier Avenue S. and S. Dearborn Street in Little Saigon. The net effects of areawide employment growth would be a more diverse range of employees in the neighborhood than are currently present, but with increasing numbers of office workers. This would provide additional daytime populations that would patronize restaurants and small retail shops. See the Land Use—Economic and Business Impacts for further discussion of potential impacts, such as the potential for displacement of businesses.

DEVELOPMENT CAPACITY

Table 3-27 summarizes the alternatives' differing implications for overall estimated development capacity within the study area.

Table 3-27
Summary of Development Capacity Changes Under Each Alternative

Alternative & Subarea	Residential Capacity (Dwelling Units)	Commercial Capacity (Number of jobs)
Pioneer Square		
Alternative 1 – Emphasis to west	~~1,029~~ 1,130	~~3,465~~ 3,500
Alternative 2 – Emphasis to east	~~1,152~~ 1,260	~~3,451~~ 3,490
Alternative 3 – Balanced	1,031	3,461
Alternative 4 – Existing Zoning	842	3,856
Preferred Alternative	1,270	4,000
Stadium Area: 1st Ave. S. corridor (not including PSM zone)		
Alternative 1 – Emphasis to west	339	9,977
Alternative 2 – Emphasis to east	0	10,105
Alternative 3 – Balanced	296	9,977
Alternative 4 – Existing Zoning	0	10,409
Preferred Alternative	0	11,300
"Over-tracks" property: 4th Ave. S.		
Alternative 1 – Emphasis to west	318	2,396
Alternative 2 – Emphasis to east	382	3,542
Alternative 3 – Balanced	409	2,926
Alternative 4 – Existing Zoning	229	2,187
Preferred Alternative	400 - 450	3,200
Chinatown/I.D west of I-5		
Alternative 1 – Emphasis to west	3,374	3,240
Alternative 2 – Emphasis to east	3,242	3,146
Alternative 3 – Balanced	3,068	3,481
Alternative 4 – Existing Zoning	2,922	3,637
Preferred Alternative	3,600	3,240
Little Saigon		
Alternative 1 – Emphasis to west	1,947	11,359
Alternative 2 – Emphasis to east	3,492	8,826
Alternative 3 – Balanced	1,264	13,360
Alternative 4 – Existing Zoning	389	7,540
Preferred Alternative	3,900	8,200 – 8,300
South-of-Dearborn, east of 4th Ave. S.		
Alternative 1 – Emphasis to west	135	2,360
Alternative 2 – Emphasis to east	122	2,714
Alternative 3 – Balanced	550	1,838
Alternative 4 – Existing Zoning	32	648
Preferred Alternative	170 - 200	2,700 - 2,800
TOTAL		
Alternative 1 – Emphasis to west	~~7,142~~ 7,243	32,832
Alternative 2 – Emphasis to east	~~8,319~~ 8,427	31,823
Alternative 3 – Balanced	6,640	35,043
Alternative 4 – Existing Zoning	4,414	28,277
Preferred Alternative	9,340 – 9,420	32,640 – 32,840

MITIGATION STRATEGIES

No mitigation measures are proposed in this section. Differences in distributions of population and employment growth among the alternatives would generate varying levels of impacts within other environmental categories. Please see the analyses and mitigation strategies recommended for the other sections in this chapter.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

None are identified.

HISTORIC AND CULTURAL PRESERVATION

AFFECTED ENVIRONMENT

HISTORIC PRESERVATION

Overview

The Livable South Downtown study area includes two designated historic districts in the Chinatown/ International District and Pioneer Square neighborhoods (see Figure 3-21). These neighborhoods are important areas for Seattle's early history, providing distinctive settings for working, living, recreation and other community activities. Further descriptions of the neighborhoods' physical qualities are provided in the Land Use sections earlier in this chapter.

City policies protect the two historic neighborhoods through several means. Special Review Districts were established to provide oversight of physical development with the intention of preserving historic, social, cultural and economic features. National Register Historic District designations in both neighborhoods further underscore their historic and cultural importance and provide guidelines for development. In areas outside the Special Review Districts, regulatory processes such as designation of new landmarks, use of SEPA authority and the design review process are available to protect landmarks and address aesthetic character of new development.

See Appendix H for further discussion of the districts, their history, and new inventory of existing buildings in parts of the study area. See Appendix I for a list and map of Pioneer Square properties that contribute to the historic district.

Rationales for Preservation

The City's Land Use Code includes distinct justifications for the preservation of the Pioneer Square and Chinatown/I.D. in the description of the Special Review Districts for these neighborhoods (see SMC sections 23.66.100 and 23.66.302).

Pioneer Square

Pioneer Square's "Reasons for designating the Pioneer Square Preservation District" listed in section 23.66.100 include the following:

1. *Historic Significance. The Pioneer Square Preservation District is unique because it is the site of the beginning of the City of Seattle. The area also retains much of the original architecture and artifacts of its early history. The District has played a significant role in the development of Seattle, the Puget Sound region and the State of Washington. It was the first location of industry, business and homes in early Seattle and the focus of commerce and transportation for more than a half century.*
2. *Architectural Significance. As a collection of late nineteenth and early twentieth-century buildings of similar materials, construction techniques and architectural style, the District is unique, not only to the City but to the country as well. Most of the buildings within the District embody the distinctive characteristics of the Late Victorian style. Many buildings are the work of one architect, Elmer H. Fisher. For these and other reasons, the buildings combine to create an outstanding example of an area that is distinguishable in style, form, character and construction representative of its era.*

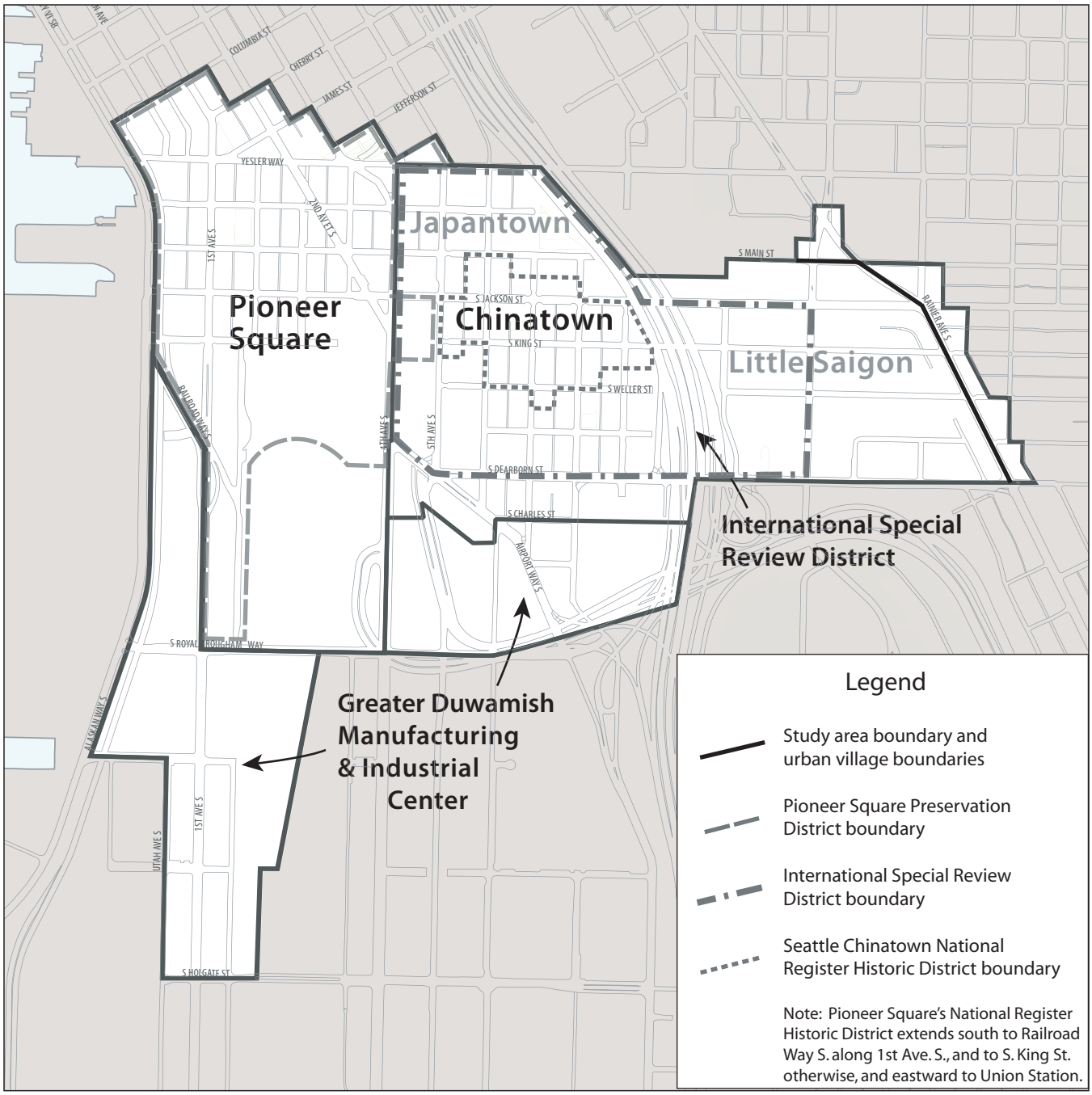


Figure 3-21

Preservation District & National Register Historic District Boundaries

Earlier in section 23.66.100, key purposes for the Preservation District include the following:

- "*preserve, protect and enhance the historic character of the Pioneer Square area and the buildings therein;*
- *Return unproductive structures to useful purposes;*
- *Encourage a variety of new and rehabilitated housing types for all income groups;*
- *Improve visual and urban relationships between existing and future buildings and structures, parking spaces and public improvements within the area; and*
- *Encourage pedestrian uses.*

Additional reasons for the Preservation District relate to social diversity, enhancing its business and economic environment, its geographic location, and the educational significance and value ascribed to preserving the unique environment of Pioneer Square.

International District

Several goals and objectives are listed for the International Special Review District. Description in SMC 23.66.302 of the Land Use Code indicates that the International Special Review District is established "*to promote, preserve and perpetuate the cultural, economic, historic and otherwise beneficial qualities of the area, particularly the features derived from its Asian heritage, by:*

A. Re-establishing the District as a stable residential neighborhood with a mixture of housing types;
B. Encouraging the use of street-level spaces for pedestrian-oriented retail specialty shops with colorful and interesting displays;
C. Protecting the area and its periphery from the proliferation of parking lots and other automobile-oriented uses;
D. Encouraging the rehabilitation of existing structures;
E. Improving the visual and urban design relationships between existing and future buildings, parking garages, open spaces and public improvements within the International District;
F. Exercising a reasonable degree of control over site development and the location of off-street parking and other automobile-oriented uses; and
G. Discouraging traffic and parking resulting from Kingdome [now Qwest and Safeco Fields'] *events and commuters working outside the District.*

In addition, the goals and objectives of the vicinity's primary zone, International District Mixed (IDM), indicate this zone shall "*recognize and promote the area's unique social mix and urban design character. This area is the core of the International District which exemplifies Asian culture. A wide range of uses, including street-level retail, housing development above street level, and the rehabilitation of existing buildings, shall be encouraged to provide a diversity of residential opportunities. Specific objectives include the following:*

A. To maintain and protect the International District core as an Asian cultural, retail and residential center;
B. To allow flexibility and discretion in land use controls, regulations and guidelines to address present conditions and those which may develop in the future;
C. To protect, preserve and promote small retail and commercial businesses;
D. To encourage development of housing above street level;
E. To encourage the rehabilitation of existing buildings; and
F. To assure new development compatible in scale and character with existing buildings.

Special Review Districts and Boards

The responsible agencies for these districts are the Special Review Boards for each neighborhood: the Pioneer Square Preservation Board and the International District Special Review Board. Board members review changes to the use and exterior appearance of buildings, streets, sidewalks and other public spaces in the district. When the Board has completed its review it makes recommendations to the Director of the Department of Neighborhoods, who is responsible for issuing Certificates of Approval. Neighborhood-specific zoning and Land Use Code regulations for these districts have been in place since at least 1985.

The Pioneer Square Preservation District encompasses all of the area zoned in Pioneer Square Mixed plus the Union Station property east of 4th Avenue S. The International Special Review District encompasses the area within the International District Mixed and International District Residential zones and also extends east of I-5 and south of S. Jackson Street to 12th Avenue S. (refer to Figure 3-21).

National Register Historic Districts

The National Park Service has designated much of Pioneer Square and part of the Chinatown/I.D. neighborhood as National Register Historic Districts, signifying their historic importance and educational value. The S. King Street and S. Jackson Street corridors west of I-5 are the center of the Chinatown/I.D. National Register Historic District, which also includes the area between S. Main Street and S. Weller Street and one property south of S. Weller Street (refer to Figure 3-21). This recognizes the largest cluster of buildings with significant historic and architectural value.

New Analysis of Potential Landmark Resources in Portion of Study Area

A consultant was engaged to conduct a survey and evaluation of those areas not previously surveyed for possible historic landmark structures (see Appendix H). This included portions of the Chinatown/I.D. neighborhood, south-of-Dearborn vicinity and part of the Stadium Area vicinity. The survey identified the following locations as those that "may" meet the landmark status, shown in Table 3-28 and Figure 3-22.

Table 3-28
Locations that "May Meet Seattle Landmark Designation Criteria"
in the Livable South Downtown Study Area

Little Saigon and vicinity	South-of-Dearborn	Stadium Area
A. Residential duplex, 500 12th Avenue S.	E. NePage McKenney Co./ Pacific Fish Co./Wan Hua Foods, 804 6th Avenue S.	I. WOSCA freight house, 801 1st Avenue S.
B. Canton Noodle House, 504 12th Avenue S.	F. Federal Immigration Services (former INS Bldg.), 815 Airport Way S.	J. National Grocery Co. Warehouse (Salvation Army Thrift Store), 1000 4th Ave. S.
C. West Coast Printing, 622 Rainier Avenue S.	G. Romaine Electric Building/ Washington Iron Works, 1101 Airport Way S.	K. McKinnon Furniture Bldg., 1518 1st Avenue S.
D. Nissei Veterans Committee Hall, 1212 S. King Street	H. Crescent Manuf. Co./RDA Bldg., 800 Maynard Avenue S.	L. Kellogg's Warehouse/Wine Outlet Shop, 1701 1st Ave. S.
		M. Industrial Rebuild Inc., 1712-1714 1st Avenue S.
		N. Buckner-Weatherby Machinery Bldg., Guardian Security, 1743 1st Avenue S.

Source: Beth Dodrill Consulting, 2007

Figure 3-22

Locations outside of National Register Historic Districts that "May Meet Landmark Designation Criteria"

The former INS building is already on the National Register of Historic Places, but has not been designated as a Seattle landmark. Similarly, the Japanese language school building at 1414 S. Weller Street, the Victorian Row Apartments at 1234 S. King Street, and the 12th Avenue S. bridge are also listed in the National Register.

The survey also examined structures in a few areas adjacent to and outside of the Livable South Downtown study area. Within these nearby areas, other surveyed buildings "may meet Seattle landmark designation criteria." These include: the Seattle Buddhist Church school building at 1416 S. Jackson Street; Antioch Baptist Church at 1445 S. Main Street; the Bemis Building at 55 S. Atlantic Street; and the Budd & Co. Automotive building at 800 Rainier Avenue S.

See Appendix H for discussion of the historic context of the neighborhoods across the study area.

CULTURAL PRESERVATION

The Pioneer Square and Chinatown/I.D. neighborhoods each contribute a distinctive character to Downtown Seattle. They are enjoyed by many Seattle residents, visitors, employees and businesspeople. But their value also has social and cultural dimensions. For some persons, these neighborhoods contain affordable housing, social networks, and supportive services like food banks and health care providers. The Chinatown/I.D. neighborhood in particular also is an environment that reflects and supports the cultural heritage and lifestyles for many members of the community. Public comments have articulated the importance of these neighborhoods as places to gather, socialize and conduct business, which helps many individuals get a foothold in the business world. These factors tend to provide a sense of belonging and a "place to call one's own."

ENVIRONMENTAL IMPACTS

HISTORIC PRESERVATION

Relationship to Livable South Downtown Planning

Livable South Downtown planning has considered historic preservation in the neighborhoods within the study area. It has considered the extent to which specific types of actions might result in adverse impacts, directly or indirectly, on designated historic resources. This has influenced the development of zoning alternatives, the pursuit of strategies such as those relating to bonuses and transfer of development rights, and further research to assess whether as-yet undesignated landmark resources are present in the study area. The potential for impacts relates not only to the magnitude of change in zoned development capacity, but also to the geographic distribution of the historic resources. These are different for each of the neighborhoods studied, and vary by zoning alternative as well. Further, the rationales and objectives for the Special Review Districts for Pioneer Square and Chinatown/I.D. neighborhoods have a bearing on the interpretation of impacts.

Impacts to Historic Resources

Pioneer Square

The City's policies emphasize the neighborhood's historic and architectural significance—including its well-preserved neighborhood setting comprised of numerous buildings with high-quality and intact architectural detailing. The Land Use Code and Preservation Board review processes anticipate that new uses and changes in use of existing structures will occur over time, but require such uses to maintain a high degree of compatibility with the character of the neighborhood. Review processes over the years

have proven to be rigorous in maintaining standards of architectural and visual consistency. Similarly, land use rules have maintained the neighborhood's character and mix of uses.

Future development would likely continue to be held to a high standard of architectural quality and compatibility with neighborhood character in order to receive approvals. Given the Preservation Boards' track record and the limited extent of proposed changes, the probability is low for significant adverse impacts related to architectural, visual and urban design compatibility. At the same time, infill development would contribute to increasing continuity of street-level uses and the overall vitality and attractive aesthetic values of Pioneer Square.

Relationship to height and scale impacts

The alternatives generate the potential for impacts to the historic character of the districts by encouraging future development that could vary from the height and scale of historic structures in the Pioneer Square and Chinatown/I.D. historic districts. In the Pioneer Square core, the alternatives include options that could: raise height limits as high as 130 feet for non-historic~~ally-~~contributing properties (Alternative 1); could allow 130-foot infill development on non-historic~~ally-~~contributing properties but also define a mix of other subarea-specific height limits in the 85-120 foot range (Alternative 2 and the Preferred Alternative); or could set a consistent height limit at 100 feet (Alternative 3). Of these, the increase to 130 feet for non-historic-~~ally~~ contributing properties in the Pioneer Square core would have the greatest potential for adverse impacts to historic resources, while lower height options would have lesser potential for adverse impacts related to building height.

At the west edge of 4th Avenue S. north of S. Jackson Street, height limits of 180 feet at the "railroad gap" properties under Alternative 1 would generate probable significant adverse height-related impacts by introducing a scale of development that could be incompatible with adjacent historic structures. Under Alternative 2 and the Preferred Alternative, height limits to 150 feet in that same vicinity would encourage a somewhat lower scale of development than Alternative 1, with a somewhat lesser potential for adverse impacts, particularly if the maximum height limit is applicable only to non-historic properties. See the Land Use—Height, Bulk, Scale and Compatibility section in this chapter and Appendix B.1 for further discussion of this vicinity as well as the potential height/bulk/scale impacts related to the "over-tracks" and "north parking lot" properties.

Conclusions about historic preservation impacts are related to the identified potential for significant adverse height-related impacts at the "railroad gap" properties, because juxtapositions of new buildings at significantly taller heights under Alternative 1 could adversely affect the perception of the historic district's ensemble of historic buildings. The Land Use—Height, Bulk, Scale and Compatibility section in this chapter proposes mitigation strategies to address ~~these~~ identified significant adverse land use-related ~~height-relate~~d impacts under Alternatives 1 and 2, which would also help mitigate historic preservation impacts as well.

Potential effects on developability of historic-contributing properties

Increases to height limits for historic~~ally-~~contributing properties in Pioneer Square, if they occurred, would increase the development potential of those properties because there is no density limit. Whether that potential could be realized depends on the effectiveness of regulations pertaining to development and demolition of Pioneer Square historic-contributing buildings. Land Use Code provisions and Historic District guidelines encourage preservation of existing historic buildings in Pioneer Square while discouraging demolition of those buildings. However, one concern is that intentional disinvestment in historic buildings could occur, to the point that buildings would deteriorate and demolition approval would finally be granted. Another concern is that property owners could sue, seeking a judgment that confirms an economic-hardship justification for demolition.

In both cases, increasing the development potential on historic-contributing properties can be interpreted as increasing the risks of these actions occurring. This could result in significant adverse impacts on the Pioneer Square historic district, if significant height increases affecting historically-contributing properties are pursued. Alternative 2 includes increases to height limits on a small number of historic-contributing properties near 3rd Avenue S., which indicates a conclusion of a ~~However, due to the~~ probable ~~significance of this~~ significant adverse impact. Under the Preferred Alternative, the recommended higher height limit would only be applicable to the non-historic properties, which should avoid the significant impacts identified under Alternative 2. ~~this type of zoning change is not likely to be recommended for those properties. Rather,~~ The recommended mitigation strategies in the Land Use—Height, Bulk, Scale and Compatibility section ~~is~~ are to confine this potential Alternative 2 rezone only to the "railroad gap" properties abutting the west edge of 4th Avenue S.

Chinatown/Japantown

The goals and objectives listed for this neighborhood's Special Review District recognize that the neighborhood's value lies not merely in its historic architectural and visual qualities but also in its value as a residential, social, cultural and economic activity center of Asian culture and heritage. This outlook influences the nature of regulations for the neighborhood. The well-defined boundaries of the National Register Historic District and an "Asian design character district" reflect the land use patterns of a concentrated historic core area that is adjacent to lower-density buildings with non-historic architectural design and parking lots. Accordingly, rules for development outside the "Asian design character district" are somewhat more flexible regarding compatibility with historic architecture than those within the character district (see SMC 23.66.336). These differences in relative sensitivity to historic character have a bearing on the interpretation of historic preservation impacts of the alternatives.

Relationship to height and scale impacts

The Livable South Downtown planning process includes a strategy to avoid rezones within the National Register Historic District except one overlap with the Publix Hotel property as part of Alternative 2. (Under the Preferred Alternative, the overlap with the Publix Hotel is removed from the recommended rezone area.) This strategy limits the potential for adverse impacts to historic resources in the Chinatown/Japantown vicinity by avoiding zoning changes that would result in potentially higher property valuations and increased development capacity that could adversely affect existing historic buildings' long-term use and existence.

The Preferred Alternative and Alternative 2 present the greatest potential to directly or indirectly alter the National Register Historic District. The Preferred Alternative and Alternative 2 would establish a 150-foot or a 125-foot height limit, respectively, in an IDM zone within the block bounded by 5th and 6th Avenues S., S. Weller Street to the south and S. King Street to the north. The Publix Hotel property on this block is part of the National Register Historic District, but other parts of the block are not. The block is located at the western end of the S. King Street corridor. Both of ~~this~~ these zone changes, if not otherwise controlled through height and bulk controls, would likely result in significant adverse impacts related to land use and height/bulk/scale elements of the environment, due in part to the sensitivity to historic character within and immediately adjacent to the National Register Historic District. Similarly, a conclusion is reached that significant adverse impacts on historic preservation could occur. This does not mean that height limits to 125 or 150 feet cannot be adopted for this block, but if so, mitigation strategies or height and bulk controls to further influence consistency of future development with historic character should be implemented. The Preferred Alternative does, in fact, include proposed height and bulk controls (such as building setbacks at either 45 feet or 75 feet) that would help avoid the potential for significant adverse impacts, and such controls could also be incorporated into Alternative 2 if that zoning is preferred.

Other potential adverse impacts to historic character could occur in other locations where proposed zoning changes are adjacent to but not within the existing National Register Historic District: near 5th Avenue S./S. Jackson Street, and along S. Weller Street, under Alternatives 1, ~~and~~ 2 and the Preferred Alternative.

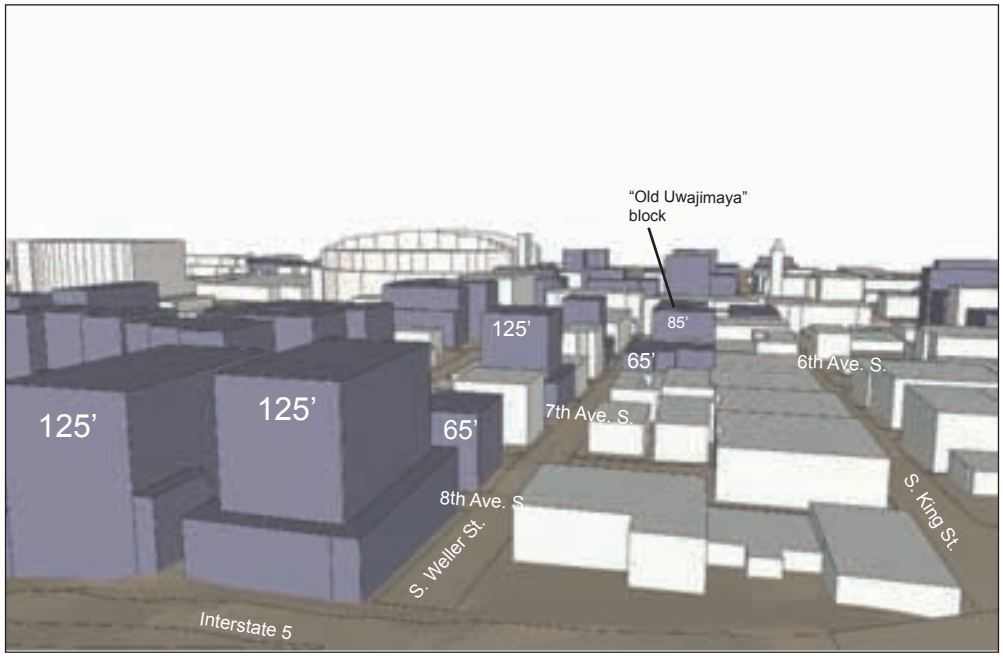
- Near 5th Avenue S./S. Jackson Street, the height/bulk/scale analysis suggests that an increase in allowable height to 240 feet (Alternative 1 and the Preferred Alternative) would avoid significant adverse height, bulk and scale impacts on the adjacent Chinatown and Japantown vicinities, due to the positive influence of recommended bulk controls such as upper level setbacks and floor size limits. Increased allowable heights to 180 feet (for Alternatives 2 and 3) would have less potential to generate height, bulk and scale impacts than Alternative 1, also due in part to bulk controls included in these alternatives. Under these alternatives, the future development's bulk and proximity to adjacent historic-contributing structures is interpreted to represent an adverse historic preservation impact but not a significant adverse impact.
- Along S. Weller Street, the height/bulk/scale analysis suggests that only two or three quarter-block properties abutting the south side of S. Weller Street are likely to experience future development under the 125-foot zoning (Alternatives 1 and 2), or to 150 feet under the Preferred Alternative. This would limit the total exposure of the National Register Historic District north of S. Weller Street to the potential adverse impacts of taller building height, bulk and scale (see Figures 3-23 and 3-23.A). For all except one historic property that is south of S. Weller Street, the physical separation provided by the S. Weller Street right-of-way would represent a buffer to the historic district. Recommended bulk controls would also help moderate potential adverse impacts. Therefore, under Alternatives 1 ~~and~~ 2 and the Preferred Alternative, proposed zones south of S. Weller Street are not expected to result in significant adverse impacts on historic resources. Alternative 3 does not include the 125-foot height limit proposal south of S. Weller Street, and so has no potential for adverse impacts.

Alteration of IDR-150' bulk limits would affect certain historically-contributing Japantown properties

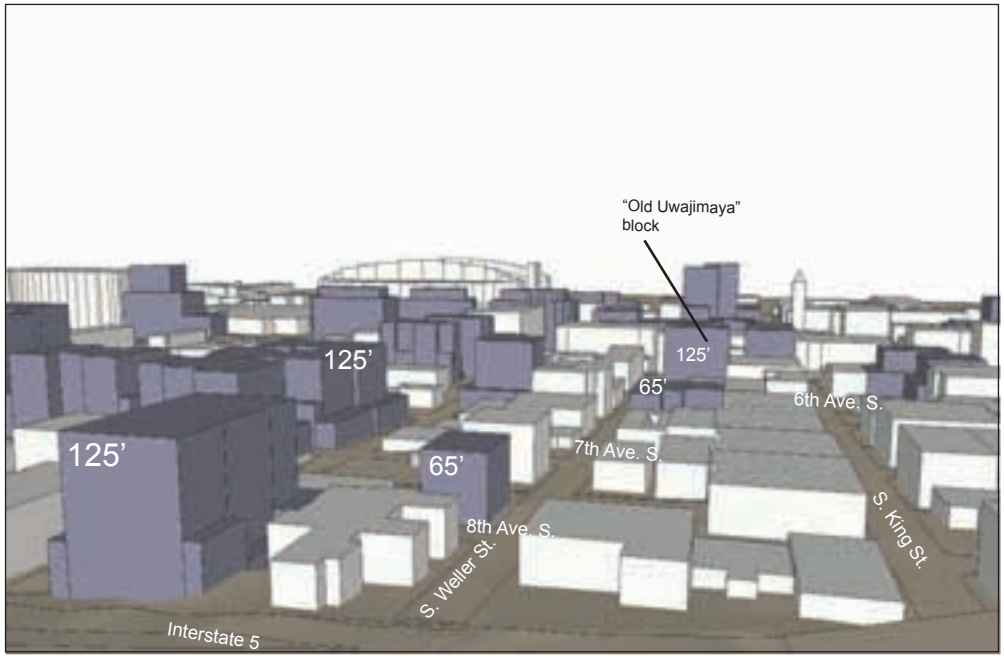
Currently, restrictive bulk limits in the 150-foot zone discourage a full-height building. As a result, recent development in this zone has been to heights up to 75 feet. Proposed changes to the IDR 150' zone's bulk limits (under the Action Alternatives including the Preferred Alternative) would enable somewhat more flexible building forms that could increase the financial feasibility for buildings to be built to the maximum 150-foot height. The proposed changes under Alternatives 1, 2 and 3 would affect zoning on some National Register Historic District properties in the Japantown vicinity near 6th Avenue S. and S. Main Street, including the Panama Hotel, Northern Pacific (N-P) Hotel, Main Street School Annex and Russell Building. However, these properties would not be affected by the Preferred Alternative because they instead would be zoned at IDM 75'/85' rather than IDR 150'.

In a worst case scenario, the changes to the IDR 150' zone could increase pressure for redevelopment of structures that comprise the core of the historic Japantown neighborhood. The Department of Neighborhoods and the International Special Review District Board would continue to ensure that these historic structures are protected. However, similar to Pioneer Square, intentional disinvestment or litigation could potentially lead to the eventual granting of demolition and/or development permits. Given the sensitivity of historic-contributing buildings within the National Register Historic District, this change has the potential to result in significant adverse impacts to historic resources.

Alternative 1



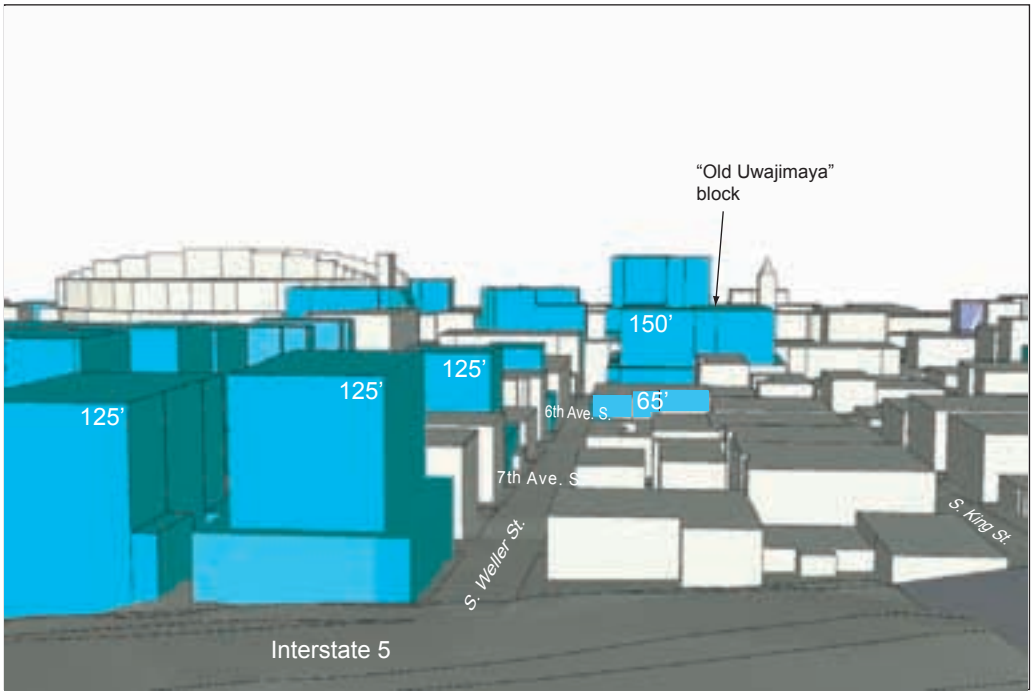
Alternative 2



Note: Hypothetical buildings shown, per the EIS growth scenario, except additional buildings shown on sites abutting S. Weller Street (Alt. 1) and on "old Uwajimaya" block (Alt. 2), for illustrative purposes.

Figure 3-23
View west from Interstate 5 at S. Weller St.

Preferred Alternative



Note: Hypothetical buildings shown, per the EIS growth scenario, except additional buildings shown on sites abutting S. Weller Street, for illustrative purposes.

Figure 3-23.A

View west from Interstate 5 at S. Weller St., Preferred Alternative

Proposed bonus and transfer of development rights (TDR) mechanisms are not likely to result in significant adverse impacts related to developability of historic structures (see the Housing section in this chapter for further discussion). Proposed bonus and TDR programs are likely to have positive long-term effects in securing the retention of structures in the National Register Historic District so long as they are oriented to maintaining and rehabilitating existing historic-contributing structures.

Little Saigon (Chinatown/I.D.)

The Victorian Row Apartments is the only current landmark structure in this vicinity. It is owned by Historic Seattle, a non-profit entity that has a long-term agreement to retain the historic structure. Under Alternatives 1 and 3, the proposed NC3 85' zone would allow future development approximately 20 feet higher than current zoning. This modest increase in development capacity on this landmark property could potentially adversely affect the long-term retention of this historic resource. However, due to the relatively small increment of change, this would be considered only a minor adverse impact.

The 125-foot (or optionally a 150-foot) maximum height proposed under Alternative 2 and the Preferred Alternative would further increase the potential for adverse impacts on the Victorian Row Apartments due to the greater increase in development capacity. However, as an existing landmark, it would be subject to further SEPA review and Landmark Board review if it was proposed for demolition. Adjacent properties would also be subject to SEPA review to assess whether mitigation measures are needed to help new adjacent development complement this property. Protections afforded to designated landmark structures would help to reduce or avoid significant adverse impacts on this landmark.

Locations that "May Meet Landmark Designation Criteria"

Sites listed in Table 3-28 that may meet criteria for landmark designation could be subject to future development. City policies indicate that existing structures that may qualify for landmark designation be referred to the City's Department of Neighborhoods for an evaluation of their consistency with the landmark designation criteria. This would be expected to occur on a site-by-site basis if or when these properties are proposed for re-development. It is not known at this time which of the sites listed in Table 3-28 would meet landmark designation criteria. Because this process is already established in City policies, and because the potentially affected properties have now been inventoried, there is only a low risk that a potential landmark would be affected in a significant adverse manner by future development related to proposed Livable South Downtown zoning changes.

In addition, four buildings identified in Table 3-28 are located in the vicinity of 1st Avenue S. south of S. Atlantic Street where zoning changes are not likely to occur. These are the buildings labeled as "K, L, M and N" in Table 3-28. The only relevant Land Use Code change under consideration in that vicinity is, under Alternative 3, the possibility of lodging uses being authorized as an allowed use.

CULTURAL PRESERVATION

Chinatown/I.D. neighborhood

An important goal of Livable South Downtown planning relates to ensuring that the social and cultural qualities in the neighborhood can be maintained. This may include land use actions that help preserve physical characteristics of the neighborhood and that also maintain residential and business activity.

The EIS analyses cannot eliminate a worst-case possibility that displacement of individual uses or structures that contribute to cultural character might occur. Such trends might occur with or without zoning changes, due to long-term economic forces, turnover in business ownership, and physical decay of structures that form the historic core of the neighborhood. The Housing section of this chapter identifies

the potential for displacement of affordable housing resources in parts of Japantown. The Business and Economic Impacts section identifies certain risks of impacts at varying levels in Little Saigon and the Chinatown core. However, due to lack of compelling evidence, no specific finding of a significant adverse impact related to cultural preservation is made in this EIS.

Livable South Downtown planning has identified possible strategies that would assist in helping to protect Asian American culture that is expressed through the physical and social environment of Chinatown/I.D. These could include:

- Programs to generate funds for affordable housing to avoid displacement of existing low-income residents in the neighborhood;
- Programs to support the preservation and rehabilitation of historic buildings, many of which contain culturally significant design features;
- Technical assistance programs to encourage retention of existing businesses in Chinatown/I.D.
- Retention of existing height limits in core business areas in Chinatown/I.D. in order to avoid gentrification pressures in these areas.

Livable South Downtown planning also supports retention and updating of Special Review District rules and standards for future development, with continued attention to ensuring high levels of compatibility with the historic and cultural qualities of the district, particularly within the National Register Historic District. When possible, rules should also be adjusted to accommodate common business practices—such as use of sidewalks for vegetable display stands—that may not be consistent with existing street use regulations.

MITIGATION STRATEGIES

Pioneer Square

Alternative 1

- If Alternative 1 zoning with 180-foot height limits is favored for the "railroad gap" properties at the west edge of 4th Avenue S., implement mitigation strategies recommended in the Land Use—Height, Bulk, Scale and Compatibility section to avoid significant adverse historic preservation impacts.

Alternative 2

- If Alternative 2 zoning with 150-foot height limits is favored for the "railroad gap" properties, implement mitigation strategies recommended in the Land Use—Height, Bulk, Scale and Compatibility section to avoid significant adverse historic preservation impacts.

Chinatown/I.D.

Alternative 2

- See the mitigation strategy proposed in the Land Use—Height, Bulk, Scale and Compatibility chapter, with respect to height, bulk and scale impacts at the block bounded by 5th and 6th Avenues S. and S. King and S. Weller Streets.

Alternatives 1, 2, 3

- Consider whether a portion of the National Register Historic District near 6th Avenue S./S. Main Street should be subject to IDR 150' zoning, which if amended in its bulk controls could increase

these properties' attractiveness for future redevelopment. Alternatively, these properties could be included in a lower-height zone to maintain protection against future development pressures.

Little Saigon

Alternative 2

- Ensure that potential zone choices to a maximum height of 125 (or 150) feet in Alternative 2 in Little Saigon would result in sufficient bulk controls to maintain compatible conditions with adjacent landmark structures, specifically in relation to the Victorian Row Apartments. Consider whether other measures are needed to further protect the long-term status of the Victorian Row Apartments if that property is included in rezones that increase development capacity.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

With implementation of mitigation strategies to address the identified significant adverse historic preservation impacts of the alternatives, no significant unavoidable adverse impacts are expected to occur.

SCENIC RESOURCES AND PUBLIC VIEW PROTECTION

AFFECTED ENVIRONMENT

This section discusses view impacts based on the City's SEPA Public View Protection policies, including the topics of public viewpoints, views of landmarks and views from scenic routes. Where possible, the impact analysis in this EIS attempts to identify the additional increment of view impact attributable to the alternatives and the relative differences in impacts among the alternatives.

EXISTING PUBLIC VIEWS PROTECTED BY ENVIRONMENTAL POLICIES

The City's SEPA rules provide protection for certain defined public views and views toward historic landmarks. The section on Public View Protection indicates, "*The City has developed particular sites for the public's enjoyment of views of mountains, water and skyline and has many scenic routes and other public places where such views enhance one's experience"* (SMC 25.05.675 P). The natural and human-made view subjects include: Mount Rainier, the Olympic and Cascade Mountains, the Downtown skyline, and major bodies of water including Puget Sound, Lake Washington, Lake Union and the Ship Canal. The city does not protect views from private property (see the ~~beginning~~ end of the "Environmental Impacts" discussion for relationship of such views to rezones).

Public Viewpoints

In an attachment, 87 public locations are identified where public views are to be protected. Of these, only four locations have a view relationship to South Downtown:

- **Kobe Terrace Park and the Danny Woo International District Community Garden**—Sixth Avenue/S. Washington Street south to S. Main Street
- **Harborview Hospital Viewpoint**—Eighth Avenue and Jefferson Street
- **Jose Rizal Park**—12th Avenue S. and S. Judkins Street
- **U.S. Public Health Service Hospital ("Pac-Med Building")**—1131 14th Avenue S.

The nature of the view relationships to South Downtown are discussed below.

Kobe Terrace and Danny Woo community garden

Two references in the special review district code for the International District pertain to Kobe Terrace Park (SMC 23.66.306 and 23.66.332). One of the goals for the International District Residential (IDR) zone is "*the design, siting, and construction of structures which minimize view blockage from Kobe Terrace park and from existing structures which are used primarily for residential purposes.*" Similarly, a height provision requires review of rooftop features for the sake of preserving views from the park. The International Special Review District Board makes decisions on development proposals in this vicinity. The IDR zone's height limit is set at 150 feet, but the newest developments in the IDR zone have not exceeded approximately 75 feet.

Kobe Terrace Park and Danny Woo Garden lie on a south and southwest-facing slope north of S. Main Street in the Maynard Avenue S. vicinity. Quite a few locations offer southerly views, but in several locations the park's trees obscure views toward distant features. A westward view is also possible in several garden locations, through two narrow parking lots framed by residential buildings, with views toward Elliott Bay, the southern end of the Olympic range and the Smith Tower. A southwesterly view is also available from some locations, over buildings in the foreground toward Qwest Field and the SR 99 viaduct, with Harbor Island and West Seattle in the background. Kobe Terrace also includes a plaza area at the terminus of S. Washington Street west of I-5, which offers westward views down S. Washington Street toward Pioneer Square and Elliott Bay. This view is essentially limited to the existing street

corridor by existing buildings and street tree vegetation (see Figure 3-24). From this vantage point, the visible Pioneer Square buildings appear low-scaled, revealing a portion of Elliott Bay in the background. The existing building on the south side of S. Washington Street, built about 20 years ago, infringed on the range of views that were formerly available from Kobe Terrace Park

Harborview Hospital Viewpoint

Harborview Hospital Viewpoint is perched on a parking garage above and east of I-5, with views in a 180-degree arc toward the office core, Elliott Bay, Pioneer Square, West Seattle, Olympic Mountains, Duwamish lowlands and even Mount Rainier to the south. From this high vantage point, Pioneer Square lies in the midground, appearing as a relatively uniform collection of boxy buildings, with the Smith Tower, Frye Hotel, King Station clock tower and athletic stadia the most visually prominent features (see Figure 3-25). A King County government office building was recently built, ~~is under construction,~~ visually relating more to the collection of Downtown office buildings than the South Downtown study area. This building ~~will~~ blocks a small view segment in the direction near Smith Tower. In addition, a ~~future possible~~ development under construction just north of Yesler Way between 5th and 6th Avenues could also slightly affect views from this viewpoint, ~~in the future~~ interrupting views toward a segment of central Pioneer Square.

Further to the south and east, Chinatown is visible in the midground over to approximately I-5, with visually prominent buildings including the Union Station office buildings, the Downtowner apartment building, and the Ticino apartments and new Washington Terrace senior apartment building appearing in the foreground near 6th Avenue and Yesler Way (see Figure 3-25). I-90 ramps are also noticeable but at the far edge of the midground. Elements of the view's background include the Duwamish industrial area, industrial operations in the Harbor Island vicinity, and the slopes of West Seattle extending toward Duwamish Head.

Jose Rizal Park

At the northern point of Beacon Hill, this park provides a signature view of the Seattle skyline as well as expansive western views of Puget Sound, the Olympic Mountains, West Seattle and South Downtown (see Figure 3-26). In the foreground, the I-90 ramps lie in front of the south-of-Dearborn vicinity. In the midground, Qwest Field is the most prominent view element, with the Union Station office complex nearby to the north.

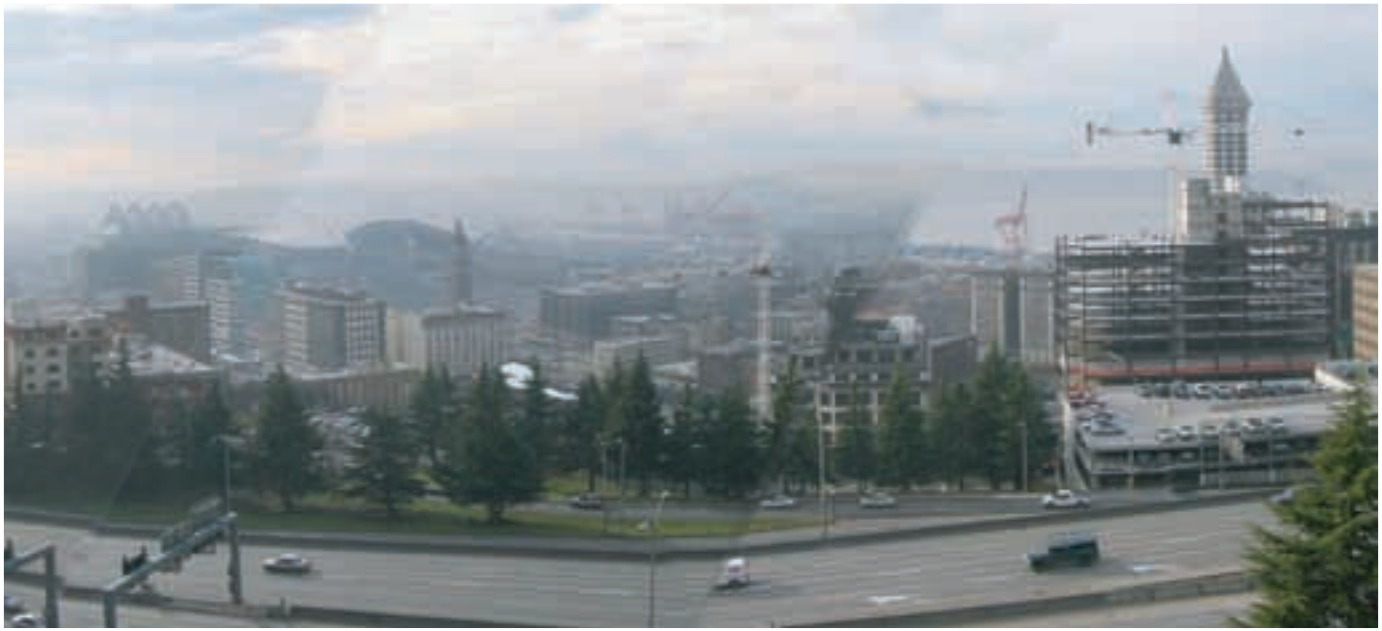
Pac-Med Building

Given the proximity to Jose Rizal Park (just across the street), northwestern views from this hospital property are relatively similar to the park's views (see Figure 3-26). However, the best views toward Downtown on this facility's grounds also include Little Saigon properties west of 12th Avenue S. in the lower foreground, visually below the Downtown skyline.

View Protected Landmarks

SEPA specifies "*it is the City's policy to protect public views of historic landmarks designated by the Landmarks Preservation Board, which, because of their prominence of location or contrasts of siting, age, or scale, are easily identifiable visual features of their neighborhood or the City and contribute to the distinctive quality or identity of their neighborhood or the City.*" This typically would apply to a project-specific review affecting only one designated historic landmark. It is also broadly applicable for this programmatic SEPA review of two historic neighborhoods with landmark districts. The City's policies, codes and SEPA authority collectively provide for the protection of the visual integrity and historic character of the neighborhoods, including the urban environmental context of the dozens of buildings that form that character.

Existing Conditions



Note: This viewpoint is located on a garage on the west side of Harborview Hospital, near Interstate 5.

Figure 3-25

Existing View Looking Southwest from Harborview Viewpoint

Existing View Looking South from Danny Woo Garden

Existing View Looking West from Danny Woo Garden

View West from Kobe Terrace

View 1/2-Block West of Kobe Terrace

Figure 3-24
Existing Views From Danny Woo Garden and Kobe Terrace (S. Washington St.)

Existing View Looking West from Jose Rizal Park

Existing View Looking Northwest from "Pac-Med" (Amazon) Building grounds

Figure 3-26

Existing Views Looking West from Jose Rizal Park and Northwest from the Amazon Building

Scenic Routes

The City's SEPA policies address the protection of public views from City streets designated as scenic routes. In relation to South Downtown, these scenic routes include:

- Yesler Way
- S. Jackson Street
- 12th Avenue S. south of S. Jackson Street
- Rainier Avenue S. south of S. Jackson Street
- A small segment of 4th Avenue S between S. Dearborn Street and Royal Brougham Way, plus Royal Brougham Way extending west to approximately Occidental Avenue S.
- Interstate 5, Interstate 90 and the Alaskan Way Viaduct

The nature of the scenic route relationships to South Downtown are discussed below.

Yesler Way

This scenic route provides views of the study area from the east. As westbound travelers on Yesler Way approach and cross I-5, the overpass bridge offers a view primarily toward Downtown buildings and down Yesler Way to Elliott Bay and the Olympics. The recently-built Washington Terrace Building impairs other southwesterly views that were formerly possible. Down the hill directly to the west, the Smith Tower and the Frye Hotel are prominent view elements.

S. Jackson Street

This scenic route provides primarily local streetscape views of the Pioneer Square and Chinatown/I.D. neighborhoods. Its modest downslope toward the west provides some broader views for westbound travelers, but I-5 overpasses are a visual interruption along this route. In Pioneer Square, the westward views open up to Elliott Bay, but the Alaskan Way Viaduct is a visual interruption in this vicinity.

12th Avenue S.

This scenic route provides views westward primarily at the 12th Avenue S. Bridge crossing S. Dearborn Street, with views similar in nature to those described above for Jose Rizal Park. Views southward are toward the prominent Pac-Med Building at the northern tip of Beacon Hill, also including local streetscape views.

Rainier Avenue S.

This scenic route provides local streetscape views and distant views south toward Mount Rainier. Its downslope toward the south also affords views of the commercial Rainier Avenue S. corridor in the midground, with an upslope toward the east limiting views in that direction.

4th Avenue S. and Royal Brougham Way

Northbound travelers on 4th Avenue S. see a pleasant skyline view with King Street Station's tower in the foreground, and other Pioneer Square and Downtown buildings. Travelers on Royal Brougham Way view the exhibition center and Safeco Field facades to the north and south, a view quite different than the Downtown skyline view when this scenic route designation was originally approved.

Interstate 5 and Interstate 90

The Interstate 5 scenic route affords a limited number of views of the study area. Southbound I-5 motorists glancing to the right see a few buildings near 6th/Yesler Way, then a series of brief views overlooking Chinatown. Northbound motorists approaching Downtown have a few opportunities to view

the South Downtown vicinity in the midground with the Downtown skyline in the background. Safeco Field and Qwest Field are visual landmarks from the northbound I-5 locations where views are possible. Approaching the Little Saigon vicinity on northbound I-5, brief views consist of a few low-scale buildings nearest to the freeway bridge from S. Weller Street to S. Jackson Street on 10th Avenue S., and the Pacific Rim Center at S. Jackson Street adjacent to I-5.

Interstate 90 affords a couple of views toward the study area, including a view toward Little Saigon from the south and a westward view toward Chinatown from ramps that merge with I-5. The view of Little Saigon includes some of the buildings on S. Weller Street and buildings further north, but is somewhat impaired by the freeway sidewalls. The view toward the west is a perspective toward Qwest Field with the Dearborn Street vicinity in the midground.

Alaskan Way Viaduct

The SR 99 viaduct provides several views of the Downtown skyline, waterfront and Elliott Bay, as well as views of several nearby buildings in the Pioneer Square vicinity and views of the athletic stadia and 1st Avenue S. vicinity. From this elevated perspective, northbound passing motorists can detect the older character of the buildings on the east side of 1st Avenue S., which is representative of the Pioneer Square character, even though the buildings' relative scale is diminished in comparison to the stadia. Further north, passing motorists may note the close proximity of several Pioneer Square historic buildings and the varied architecture of the Downtown skyline elements including Smith Tower.

ENVIRONMENTAL IMPACTS

The impact analysis in this section pertains predominantly ~~only~~ to the public views that are protected by environmental policies. These include designated public viewpoints, views to landmarks, and scenic route view relationships.

However, it is acknowledged that future possible development in the study area might affect views from locations that are not protected by such policies. EIS scoping comments indicated interest in views from both stadium concourses and from condominiums in Pioneer Square, for example. The likelihood of view blockage is one factor taken into consideration when making rezone decisions, according to rezone criteria pertaining to height limits in SMC 23.34.009. This means that following the publication of this EIS, it is expected that decision-makers will consider view relationships in their deliberations. Also, see the "Potential Changes to Private Views" discussion at the end of this section that describes view relationships from locations that are not designated public viewpoints at a programmatic level.

PUBLIC VIEWS PROTECTED BY ENVIRONMENTAL POLICIES

Public Viewpoints

Kobe Terrace and Danny Woo community garden

View to West on S. Washington Street

Under all alternatives, future development could slightly constrain the view corridor down S. Washington Street, through the addition of building bulk on nearby properties on S. Washington Street. However, due to the view constrictions of existing buildings, the additional infringement would be limited to relatively limited portions of building bulk on either side of the street with the view corridor retained down the street right-of-way toward Elliott Bay (see Figure 3-27). Potential adverse view impacts under the Preferred Alternative would be similar to Alternative 1.

View to West from Garden

Future possible development on one property on the west side of 6th Avenue S. south of S. Washington Street could partially or fully block the available westerly views from several viewpoints in the community garden (see Figure 3-28). However, this could occur under existing zoning as well, which ranges up to a maximum height limit of 150 feet. The possible maximum heights range from 240 feet in Alternative 1 and the Preferred Alternative, to 180 feet in Alternative 2, to no additional height under Alternatives 3 and 4. The level of blockage would ultimately relate to building design, which could be positively influenced by bulk shaping controls included in the Alternatives and by the deliberations of the neighborhood's special review board.

In views toward the southwest from the Danny Woo Garden vicinity, other possible future development in the 5th Avenue S./S. Jackson Street vicinity could further impair views toward the Qwest Field vicinity and West Seattle background, given the higher height limits proposed in Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative.

Views to South from Park and Danny Woo Garden

With adjustments in IDR 150' zone development regulations, additional minor increments of view blockage from Danny Woo Gardens would be possible if future building development occurred along S. Main Street. Somewhat bulkier development in upper portions of future buildings could occur, which might widen the extent of view blockage. Under the Preferred Alternative, minor adjustments in the zoning boundaries compared to other alternatives leads to slightly less potential for view impacts west of Maynard Avenue S. than Alternatives 1, 2 and 3. However, actual view impacts would depend on actual development site locations and proposed building designs. Also, because the garden is already protected from adverse view impacts by city policy and this is an issue deliberated upon by the neighborhood's special review board, the potential for additional significant adverse view impacts would either be avoided or controlled by these future development review processes. Therefore, these are identified as potential adverse impacts but not as significant adverse impacts (see Figure 3-29).

Alternative 1 and Preferred Alternative

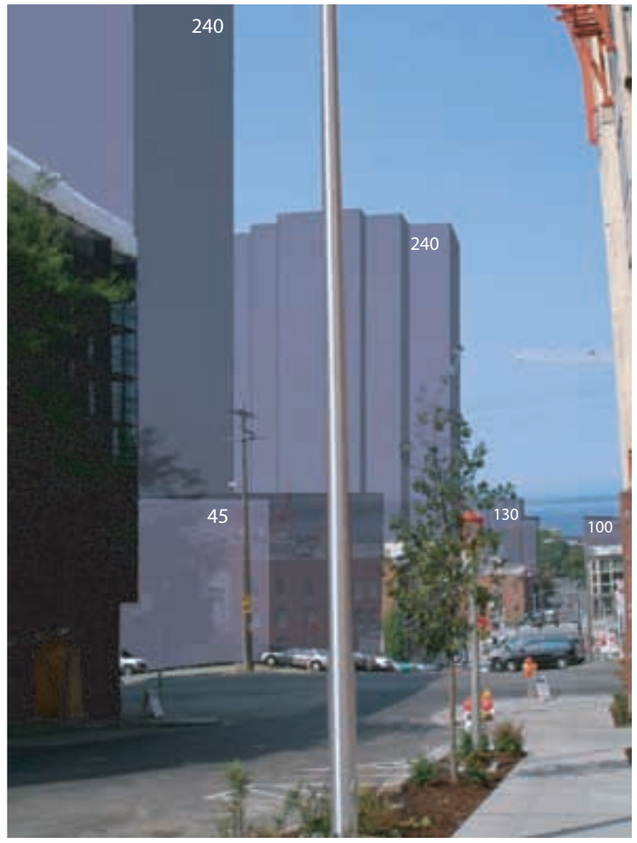
Alternative 2, 3

Alternative 4

Note: Buildings shown represent a hypothetical development that matches the growth assumed per the EIS growth scenario. The dotted line shown in the middle picture illustrates the maximum building “envelope” of 180 feet applicable to Alternative 2.

Figure 3-28
Effect of Future Possible Development on Views West from Danny Woo Garden

Alternative 1 and Preferred Alternative



Alternatives 2 and 3

Note: The view location is approximately one-half block west of Kobe Terrace. Actual views from Kobe Terrace are constrained by existing buildings and trees as shown on Figure 3-24. The views above illustrate how future possible building bulk would relate to view perspectives westward down S. Washington Street. Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-27

Effect of Future Possible Development on Views West From S. Washington St., near Kobe Terrace, Preferred Alternative and Alternatives 1, 2 and 3

Alternative 1

Alternative 2, Preferred Alternative[2]

Alternative 3

Notes:
1. Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.
2. Preferred Alternative scenario is similar to Alt. 2 portrayal except buildings shown at 125 feet could reach 150 feet.

Figure 3-29
Effect of Future Possible Development on Views South from Danny Woo Garden

Harborview Hospital Viewpoint

The alternatives' proposed changes in the vicinity of 6th Avenue/Yesler Way and down toward 4th Avenue S./S. Jackson Street generate the only potential adverse impacts on views from this viewpoint. Compared to the existing zoned height limit of 150 feet, Alternative 1's and the Preferred Alternative's height limit of 240 feet could result in future development near 6th Avenue/Yesler Way that would extend a building above the West Seattle horizon line in the background (see Figure 3-30). A 150-foot building would probably visually reach just below that background horizon line. Alternative 2's and 3's 180-foot height limits would result in somewhat lesser impacts than Alternative 1, but also could extend a building's top slightly above the West Seattle horizon line (see Figure 3-30). This extension above the horizon line would increase the relative visual prominence of a new building and decrease the continuity of territorial views from this viewpoint. Such impacts are interpreted to be "adverse" but not "significant adverse" impacts.

For all alternatives, including existing zoning (Alternative 4), new development at or near 6th Avenue/ Yesler Way could block or impair views toward the King Street Station clock tower and a portion of Pioneer Square—meaning this is not a new impact of the alternatives. Other impacts on this viewpoint's views are negligible.

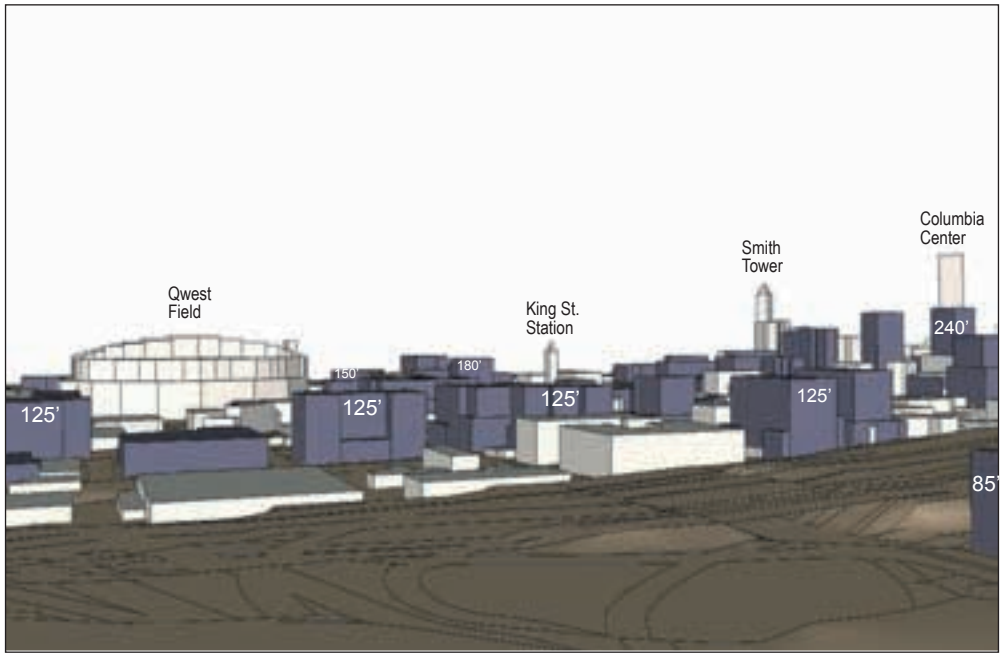
Jose Rizal Park

Future development under the alternatives would add to building bulk in the midground of views from this location (see Figures 3-31 and 3-32). In views generally toward the west, future development under any of the alternatives would remain below the lower horizon line representing land directly across Puget Sound and also below the Olympic Mountains horizon line. The only exception to this conclusion would occur if 240-foot buildings (under Alternative 2) were built in the Qwest Field north parking lot, they would visually protrude into the lower portion of the Olympic Mountains backdrop. Under the Preferred Alternatives, potential adverse impacts on views from this location would be similar to Alternative 2, except somewhat lesser in magnitude due to reduced scale in the southern portion of the "over-tracks" property (see Figure 3-32.A). In views toward Downtown, future development in Chinatown, Japantown and Pioneer Square would add to building bulk in the lower foreground and midground of skyline views (including buildings up to 150 feet in Chinatown south of S. Weller Street under the Preferred Alternative), but would not generate significant adverse impacts on the qualities of views from this location.

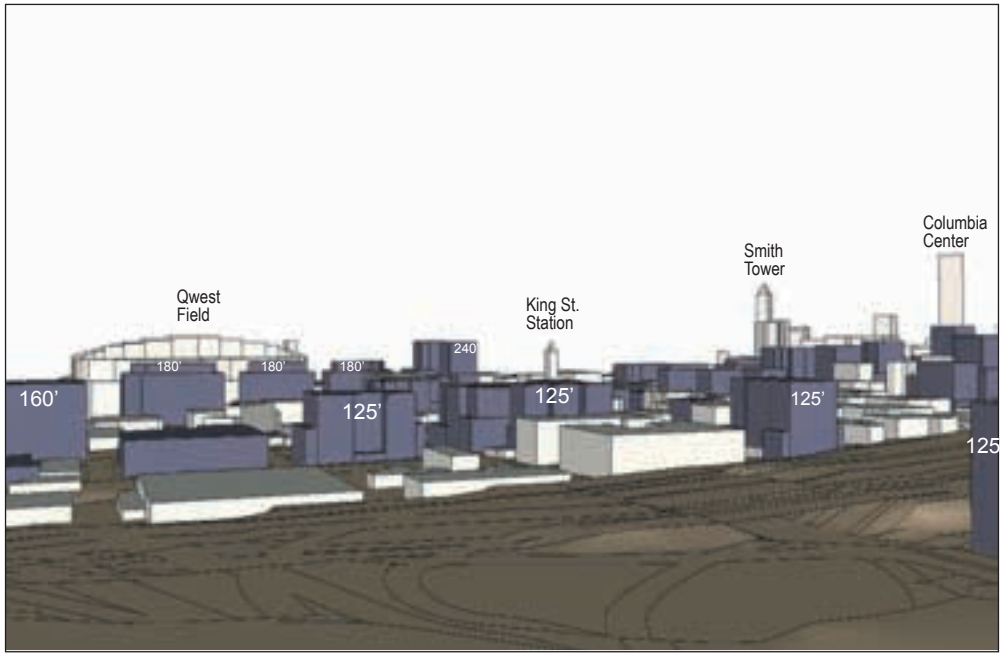
Pac-Med Building

The view opportunities available from this facility's grounds include more of Little Saigon in the lower foreground than views from Jose Rizal Park. Under any of the EIS alternatives, future development would add new buildings to the foreground and midground of views toward the Downtown skyline. However, even with the highest height limits in Little Saigon (Alternative 2 and the Preferred Alternative), Chinatown (the Preferred Alternative) and in Japantown (Alternative 1 and the Preferred Alternative), future buildings would not generate significant adverse impacts on the qualities of views from this location (see Figures 3-33 and 3-33.A).

Alternative 1



Alternative 2



Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-33

View Northwest from "Pac-Med" (Amazon) Building Grounds, Alternatives 1 and 2

Preferred Alternative

Note: Buildings shown represent a hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-32A

View from Jose Rizal Park with Future Possible Development, Preferred Alternative

Alternative 3

Alternative 4

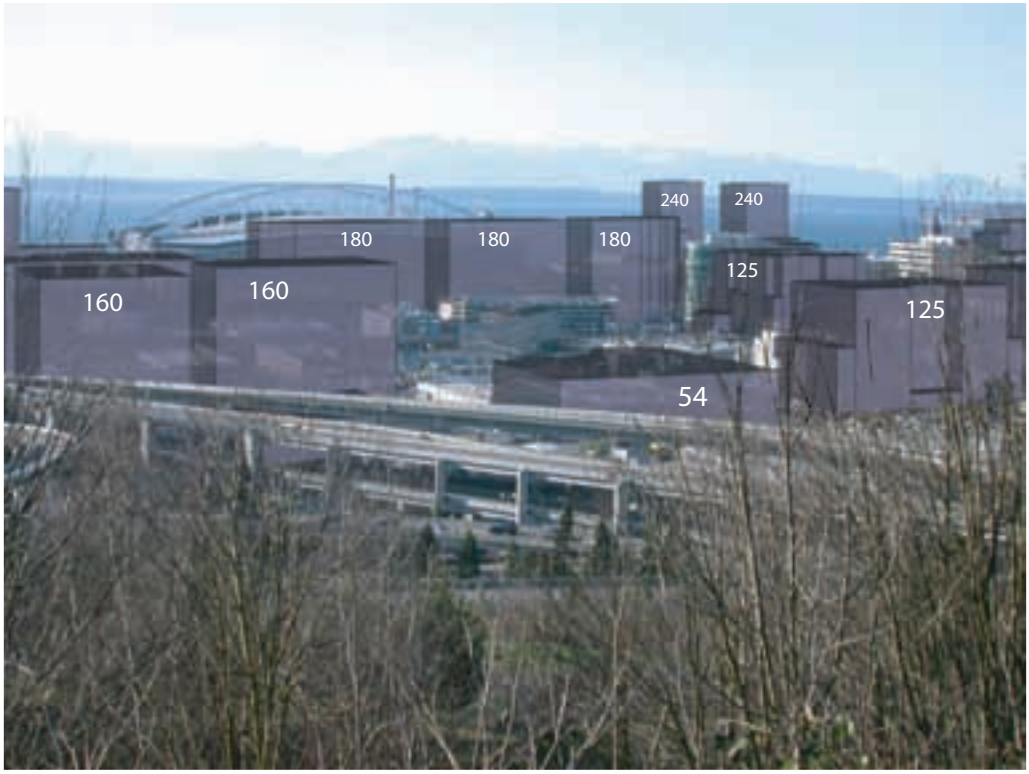
Note: Buildings shown represent a hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-32

View from Jose Rizal Park with Future Possible Development, Alternatives 3 and 4

Alternative 1

Alternative 2



Note: Buildings shown represent a hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-31
View from Jose Rizal Park with Future Possible Development, Alternatives 1 and 2

Alternative 1 and Preferred Alternative

Alternative 2

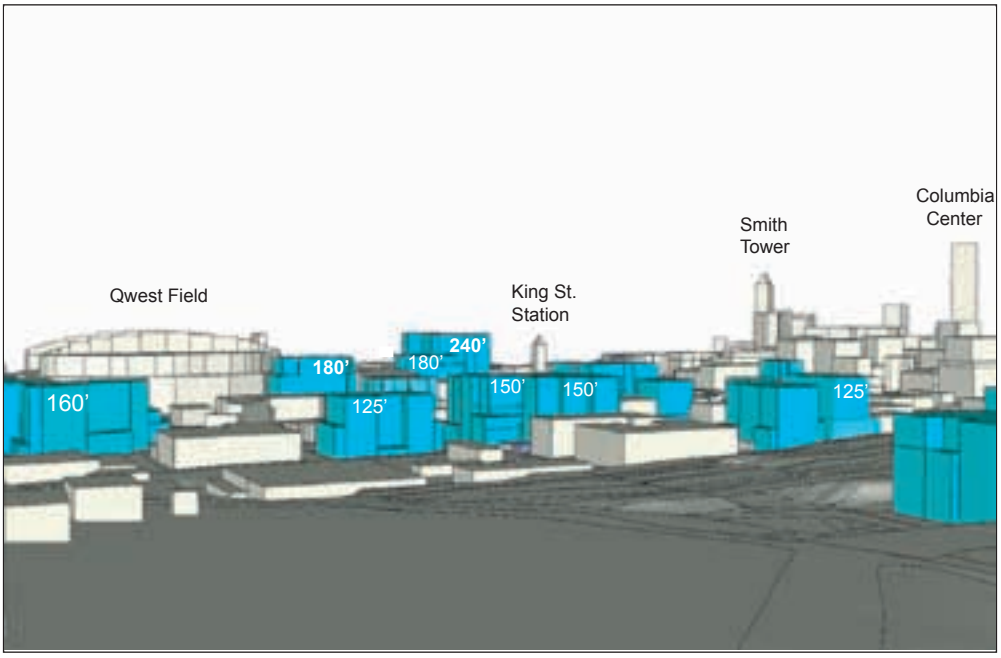
Alternative 3

Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario. Modest differences in background buildings under Preferred Alternative are not shown.

Figure 3-30

Effect of Future Possible Development on Views Southwest from Harborview Viewpoint, Preferred Alternative and Alternatives 1, 2 and 3

Preferred Alternative



Note: Buildings shown represent hypothetical development that matches the growth assumed per the EIS growth scenario.

Figure 3-33.A

View Northwest from "Pac-Med" (Amazon) Building Grounds, Preferred Alternative

View-Protected Landmarks

The City's view-related policy statements in SEPA about protection of views toward landmarks appear to relate to single landmarks that provide distinctive visual qualities and points of identity or wayfinding in a neighborhood. The Smith Tower and King Street Station clock tower are the most likely candidates with these characteristics in this study area. In project-specific review, this SEPA authority would likely be applied only in rare circumstances where development plans would not otherwise be modifiable through City departmental or special review processes.

This EIS impact analysis identifies only a limited potential for adverse impacts on views toward distinctive landmarks.

- Views toward the King Street Station clock tower from some angles would likely be interrupted by future development on the over-tracks property, including views from the nearby 4th Avenue S. segment that is mapped as a scenic route. Possible mitigation strategies or bulk control requirements are recommended for the over-tracks property and the Qwest Field north parking lot development, ~~in part~~ including as part of the Preferred Alternative, to maintain good relationships of future building bulk to the clock tower.
- For the Smith Tower, even though a couple of properties nearby to this building are defined as non-historically contributing (most notably the "sinking ship" garage site), future development either is not likely on these properties in the foreseeable future, or would be subject to future special review processes to determine its consistency with district's rules and regulations. This is interpreted to represent a potential adverse impact but not a significant adverse impact.

Please also see the impact analyses presented in the Land Use and Historic and Cultural Preservation sections in this chapter.

Scenic Routes

Yesler Way

Given the topography and blockage of views by existing buildings, expansive westward views are only available from one location along this scenic route—as a viewer approaches the 6th Avenue/Yesler Way intersection from the east. Property at the southwest corner of 6th Avenue/Yesler Way could be developed in the future. Future building heights could range from 240 feet in Alternative 1 and the Preferred Alternative, to 180 feet in Alternatives 2 and 3, to 150 feet under existing conditions (Alternative 4). Visual impacts under any alternative would be similar—views toward a portion of West Seattle and the Duwamish vicinity would be blocked. However, views down the Yesler Way corridor toward Elliott Bay would continue to be available. No appreciable net difference in scenic view impacts is identified between Alternatives 1, 2, ~~and~~ 3, the Preferred Alternative and the existing zoning (see Figures 3-34 and 3-35).

S. Jackson Street

In Little Saigon east of I-5, Alternatives 1, 2 and 3 would retain 65-foot height limits or propose 85-foot height limits along S. Jackson Street. The Preferred Alternative includes the possibility of height limits up to 125 feet on properties along S. Jackson Street. The effects of these future building heights on scenic route views along S. Jackson Street would be negligible. Under Alternative 2 and the Preferred Alternative, locations one block south of S. Jackson Street could accommodate 125-foot buildings, which might be visible in some views from S. Jackson Street but would not appreciably affect the scenic route.

Existing View Looking South from Danny Woo Garden

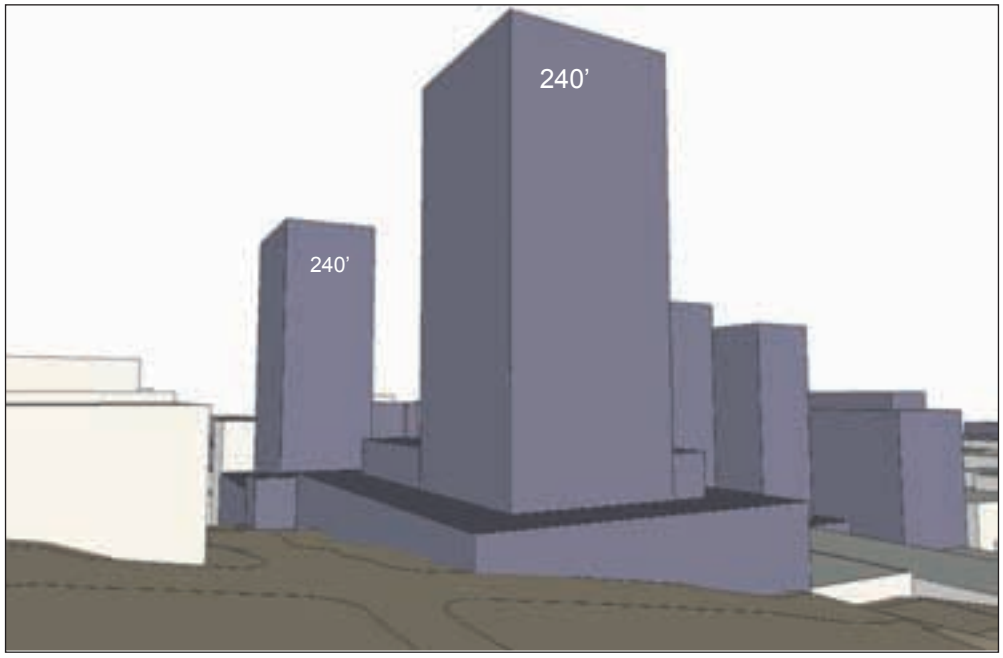
Existing View Looking West from Danny Woo Garden

View West from Kobe Terrace

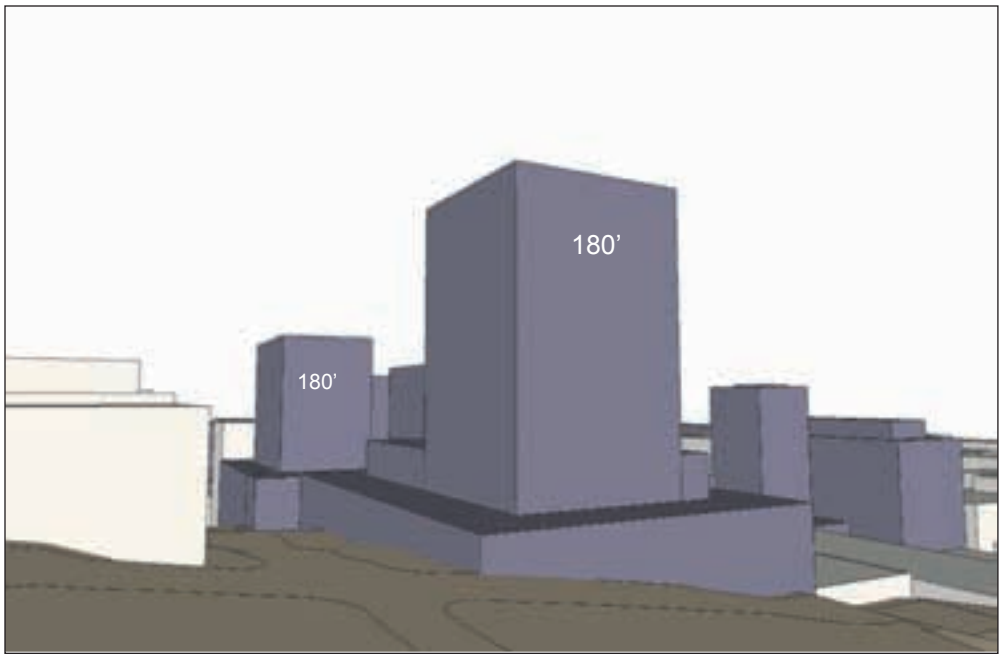
View 1/2-Block West of Kobe Terrace

Figure 3-24
Existing Views From Danny Woo Garden and Kobe Terrace (S. Washington St.)

Alternative 1 and Preferred Alternative



Alternatives 2 and 3



Note: Building forms illustrate the maximum possible building size per draft bulk control concepts, and the relationship between existing and future possible buildings on this hillside location.

Figure 3-35

Illustration of Possible Building Bulk near 6th &Yesler, Preferred Alternative and Alternatives 1, 2, 3

Other proposed changes in Chinatown along a two-block street segment near 5th Avenue S./S. Jackson Street could result in future development of structures 240 feet under Alternative 1 and the Preferred Alternative, or 180 feet under Alternatives 2 and 3 (see Figure 3-36). This potential additional node of dense development would add visual interest to the scenic route. This is interpreted to be, at worst, an "adverse" impact but not a "significant adverse" impact to the scenic route.

12th Avenue S.

Under the alternatives, future development adjacent to this street in Little Saigon could range from 85 feet (Alternatives 1 and 3) to 125 feet (Alternative 2 and the Preferred Alternative), potentially occurring on a few properties. Potential effects of additional building bulk on views along this route are minimal because of the view orientation southward up 12th Avenue S. At worst, potential impacts on this scenic route would be considered "adverse" but not "significant adverse" impacts.

Rainier Avenue S.

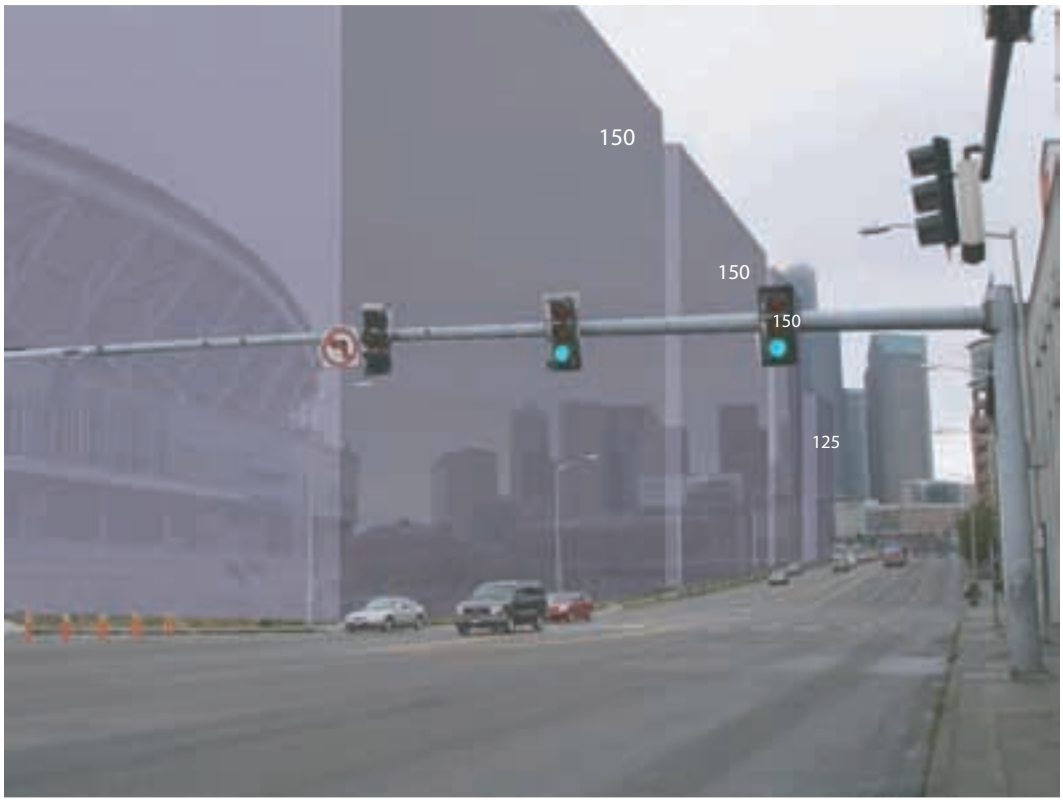
Under ~~the~~ Alternatives 1, 2 and 3, only the west side of this street would experience potential additional building heights, up to 20 additional feet, compared to the existing zoned height limit of 65 feet. ~~This could occur under Alternatives 1, 2 and 3.~~ Under Alternative 2, the nearest properties along the west side of the street would be limited to 65 feet (no change) between S. Jackson Street and S. Weller Street, although residential-oriented structures further west could reach up to 125 feet in height. Similarly, under the Preferred Alternative, a residential-oriented structure up to 125 feet near the corner of Rainier Ave. S./S. Jackson Street could occur. While this would introduce a taller building to this route, it would not likely significantly impair the scenic qualities of views down Rainier Avenue S. Under any of these alternatives, the proposed Goodwill site development would be assumed to add building bulk comparable to their proposal reaching as high as 85 feet (or conceivably to 160 feet under the Preferred Alternative). The net potential for significant adverse impacts on the scenic route is low—views down the avenue toward Mount Rainier would be retained and the aesthetic quality of new buildings built along this part of the avenue could improve the street corridor's aesthetics over time. However, unless design review processes ensured that the tallest portions of buildings were located carefully to maintain good relationships to Rainier Avenue S., the Preferred Alternative would have the greatest potential for adverse impacts to this scenic route's view qualities.

4th Avenue S.

Views along the 4th Avenue S. corridor scenic route could change if significant development occurs on the over-tracks property. Future development in this location would block most of a skyline view northward toward Downtown, except for buildings visible northward along the 4th Avenue S. corridor (see Figure 3-37). This type of impact would also be possible under existing zoning that would accommodate buildings up to 120 feet in height. However, the proposals under Alternatives 1, 2 and 3 would incrementally add to the potential worst-case impact through additional building height that could range up to 150 or 180 feet. This increment of additional impact on this scenic route and the probable loss of a particular Downtown skyline view from 4th Avenue S. is identified as a probable significant adverse impact of Alternatives 1, 2 and 3. Under the Preferred Alternative (see Figure 3-37.A), the probable degree of impact would be moderated from the worst-case conditions shown on Figure 3-37. Even though the maximum building height would reach to 180 feet, the probable significant setbacks from 4th Avenue S. would reduce the perceived "canyon" effect of extensive building bulk at the edge of the right-of-way. Building bulk relationships between the new "over-tracks" buildings and King Street Station would also be improved, compared to the worst-case condition, due to recommended zoning and bulk controls. This means that the Preferred Alternative's potential adverse impacts on scenic routes would be somewhat less than the potential worst-case impacts identified for the other action alternatives. Mitigation strategies in relation to Alternatives 1, 2 and 3 could include additional bulk controls or shaping to influence the quality of the available views that would remain along this corridor.

Alternative 1

Alternatives 2, 3

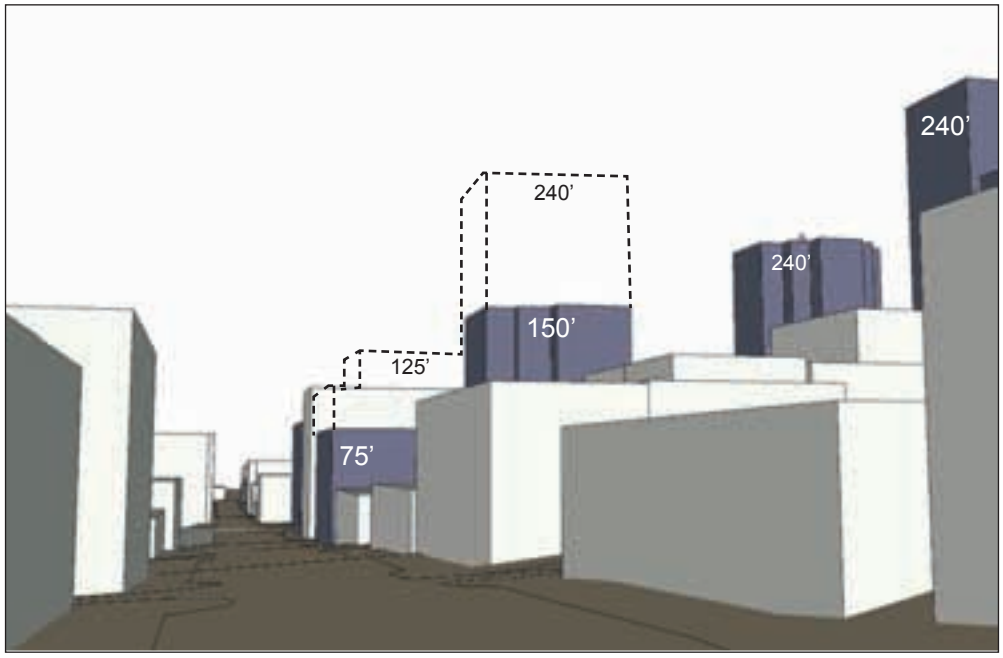


Note: The visible building facades reach 150 feet. Upper portion of building to 180 feet is not visible. Building forms are hypothetical and do not include setbacks from the edge of sidewalk.

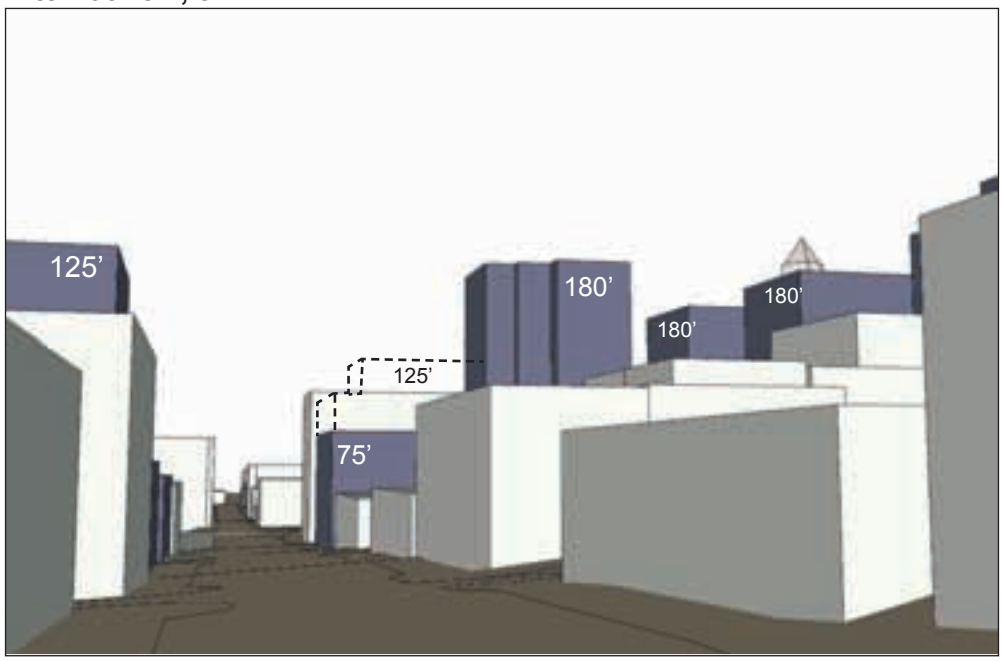
Figure 3-37

Possible Effects on Scenic Route Views, North from 4th Avenue S., Alternatives 1, 2 and 3

Alternative 1



Alternative 2, 3



Note: Buildings shown represent a hypothetical development that matches the growth assumed per the EIS growth scenario. Dotted lines indicate a possible maximum "building envelope" per height limit and draft bulk control concepts.

Figure 3-36

View west down S. Jackson St. from Maynard Avenue S., Alternatives 1, 2 and 3

Preferred Alternative

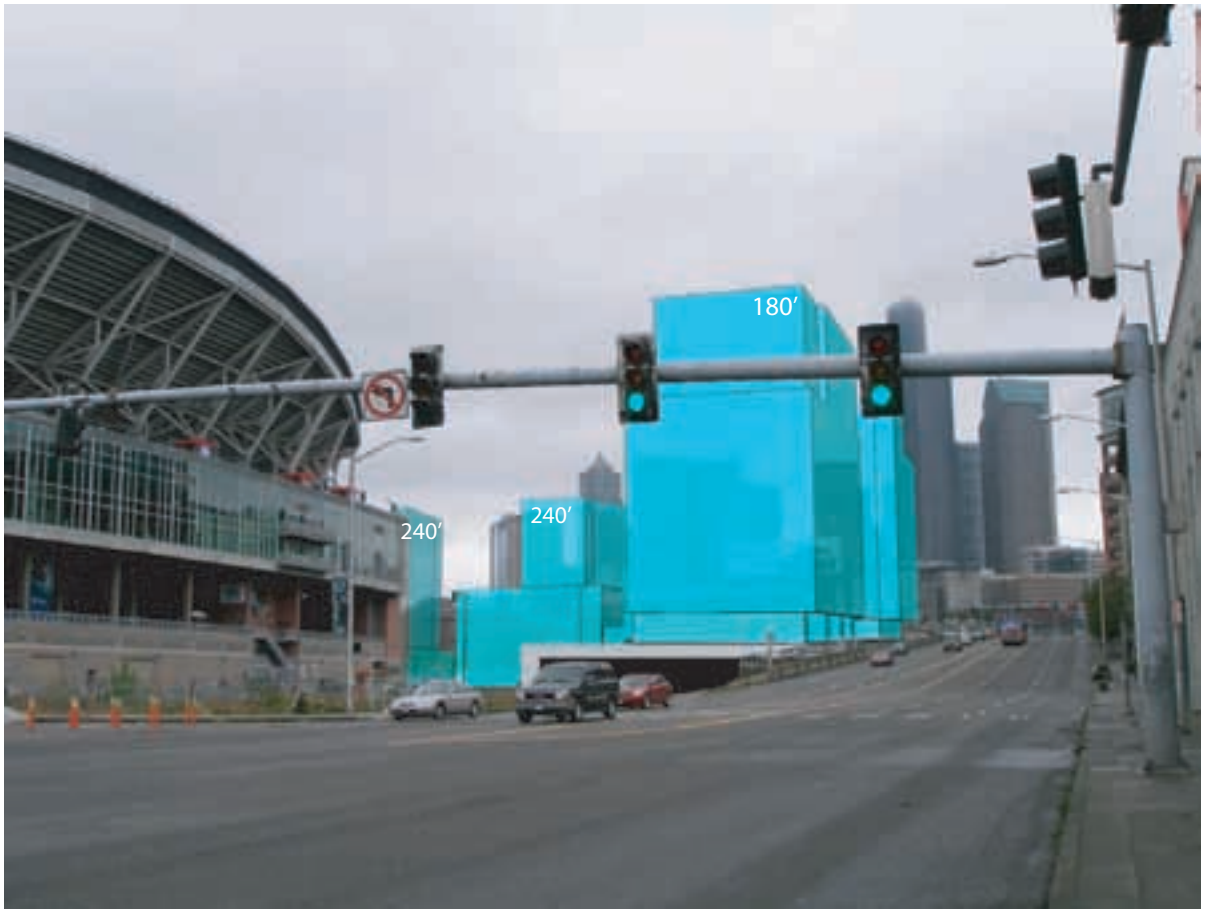


Figure 3-37A
Possible Effects on Scenic Route Views, North from 4th Avenue S., Preferred Alternative

S. Royal Brougham Way
Given the presence of the stadia and exhibition center, former scenic views toward Downtown along the identified segment of S. Royal Brougham Way are already fully blocked. Therefore, no additional impacts of the alternatives are identified on the scenic route quality of S. Royal Brougham Way. Future road improvements will also contribute to an altered visual environment in this vicinity within the next few years.

Interstate 5 and Interstate 90
Future development under the alternatives would add to building bulk in the midground of views from these routes; on the I-90 off-ramps, differences in building bulk within the south-of-Dearborn vicinity would be closest in proximity to these routes. However, none of these potential changes under any of the alternatives are interpreted as a significant adverse impact on the scenic route aspect of these freeways.

Alaskan Way Viaduct
The scenic view qualities of this route would be altered by other proposed road or highway development. Under the alternatives, future infill building development could take a variety of shapes but would remain at a relatively low to moderate scale. This might include future development of the WOSCA property that would likely place new buildings along the east edge of the current SR 99 corridor (which could be the tallest under Alternative 1 or the Preferred Alternative). Such an outcome under any alternative would probably block views toward Qwest Field and the historic buildings on the east side of 1st Avenue S. This would represent an incremental loss of views along this scenic route that is interpreted to represent an "adverse" but not a "significant adverse" impact on the scenic route. Presenting a well-designed set of facades on the west side of the WOSCA property is an important design principle that should be included in future WOSCA site development planning, so that future views from this thoroughfare are not toward unsightly "backs" of buildings.

POTENTIAL CHANGES TO PRIVATE VIEWS

As noted above, the City does not protect against changes to private views resulting from proposed development, under the City's SEPA ordinance. However, the potential for such changes is one factor taken into consideration when making rezone decisions, according to rezone criteria pertaining to height limits in SMC 23.34.009. This means that following the publication of this EIS, it is expected that decision-makers will consider view relationships in their deliberations. Additionally, persons may provide information, view studies or comments to the City Council regarding potential changes to private or public views that might result from the proposed zoning changes.

Comments were received during EIS scoping that requested SEPA analysis of potential changes to views from condominiums in Pioneer Square as well as from locations in Safeco and Qwest Fields. Because a programmatic EIS generally does not analyze potential impacts to particular lots or properties, that analysis is not provided here. Safeco and Qwest Fields are functionally equivalent to private properties, as distinguished from the public parks and locations that are subject to the public view protection policies described above. However, the discussion below broadly indicates how future development in the study area might relate to directional views from private locations.

Views westward toward Puget Sound and the Olympic Mountains from private properties within the study area could be impeded if future development intervenes and is taller than the viewers' viewing points. This includes perspectives from a variety of existing buildings that would include the office buildings on the east side of 4th Avenue S. near Chinatown, from existing residential buildings in the Japantown vicinity, from existing residences at the west edge of the Jackson Place vicinity, from existing buildings on the east side of 1st Avenue S. south of S. King Street, from the existing Safeco Field and

Qwest Field stadia in locations where westward views are possible, and potentially from other buildings within Pioneer Square.

Available views northward are primarily toward the Downtown skyline. Such views vary depending on where the viewer is – some views along street corridors such as 4th Avenue S. may contain only a limited segment of the skyline. In views from higher portions of existing buildings, such as office buildings or stadia, a wider-ranging skyline view is possible. With future development, views northward toward the skyline could be changed by higher buildings located in more southerly locations. Skyline views would still be available, but they would contain more buildings within their composition.

Current views to the east from any location are relatively limited due to topography, consisting primarily of views of Beacon Hill and First Hill, and including elements such as Harborview Hospital. Localized changes in views from private locations would be possible, from vantage points such as office buildings along 4th Avenue S., where future development could occur in properties to the east.

Current views southward from private locations include potential views from higher elevations Downtown toward the Duwamish Valley and West Seattle, and from the Yesler Terrace vicinity east of I-5 southward toward Mount Rainier and the Rainier Valley. Future development in Pioneer Square and its nearby vicinity could alter some private views from Downtown locations toward the Duwamish Valley and West Seattle due to intervening taller buildings. Similarly, future development in the central part of Little Saigon could alter some private views from Yesler Terrace southward toward Mount Rainier and the Rainier Valley.

MITIGATION STRATEGIES

- Unless adequately resolved by setbacks and bulk control strategies incorporated into rezones under any Action Alternative (including the Preferred Alternative), review of future development proposals for the "over-tracks" property should examine strategies for reducing adverse impacts to the scenic route along 4th Avenue S., and additional bulk control strategies so that future buildings do not significantly infringe on the King Street Station clock tower's visual setting.
- Review of future development proposals for the WOSCA property should require high-quality façade treatments that would not appear to "turn their backs" on viewers passing by in the SR99 corridor.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

With increased height limits in the "over-tracks" property vicinity, future development would be more likely to block or impair a Downtown skyline view from the 4th Avenue S. scenic route near Qwest Field.

ENVIRONMENTAL HEALTH

AFFECTED ENVIRONMENT

NOISE COMPATIBILITY

The EIS noise analysis is based on a study conducted by ESA Adolfson that took noise measurements from several locations in the study area and interpreted the findings (see Appendix F).

Noise Principles and Descriptors

Noise is defined as unwanted sound. Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) which is measured in decibels (dB), with zero dB corresponding roughly to the threshold of human hearing, and 120 to 140 dB corresponding to the threshold of pain. The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that de-emphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to low and extremely high frequencies. This method of frequency weighting, referred to as "A-weighting", is expressed in A-weighted decibels abbreviated as dB(A).

Noise Exposure and Community Noise

An individual's "noise exposure" is a measure of noise over a period of time. A "noise level" is a measure of noise at a given instant in time. "Community noise" varies continuously over a period of time depending on the contributing sound sources within the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with the individual contributors unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding to addition and subtraction of distant noise sources such as traffic and atmospheric conditions. What also contributes to variation is the addition of short duration single event noise sources (e.g., aircraft flyovers, motor vehicles, sirens). These successive additions of sound to the community noise environment vary the community noise level from instant to instant, requiring the measurement of noise exposure over a period of time to legitimately characterize a community noise environment. Statistical noise descriptors include the following.

Leq: the energy-equivalent sound level is used to describe noise over a specified period of time, typically one hour, in a single numerical value. The L_{eq} is the constant sound level which would contain the same acoustic energy as the varying sound level, during the same time period (e.g., the average noise exposure level for the given time period).

Lmax: the instantaneous maximum noise level for a specified period of time.

L8.3: the noise level equaled or exceeded 8.3% of the specified time period (e.g. 5 minutes per hour); it is generally similar in level to the Leq.

L10: the noise level equaled or exceeded 10% of the specified time period; similar in level to the Leq.

L90: the noise level that is equaled or exceeded 90 percent of the specified time period. The L90 represents the background noise level in most environments.

Leq (h) Hourly A-weighted noise level in decibels dB(A).

Ldn: 24-hour day and night A-weighted noise exposure level which accounts for the greater sensitivity of most people to nighttime noise by weighting noise levels at night ("penalizing" nighttime noises). Noise between 10:00 p.m. and 7:00 a.m. is weighted (penalized) by adding 10 dBA to take into account the greater annoyance of nighttime noises.

As a general rule, in areas where the noise environment is dominated by traffic, the L_{eq} during the peak-hour is generally equivalent (plus or minus 2 decibels) to the Ldn at that location.

Effects of Noise on People

The effects of noise on people can be placed into three categories:

- subjective effects of annoyance, nuisance, dissatisfaction;
- interference with activities such as speech, sleep, learning; and
- physiological effects such as hearing loss or sudden startling.

Environmental noise typically produces effects in the first two of these categories. There is no wholly satisfactory way to measure subjective effects of noise, or reactions of annoyance and dissatisfaction. There is a wide variation in individual thresholds of annoyance, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted: the so called "ambient noise" level. In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will be judged by those hearing it. With regard to increases in A-weighted noise level, the following relationships occur:

- except in carefully controlled laboratory experiments, a change of 1 dB(A) cannot be perceived;
- outside of the laboratory, a 3 dB(A) change is considered a just-perceivable difference;
- a change of at least 5 dB(A) is required before any expected noticeable change in human response; and
- a 10-dB(A) change is subjectively heard as a doubling in loudness, and can cause adverse response.

These relationships occur in part because of the logarithmic nature of sound and the decibel system. The human ear perceives sound in a non-linear fashion. Because the decibel scale is based on logarithms, two noise sources do not combine in a simple additive fashion. For example, if two identical noise sources produce noise levels of 50 dB(A), the combined sound level would be 53 dBA, not 100 dB(A).

Noise Attenuation

Stationary point sources of noise attenuate (lessen) at a rate of 6 to 7.5 dB(A) per doubling of distance from the source, depending on environmental conditions (such as atmospheric conditions and presence of noise barriers, either vegetative or manufactured). Typical "line" sources of noise, such as highways and busy arterial roadways, attenuate at a rate of 3.0 to 4.5 dB(A) per doubling of distance from the roadway.

Seattle Noise Regulations and Impact Criteria

The City of Seattle limits noise levels at property lines of neighboring properties. Maximum permissible noise levels apply to a single source of noise, and relate to the zoning district of the noise source and the receiving property (see Table 3-29). Sounds from motor vehicles on public roads, aircraft, trains, and unamplified sounds for public events are exempt from the property line regulations in Table 3-29. See Appendix F for other details.

Table 3-29
City of Seattle Maximum Permissible Sound Levels

	District of Receiving Property		
District of Sound Source	**Residential dB(A)**	**Commercial dB(A)**	**Industrial dB(A)**
Residential	55	57	60
Commercial	57	60	65
Industrial	60	65	70

Note: Between 10 p.m. and 7 a.m., the maximum permissible noise levels are reduced by 10 dBA for residential receiving properties. Source: City of Seattle, SMC 25.08.410, June 2007

Study Area Noise Sources

Across the study area, noise is generated by several sources that are typical of Downtown and industrial areas. Land uses and activities that generate noise include:

- Port/warehouse/industrial and commercial business traffic and loading/unloading activities
- Music/dance entertainment venues (primarily in Pioneer Square)
- Athletic facility events and associated activities
- Construction activity
- Regular maintenance activities, such as solid waste collection

Transportation-related noise sources that influence ambient noise levels in their vicinities include:

- Interstate 5 (along Chinatown, Little Saigon and south-of-Dearborn Street edge areas)
- Interstate 90 (along S. Dearborn Street and south-of-Dearborn Street edge areas)
- SR 99—Alaskan Way Viaduct traffic
- Railroad "tail track" near Alaskan Way
- Railroad tracks to/from King Street Station (vicinity ranges from S. Washington Street to S. Holgate Street)
- Railyards and other areas for loading/unloading, storage and movement of containers between transportation modes (primarily south of S. Atlantic Street near Utah Avenue S.)
- Emergency medical helicopter flights to and from Harborview Hospital
- General vehicle traffic, including truck and bus traffic, on surface streets

Typical freeway and surface street traffic noise includes sound generated by tires on pavement, brakes, engines, sirens and horns. Railroad-generated noise includes a variety of mechanical noises generated by the trains, whistles and other warning signals, and noises from loading/unloading activities. Emergency helicopter traffic affects noise levels primarily near 6th Avenue and Yesler Way, and other areas near I-5.

Indoor Residential Noise Levels

Although not included in the City of Seattle's codes, the Uniform Building Code suggests that interior noise levels due to exterior sources must not exceed an Ldn of 45 dBA in any habitable room. This level is assumed to allow for normal sleep and day-to-day activities within a residence. In high-noise environments (e.g., those above 65 Ldn) in other jurisdictions, site-specific noise studies may be conducted to inform noise insulation needs. Typical home construction reduces noise levels at least 20 dB(A) (from the outdoor noise level to the indoor noise level), which results in noise levels of 45 Ldn dB(A) only when outdoor noise levels are below 65 Ldn. Both the Federal Highway Administration (FHWA) and Federal Aviation Administration (FAA) have programs designed to help achieve indoor and

outdoor noise levels consistent with these limits. However, residences near freeways, railroads and airport landing areas are often exposed to outdoor noise levels greater than 65 Ldn and need additional noise insulation to achieve an indoor noise level of 45 Ldn dB(A). Modified wall designs and sound controlling windows are typically used to achieve increased levels of sound reduction. Sound Transmission Class (STC) is a widely-used rating of noise reduction provided by windows and walls. The STC rating is roughly equivalent to the noise reduction provided, in decibels (dBA). Walls can be built to achieve noise reduction of 35-45 dBA and windows can provide a noise reduction of 40-45 dBA.

Outdoor Residential Noise Levels

Outdoor noise levels are more difficult to attenuate because, by definition, outdoor use areas are not enclosed. Outdoor use areas are considered "noise impacted" by FHWA and FAA when levels exceed approximately 65 Ldn. See Appendix F for other details.

Results of March 2007 Noise Measurements

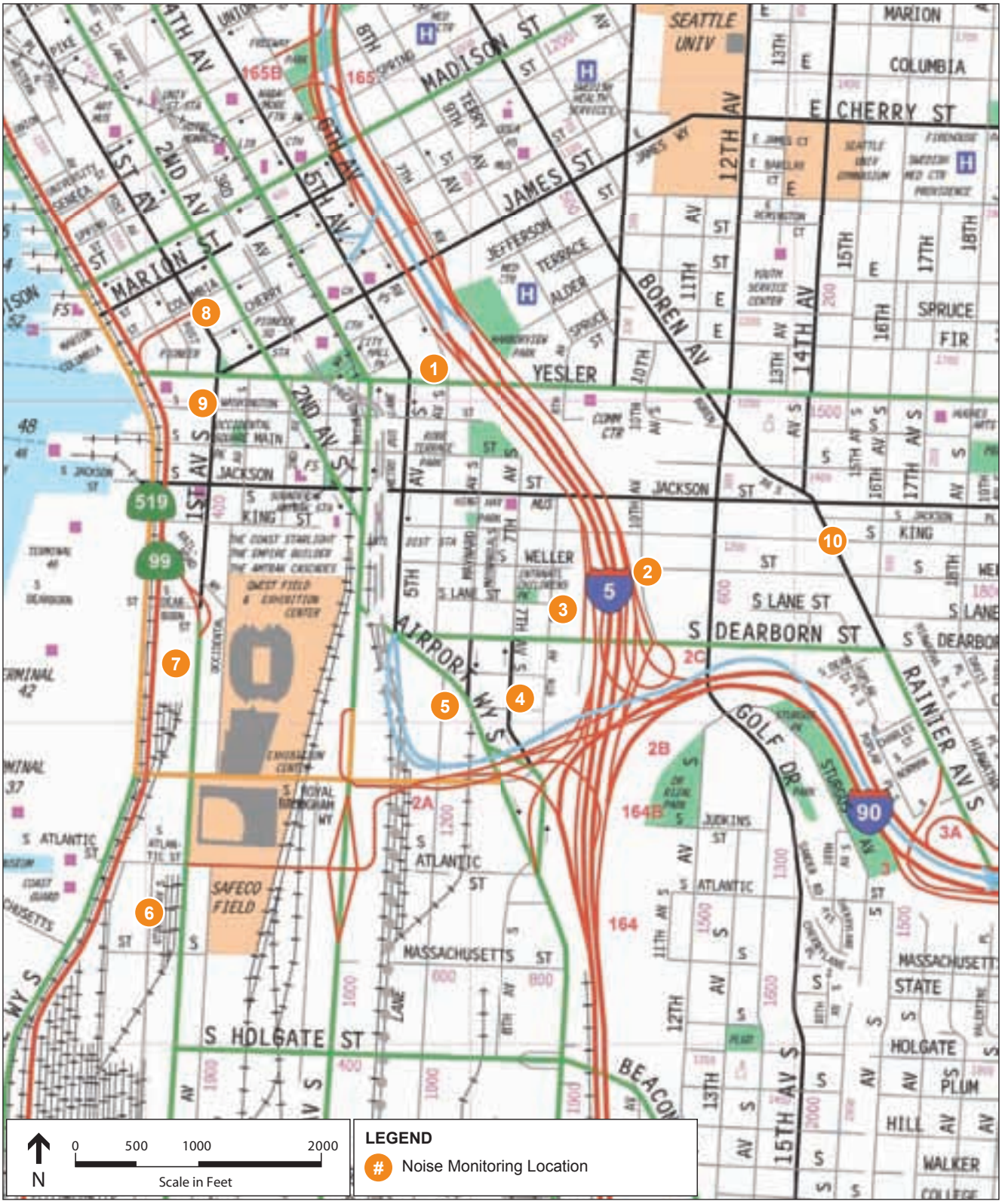
In March 2007 over two days, long-term noise measurements were made at ten locations. Also, twenty short-term noise measurements were taken—two each at the ten measurement locations (see Appendix F for other details). Table 3-30 shows the rankings of the measured sites from loudest to quietest, based on the 24-hour average noise levels measured as Ldn. Figure 3-38 shows the noise measurement locations. The data illustrate relatively loud conditions in Pioneer Square, Chinatown and Stadium Area locations that are near SR 99 and I-5, and somewhat quieter conditions in locations away from major highways.

Table 3-30
Noise Levels Measured at South Downtown Sites, Ranked Highest to Lowest

Site Number	Neighborhood	Site Location	24-hour Average Noise Level, Ldn	Range of Hourly Averages, Leq
8	Pioneer Square	1st Avenue & Columbia St.	79	64-85
7	Stadium Area	WOSCA Parking Lot	79	66-78
1	Chinatown/I.D.	Yesler Way & 6th Avenue	78	65-76
2	Chinatown/I.D.	10th Ave. S. & S. Weller St.	77	65-76
9	Pioneer Square	S. Washington St. & 1st Ave. S.	76.5	63-82
4	S.-of-Dearborn	7th Ave. S. & S. Plummer St.	75	63-75
3	Chinatown/I.D.	8th Ave. S. & S. Lane St.	71	58-71
6	Stadium Area	Utah Ave betw. Atlantic & Massachusetts	70.5	59-70
5	S.-of-Dearborn	6th Ave. S. and Airport Way S.	70.5	59-70
10	Little Saigon	S. King St. & Rainier Ave. S.	68	56-65

Source: ESA Adolfson, 2007

Short-term noise measurement data indicate the relative noise levels of typical noise generators, including street and highway traffic, train horns, airplanes, helicopters, sirens, truck and bus traffic (see Table 3-31).



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CREATED BY: JAB / DATE LAST UPDATED: 03/26/07

MAP: Rand McNally & Company, 2006.
SOURCE: ESA Adolfson.

Figure 3-38
Noise Monitoring Location Map

Livable South Downtown

0 2 4 6 8 10
Scale in 100 Feet
N

Several of these generators created sound in the low-to-mid 70's Leq decibels. The ranges for each location in the rightmost column of Table 3-31 also indicate which areas experience noisier conditions as measured by individual sources. The locations with the highest measured levels are those nearest and most exposed to SR99 and I-5. The location with the lowest measured levels was the Little Saigon location west of Rainier Avenue S. Findings, including graphic portrayals of the sound measurements, are shown in Appendix F. See the Noise Compatibility discussion in the following Environmental Impacts part of this section for more interpretation of the relevance of these findings.

Table 3-31
Noise Sources and Associated Noise Levels from Five-Minute Measurements

Site Number	Neighborhood	Site Location	Five-minute Leq Noise levels (dB)	Noise Sources dB(A)
1	Chinatown/I.D.	Yesler Way & 6th Avenue (west of I-5)	67, 71, 72	Bus: 72 Helicopter: 78 Freeway: 67, 70-73 Train horn: 71 Airplane: 68
2	Chinatown/I.D.	10th Ave. S. & S. Weller St. (east of I-5)	71, 72	Freeway: 70-74 Trucks: 69-73 Siren: 71 Plane: <71
3	Chinatown/I.D	8th Ave. S. & S. Lane St. (west of I-5)	64, 67	Freeway: 64-67 Street traffic: 65 Truck: 73 Airplane: 66
4	South-of-Dearborn	7th Ave. S. & S. Plummer St. (I-5, I-90)	67, 69	Freeway: 64, 68-70 Train horn: 66, 70-74 Street traffic: 70-71
5	South-of-Dearborn	6th Ave. S. and Airport Way S. (I-5, I-90)	66, 67, 70	Truck beeper: 71 Freeway truck: 71 Airplane: 65
6	Stadium Area	Utah Ave betw. Atlantic & Massachusetts	65, 67, 68	Traffic: 67 Trucks: 70.5 Siren: 73 Train horn: 70-73
7	Stadium Area	WOSCA Parking Lot (east of SR 99)	76, 77	Traffic: 75, 73-78 (w/train horn audible)
8	Pioneer Square	1st Avenue & Columbia St.	70, 72	Street traffic: 70-75, 73 Bus: 77
9	Pioneer Square	S. Washington St. & 1st Ave. S.	70, 71	Viaduct/local traffic: 72
10	Little Saigon	S. King St. & Rainier Ave. S.	61, 65	Airplanes: 65-67 Street traffic: 61-65

Source: ESA Adolfson, 2007

HAZARDOUS SUBSTANCES

A large portion of the study area has a documented history of industrial and commercial uses. Most of the former tidelands in the study area were filled in the first decade of the 1900s, typically using soils from other re-grading efforts elsewhere in the city. The diverse range of activities in the southern portion of the study area has included sawmills, railroad operations, steel manufacturing, iron foundries, machine shops, warehouses, garages and fueling stations. Underground fuel tanks, heating oil tanks, past use of solvents and metals in production processes, operation, maintenance and storage of heavy vehicles, and presence of asbestos and lead-based paints in old buildings are a few of the elements and activities that have contributed to probable residual presence of contaminants in soils and groundwater from these activities.

Several past studies provide information for properties along the 1st Avenue S. corridor. Residual contaminants that may be present include solvents, gasoline and petroleum products such as diesel and fuel oils, metals such as mercury, silver, lead, zinc, copper, and other contaminants. Also, poly-chlorinated biphenyls (PCBs) are identified as present or reasonably predictable in a few locations. In addition, creosote, timber and woody debris are present in some areas due to remnant pilings at former tideland properties. Numerous properties in the Pioneer Square and Chinatown neighborhoods also have past use patterns involving a variety of businesses and industries that suggest the likely presence of residual contaminants. These characterizations of past use and contaminant presence also extend to the south-of-Dearborn vicinity.

In Little Saigon, industrial uses are known to have occupied the S. Dearborn Street vicinity, and current use patterns in the neighborhood include a diversity of commercial and light industrial activities, warehousing and automobile-related uses. This pattern suggests the probable presence of residual contaminants in soils in this vicinity as well. For example, an evaluation prepared for the "Dearborn Street" (a.k.a. Goodwill properties) mixed-use center proposal indicates potential residual contaminants in soil and groundwater, including petroleum hydrocarbons, chlorinated solvents and heavy metals (Dearborn Street Draft Supplemental EIS, Appendix 1, 2006). (Other sources include: SR 99 Alaskan Way Viaduct & Seawall Replacement Project Draft EIS, 2004 and Supplemental Draft EIS, 2006; Football/Soccer Stadium and Exhibition Center Project Draft EIS, 1998; Geotechnical and Environmental Report for Baseball Stadium, 1996.)

AIR POLLUTANT EMISSIONS AND PUBLIC HEALTH

Odor/Air Quality

Air pollutant and odor sources in the study area are similar to those described for noise: transportation activities along highways (I-5, I-90 ramps, SR 99) and surface streets, and industrial and port activities in the broader SODO vicinity. Railroad, truck, bus, ship and automobile traffic are probable sources.

Fine particulates known as PM 2.5 (less than 2.5 micrometers in size), typically associated with wood-burning and diesel fuel exhaust, are a primary vehicle-generated pollutant of interest to the Puget Sound Clean Air Agency (PSCAA). This kind of fine particulate can behave more like a gaseous substance and less like dust in its movement in air. Nitrogen oxides (NOx), volatile organic compounds (VOC) and carbon monoxide are other pollutants of interest. Particulates can have negative public health effects such as exacerbation of respiratory problems (asthma, decreased lung function) as well as contributing to risk of cancer and heart attack.

Research data suggest that due to proximity to industrial and transportation activities, air pollutant levels in some portions of the study area are probably elevated compared to other neighborhoods in the city, ~~especially~~ within approximately 100-200 meters~~feet~~ (about 330-650 feet) of major transportation

facilities. This is the distance where particulates are most likely to circulate in the air and alight on building and ground surfaces. Elevated sources such as the tallest portion of the I-90 ramps probably cast ~~also result in the casting of~~ particulates the farthest, ~~further than 100 feet,~~ and swirling winds may have similar effects. While Port-related ship activities generate air pollutant emissions, available data do not allow for precise mapping of effects on localized air quality conditions (PSCAA, 2007).

Available monitoring data from PSCAA equipment at Beacon Hill (near Jefferson Park) and East Marginal Way south of Spokane Street are the best indicators of local conditions for PM 2.5 particulates. The current federal standard for PM 2.5 particulates is 65 $\mu g/m^3$ (micrograms per cubic meter) and the proposed federal standard is 35 $\mu g/m^3$ for the three-year average of the 98th percentile of daily concentrations. At the Beacon Hill monitor site, the concentrations remained at approximately 24-25 $\mu g/m^3$ from 2001-2005, while at the Marginal Way monitor site, concentrations slightly decreased from approximately 34 $\mu g/m^3$ to around 30 $\mu g/m^3$ during that period (PSCAA 2005 Air Quality Data Summary, 2006). These data suggest a slight trend to improved air quality conditions for particulates.

Land use characteristics with respect to mixing of residential and industrial uses are summarized below.

- Within the study area, a variety of industrial, warehouse and distribution activities occur in the 1st Avenue S. vicinity, small-scale industrial uses and the City's Charles Street Yards in the south-of-Dearborn vicinity, and small-scale industrial and distribution activities in the King and Weller Street vicinity east of 12th Avenue S. in the Little Saigon area.
- The industrial and transportation-oriented areas nearest the study area include the Port's Terminal 46, the SIG Railyard between Alaskan Way and Utah Avenue S., railyards between Occidental Avenue S. and 3rd Avenue S., general industrial/commercial uses along 4th Avenue S., King County Metro bus yard facilities south of S. Royal Brougham Way, and an industrial area east of I-5 along Rainier Avenue S.
- A few residential uses are located near the areas dominated by industrial and commercial uses. These include the William Booth Center housing at S. Charles Street in the south-of-Dearborn vicinity; the Victorian Row Apartments on S. King Street east of 12th Avenue S., and a small number of other single-family homes in Little Saigon.

The available information suggests that air quality should be a consideration in evaluating overall land use compatibility, especially where residential uses would be located in proximity to highways, railroads, port and industrial sources. A distance of at least 100 meters (approximately 330) feet from such facilities can be defined as the area of greatest concern about negative effects on environmental health of potential residents, plus an additional ~~distance of at least 100~~ 330 feet from elevated highways that may cast particulates over greater distances. This would be of greatest interest to the south-of-Dearborn vicinity, 1st Avenue S. corridor, International District properties nearest I-5 and Pioneer Square properties nearest SR 99.

PUBLIC HEALTH BENEFITS AND URBAN GROWTH PATTERNS

A body of research, including studies by University of British Columbia professor Larry Frank, has recently focused on the relative advantages to public health of living within mixed-use in-city areas, as contrasted to low-density suburban areas. In suburbs, the typically longer distances between homes and services often require residents to use automobiles to conduct daily activities. This leads to suburban residents walking less and exercising less often, and increased incidence of obesity and other health afflictions. In contrast, research suggests that in-city residents are able to walk more often and may more frequently substitute walking in place of automobile trips for some of their daily activities.

These research findings help support the City's urban village strategy for long-term growth. By encouraging the evolution of multi-purpose mixed-use neighborhood centers with denser residential occupation and more diverse range of available services, communities are more walkable and can satisfy the needs of residents with less frequent use of automobiles. This is good not only for the form and quality of the urban environment, but also encourages healthy patterns of living for in-city residents. However, factors such as local air quality should also be considered in broad assessments of public health, at least for areas in close proximity to freeways and railroads.

ENVIRONMENTAL IMPACTS

NOISE COMPATIBILITY

All Alternatives

As indicated by the noise measurement data, several portions of the study area in general proximity to highways and railroads are subject to relatively high noise levels ranging from 70 to 79 Ldn dBA. Noise from freeways, trucks, general street traffic, sirens, train horns, helicopters, ~~and~~ airplanes and stadium/ event center activities all contribute to noise in this area. Locales within roughly one block of the SR 99 Viaduct are the areas subject to the highest noise levels, at 79 Ldn dBA, and the Yesler Way/6th Avenue vicinity and S. Weller Street/10th Avenue S. vicinity, both near Interstate 5, are subject to levels of 77 to 78 Ldn dBA. Future noise levels along SR 99 would relate to the road and highway configuration that is achieved in that vicinity.

Future residential development in these vicinities would likely face the greatest adverse exposure to high noise levels. This is probable because the 20 dBA noise reduction provided by typical residential construction methods would not likely reduce the average interior noise level to the preferred 45 Ldn dBA level. Comparing the alternatives, Alternatives 1 and 3 would accommodate residential development in the northern portion of the WOSCA property, which would likely be subject to high noise levels from SR 99 traffic and other nearby sources such as railroad traffic. A few potential infill development sites near SR 99 in Pioneer Square would also be subject to such effects. Denser levels of residential development could also occur in the other cited locations under most alternatives—the most impacted of these being under Alternative 1 and the Preferred Alternative near Yesler Way/6th Avenue, and under Alternative 2 and the Preferred Alternative near S. Weller Street/10th Avenue S. Similarly, future residential development in several other vicinities would also likely be unable to meet a 45 dBA interior noise level using typical construction techniques.

~~In order to adequately respond to~~ To acknowledge these significant adverse noise conditions if residential uses are to be present, the use of STC-rated construction materials and methods for exterior enclosure in future residential development likely should be required. (STC-rated construction is already required by the Building Code for interior walls between dwelling units.) The objective would be to reduce interior noise levels in residential uses to approximately 45 Ldn dBA, which would likely necessitate the use of higher STC-rated materials and methods for exterior enclosure at the noisiest locations. This approach would also ~~require~~ suggest consideration in future project development reviews of whether, in the highest-impacted vicinities, operable windows ~~may~~ should be present and if not, whether adequate ventilation systems for cooling and air circulation would be present. These approaches are likely possible to implement through use of SEPA authority in future Master Use Permit reviews, on a case-by-case basis.

Interpretation of noise analysis findings with respect to zoning and land use compatibility suggests that residential uses with preferred interior noise levels are possible to develop in proximity to SR 99, I-5 and

I-90 if sufficiently noise-mitigating construction materials and methods are used. However, the high noise levels are a negative when evaluating the overall compatibility of zoning options that would allow residential uses in these locations.

HAZARDOUS SUBSTANCES

All Alternatives

The probable presence of contaminants in soil and/or groundwater across many portions of the study area means there is a heightened interest in the risks of potential exposure to hazardous substances with future development. There could be increased risks of contaminant disturbance and potential for releases during future construction activities in several locations under any alternative, including the No Action Alternative. Similarly, demolition of buildings throughout the study area could generate risks associated with the presence of contaminants such as lead and asbestos.

Differences among the zoning alternatives would enable residential uses to be present in certain locations where other alternatives' zoning would not allow for residential use. Conceptually, this might increase the worst-case potential risks of exposure due to the long-term presence of residents. This worst-case risk assumes that contaminants, to the degree they are present, would manifest an elevated health risk to residents. Under this scenario of potentially elevated risk, the most relevant differences among the alternatives are:

- The permission of residential uses in the northern portion of the WOSCA property (and immediate vicinity) under Alternatives 1 and 3;
- The lack of permission for residential uses at the WOSCA property or in the "south-of-Dearborn vicinity under the Preferred Alternative; and
- The permission of residential uses in the "south-of-Dearborn" vicinity under Alternative 3.

However, it must also be acknowledged that current regulatory practices associated with hazardous materials would dictate further site-specific assessments of actual conditions and remediation actions implemented prior to or during construction. This could include various forms of on-site investigations, records research, cleanup plans and compliance with regulatory processes. Such actions would in all probability result in cleanup or remediation to required levels, tailored to the individual circumstances of future development proposals. It would take into account whether residential uses would be present, which could entail a higher level of cleanup. This would help avoid the potential for worst-case impacts under almost any scenario involving future construction in the affected area.

Based on the interpretation above, this EIS does not identify a significant adverse impact of this type for any of the EIS zoning alternatives, nor is there any substantial difference in potential for worst-case impacts among the alternatives. However, these conclusions should not be interpreted as negating the need for proper evaluation of hazardous substances in later phases of review, e.g., future site-specific development proposals.

ODOR/AIR QUALITY

All Alternatives

The available information about air quality and public health effects in this area does not provide definitive evidence of significant air quality problems, but does provide advisory guidance on the possible proximity of residential uses to transportation and port facilities. Maintaining a distance of approximately 330-650 ~~at least 100~~ feet between residential uses and such facilities for the purposes of avoiding adverse

exposure of residents to air pollutants is advisable. ~~a recommended means of maintaining compatibility.~~ The following observations can be made at a programmatic level as to the impacts of the alternatives. Also, see a discussion of greenhouse gases at the end of the Energy section in this Chapter 3 of the FEIS.

1st Avenue S. Corridor: Alternatives 1 and 3 include allowing residential uses in the northern portion of the WOSCA property. If such uses occurred, they would be located adjacent to SR 99 and the railroad "tail track" and relatively near (at approximately 180-200 feet) to the edge of the Port's Terminal 46 property. Each of these transportation and port facilities would continue to generate particulates and other air pollutants. The proximity of these pollutant-generating activities, particularly the train activity and highway traffic, to the WOSCA property suggests an adverse exposure of potential future residents to air pollutants would occur if residential uses are present. Over the long-term, such exposure would increase the risks for adverse effects on residents' health.

In locations south of S. Royal Brougham Way, the additional presence of two railyards, truck traffic on local streets, and SR519 connections to I-5 and I-90 suggest that additional multiple air pollutant sources would contribute to adverse air quality-related health effects on residents if residential uses were present. However, since the Livable South Downtown EIS alternatives do not include residential uses in this area, this impact is not attributed to any of the EIS alternatives.

Chinatown/I.D. near I-5: The Alternative 1, 2, ~~and~~ 3 and Preferred Alternative proposals would increase the potential for future residential development in proximity to I-5, on both the east and west sides. The area of greatest concern includes the properties that are within approximately one block and ~~100-200 feet of I-5, which are essentially those directly abutting and others nearby that~~ are most exposed to the I-5 right-of-way. Within this most-exposed area, the risks of adverse air quality-related environmental health effects would be greatest, if residential uses are present. With increasing distance, the probable concentrations of particulates and other vehicle-traffic-related air pollutants and the potential for these significant health risks would diminish.

South-of-Dearborn: The Alternative 3 SDM zone proposal includes the possibility of residential uses in the south-of-Dearborn vicinity. This would increase the proximity of residents to general industrial and maintenance activities within the study area (such as the City's Charles Street Yards), and their proximity to similar activities located nearby to the south. Similarly, such development could occur closer to the existing elevated Interstate 90 ramps. Within approximately one block (roughly 330-650 feet) ~~100-200 feet~~ of the Interstate 90 ramps, the risks of adverse air quality-related health effects would be greatest, if residential uses would be present.

Stadium North Lot: In the Qwest Field north parking lot, new residential development could occur as close as 200 to 1,000 feet of the main Amtrak and commuter rail station at King Street Station. In addition, the zoning alternatives include the ~~possibility of~~ potential for residential uses above the rail station facility. The future condition could continue to be an open-air rail station, or could become a facility topped and enclosed by future commercial or mixed-use development.

The proximity of future residential uses could conceivably contribute to residents' exposure to pollutant emissions from train operations. This is identified as a potential adverse environmental health impact. Locations closest to the rail station would be of most concern with respect to residential use. The relative exposure to this polluting condition would depend upon whether the rail station area is enclosed by future over-tracks development. The inclusion of mechanical systems ~~would likely~~ could control air pollutant emissions and direct them to fans or vents. Such vents could be designed and located to avoid or minimize emissions to areas near residential uses, with a probability that related adverse health risks could be avoided.

Under the No Action Alternative (Alternative 4), no zoning changes would occur and, by definition, no impacts would occur. However, existing use patterns that place some residents relatively near Interstate 5 and SR 99 would continue to be present, contributing to possible public health concerns about chronic exposure to particulates.

PUBLIC HEALTH BENEFITS AND URBAN GROWTH PATTERNS

The research findings relating improved public health prospects to mixed-use neighborhoods and in-city living help support the Livable South Downtown planning effort's encouragement of denser residential populations in the Pioneer Square, Chinatown and Little Saigon neighborhoods. New residents would not only enliven these neighborhoods, but the residents would benefit from more active lifestyles, as well as access to regional and intracity transportation systems, as well as greater proximity to jobs, goods and services. At the same time, denser habitation in these areas in the Downtown Urban Center would help avoid the added development impacts, under the No Action Alternative, of additional development in suburban and rural-fringe areas, including effects on the natural environment and increased use of automobiles and congestion on regional transportation systems.

These public health benefits would be roughly similar under any of the alternatives studied in this EIS. Differences among the alternatives regarding overall public health benefits would be relatively subtle. On the whole, the growth patterns recommended among Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative would be expected to result in net positive impacts in terms of prospective public health benefits. The No Action Alternative (Alternative 4) would result in no direct impacts. However, the No Action could still contribute indirectly to adverse environmental health impacts at the regional level, in terms of greater contributions to air pollutant "greenhouse gas" emissions over the long term because of increased vehicle miles traveled caused by less efficient patterns of growth and occupation. The overall range of impact conclusions in this Environmental Health section should be noted when making judgments about overall public health prospects in the study area.

MITIGATION STRATEGIES

All Alternatives

Noise Compatibility

- In order to achieve interior noise levels in residential uses to 45 Ldn dBA under any alternative, future residential construction could be required or encouraged on a project-by-project basis (for example through use of SEPA authority and/or the design review process) to use STC-rated construction materials and methods in exterior walls. This should be given greatest consideration in project decisions on sites nearest I-5, I-90 and SR99. Noise measurements ~~should~~ could be taken to inform future building design at a given site, and building design ~~should~~ could incorporate assemblies (e.g. wall and window treatments, including details such as caulking) meeting a certain STC rating, to provide adequate noise reduction for residential uses.
- ~~Future residential construction in certain high-noise areas could be required to demonstrate that operable windows would not be present and sufficient ventilation systems would be provided if operable windows are not present.~~

Hazardous Substances

- Given the conclusion of no identified significant adverse impacts, no mitigation strategies need to be identified. Per existing laws, implementation of remediation strategies for individual development sites would continue to be required.

Odor/Air Quality

- The ability to locate residential uses in close proximity to SR 99, I-5 and the I-90 ramps (within approximately 330 to 660 ~~100~~ feet) could be discouraged ~~regulated~~ and/or avoided through zoning choices.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Noise Compatibility

With implementation of noise mitigation strategies, where applicable, into applicants' project designs at the most noise-affected locations ~~on a project-by-project basis~~ to reduce interior sound levels to 45 Ldn dBA, significant unavoidable adverse noise impacts on future residential uses would not be expected to occur.

Hazardous Substances

None are anticipated.

Odor/Air Quality

With implementation of mitigation strategies to reduce exposure of residential uses to air pollutants, significant unavoidable adverse impacts would not be expected to occur.

FIRE PROTECTION AND EMERGENCY SERVICES

AFFECTED ENVIRONMENT

Seattle Fire Department (SFD) provides fire protection and emergency services to the study area. Fire Station 10, located at 301 2nd Avenue S. in Pioneer Square is the closest station to most parts of the study area. Other stations responding to this area include the Harborview Station (near Terry Avenue/Alder Street) which has two medic companies, and Stations 5 (near Alaskan Way/Madison Street), 6 (near 23rd Avenue/Yesler Way), and 2 (near 4th Avenue/Bell Street). A new Fire Station 10 is under construction between 4th and 5th Avenues on S. Washington Street, expected to be occupied by the first quarter of 2008. This facility will provide for easier vehicle egress than the current station.

Equipment and staff resources at Fire Station 10 include:

- Ladder – 7 person crew
- Engine – 4 person crew
- Aid Van – 2 person crew (staffed by the Engine crew)
- Haz-Mat Van – 7 person crew (staffed by the Ladder crew).

The average response times for first-in companies, based on all incidents for during 2006, are shown below:

Advanced Life Support	4.3 minutes
Basic Life Support	4.5 minutes
Fire/Rescue/Haz-Mat	4.5 minutes

Table 3-32 shows seven years of fire/emergency call data generated by the study area. Data in the last two years show a trend toward more basic and advanced life support calls, and no increase in fire-related calls. Fire Station 10 handled 61% of the study area's responses over the seven-year period of 2000-2006. The other cited stations handled 32% of the responses, and miscellaneous other stations responded to the remaining 7% of calls from the study area. Citywide trends show increases in call volumes, and increasing numbers of responses handled by crews from stations outside the immediate service area (Roberts, SFD, 2007).

Table 3-32
Number of Fire/Emergency Incident Responses in Study Area, From All Stations

Type	2000	2001	2002	2003	2004	2005	2006	TOTAL
Advanced Life Support	1,077	1,047	1,077	1,090	945	1,140	1,247	7,623
Basic Life Support	2,130	1,989	2,079	2,179	2,580	2,979	3,172	17,108
Fire/Rescue/Haz-Mat	840	796	731	708	725	677	702	5,179
TOTAL	4,047	3,832	3,887	3,977	4,250	4,796	5,121	29,910

Seattle Fire Department identifies a need for additional staff to serve citywide growth expected in the coming decade. Voter approval of EMS levies will influence funds available for staffing increases. A November 2007 vote has a proposal to fund another fully-staffed medic unit. Recent and anticipated Downtown growth will generate additional call volumes over time, which could lead to the need for expanded staffing of stations serving Downtown and adjacent neighborhoods, including the South Downtown vicinity (Hepburn, 2007).

FIRE/EMERGENCY PROTECTION IMPACTS WITH FUTURE GROWTH

All Alternatives

Protection can be provided to future development up to 240 feet

Future development evaluated in the zoning alternatives for this EIS includes building types and sizes that can be served by the Seattle Fire Department. This includes buildings up to the highest height limits of 180 feet and 240 feet. Reviews of future development proposals would ensure that fire safety and building code requirements are met, addressing needs such as sprinklers, standpipes and accessibility. As noted in the Water Utility section in this chapter, Seattle Public Utilities anticipates that adequate fire flow volumes can be provided to the vicinities in the study area.

Relationship to north parking lot and "over-tracks" development

The potential for larger developments in certain locations is of interest to the Seattle Fire Department, with respect to meeting fire and life safety standards and maintaining emergency accessibility.

- The potential for fires or hazardous material incidents at the railroad track level is a fire/emergency impact concern with future development above railroad tracks. Such development would be required to meet the standards of National Fire Protection Association (NFPA) Standard 130, which entails providing sufficient ventilation, lighting, egress and life safety protection systems for the railroad track area. Adequate separation of the buildings above from rail activity and potential emergency incidents below would also be required, which is likely to increase the protective and structural standards for such buildings (English, SFD, 2007). Future reviews, including SEPA review, would be necessary to make specific conclusions about potential impacts of this kind of development proposal. However, the Preferred Alternative assumes that commercial buildings at the "over-tracks" property would likely not be present over the main-line railroad tracks and that openings would remain present to allow for emergency access. This means a somewhat reduced probable potential for worst-case safety impacts under the Preferred Alternative.

- Sufficient accessibility for emergency equipment should be maintained at all times in the Qwest Field north parking lot vicinity. This includes during event times, and load-in/load-out of large equipment and display materials, which occurs periodically for trade shows, large concerts and similar events. Based on existing and anticipated configurations of streets, it appears likely that emergency accessibility can be maintained, even during times when certain streets might be affected by load-in/load-out. At such times, a route passable to emergency equipment should be maintained. Future individual events would continue to be subject to safety permits from city agencies, and review by the Stadium Area Parking and Access Review Committee (PARC).

Equipment and Staffing

Future building development up to 240 feet would not generate the need for additional special types of equipment (English, SFD, 2007). A haz-mat van, ladder, engine and medic aid van would be available nearby from Fire Station 10, and other equipment from supporting stations. However, additional numbers of vehicles and staffing for those vehicles are likely to be necessary over time as populations increase in the study area.

Additional growth in the study area is likely to increase the number of calls for service from SFD. Due to the currently high volume of emergency calls in Downtown, such increases could contribute to further strains on the ability to effectively respond with current equipment and staffing resources. Given the

magnitude of growth studied in this EIS, the projected growth in the study area could lead to significant adverse cumulative impacts on fire/emergency protection by 2030 (English, Hepburn, SFD, 2007). In other words, additional equipment and staffing resources beyond currently identified resources may be needed over time to maintain fire/emergency protection in the study area.

MITIGATION STRATEGIES

POSSIBLE MITIGATION STRATEGIES

To address the identified possibility of a long-term cumulative significant impact of growth on fire/emergency protection, the following mitigation strategy is presented.

- Explore methods to address cost impacts to SFD of providing additional staffing and equipment to serve cumulative future growth in the study area. Consider defining impact fees or similar strategies that would be proportional to the level of impact anticipated with individual developments.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Long-term growth in the study area could lead to significant adverse cumulative impacts on fire/emergency protection by 2030. However, such impacts could be addressed through dedication of additional staffing and equipment resources when needed.

POLICE PROTECTION

AFFECTED ENVIRONMENT

Police protection services in the study area are provided by the Seattle Police Department's (SPD) West Precinct west of Interstate 5 and the East Precinct east of Interstate 5. The study area is located within five patrol district beats. Approximately 40 to 45 officers are allocated to serve the study area vicinity. This estimate of staffing is based on the call volumes served in the study area, and includes bicycle officers, community police team, anti-crime team and 9-1-1 response staff. This number may vary at any given time depending on call patterns and personnel-related issues (Quinn, SPD, 2007). Apart from the staffing listed above, police also provide traffic controls for events at the stadiums, per agreements with stadium tenants, related to the annual transportation management plans for those venues, and other requests by the tenants (Nygard, 2008). See the Transportation section for other discussion of event management activity.

SPD does not have an official level-of-service policy for officers-per-thousand population. The current citywide ratio is approximately 2.2 officers per thousand population. SPD evaluates service coverage based on three elements: maintaining a seven-minute average emergency response standard; increasing the amount of time patrols engage in proactive work on issues that generate repeated calls for service; and having ten cars free citywide (two per precinct) at any time for proactive work and backup response. The average response time for emergency service calls citywide varies throughout the day and week and by precinct, but on average is approximately six minutes. For many emergency situations, officers often arrive in less than five minutes.

SPD's "Neighborhood Policing Staffing Plan, 2008-2012" provides an overview of call frequency, variability in call volumes throughout the day and week, and geographic differences in demands for service among the five precincts. Calls are highest during the daytime hours. The staffing plan describes why additional officers are needed so that calls for service can be handled more effectively and additional time can be spent on "proactive" crime prevention activities. The department's proposal also includes adjusting patrol beat geography across the city to even out workload in precincts, revising patrol deployments, and adding 105 new patrol officer positions (154 since 2005). If this occurs, authorized patrol strength will increase by approximately 25% over 2005 levels.

Data analysis by SPD indicates that the department annually received approximately 32,000-34,000 dispatched calls for service in the Livable South Downtown study area over each of the past six years (Adams, SPD, 2007). The trend in call volume in this area has been stable for the past six years, but volumes during this time were somewhat higher than experienced in the late 1990s. Projected trends are for an increase in call volumes over the next few years (Adams, SPD, 2007). Narcotics-related calls are the most common type of call received, with theft, assault and auto theft also common incidents reported.

Community representatives have identified public safety as a key priority to improve the neighborhoods' quality of life. In Pioneer Square, this particularly relates to maintaining orderly and civil on-street behavior throughout the day and night, including addressing public drug use and dealing, and public inebriation (Montgomery, 2007). In Chinatown/I.D. the representatives' key priorities for public safety are similar to those for Pioneer Square, also with an interest in improving lighting in targeted low-lit areas where late-night drinking, prostitution and drug dealing activity occurs (Kurimura, Im, 2007). Criminal activity in the Hing Hay Park vicinity is also a concern. Community stakeholders also have identified the division of precincts on either side of Interstate 5 as a factor that decreases the perceived coordination and effectiveness of police protection in the Chinatown/I.D. neighborhood (Johnson, Im, 2007).

ENVIRONMENTAL IMPACTS

Future projected population and employment growth in the study area, with or without zoning changes, will gradually increase the demands for police protection over time. Compared to existing zoning, Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative would increase the probable density of employment and residential presence. This would likely increase the overall volume of calls for service and need for proactive police work as additional growth occurs in the area. An increasing residential presence would likely increase call volumes related to domestic disputes, burglaries, vandalism and auto theft. Commercial uses would likely increase call volumes related to crimes such as shoplifting, robbery and graffiti.

This programmatic EIS does not predict growth-related increases in call volumes, or a potential demand for additional police officers. SPD does not rely on these kinds of formulas, and they may not be accurate or representative of future call volumes or needs for proactive work (Quinn, SPD, 2007). Experience suggests that common unlawful activity in these neighborhoods—loitering, drug dealing, public inebriation and disorderly conduct—arise due to a combination of "environmental" factors rather than the number of residents or employees in the neighborhood. An example of an "environmental" factor is a combination of vacant and low-lit areas in proximity to establishments selling alcohol. To the extent that residential uses fill in vacant areas over time, increase lighting, put more pedestrians and "eyes on the street", and establish a more continuous pattern of street-level uses, there would be fewer dark areas where unlawful activity could occur. At the same time, an increasing presence of pedestrians and an increasing density of uses attracting night-time customers—such as restaurants and nightclubs—might also contribute to increased call volumes.

Gradual increases in call volumes would most likely cause SPD to dedicate more officer resources to respond to the range of calls generated by future growth. The overall level of police coverage would be a function of total call volumes, the frequency of overlapping emergency calls and the availability of police staffing to provide backup response as well as proactive crime prevention work. Changes that would affect shift start/end times and officer duty cycles, which determine the pattern of days on and off, are currently being considered, and any changes in these factors also would impact the availability of officers. SPD's proposed staffing increases through 2012 should allow increased patrol strength that could address much of the potential increase in demand over the next decade (Adams, SPD, 2007). Further staffing increases over time would be dependent upon future City budgeting decisions as well as precinct commanders' assignment of patrol officers in response to call volumes and the perceived need for proactive work. Due to the separate contracted nature of the police staffing to provide event traffic controls, that staffing function is not related to patrol staffing and would be likely to continue without any appreciable change in the future (Nygard, 2008). This means that no probable growth-related impact is identified. See the Transportation section for additional discussion of event traffic management.

Other activities beneficial to public safety would include: an active neighborhood/block watch program, close links between neighborhood groups and SPD Precinct commanders, continued partnership with human service providers, and a commitment to address public safety by implementing "Crime Prevention Through Environmental Design" (CPTED) principles. The CPTED approach would be able to address a number of the "environmental" factors noted above by minimizing the number of unsafe places in the community's environment. These strategies would make a difference over time in improving public safety.

SPD acknowledges that public safety should be maintained through effective best practice approaches to policing that will address the specific issues relevant to the study area. Recent programs and actions undertaken by SPD in the study area include frequent and regular contact with businesses and residents

throughout the area, emphasis patrols occasioned by events at Qwest Field and Exhibition Center, and a special program to address problems associated with abandoned vehicles (Quinn, SPD, 2007).

In addition to the benefits of additional residential and street-level commercial presence, Livable South Downtown planning endorses a number of measures to be undertaken to improve public safety in the neighborhoods, including: lighting improvements in under-illuminated areas, continuation of multi-agency efforts to clean up homeless encampment areas, and redrawing precinct boundaries to include Little Saigon in the West Precinct thereby consolidating the neighborhood's police coverage. This analysis suggests that future growth would result in a combination of positive and negative influences on public safety, SPD call volumes, and needs for proactive work. The overall effect of growth trends and probable increases in calls for service would represent an adverse impact on SPD, but growth would also bring additional opportunities to improve the area's public safety.

MITIGATION STRATEGIES

Due to a lack of identified significant adverse impacts, no mitigation strategies are required. See the public safety strategies suggested in the Impact discussion above.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

None are identified.

PARKS AND RECREATION

AFFECTED ENVIRONMENT

The Livable South Downtown study area includes several parks, plazas and other facilities for the diverse residents, employees, tourists, business patrons and stadium eventgoers in this area. These facilities are primarily located within the central parts of the Pioneer Square and Chinatown/I.D. neighborhoods, with limited open spaces available in other portions of the study area such as Little Saigon and the industrial-zoned stadium area. A summarized list of neighborhood parks, open space, recreational features and public-private open spaces includes the following:

Pioneer Square

Occidental Park and pedestrian mall
City Hall Park
Pioneer Square Park
Pedestrian plaza north of King Street Station
Washington Street Boat Landing
Waterfall Park at 2nd/Main*
Qwest Field north plaza*, Occidental promenade
Safeco Field plazas*
Colman Dock
Prefontaine Place

Chinatown/I.D.

Kobe Terrace/Danny Woo Gardens
Hing Hay Park
Children's Park
Plazas in the Union Station block*
Lane Street plaza at Uwajimaya*
Community Center, Library

Nearby outside the study area:

Yesler Terrace community center and playfields
Bailey Gatzert School playfields
Dr. Jose Rizal Park

(Note: Locations identified with a "*" are publicly used spaces that are maintained by private or public entities other than City of Seattle.)

Other event-oriented recreational/entertainment facilities that typically require ticket purchase for entry include Qwest Field and Events Center, and Safeco Field, located in the Stadium Area.

The variety of neighborhood parks and open spaces serve multiple purposes. Aesthetically, they provide open space, visual relief, greenery and distinctive character elements that complement the historic character of these neighborhoods. They attract daytime use by many pedestrians and passersby. A few of these parks and plazas also provide active recreational opportunities for residents, with play equipment and gardening spaces. These include the Kobe Terrace/Danny Woo Gardens (which has active vegetable gardening spaces) and Children's Park in Chinatown/I.D. In addition, a community center and library near 8th Avenue S./S. Dearborn Street provides facilities for indoor athletic and recreational activities. Newer features of Occidental Park such as "bocce ball" courts also provide for limited active recreation. In Little Saigon, a nearby community center and playfield facilities at Yesler Terrace and Bailey Gatzert School also provide for some active recreation opportunities. Otherwise, the existing park and plaza spaces throughout the study area are more attuned to passive recreation, such as people-watching, sightseeing and photography. Occasional art-walks, weekend markets and street-vending activities also enliven these spaces.

Planned or possible future park/recreation improvements include: a future expansion of Hing Hay Park to the U.S. Post Office property to the west; landscaping improvements along Maynard Avenue S. south of S. Main Street; addition of a kiosk structure at Occidental Park; possible renovation of City Hall Park; and future development of park/plaza space in the Public Safety block (between James and Cherry Streets, 3rd and 4th Avenues).

In 2005 and 2006, Seattle Parks and Recreation (Parks) explored numerous properties for possible acquisition in Chinatown and Little Saigon vicinities. This effort included funds available from the 2000 Pro-Parks levy and King County. The proposal to expand Hing Hay Park to an adjacent property is the intended result of that effort (Blair, 2007).

In planning for park needs, Parks uses the following guidelines for distribution of park and open space:

Neighborhood Park or Usable Open Space, in Urban Village

Publicly-owned or dedicated open space that is easily accessible and intended to serve the immediate urban village. This encompasses various types of open space for passive enjoyment as well as activity and includes green areas and hard-surfaced urban plazas, street parks, and pocket parks. Dedicated open spaces should be at least 10,000 square feet in size.

Desirable: One acre of open space per 1,000 households and one-quarter acre of urban space per 10,000 jobs in the Downtown Urban Core. One-quarter acre within 1/8th mile of all locations in urban village density areas.

Acceptable: One-quarter acre within ½ mile, or community approved offset to lack of usable park space.

Offsets: School grounds, recreation facility, green streets, boulevard, and trail.

Using these measures, most of Little Saigon and the Jackson Place edge east of Rainier Avenue S. are areas identified as further than 1/8-mile from a usable open space. The existing aforementioned parks in Chinatown west of I-5 do meet proximity goals, however. In Pioneer Square, the neighborhood meets the proximity goals except in the stadium vicinity. Parks in its 2006 "gap analysis" identifies the Pioneer Square neighborhood as meeting its open space per household goals currently and for 2024, but not the Chinatown/I.D. neighborhood. According to goals for 2004 household presence, this urban village is about 0.3-acre short on usable open space, and for 2024 goals (per growth projected in the City's Comprehensive Plan) is about 1.3 acres short.

Parks planners also use several other guidelines for suggested proximity to active recreation facilities. For example, one soccer and baseball field is desirable within one to two miles of all Seattle residents. A community center should be available within one mile of Seattle residents, and community centers should serve populations of about 15,000-20,000 people (Seattle's Parks and Recreation Plan, 2000). The relatively recent construction of community centers in Chinatown and Yesler Terrace has addressed this active recreation space demand to some degree, and athletic fields are also present in Yesler Terrace and at Bailey Gatzert Elementary School near 14th Avenue S./S. Main Street.

As suggested by recent property acquisition efforts, the Downtown urban environment can be a difficult place for the City to acquire individual properties to provide additional park and recreation facilities due to limited availability and high costs. However, to the extent funding becomes available in the future Parks will consider opportunities for additional park and recreation investments (Blair, 2007)

ENVIRONMENTAL IMPACTS

Analysis for this EIS anticipates more residential and employment growth than was previously evaluated in parks planning. Compared to previous studies that assumed the growth projected in the City's Comprehensive Plan to 2024, the additional increment of residential growth studied in Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative amounts to about 3,700 to 4,100 more households by 2030 (see Table 3-33). For the No Action Alternative (Alt. 4), the additional residential growth amounts to about 1,400

additional households. The additional increment of growth would result in additional demand for parks, open space and recreational facilities, which can be evaluated at a programmatic level for its potential impacts.

Table 3-33
Net Additional Growth Contributing to Park/Recreation Demand Under the Alternatives

Comprehensive Plan Growth Assumptions, to 2024 (households)	Livable South Downtown EIS Growth Assumptions, to 2030 (households)	Net Difference Between EIS and Comprehensive Plan Growth Assumptions, to 2030 (households)
	Overall Total:	***Net Additional Amount Of Growth Evaluated in EIS:***
Pioneer Square: 1,000 Chinatown/I.D.: 1,000 TOTAL 2,000	Alts. 1, 2, 3 & Preferred Alt.: Appx. 5,700 – 6,100 Alt. 4 No Action: Appx. 3,400	Alts. 1, 2, 3 & Preferred Alt.: Appx. 3,700 – 4,100 Alt. 4 No Action: Appx. 1,400

Source: DPD, 2007

Using the DPR acreage-per-household guidelines, the net additional amounts of residential growth through 2030 would translate to an additional residential-based demand for usable park/recreation open space of:

- Alternative 1: 3.7 acres (equivalent to a space about 400 x 400 feet)
- Alternative 2: 4.0 acres
- Alternative 3: 4.1 acres
- Alternative 4: 1.4 acres
- Preferred Alt.: 4.1 acres

The projected demands from additional employment growth would be relatively small, amounting to less than one acre under each of the alternatives.

If neither the City nor future development provides additional park/recreation open space sufficient to meet Parks' acreage-per-household guidelines, additional deficits in open space would be generated. Such deficits are identified as potential adverse impacts of future growth on parks and recreation. Other aspects of potential parks and recreation impacts are summarized below.

Increased Use of Existing Parks and Recreation Facilities

Future residential and employment growth would tend to increase the overall use and activity levels of existing parks and open spaces. In many instances this would better activate and improve the safety of public spaces. However, with large increases in resident and employee populations, there could eventually be volumes of use at some parks or recreation facilities that would represent "overuse" of such facilities. An example would be maximized use of community center athletic facilities.

Increased Need for Usable Open Space Distributed Across the Study Area

With the probable trends of increased residential infill development across non-industrial portions of the study area and increased commercial/office development in IC zones, the residential and employee populations would be more densely distributed across the study area than under existing conditions. This would generate additional demand for usable open spaces that are distributed more evenly across the study area. Examples of areas with increased demand for open space over time include Little Saigon,

where there is no dedicated park space, the south-of-Dearborn vicinity, the Qwest Field north parking lot and "over-tracks" vicinity west of 4th Avenue S., and the 1st Avenue S. corridor south of S. King Street. Similarly, even though there are park or plaza features in or near certain areas in Chinatown and Pioneer Square, local resident and employee populations would benefit if additional open space amenities were available.

Conclusion of Adverse Impacts for Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative

The impacts identified above represent adverse impacts of future growth attributable to the zoning alternatives. Options for addressing these added demands include:

- seeking to ensure that sufficient usable open space is provided on-site or in nearby off-site locations, as part of future development projects, through requirements, incentives, public benefit improvements, or other strategies; and/or
- future City actions to acquire and improve properties for parks and open space; and/or
- improve properties already in public ownership.

It is also noted that under the proposed South Downtown Mixed (SDM) zone, an increased importance is attached to achieving open space amenities in future development. Assuming this zoning strategy would be successfully implemented, Alternative 3 would have a lesser potential for adverse open space impacts due to the greatest presence of SDM zones. Comparatively, Alternative 2 would have a greater potential for such impacts due to the lack of SDM zones, and Alternative 1 and the Preferred Alternative would have an intermediate potential for impact between Alternatives 2 and 3. In other areas of the Pioneer Square and Chinatown/I.D. neighborhoods, the overall potential for adverse open space impacts is roughly comparable under Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative, and lesser for the No Action Alternative (Alt. 4).

MITIGATION STRATEGIES

Due to a lack of identified significant adverse impacts, no mitigation strategies are required. City agencies may consider actions that would provide additional parks and open spaces in this area over time.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

None are identified.

ENERGY

AFFECTED ENVIRONMENT

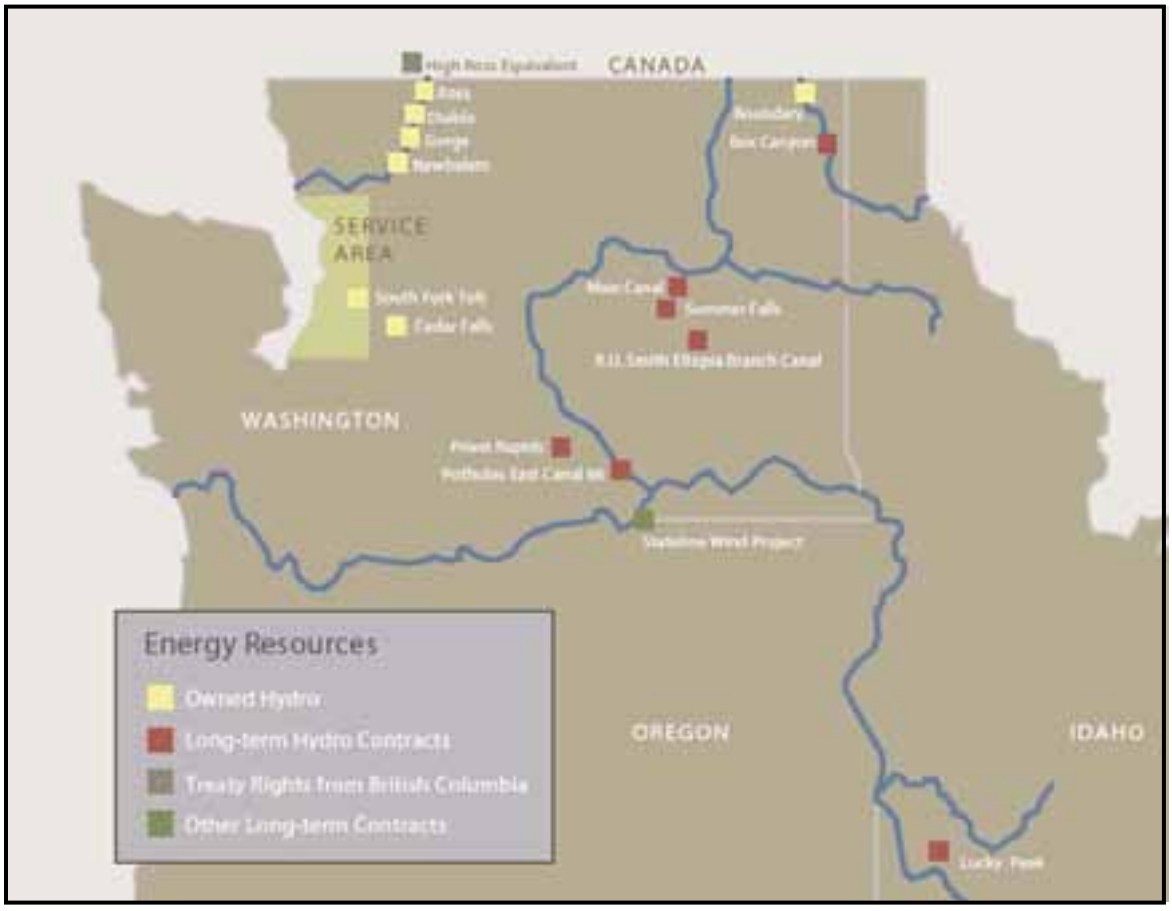
INTRODUCTION

Seattle City Light (SCL) is the municipal electric utility for Greater Seattle, serving approximately 350,000 customers, with a history dating back to 1902. SCL's service area is 131 square miles, an area with a total population of roughly 740,000 people.

GENERATION AND SUPPLY

The total capability of City Light hydroelectric plants is 1,920 megawatts (MW). The highest recent peak usage of 1,716 MW occurred in December 2005. City Light owns and operates hydro generating facilities at (1) Cedar Falls, (2) Boundary, (3) Gorge, (4) Newhalem, (5) Diablo, (6) Ross and (7) South Fork Tolt (see Figure 3-39). In addition, SCL acquires generation from Priest Rapids, Stateline wind project, Lucky Peak, products of Bonneville Power Administration consisting of "Slice" and "Block" purchases from the Mid-Columbia system and irrigation-based hydroelectric generation from the Grand Coulee Project Hydroelectric Authority.

Figure 3-39
Seattle City Light Energy Resources



HIGH-VOLTAGE TRANSMISSION SYSTEM

Electrical transmission lines connect to generation resources, bringing bulk power to receiving substations at high voltage. The SCL transmission system consists of approximately 657 circuit miles of 230 kilovolt (kV) and 115 kV lines. City Light's facilities have multiple interconnections with Bonneville Power

Administration, Puget Sound Energy, Snohomish County Public Utility District and Avista Corporation systems.

DISTRIBUTION SYSTEM

City Light has nearly 2,500 circuit miles of distribution lines at three power levels, and the lines are served from thirteen receiving substations. Three of these substations (Broad Street-Annex, Union Street and Massachusetts Street) serve an underground 13.8 kV Downtown network. Another two of these substations (East Pine and University) serve an underground 26.4 kV network in the First Hill area and University District area. The rest of Seattle gets power from a 26.4 kV looped radial distribution system. The looped radial substations are as follows: Broad (26 kV), Canal, Creston Nelson, Delridge, Duwamish, East Pine, North, Shoreline, South, University and Viewland Hoffman. South Substation also serves a dedicated 34.5 kV service to Nucor Steel.

For the South Downtown study area, there are two distribution systems: (1) the underground 13.8 kV network system and (2) the looped radial 26.4 kV system which is a combination of underground and overhead distribution. Both systems are designed to provide a highly reliable power supply to customers including Downtown commercial and residential uses, the Port of Seattle and industrial uses.

Downtown Network - Massachusetts Substation (13.8 Kv)

The Downtown network is broken up into 12 sub-networks, five identified with the Broad substation, four identified with the Union substation, and three identified with the Massachusetts substation. Of these, the "Mass South" sub-network serves primarily Pioneer Square but also a segment of Chinatown/I.D., bounded by approximately Yesler Way, Alaskan Way, I-5, S. King Street in Pioneer Square, and as far east as Maynard Avenue S./S. Jackson Street. Other parts of the study area are served by the South substation near S. Spokane Street (described below).

The "Mass South" sub-network is an underground network operating at 13.8 kV. The load for the approximately 1,500 metered customers in this area is 15.2 MVA, a little more than one-third of the load served by this substation. During high-demand periods in 2005-06, the coincidental loads for the Downtown-oriented Broad, Union and Massachusetts Substations added up to a total of 241 MW or 14.0% of the entire City Light demand of 1,716 MW. On July 24, 2006, the summer peak load for the Downtown-oriented Broad, Union and Massachusetts Substations added up to a total of 261 MW or 18.3% of the entire City Light summer peak demand of 1,427 MW. Warm weather and air conditioning needs led to the summer peak demands being higher than winter peak demands.

Electrical system improvement plans for the Pioneer Square-oriented service area include replacing old cables with new cables for four feeders emanating from Massachusetts Substation. In addition, new duct banks and new manholes will be installed. This is planned to occur over the next 15 years. Also, as part of SR99 improvements, five feeders will likely be rerouted.

South Substation (26.4 kV)

Service from the South Substation occurs through a combination of underground and overhead distribution feeders. Seven feeders from the South Substation serve the South Downtown and Duwamish vicinity, including one (known as "2638") that serves the majority of the Chinatown/I.D. neighborhood and into First Hill. The other feeders provide service to various portions of the Duwamish industrial area, including the Stadium Area and vicinity of 4th Avenue S.

The non-coincidental feeder load for the main feeder serving Chinatown/I.D. ranges from about 10.0 MVA (220 amps) in summer to 11.4 MVA (250 amps) in winter. City Light has identified potential re-conductoring projects for this area, but these projects are not currently budgeted. Unless there are specific new large loads coming on-line within the next couple years, or there is a need to transfer load from one feeder to another, City Light does not plan on new feeder enhancements.

PROJECTIONS OF FUTURE LOAD GROWTH

The load for the entire Downtown underground network is projected to grow at approximately 1.3% per year. Another estimate indicated that the Mass South sub-network could carry only 3% to 4% of the projected Downtown area load increase or an annual load growth "trend" of approximately 0.04% per year at 15.2 MVA base loads in 2006.

In the near term, City Light is performing work to maximize the substation and distribution feeder capacities for the Downtown network. Capacity work requires re-conductoring feeders using larger cables, balancing and transferring feeder loads between neighboring substations, and increasing some network capacities. Taken as a whole, the proposed enhancements will result in maximum utilization of network feeder and substation capacity available from substations to the Downtown network.

The projected growth for the South Substation's 26.4 kV service is 1.1% per year. No major system improvements to serve this growth are currently anticipated, although some minor feeder improvements may be needed.

PORT OF SEATTLE LOAD GROWTH

The Port of Seattle has requested comments from City Light on potentially providing shore power connections, a practice referred to as "cold ironing", to some of the Port's marine terminals. The estimated load for each freighter is approximately 7 MW. The terminals being considered for such service are at Terminals 5, 18, 25, 30, 37-46 and possibly Terminal 115. This includes potential service to cruise ships. If all of these occur, the estimated peak load "increase" would be between 50-70 MW. The study by the Port states this could occur over a 4-12 year period. This study is a recent planning activity and implementation would require approval by the Port Commissioners. As such, at this time, City Light's projections on use of the existing feeders and substation capacities do not include the maximum potential Port load increase.

INTEGRATED RESOURCE PLAN

City Light has developed and uses a long range plan, subject to bi-yearly updates, to guide the acquisition of new energy resources to meet the needs of its customers. The current 2006 Integrated Resource Plan (IRP) recommendations and EIS can be found on the web at: http://www.seattle.gov/light/news/issues/irp/. The IRP process involves looking at electricity resources (owned and long term contracts) and electrical demand forecasts over a 20 year period, to determine when new resources will be needed. Then, alternative mixes of existing and new resources are evaluated and compared based on cost, risk, reliability and environmental impacts, to select timely resource acquisitions that ensure customer obligations are met.

Environmental impacts associated with meeting electrical energy requirements anticipated under the existing forecast were assessed in the 2006 IRP EIS. A major focus of this document was air quality impacts and assessment of greenhouse gas emissions. SCL has adopted a policy of meeting load growth with conservation and renewable energy resources and fully offsetting all carbon emissions that may be a result of energy purchases needed to serve customers. This is an ongoing commitment that has been fulfilled in the past few years, beginning in 2005.

GREEN POWER & CONSERVATION

Seattle's history of renewable energy began in the early 1900's with the Cedar Falls hydroelectric plant. Later, City Light developed the Skagit and Boundary hydroelectric facilities. The Skagit facilities were recently recognized as meeting strict "low-impact hydro" certification requirements (see www.lowimpacthydro.org for additional information).

Since 1977, conservation has been Seattle's energy resource of choice. City Light's mission is to provide a full-range of cost-effective energy efficiency service to customers. In 2001, the State Legislature passed

a law allowing customers to partner with their electric utility to purchase new clean renewable energy sources. City Light responded by creating Seattle Green Power with voluntary customer payments helping to fund a wider range of new renewable energy sources, including local solar demonstration projects. Customer participation in green power programs helps to acquire additional supplies and accelerate the market for new renewable energy that does not create greenhouse gas emissions.

In 2002, City Light contracted for one of the largest wind power purchases in the country, 175 megawatts from the Stateline project in eastern Washington and Oregon.

In 2005, City Light began offering its Green Up program, offering market-based renewable energy certificates, or green tags, from wind power, to "green up" customer energy portfolios. City Light has long supported customers with a wide range of conservation products and services, including financial incentives that reduce customer electric bills and support the local economy.

EVALUATION OF EXISTING ENERGY USE IN PIONEER SQUARE NEIGHBORHOOD

A study was conducted by International Sustainable Solutions (ISS) to evaluate energy use patterns within the Pioneer Square neighborhood.

The ISS study found that:

- Many of Pioneer Square's existing buildings (not including Qwest Field), due to characteristics such as operable windows and less energy-intensive systems, actually perform well, with office, warehouse and residential buildings using in the range of about 10-15 kilowatt-hours per square foot annually, compared to a U.S. average of almost 29 kilowatt-hours per square foot during the 1990s. Pioneer Square retail uses' energy intensity was higher, in the range of 50 kilowatt-hours per square foot annually.
- Comparatively, some projects designed to meet LEED[1] standards (including Seattle's Justice Center and the "Brewery Blocks" in Portland, Oregon achieved energy levels in the low 20's of kilowatt-hours per square foot, and higher performance is possible—such as at the White Rock, British Columbia City Operations Center, which achieved energy intensity levels below 10 kilowatt-hours per square foot annually.
- Similarly, other European examples that use available energy-efficient technologies are performing in the range of 5-10 kilowatt-hours per square foot annually.
- A combination of several strategies would need to be implemented to achieve a major improvement in the neighborhood's energy efficiency. Strategic options could include: high performance energy efficiency requirements in new buildings; incorporation of local renewable energy by using technologies such as solar photovoltaic systems; local combined heat and power generation; and/or use of other sustainable energy technologies. These kinds of strategies are being implemented in various European countries.

[1] "LEED" is a trademark and an abbreviation for "Leadership in Energy and Environmental Design"

FUTURE GROWTH IMPACTS ON THE ELECTRICAL SYSTEM

All Alternatives

For EIS Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative, the growth scenario evaluates approximately 6,000 dwelling units of additional residential growth, and approximately 24,600 jobs of additional employment growth in the study area by 2030. Employment growth would be expected to occur within existing buildings as well as new buildings developed by 2030.

The projected growth would increase overall demands in the study area for electrical service and overall energy demand, and there are environmental impacts associated with development of new electric resources that could be needed to meet this demand.

There also may be construction impacts associated with expansion or improvement of the electrical distribution system to serve new load. However, the analysis to date indicates that the City Light distribution system can accommodate load growth identified in the ~~four~~ EIS alternatives (Chung, Nierenberg, 2007), including the Preferred Alternative (DPD, 2008). To reach this preliminary conclusion, City Light staff reviewed the existing systems' characteristics, the EIS growth scenarios, prospective future load growth in the Duwamish industrial area, and City Light's ongoing planning of future system improvements. Additional analysis to verify this conclusion will be conducted by City Light.

While no specific distribution system infrastructure capacity improvements related to the projected growth are identified at this time (for example, no new feeder lines are likely to be needed to serve projected growth using standard assumptions about types of commercial and residential growth), if unusually high energy demands or customer service requirements are proposed, such as a data center or research facility, City Light would partner with the applicant to ascertain electrical demands and any specific energy delivery improvements (such as a feeder extension) that might be needed to serve such uses. It is also possible that individual developments would need localized improvements to extend service from existing lines. In such cases, City Light's policy is that developers provide and bear the cost of such improvements (Nierenberg, 2007).

City Light needs right-of-way space to build power line infrastructure to meet future building development and growth demands. Overhead electric lines are one option outside of network areas. However, developers of new buildings often want to locate the building bulk abutting the property lines at the edge of street rights-of-way. In such cases, clearances to power lines in the rights-of-way may not be sufficient to maneuver equipment and maintenance personnel, so a safety hazard may occur. In such circumstances, City Light coordinates with customers to determine how service may be achieved while maintaining required clearances. In some cases, adjustments in building design may be sufficient to provide adequate clearance. In others, more costly undergrounding of electric utilities may be needed, and if needed to accommodate specific developments, the building developer may be responsible for any cost difference. This concern about new building design could continue to be addressed on a project-by-project basis (DPD favors this approach), or additional building setback controls could be defined for zones in the affected vicinity. Figure 3-40 below shows where overhead systems are present in the study area.

ENERGY CONSERVATION AND SUSTAINABILITY

There is growing public sector, citizen and development community interest in addressing global climate change and advancing sustainable development practices. SCL's programs and approaches already address several aspects of conservation and sustainable practices, especially in how the supply of energy is provided (see summarized information in "Affected Environment" discussion above, and the referenced

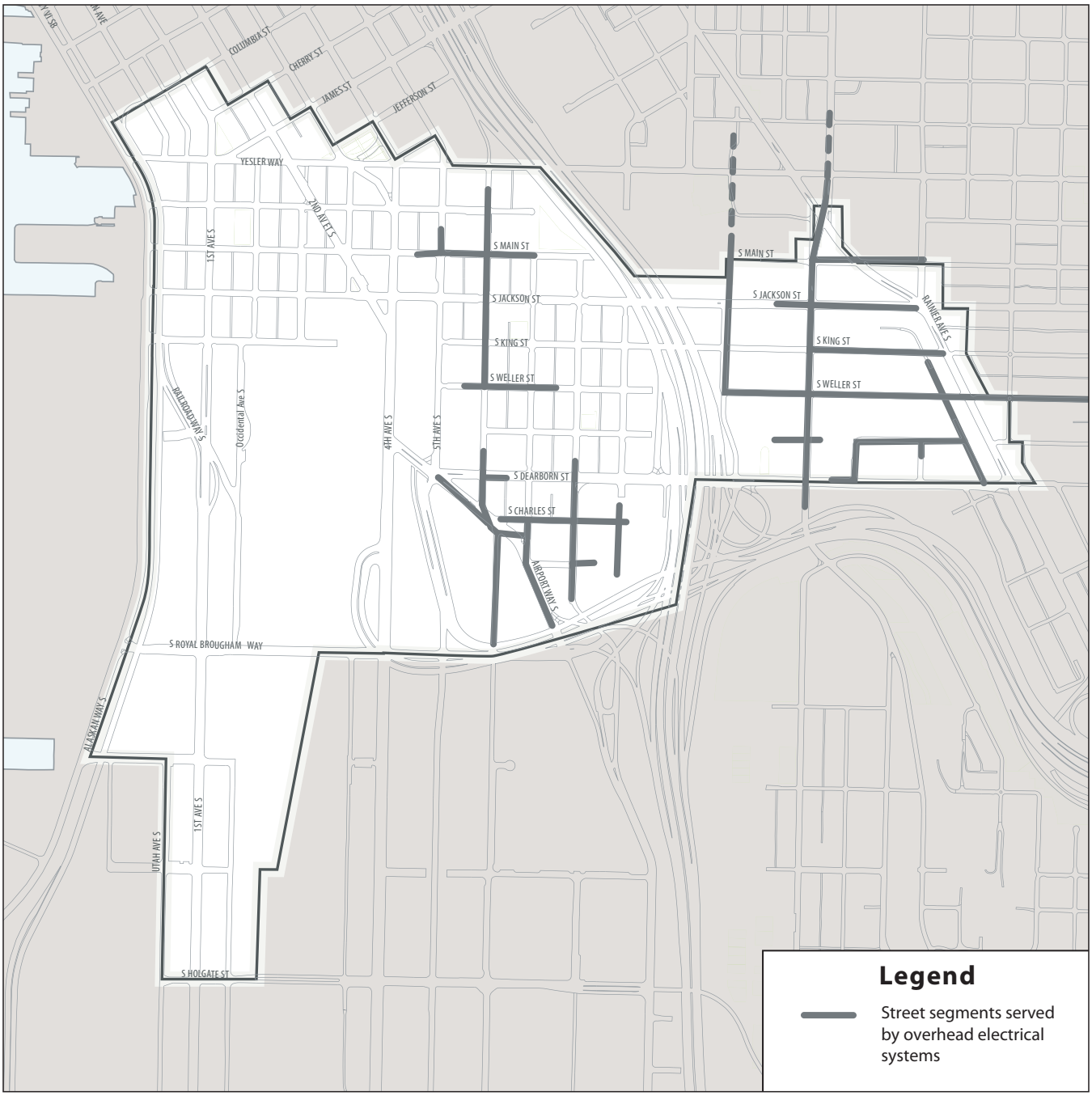


Figure 3-40

Location of Overhead Electrical Systems

Livable South Downtown

documents for more information). To address the study area's future energy demands, Livable South Downtown recommendations will include consideration of strategies that are meant to achieve higher energy efficiency and limits on carbon emissions, through conservation and sustainable development strategies. This direction is supported by current City policy including SEPA policies, smart growth planning objectives, SCL's and Citywide carbon emission reduction objectives, and other components of the city's Climate Action Plan and SCL's 2006 Integrated Resource Plan.

The preferred approach will set performance levels for energy use and conservation, will encourage or require conservation strategies to be incorporated in design of new development, and will define how carbon emissions will be addressed. A comprehensive strategy may include the following:

1. **Beat Energy Code minimum performance:** New structures should be designed to exceed Seattle Energy Code minimum performance levels by at least 15%.
2. **Coordinate early with City Light on energy conservation assistance:** Developers and their designers should coordinate with City Light staff early in the design process to take advantage of City Light energy conservation funding opportunities relating to building development.
3. **Compare building performance to recognized benchmarks such as the 2030 Challenge:** As a way of measuring and disclosing performance, define a benchmarking method such as levels associated with the "2030 Challenge" that compares performance to a goal without setting an absolute requirement.
4. **Set an "energy budget" or similar performance level at building or district scale:** Certain types of new structures in rezoned areas could be required to not exceed the total energy use expected to occur under today's zoning, thereby setting an "energy budget" or a performance level that must be achieved even though future development would be larger than previously anticipated.
5. **Consider district-based approaches:** Strategies such as district heating/cooling systems that could provide benefits to multiple parties as well as additional environmental benefits not available through conventional or site-by-site development approaches.
6. **Consider participation in larger-scale carbon emission reduction strategies or programs:** Through the Climate Action Plan, the City will continue to examine options to achieve carbon emission reductions and climate protection. Ongoing agency and interdepartmental work will likely yield approaches that are part of a big-picture approach to sustainable growth. This may, for example, describe methods for addressing transportation-related emissions as a side-effect of growth.

Further discussion will be needed to settle on the optimal approach for South Downtown. The long-term net result of such actions is likely to promote fulfillment of the City's SEPA policies, which indicate "it is the City's policy to promote energy conservation and the most efficient possible use and production of energy."

Update for the Final EIS

The recommended strategy is that new proposals gaining bonus development rights should achieve a minimum performance level of "energy cost savings" that beat Seattle Energy Code minimums by 20%. This would be approximately equivalent to achieving a LEED "Gold" performance level of 8 "EA1" credits for the energy-related portion of LEED, and approximately equivalent to beating the ASHRAE/IESNA Standard 90.1 by 30%. A majority of new structural development would likely use bonuses, but not necessarily developments involving rehabilitation of existing structures or small new structures.

Setting this performance level suggests that energy system design should be evaluated in early stages of future development project design. This would likely require an approach such as running a "whole building project simulation" modeling, for which City Light may be able to fund some of the modeling costs. This would also likely require a meeting with City Light's energy conservation staff to discuss opportunities in efficient energy design and conservation.

The Livable South Downtown planning effort also recommends considering "other possible actions" that could promote energy efficient approaches and sustainable strategies in future development:

- Ban electrical resistance space heating methods such as electric baseboards to avoid foreclosing future district energy heating and/or cooling solutions.
- Require energy efficiency that results in a 60% fossil fuel use reduction (e.g., natural gas) compared to a comparable building as described in the U.S. Dept. of Energy's "Commercial Building Energy Consumption Survey" database. This would promote achievement of the City's Climate Action Plan and related climate change mitigation initiatives.
- Encourage larger developments in particular to further explore district energy strategies, with the cooperative evaluation and possible assistance of public-sector agencies and energy providers such as the Seattle Steam Company. A district energy heating and/or cooling system may be feasible in future development, but would require further interactive assessment of a combination of regulatory, cost and policy considerations that may determine the feasibility of proceeding.

Probable improved performance of future development in controlling greenhouse gas emissions

At a programmatic level of detail, it is possible to make a few observations about probable positive effects of proposed and other possible strategies on limiting contributions to greenhouse gas emissions. These observations may not account for all economic, environmental or policy considerations that may be in play, but are worth noting as to the recommendations' relative probable benefits.

- A mandated 20% increase in energy efficiency in individual future developments would be worthwhile to pursue because it is intended to reduce total energy demands on the generation system and related environmental costs including atmospheric impacts, compared to a typical development meeting current minimum code levels. Improved efficiency is assumed to have both environmental and financial benefits.
- The inclusion of "other possible actions" creates the possibility of other possible benefits in energy efficiency that could reduce atmospheric impacts of future development. These possible actions relate to electrical space heating bans, reduced fossil fuel use, and encouraging hydronic or other district energy strategies. Each of these strategies could facilitate alternative energy choices with fewer probable atmospheric impacts. Again, improved efficiency in energy choices is assumed to have environmental and financial benefits.[2]
- Requiring and otherwise encouraging reduced vehicle trip generation through the proposed methods of reduced commuter parking capabilities and required transportation demand management programs would contribute to additional vehicle trips avoided on the regional transportation system. To the extent that workers use transit options that are readily available in most of the study area, the avoided vehicle trips of single-occupant vehicles would reduce the total amounts of greenhouse gases emitted by such vehicles.
- Meeting LEED requirements facilitates more use of local manufactured, renewably harvested, recycled content and re-used materials, which means greater efficiencies in energy consumption that is "embodied" in the materials and their production and transport.
- Implementing the "green factor" landscaping strategy, green roofs and similar sustainable strategies would help reduce environmental "heat island" effects in the immediate area, which potentially could also contribute to reduced energy demand for heating and cooling needs.
- Encouraging further consideration of hydronic or district energy strategies would maintain the secondary benefit of "leaving our options open" in how to serve future development. Otherwise, options could be foreclosed that might be more favorable in the future. For example, if it was

[2] This result does not delve into secondary possible impacts of making alternative energy choices, which conceivably could uncover economic or environmental considerations of alternative choices. However, further detailed quantification of these possible benefits or associated costs is beyond the scope of this EIS.

later determined that significant ground-source heating opportunities were available in the study area but were no longer economically favorable to pursue, that could be interpreted as a lost opportunity with an associated environmental cost.

A potential for adverse impacts in total greenhouse gas emissions that remains unconfirmed
With the increased zoned development capacity and concentration of future development that is represented by the Action Alternatives, it can be hypothesized that increased total amounts of greenhouse gas emissions could occur within the study area, compared to future development under the No Action Alternative. It can also be hypothesized that emissions associated with vehicle-miles-traveled, from a regional perspective, would be comparatively lower with future development under the Action Alternatives compared to the effects of growth patterns and commuting choices that would otherwise occur under the No Action Alternative.

However, it is beyond the scope of this programmatic EIS to quantitatively confirm whether the net effect of energy-conserving strategies included in the Preferred Alternative would result in a balancing of or net reduction in total greenhouse gas emissions, if a comparison was made to assumed development under No Action conditions. This relates to the lack of sufficient details to analyze future individual development projects, the uncertain composition of the final strategies selected, and the complexities of assessing numerous in-depth implications that may relate to economics, environmental costs, legal, operational and City policy concerns. Such efforts at assessment are better pursued through assessment at a project-specific level, and through the efforts of multiple City departments in their planning for the future. Therefore, no firm conclusions may be drawn as to whether the Action Alternatives would in the worst-case result in a net adverse impact in total greenhouse gas emissions from the study area, or not. Similarly, no conclusions may be drawn as to whether the Action Alternatives could generate significant impacts upon the maintenance of a healthy global atmosphere, which is problematic due to scientific uncertainty regarding appropriate methodologies to make such a determination. However, the lead agency may proceed even without such conclusions (SMC 25.05.080).

MITIGATION STRATEGIES

The incorporation of strategies to address conservation and sustainability objectives into the City's final recommendations will help avoid or mitigate potential impacts associated with development of new electric resources and fulfill the City's SEPA policies on energy.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

None are identified.

WATER UTILITY

AFFECTED ENVIRONMENT

EXISTING WATER SYSTEM CONDITIONS

The Livable South Downtown study area is located in the South 326 pressure zone. Water services are provided by Seattle Public Utilities (SPU) to approximately 1,000 locations, of which roughly 70% are in Downtown zoned areas, 20% are in industrial zoned areas and 10% are in commercial zoned areas.

Sizes

The study area contains primarily 12-inch and larger diameter cast iron water mains. The major supply mains consist of 16-, 24-, and 30-inch mains that convey water in a north-south direction along the major avenues. The western study area vicinity is served by 12- and 24-inch mains in Alaskan Way and 1st Avenue S. respectively. In the Chinatown vicinity, there are 12-inch and 16-inch mains in 4th Avenue S. and 6th Avenue S., respectively, and 30-inch and 24-inch mains in Airport Way S.-to-7th Avenue S. and S. Dearborn Street respectively. The east-west pipe gridding consists mostly of 12-inch mains in the Pioneer Square and Chinatown vicinities, although there are a few scattered blocks with 8-inch mains. In the Little Saigon vicinity, 12th Avenue S. is served by a 24-inch main, with 8-inch mains present in most streets east of 12th Avenue S.

Age

The majority (63%) of the water mains in the study area were installed prior to 1920.

Water Pressure

Water pressure in this area is very good, ranging from 50-75 pounds per square inch (psi) in Little Saigon and higher hill areas of Japantown, to between 75-120 psi in the central portion of the study area, and between 120-129 psi in the western areas toward the waterfront.

Available Fire Flow

Nearly all of the hydrants in the study area supply at least 4,000 gallons per minute (gpm) at a residual pressure of 20 psi. Two locations provide fire flow below this level: S. Washington Street west of Maynard Avenue S. (near I-5), and S. Weller Street between 12th Avenue S. and Rainier Avenue South. Developers may need to install water main improvements at these locations if required for their structures. Actual fire flow requirements for new or improved structures are determined by the Seattle Fire Marshal's Office, based on the 2003 International Fire Code. Most Downtown structures rely on flow from several nearby hydrants to meet their fire flow requirements.

Reliability of Existing Water Mains

Since 2000, there have been about 25 water main leaks or breaks in this area. This is considered to be within a normal range of system performance (SPU, 2007). Seventeen of these leaks were joint-related leaks of which 15 occurred on pre-1920 cast iron mains where water pressures are about 125 psi. When these incidents occur, the main segments must be shut down to prevent further joint damage and isolate them for repairs. Spot repairs to water mains will continue to be occasionally needed in the study area due to local characteristics that include high water pressure, cast iron pipe, lead joints, soil and groundwater conditions, and rail and truck traffic vibrations.

Ongoing Planning Efforts, System Improvement Needs

Fill soils in the low-lying areas west of I-5 make watermains vulnerable to earthquake damage. In the worst-case, the entire pressure zone's service could be affected by earthquake damage in the study area. The installation of isolation valves is a potential improvement described by SPU engineers that would help reduce the extent of damage to water service (SPU, 2007). Conceptually, such valves should be located at the southern edge of the Downtown central business district just north of Yesler Way. This would enhance overall water main reliability in areas with good soils, though it would not solve post-earthquake needs in severely affected areas. Given its location and soil conditions, water supply likely could be maintained in Little Saigon after a seismic event, provided that service from an adjacent pressure zone is available.

Another possible system improvement would be to install additional local line valves with better spacing, which would reduce the size of shut-down areas when water main breaks or leaks occur. This would reduce disruptions and improve overall reliability of service. One drawback is cost—the larger diameter mains in the study area would necessitate costly commercial-level valving.

ENVIRONMENTAL IMPACTS

WATER SYSTEM IMPACTS WITH FUTURE GROWTH

All Alternatives

For EIS Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative, the growth scenario evaluates approximately 6,000 dwelling units of additional residential growth, and approximately 24,600 jobs of additional employment growth by 2030. Employment growth would be expected to occur through development of new buildings but also through increased employment within existing buildings.

Projected growth would increase the overall demand for domestic water service and fire flow protection in the study area. At a programmatic level of review, no significant adverse impacts on water utilities are identified for any of the EIS alternatives (SPU, 2007). No specific system improvement needs related to the projected growth are identified. SPU staff indicate that the existing water system in the study area is well-prepared to provide service to future growth. From a system-wide perspective, the sizing of the system, and the available water pressure and fire flow volumes are generally adequate to provide service to future levels of growth under any of the EIS alternatives. This does not rule out the possibility that individual developments may be required to make localized improvements to meet fire flow or domestic service requirements. If improvements would benefit multiple parties, a developer's improvement costs are calculated in proportion to the scale of their development (SPU, 2007).

Under the No Action Alternative (Alt. 4), the expected amount of future growth would be less than predicted for the other alternatives, also with no significant adverse impacts on water utilities identified.

POSSIBLE SEISMIC DAMAGE CONTROL STRATEGIES

The EIS evaluates future growth within several portions of the study area that are at risk of seismic damage due to their soil characteristics. In order to reduce the worst-case risks of damage and water service interruptions, the installation of isolation valves between the study area and the Downtown office core, as suggested by SPU, may have merit. This type of improvement would be a precautionary measure that could be pursued as part of citywide planning and improvement efforts over the long-term regardless

of zoning for the study area. Also, see the Earth section in this chapter for additional discussion of seismic risks and potential damage.

POSSIBLE WATER-USE SUSTAINABILITY STRATEGIES

Despite the lack of identified significant adverse impacts on the water utility system, there would be opportunities in future development to encourage the use of alternative strategies that would reduce overall domestic water use and effluent flows to the sewer system. These strategies would have multiple kinds of environmental benefits.

Rainwater harvesting could provide supplemental water for toilet flushing, which comprises up to 20 percent of water demand in a typical building. ***On-site treatment of wastewater***, using proven technologies, could also contribute non-potable water for re-use without taking up too much space. Using both of these methods together could potentially address all or most toilet flushing needs in a new building, which would generate year-round benefits by reducing "base flows." This would also reduce the volume of effluent flows into the sewer system, which helps reduce the potential for combined sewer overflows that are a significant environmental pollution concern in Seattle. Over the long-term, ***electronically-monitored "smart" valve systems*** may also be possible to employ in parts of Seattle's sewer system to help manage sewer flows better in real time and avoid overflows.

MITIGATION STRATEGIES

Due to a lack of identified significant adverse impacts, no mitigation strategies are proposed. However, please see the strategies listed above relating to seismic damage control and environmental sustainability.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

None are identified.

SEWER AND STORMWATER UTILITY

AFFECTED ENVIRONMENT

EXISTING SEWER SYSTEM CONDITIONS

The South Downtown study area has one of the older sections of Seattle's sewer system. Approximately 55% of the pipes were built before 1920. Materials used for these older pipes include brick, vitrified clay, and cast iron. Pipes built after 1950 tend to be reinforced concrete. About 75% of the system in the study area is "combined", meaning pipes carry both stormwater and wastewater. Only about 12% of the study area's system consists of separated sewer lines. Seattle is responsible for the collector sewer pipes; these feed into large interceptor lines that are owned and operated by King County Metro, which transports the flows to King County's sewage treatment plant at West Point near Discovery Park.

In the study area, the sewer lines vary widely in size—from 8-inch diameter in limited segments to 48-inch or even 60-inch diameter in some segments, and even larger in the Metro mainline. The King County Metro mainline known as the "Elliott Bay Interceptor" runs along Occidental Avenue S., S. King Street, and then northward along 2nd Avenue S. and 2nd Avenue. Areas south of S. Royal Brougham Way drain northward. Several sewer lines in Pioneer Square flow westward, while lines in Chinatown typically flow southward toward S. Royal Brougham Way. East of 12th Avenue S. in Little Saigon, sewage flows travel eastward and then southeastward along Rainier Avenue S. and Dearborn Place S. Stormwater outfall points to Elliott Bay include locations at S. Royal Brougham Way and S. Washington Street. Available information suggests that the city sewer system's performance in the Pioneer Square vicinity during large storms can be influenced by the performance of the Elliott Bay Interceptor, in that stormwater volumes can take longer to drain to the Interceptor when it is carrying peak volumes itself.

Topography and soils influence sewer system operation in the study area. Fill soils are present in several flatter areas west of I-5, while till soils are more prevalent in higher elevation areas east of I-5. West of I-5, several lower elevation areas have groundwater present at shallow depths, and can be subject to the influences of tidal action in Elliott Bay. This can lead to groundwater infiltrating into older pipes, which can increase the water volumes in the pipes. Shallow groundwater may also create a need for de-watering in some existing buildings to maintain dry conditions in basements, contributing to sewer system volumes.

Many of the pipes have been inspected using cameras and a number of them have some form of defects. This does not necessarily mean that the pipes need to be replaced. A defect can be identified and remain in place for years with virtually no change and no effect on system performance. SPU has found, in fact, that some of the older vitrified clay pipes are exceptionally long-lasting. Spot repairs in many cases are sufficient. In other cases, pipes with a number of defects can be relined to improve their effectiveness.

ENVIRONMENTAL IMPACTS

IMPACTS OF FUTURE GROWTH ON THE SEWER SYSTEM

All Alternatives

Projected growth under any alternative would increase the overall generation of sewage volumes in the study area. Growth would also result in increased coverage of land by new buildings, which would generate additional roof-related stormwater runoff. However, because stormwater control systems are probably non-existent on numerous properties, the inclusion of new on-site stormwater control systems in future development projects would be beneficial in slowing down runoff and reducing the potential for

overflows of combined sewer systems during intense storms. In addition, the probable inclusion of additional "green" features into at least some future developments would further help moderate stormwater volumes and peak flows to the combined sewer systems (see discussion below). Also, expected improvements to the stormwater and plumbing codes would help limit the potential for future system impacts.

SPU is currently modeling the South Downtown sewer system to evaluate the capacity of the current system and its operation, as well as the effects of future growth. At a programmatic level of review, no significant adverse impacts on sewer utilities have been identified due to projected growth under any of the EIS alternatives, including the Preferred Alternative. This does not rule out the possibility that additional findings could be made, nor does it rule out that individual developments might need specific localized improvements to meet service hookup requirements. In such cases, SPU's current policy is that developers provide such improvements.

Under the No Action Alternative (Alt. 4), the expected amount of future growth would be less than predicted for the other alternatives, also with no identified significant adverse impacts on the sewer system.

POSSIBLE DRAINAGE/WASTEWATER SUSTAINABILITY STRATEGIES

SPU has commissioned a study to look at various "demand management" strategies to control stormwater before it enters the wastewater collection system. The performance of several specific strategies is being studied including: green roofs, porous pavement, cisterns (e.g., that provide for "rainwater harvesting"), bioretention swales, tree boxes, infiltration trenches, and other vegetated amenities. The intent of the study is to quantify the potential of these on-site strategies to determine if inclusion in future sewer management decisions is warranted. Environmental benefits might include the potential for reduced combined sewer overflows (CSOs), although this is not a confirmed finding. As noted in the Water Utility section of this chapter, strategies like rainwater harvesting can also be beneficial by providing a source for non-potable water re-use, thereby reducing overall domestic water needs.

The potential inclusion of these types of strategies as ~~incentives or requirements~~ strongly encouraged or required for future development plans in the South Downtown study area could ~~provide for improved~~ detain and/or divert some stormwater flows destined for the area's combined sewer system, which would be a positive factor in maintaining the performance of the area sewer system. ~~in its stormwater controls and increase the avoidance of CSOs.~~ The Livable South Downtown planning effort recommends that such strategies be incorporated in future development, with further details defined per guidance of DPD and SPU.

MITIGATION STRATEGIES

Due to a lack of identified significant adverse impacts, no mitigation strategies are proposed. However, please see the strategies listed above relating to environmental sustainability. Completion of the sewer system model may suggest other operational system improvements.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

None are identified.

EARTH

AFFECTED ENVIRONMENT

SEISMIC HAZARDS

Overview

A June 2005 study prepared for Washington State, "*Scenario for a Magnitude 6.7 Earthquake on the Seattle Fault*" by the Earthquake Engineering Research Institute (EERI) illustrates the potentially widespread consequences of a major earthquake. Potential losses from a magnitude 6.7 shallow earthquake could be ten times worse than the 2001 Nisqually earthquake, with thousands of lives lost, destruction of buildings, disruption of transportation and utilities, and severe economic disruption. Given South Downtown's historic buildings and transportation systems, seismic risks and protective strategies should be understood.

Geologic Conditions and Seismic-Related Ground Failure

The Seattle Fault zone runs through Puget Sound, Seattle, Bellevue and Issaquah, roughly parallel to Interstate 90. Shallow earthquakes could occur in this fault or five other known surface fault zones. Over 50 years, there is a 2% probability that severe ground motion could occur, based on all potential earthquake sources—and "*the projected ground motions are some of the highest in the country.*" (EERI, 2005).

A substantial portion of South Downtown and the Duwamish vicinity have poor soils, reflecting prior mud flats and subsequent filling. These poor soils generally extend as far as Chinatown/I.D. within one block of Airport Way S., angling northwest toward Second Avenue Extension (see Figure 3-40.A). These are identified as "liquefaction hazard areas" meaning that during earthquakes the soils may behave like a liquid and experience shaking and accelerated movement.

Seismic ground failures in a shallow earthquake could include surface ruptures, landslides, loss of bearing capacity, ground settlement, lateral spreading and local flooding. Lateral spreading causes liquefied ground masses to move downward—the EERI analysis estimates such movement in South Downtown of at least 1 to 3 feet, more near shorelines. Buildings could settle or tip over due to loss of soil bearing capacity. Water ejected from soils could cause local flooding (EERI, 2005). A tsunami or flooding might also occur—perhaps 10 feet or higher, if a major earthquake deforms the Puget Sound seafloor.

Types of Potential Seismic Damage

Commercial, Industrial and Residential Buildings

Buildings most at risk for severe seismic damage are those built with "unreinforced masonry" (URM). South Downtown neighborhoods contain the largest concentration of such URM buildings in the region. These are at risk due to inadequate structural qualities, such as inadequate wall anchorage, unstable parapets, weak masonry walls, and risk of deflections, twisting or wall collapse. This includes older industrial buildings built before 1973.

The potential for damage from a magnitude 6.7 earthquake in the Seattle Fault would be high, due to "*very strong ground motions that generate forces far in excess of those experienced during the 2001 Nisqually earthquake."* (EERI, 2005). Approximately 3,900 commercial and industrial buildings in the region would experience moderate-to-extensive structural damage, amounting to $10.5 billion in losses. "*In addition…about $15.3 billion in damage to single- and multi-family residential structures* [would occur], *temporarily displacing more than 46,000 households.*" Extensive damage to local buildings

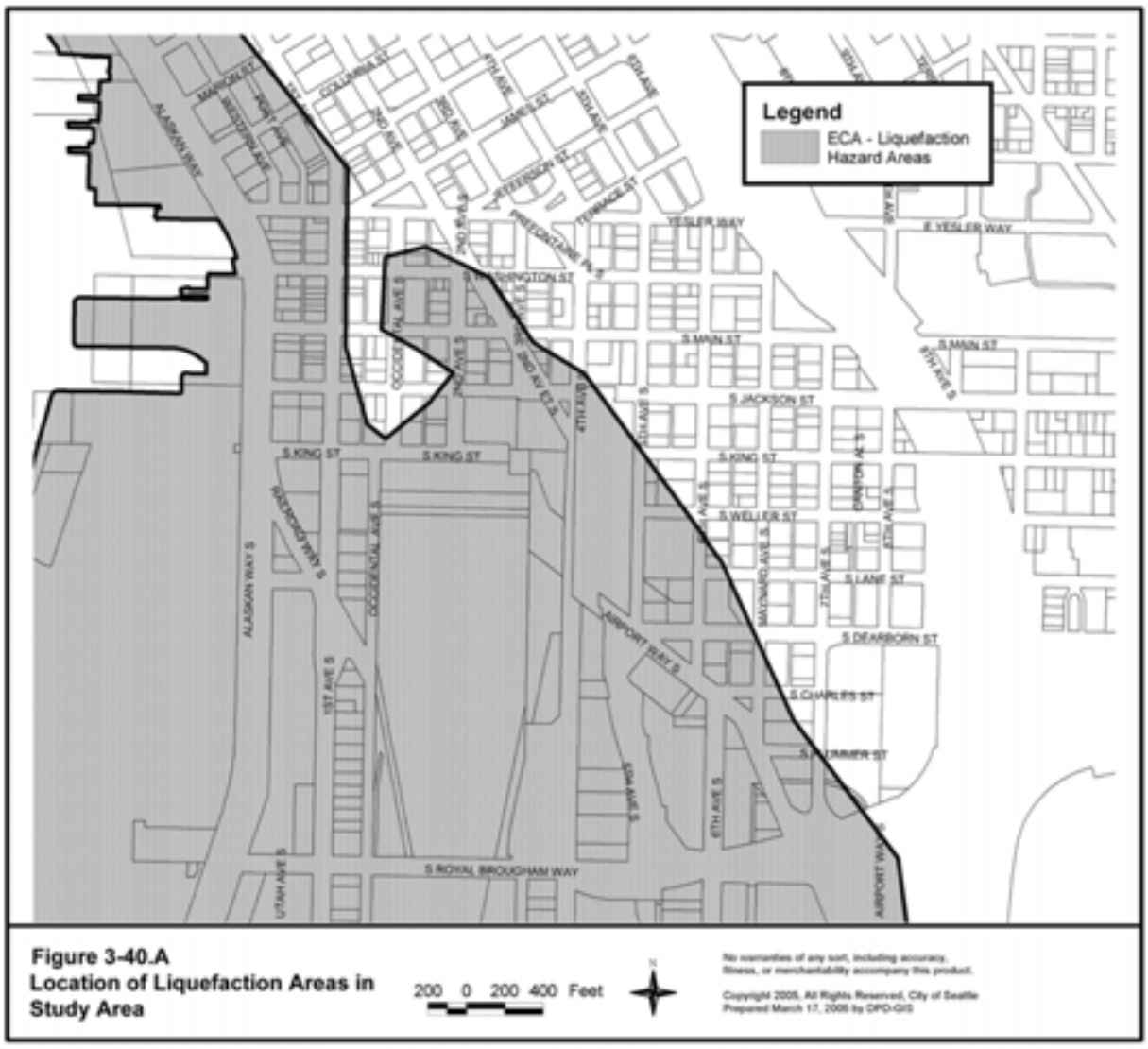


Figure 3-40.A
Location of Liquefaction Areas in Study Area

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Prepared March 17, 2008 by DPD-GIS

would severely affect the social and economic functioning of the study area's neighborhoods, as well as the historic resources that define their character.

Utilities

Water, sewer, electrical, communication and natural gas utilities are at risk.

- ***Water/sewer:*** Vulnerable to significant damage from major ground shaking, particularly where surface rupture or lateral spreading would occur. Pump stations, tanks and other equipment could also be seriously damaged. Sewage discharges to local water bodies could occur.
- ***Electricity:*** Could experience damage to transmission and distribution lines and substations. Potential collapse of the Alaskan Way Viaduct would cause significant damage or impairment to adjacent electrical systems. Approximately half of the electrical system would suffer outages, with service likely restorable within a few days.

- ***Communications:*** Could experience damage and service challenges.
- ***Natural Gas:*** Facilities in poor soils will experience some damage, even though Puget Sound Energy has replaced much of its iron pipe with PVC pipe.

Transportation Systems

Road, transit, rail, ferry, air and water port systems are integral to the regional economy. "*A major disruption to any one of these components…will overload the other systems, reducing their efficiency, potentially bringing them to a halt, with devastating effect on the region's economy."* (EERI, 2005). Some roads and bridges could be severely damaged or collapse, particularly vulnerable structures such as the Alaskan Way Viaduct and Fourth Avenue South bridge structure.

Marine Ports and Related Infrastructure

The Ports of Seattle and Tacoma are each multi-billion dollar contributors to the region's economy, providing movement of goods to and from other countries. Connections to rail and highway networks are important conduits for the flow of goods. Various port facilities, such as piers, wharves, seawalls, container storage yards, and upland equipment are at risk of damage. Most of the ground in these facilities is moderately or highly susceptible to seismic movement and damage. The 1995 Kobe, Japan quake caused great damage to port facilities, leading to major losses of shipping business. The same could occur in this region. Damage to railroad lines would compound the problems with the flow of goods.

Economic and Business Impacts

As suggested by the preceding discussion, potentially catastrophic damage would have tremendous regional economic impacts. Kobe, Japan incurred losses of roughly $200 billion, in a city of comparable size and geography to the Seattle area. Many small businesses would fail in the wake of a major earthquake, and impaired roads and utilities would create lasting effects on commerce and industry.

A consultant's study for DPD used a Federal Emergency Management Agency model known as "HAZUS" to estimate potential earthquake losses in the study area. The model estimates potential losses of building inventory, transportation and utility infrastructure, economic losses due to impaired conditions, social impacts (shelter and casualties) and debris generation. It estimates damages to the existing inventory of buildings, facilities and infrastructure per the soil conditions and possible kinds of earthquakes. Because this study represents only an initial review of potential losses, it may underestimate some losses that could be better estimated if additional in-depth examination of potential infrastructure damage and economic losses occurred.

Table 3-34 illustrates the model results for earthquakes at different magnitudes. For example, the aftermath of an 8.5 magnitude earthquake could generate almost $10 billion in damages to buildings and infrastructure: around $1.7 billion in building-related capital and economic losses, almost $8 billion in transportation system capital losses and economic losses, and around $300 million in other utility infrastructure capital and economic losses, just in the study area. The presence of transportation and port facilities that are critical to the region's economy heighten the potential for losses and the interests in seismic damage prevention.

Table 3-34
Estimated Capital and Economic Losses in South Downtown During Major Earthquake Events

Earthquake Magnitude	Building-Related		Transportation System		Other Utility Infrastructure		Totals
	Capital (000,000)	Economic (000,000)	Capital (000,000)	Economic (000,000)	Capital (000,000)	Economic (000,000)	(000,000)
7.0	$568	$108	$6,486	$747	$199	$45	$8,153
8.0	$1,322	$224	$6,486	$1,189	$199	$66	$9,486
8.5	$1,447	$277	$6,486	$1,478	$199	$84	$9,971

Source: Ince, 2006

ENVIRONMENTAL IMPACTS

IMPACTS WITH FUTURE GROWTH

All Alternatives

This EIS makes does not identify significant adverse seismic hazard impacts directly related to the EIS zoning alternatives. However, under any zoning alternative, future development is likely to occur across the study area in vicinities that have elevated risk of seismic damage, due to presence of fill soils in former tidelands in the southern half of the study area, and proximity to the Seattle Fault zone.

Alternatives 1, 2, ~~and~~ 3, and the Preferred Alternative are similar in their overall relationship to potential seismic impacts. Each would accommodate large developments on the west side of 1st Avenue S., in the north parking lot of Qwest Field, possibly over the railroad tracks near 4th Avenue S. and in the south-of-Dearborn vicinity. These are all areas at least partially within fill soils. The Preferred Alternative is most comparable to Alternative 2 in its relationship of future development to the liquefaction hazard area.

New structures would be subject to the protective requirements of Seattle's building code, which requires increased structural strength that would limit seismic damage potential. This means that residents of future newly developed buildings would meet required levels of protection against seismic damage to their building. However, due to the potential damages to its utility and road infrastructure and older building inventory, the study area could be subject to delay in restoring habitable living conditions. This risk might be reduced if strategic investments are made to reduce worst-case potential for seismic damages to the infrastructure networks and building stock. For example, the installation of isolation valves between Downtown and the study area could reduce the risk and extent of damage to the water system.

Under any alternative, the southern portion of the study area would be subject to risks of interrupted transportation networks, damage to port facilities and other impairments to port-related economic activity. There are no meaningful differences in potential adverse impacts among these zoning alternatives.

If an earthquake occurred under Elliott Bay, a tsunami could be generated that could flood portions of the study area, to a depth of approximately five feet. This might occur in the lower elevations that were previously tidelands. This risk provides some support for continued discouragement of residential uses at ground floor level in Pioneer Square, Chinatown core, and the south-of-Dearborn area.

MITIGATION STRATEGIES

POSSIBLE MITIGATION STRATEGIES

South Downtown's seismic vulnerabilities mean it is at risk for loss of life and major damage of its existing historic buildings, infrastructure and economy. The following is a brief list of possible strategies for improving protection against damage and losses from a major earthquake:

- As part of long-term citywide planning and improvement efforts to lessen potential seismic damage, ~~prioritize~~ investments in utility system safeguards and retrofits, such as water system isolation valves, ~~that would~~ could be made to help reduce disruption of service and utility system damage
- Encourage retrofit of high-risk unreinforced masonry buildings
- Prioritize protection of transportation and port infrastructure, to reduce economic impacts and disruption of vehicle movement
- Replace the vulnerable Alaskan Way Viaduct and seawall
- Expand public earthquake awareness and education programs
- Expand funding for emergency management and preparedness
- Develop an earthquake recovery strategy that would identify cost-effective preventive measures to speed recovery after a major earthquake.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The study area and its infrastructure are subject to seismic damage risks. However, no significant unavoidable adverse impacts specific to the zoning alternatives are identified.

TRANSPORTATION

AFFECTED ENVIRONMENT

OVERVIEW

The study area is used for a wide range of residential, commercial, industrial, transportation and entertainment purposes. It is strategically located adjacent to Downtown, Port of Seattle, a manufacturing and industrial center, and two stadium/exhibition facilities, and contains diverse neighborhoods with a mix of uses. It is served by a number of transportation networks—interstate highway, arterial and local streets, bus transit, ferries, passenger rail, commuter rail and freight-oriented rail—that provide accessibility serving the full spectrum of transportation needs. The networks are subject to Downtown employee commuting, truck and rail freight movement, event traffic and local traffic patterns. Due to the interaction of these patterns, conditions can become congested during morning and evening peak periods and at other times.

This transportation section is based on a consultant evaluation of transportation impacts contained in Appendices G and G.1 to this ~~Draft~~ EIS. This section addresses the topics of arterial street system performance, transit system performance, freight movement, pedestrians, bicyclists and management of stadium event-related traffic. The next section in this chapter addresses parking-related impacts, which are also addressed in Appendix G.1 to this ~~Draft~~ EIS.

The section is organized to document existing conditions, predict future conditions with and without rezones in 2030, assess the transportation-related impacts of the EIS rezone alternatives, and identify possible strategies that would mitigate identified adverse impacts. The following illustrates the organization of the section:

Existing Conditions (Affected Environment)

- Arterial Street System
    - AM and PM Peak Hour traffic volumes and vehicle travel characteristics
    - Corridor operations and travel speeds
    - Intersection operations
- Transit
- Freight Movement
- Pedestrians and Bicyclists
- Event Traffic ~~Management~~

Environmental Impacts

- Travel forecasts for the No Action and Action Alternatives
- Arterial street system impacts
    - 2030 Forecast traffic volumes, AM and PM Peak Hours
    - Vehicle travel characteristics
    - Corridor operations and travel speeds, AM and PM Peak Hours
    - Intersection operations, AM and PM Peak Hours
- Transit
- Freight Movement
- Pedestrians and Bicyclists
- Event Traffic ~~Management~~

Mitigation Strategies

- A range of possible mitigation strategies to address identified impacts

Significant Unavoidable Adverse Impacts

- A summation of significant unavoidable impacts

ARTERIAL STREET SYSTEM

Street Network

The largest arterial corridors within the study area's street network serve the highest traffic volumes while supporting several different types of travel modes. Table 3-35 summarizes the characteristics of these corridors. See Appendix G for further description of corridors.

Table 3-35
Street Network Corridor Characteristics

Corridor	Classification	Direction	Lanes [1]	2007 AWDT [2]	Speed Limit	Sidewalks
North-South Corridors						
1st Avenue S	Principal Arterial /	NB	2	25,000	35	Both Sides
(Yesler Way to S Spokane St)	Minor Arterial [3]	SB	2			
2nd Avenue Extension S	Principal Arterial	NB	-	13,000	30	Both Sides
(James St to 4th Ave S)		SB	3			
3rd Avenue S	Minor Arterial	NB [4]	2	7,500	30	Both Sides
(James St to S Jackson St)		SB	2			
4th Avenue S [5]	Principal Arterial	NB	3	29,000	30	Both Sides
(S Washington St to S Spokane St)		SB	2			
Rainier Avenue S	Principal Arterial	NB	2	31,000	30	Both Sides
(S Jackson St to S Dearborn St)		SB	2			
East-West Corridors						
S Jackson St	Principal Arterial	EB	2	16,500	30	Both Sides
(Alaskan Way S to Rainier Ave S)		WB	2			
S Dearborn St	Principal Arterial	EB	2	21,500	30	One Side
(Airport Way S to Rainier Ave S)		WB	2			
S Royal Brougham Way	Principal Arterial	EB	2	12,000	30	Both Sides
(Alaskan Way S to 4th Ave S)		WB	3			
S Atlantic Street	Principal Arterial	EB	2	19,000	30	Both Sides
(Alaskan Way S to 4th Ave S)		WB	2			

Source: *The Transportation Strategic Plan, 2005 Update* (SDOT, August 2005), field survey (March 2007), The Transpo Group (July 2007)
1. The number of lanes varies especially at intersection approaches. Reported is the mid block number of lanes excluding parking lanes.
2. Average Weekday Daily Traffic Volumes. Displays the highest measured daily traffic volumes along the corridor segment.
3. 1st Avenue S is classified as Principal Arterial south of Alaskan Way Viaduct Ramps and Minor Arterial North of AWV Ramps.
4. 3rd Avenue S is SB only between Yesler Way and S Washington St and between 2nd Avenue Ext S and S Jackson St.
5. 4th Avenue is NB only between 2nd Avenue Ext S and S Washington St.

Peak Hour Traffic Volumes

Traffic volume data were collected for the study area to evaluate existing weekday traffic conditions during both the AM and PM peak hours, which typically have the highest volumes and levels of congestion in the study area (see Figure 3-41 for 2007 volumes). During the AM peak hour, traffic volumes are highest heading toward Downtown employment centers along corridors such as 1st Avenue S., 4th Avenue S. and Rainier Avenue S. During the PM peak hour, the highest traffic volumes are the reverse of the AM peak hour, also including S. Dearborn Street, S. Jackson Street, SR 519 at S. Atlantic Street, and ramps from I-90 at 4th Avenue S. However, the corridor segments in the southern part of the study area typically have the same number of vehicles in each direction during the PM peak hour as they do during the AM peak hour. In this area and further south, industrial and commercial land uses generate vehicle trips going both northbound and southbound to access the major freeways.

Vehicle Travel Characteristics

Analysis of travel patterns indicates that during both the AM and PM peak hours, through-traffic accounts for more than 90 percent of the traffic on the South Downtown road network. This means these trips have neither origins nor destinations in the study area.

- In the AM peak hour, the average number of trips having their origin or destination within the study area is about 6,800 person trips, or 3,400 vehicle trips.
- In the PM peak hour, the average number of trips having their origin or destination within the study area is about 10,600 person trips, or 5,600 vehicle trips.

(See Tables 4-2 and 4-3 in Appendix G for more information).

Corridor Operations and Travel Speeds

Arterial level of service (LOS) and average speeds are the primary criteria to measure performance along major corridors. The travel-time based "arterial level of service" measure ranging from letter grades of "A" through "F" is based on guidelines of the *Highway Capacity Manual* (Transportation Research Board, 2000), and is summarized as follows:

LOS	Description of Operations	Average Travel Speed
A	Describes primarily free-flow operations at average travel speeds, usually about 90% of the free flow speed (FFS) for the given street class. Vehicles are completely unimpeded in their ability to maneuver within the traffic stream. Control delay at signalized intersections is minimal.	>30
B	Describes reasonably unimpeded operations at average travel speeds, usually about 70% of the FFS for the street class. The ability to maneuver within the traffic stream is only slightly restricted, and control delays at signalized intersections are not significant.	>24-30
C	Describes stable operations, however, ability to maneuver and change lanes in mid-block locations may be more restricted than LOS B, and longer queues, adverse signal coordination, or both may contribute to lower average travel speeds of about 50% of the FFS for the street class.	>18-24
D	Borders on a range in which small increases in flow may cause substantial increases in delay and decreases in travel speed. LOS D may be due to adverse signal progression, inappropriate signal timing, high volumes, or a combination of these factors. Average travel speeds are about 40% of FFS.	>14-18
E	Characterized by significant delays and average travel speeds of 33% or less of the FFS. Such operations are caused by a combination of adverse progression, high signal density, high volumes, extensive delays at critical intersections, and inappropriate signal timing.	>10-14
F	Characterized by urban street flow at extremely low speeds, typically one-fourth of the FFS. Intersection congestion is likely at critical signalized locations, with high delays, high volumes and extensive queuing.	<10
		For Class III Streets: Typical free flow speed: 35 mph

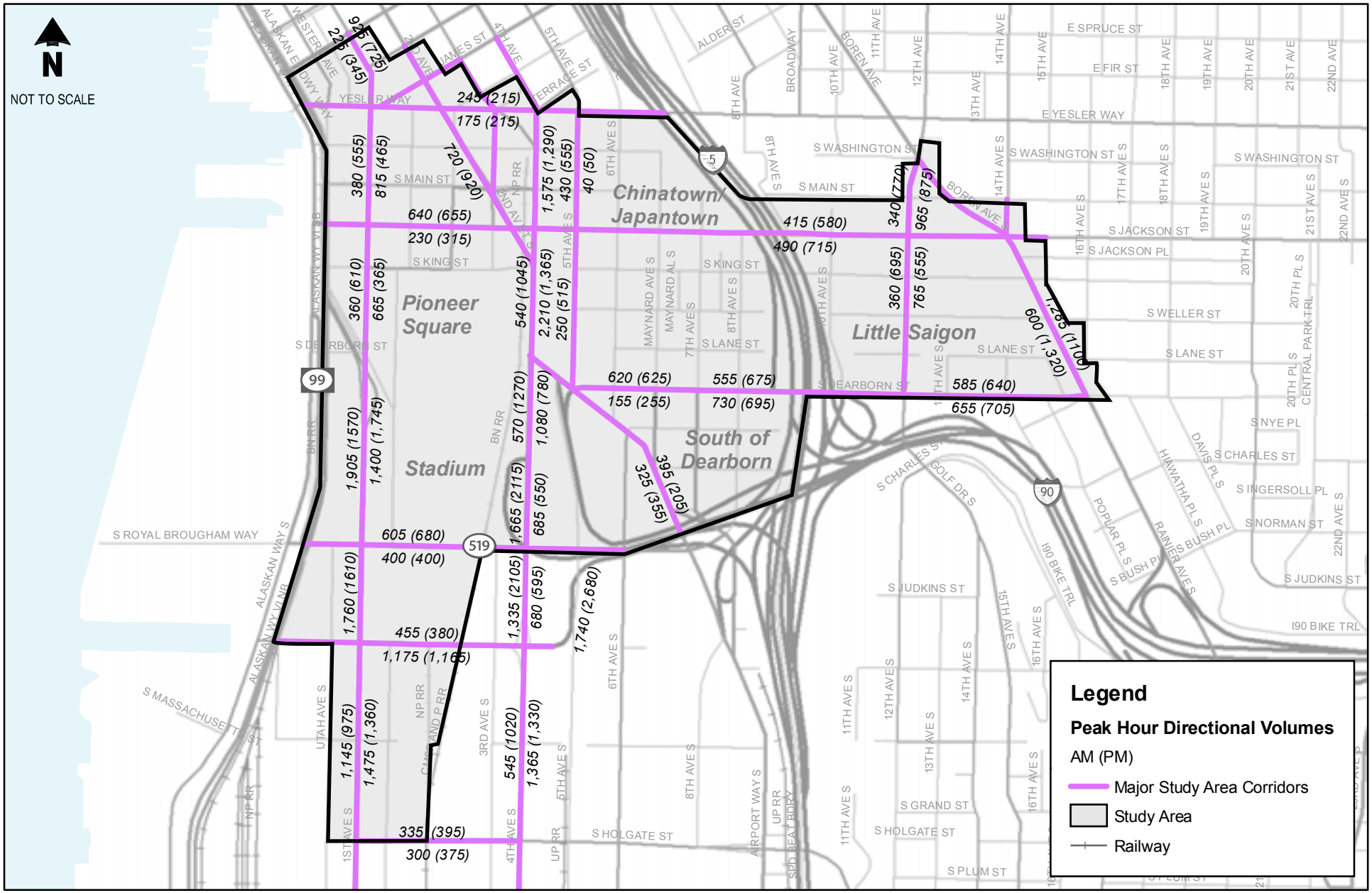


Figure 3-41

Livable South Downtown

2007 Weekday AM & PM Peak Hour Traffic Volumes

Table 3-36 summarizes the 2007 existing conditions for level of service and average speed in the AM and PM peak hour.

During the AM peak hour, most study area corridors are experiencing some level of congestion, with several locations operating below LOS D. This can occur due to the operations at a few intersections that may operate poorly and create higher average delays. For example, Rainier Avenue S. operates at LOS E due to congestion at its intersections with S. Dearborn Street and S. Jackson Street. The 2nd Avenue Extension S. operates at LOS F due to the signal time-related delays incurred at the intersection with S. Jackson Street. Among the east-west corridors, S. Royal Brougham Way and S. Atlantic Street experience low performance. The levels of service along both corridors are exacerbated by the delays at the 1st Avenue S intersections caused by traffic using these corridors to access the Alaskan Way Viaduct as well as traffic from the Viaduct to I-90. Speeds are particularly low along these two corridors due to the closely spaced intersections with Occidental Avenue S. Furthermore, the rail crossing along S Royal Brougham Way also contributes to the total delays along this corridor.

Table 3-36
Corridor Operations and Speeds (2007 Existing Conditions)

Corridor/Arterial[1]	AM Peak				PM Peak			
	LOS[2]		Speed[3] (mph)		LOS[2]		Speed[3] (mph)	
North – South Corridors	**NB**	**SB**	**NB**	**SB**	**NB**	**SB**	**NB**	**SB**
1st Avenue S	D	C	15	19	D	D	16	16
2nd Avenue Extension S	-[4]	F	-[4]	8	-[4]	F	-[4]	9
3rd Avenue S	D	D	12	10	C	E	14	8
4th Avenue S	D	D	15	17	D	E	16	13
Rainier Avenue S	E	E	12	13	E	F	12	9
East – West Corridors	**EB**	**WB**	**EB**	**WB**	**EB**	**WB**	**EB**	**WB**
S Jackson Street	E	F	12	10	E	E	11	11
S Dearborn Street	E	E	11	11	F	F	9	8
S Royal Brougham Way	F	F	7	5	F	F	8	7
S Atlantic Street	E	F	11	7	E	F	11	10

Source: The Transpo Group (July 2007)
1. Corridor extents are listed in Table 4-1 of Appendix G.
2. Arterial Level of Service based on the Highway Capacity Manual, Transportation Research Board, 2000 methodology for urban arterials.
3. Arterial speed in miles per hour which includes the average speed delay encountered at each signalized intersection along the corridor as well as delays at mid-block sections.
4. 2nd Avenue Extension S is one-way southbound.

During the PM peak hour, delays are observed particularly in the southbound direction of the north-south corridors, leaving Downtown, including 1st Avenue S., 3rd Avenue S., 4th Avenue S., and Rainier Avenue S.

- Delays along 1st Avenue S. mainly occur at the intersections of S. Royal Brougham Way and S. Atlantic Street where the Downtown outbound traffic joins the traffic from the industrial areas south of the study area, which results in delays at each of the intersections. S. Atlantic Street is a particularly critical connection conveying 1st Avenue S. traffic to eastbound I-90 via S. Atlantic Street (SR 519).
- Delays along 4th Avenue S. are caused by traffic delays at the intersections with S. Jackson Street and S. Royal Brougham Way.
- Along Rainier Avenue S., the intersections with S. Dearborn Street and S. Jackson Street experience delays which contribute to the low speeds and LOS especially in the southbound direction.

- Delays on the east-west corridors are mainly along S. Atlantic Street and eastbound S. Royal Brougham Way and S. Jackson Street, caused by traffic heading toward I-90 and the Rainier Valley. Delays at 1st Avenue S., and due to intersection spacing and a rail crossing contributes to a share of the delays along the S. Atlantic Street and S. Royal Brougham Way corridors as well.

Intersection Operations

Table 3-37 illustrates the number of intersections, among the 49 signalized study area intersections, that operate below LOS D for the AM and PM peak hours. The level of service (LOS) is a standard measure of intersection performance that describes the average delay encountered by vehicles entering the intersection. Intersection LOS is measured on a scale from "A" to "F" as summarized below.

LOS	Average Control Delay (seconds/vehicle)	General Description (signalized intersections)
A	< or = 10	Free flow
B	>10 - 20	Stable flow (slight delays)
C	>20 - 35	Stable flow (acceptable delays)
D	>35 - 55	Approaching unstable flow (tolerable delay, occasionally wait through more than one signal cycle before proceeding)
E	>55 - 80	Unstable flow (intolerable delay)
F	>80	Forced flow (jammed)

During the AM peak hour, the only intersection operating at LOS F is 1st Avenue S./S. Atlantic Street. Delays are observed on all approaches to the intersection, and traffic queues spill back to "upstream" intersections. Delays are also observed at the intersection of 1st Avenue S./S. Royal Brougham Way that operates at LOS E causing queues that can block adjacent intersections and driveways. These intersections play a key role in moving local traffic from 1st Avenue S. to 4th Avenue S. and to the Alaskan Way Viaduct and I-90 (e.g., primarily pass-through traffic). The intersection of 1st Avenue S./S. Holgate Street also operates at a LOS E due to the heavy northbound traffic in the AM peak hour. Other intersections operating at LOS E are 3rd Avenue/Yesler Way and 4th Avenue S./S Jackson Street. The delays at these intersections are the result of a high number of northbound vehicles entering the Downtown area, primarily commuters, that are conflicting with the westbound volumes.

Table 3-37
2007 Existing Intersection Operations Along the Major Corridors

Corridor/Arterial[1]	Number of Signalized Intersections	Number of Signalized Intersections Operating below LOS[2] D	
		AM Peak Hour	PM Peak Hour
North – South Corridors			
1st Avenue S	10	3	3
2nd Avenue Extension S	5	0	0
3rd Avenue S	2	1	1
4th Avenue S (NB)	10	1	1
4th Avenue S (SB)	7	0	0
Rainier Avenue S	2	0	0
East – West Corridors			
S Jackson Street	10	1	1
S Dearborn Street	9	0	0
S Royal Brougham Way	5	1	1
S Atlantic Street	2	1	1

Source: The Transpo Group (July 2007)
1. Corridor extents are as listed in Table 4-1 of Appendix G.
2. Level of Service based on the *Highway Capacity Manual*, Transportation Research Board, 2000

As shown in Table 3-37, the same number of intersections operate below LOS D in both the AM and PM peak hours. However, these are not necessarily the same intersections given the difference in travel patterns between the AM peak hour (with a majority of northbound and westbound traffic) and the PM peak hour (with a majority of southbound and eastbound traffic). The only intersection operating at a LOS F in the PM peak hour is at 4th Avenue S./S. Jackson Street which is due, in particular, to the volume of traffic on 4th Avenue S., the low amount of signal green time devoted to eastbound vehicles and the coordination with the 2nd Avenue Extension S./S. Jackson Street intersection.

The intersections operating at LOS E in the PM peak hour are 1st Avenue S./S. Atlantic Street and 1st Avenue S./S. Royal Brougham Way. Both intersections have a high number of southbound left turns (e.g., toward 4th Avenue S) that conflict with northbound traffic, reducing the amount of signal green time to serve both movements. The intersection of 4th Avenue S./S. Royal Brougham Way also operates at LOS E due mainly to the amount of signal green time dedicated to the southbound movement, which serves over 2,000 vehicles an hour.

TRANSIT

The Seattle Transit Plan identifies an "Urban Village Transit Network" (UVTN) to serve the City's urban villages and neighborhoods. The identified UVTN corridors are the focus of the Transit Plan and are envisioned to be a network of high quality, reliable transit corridors. The primary transit corridors evaluated as part of this analysis include 1st Avenue S., 2nd Avenue Extension S., 3rd Avenue, 4th Avenue S., 5th Avenue S./E3 Busway and S. Jackson Street (and Rainier Avenue S. south of Yesler Way is also a UVTN corridor).

The study area is well served by a variety of transit that include local bus routes (King County Metro), regional bus routes (Sound Transit and partners), ferries (Washington State Ferries), commuter rail (Sound Transit), and intercity passenger rail (Amtrak Cascades). This analysis of transit service concentrates on the performance of local transit, with performance measures drawn from those developed as part of the Seattle Transit Plan. See Appendix G for more information about the various types of available transit service.

The transit service performance measures include *frequency, span of service, travel speed* and *passenger loading.*

- *Frequency:* the maximum scheduled gap between consecutive buses on the route, which should reflect the maximum waiting time a customer could experience at a bus stop before a bus arrives. The "passing" threshold is 15 minutes, meaning buses arrive every 15 minutes or more frequently.
- *Span of service:* the hours in the day that a service runs at minimum acceptable frequencies of 15 minutes or less. The scoring threshold is 12 hours of service.
- *Travel speed:* Transit travel (operating) speed is expressed as a Percentage of Posted Speed Limit (%PSL). The "passing" threshold is 30% of the posted speed limit.
- *Passenger loading:* This threshold measures the service capacity and comfort experienced by the passenger. It is expressed as a ratio of passengers to bus capacity (e.g., 1.0 = 100% of seated capacity). The "passing" threshold is 0.9 or 90% occupancy. The measurement is made based on the load that occurs about 85% of the time on the most crowded route during the most crowded time period.

Table 3-38 summarizes current bus transit performance.

Table 3-38
Bus Performance Measures (2006)

Corridor	From	To	Frequency (Minutes)	Service Span (Hours)	Speed (Percent)	Passenger Load (Ratio)
1st Ave S	Yesler Way	S R. Brougham Way	9.58	17.50	32.2%	1.20
1st Ave S	S R. Brougham Way	S Holgate St	8.95	18.00	41.3%	1.27
2nd Ave Ext S	Cherry St	4th Ave S	4.20	21.00	22.4%	1.01
3rd Ave S	James St	S Jackson St	1.60	21.00	17.5%	0.91
4th Ave S	Yesler Way	S R. Brougham Way	2.82	20.90	30.0%	1.30
5th Ave S (E3)	S R. Brougham Way	S Holgate St	5.00	18.00	43.0%	1.15
12th Ave S	Boren Ave S	S Dearborn St	12.85	10.20	33.7%	0.94
Rainier Ave S	S Washington St	S Dearborn St	85.61[1]	16.00	33.6%	0.60
Yesler St	1st Ave S	6th Ave S	16.16	16.22	26.9%	0.51
S Jackson St	1st Ave S	8th Ave S	11.08	16.45	16.2%	0.86
S Jackson St	8th Ave S	Boren Ave S	4.65	19.83	22.8%	0.99
City of Seattle Passing Thresholds			**15.00**	**12.00**	**30.0%**	**0.90**

Source: *City of Seattle/King County Metro UVTN Monitoring Report* 2006.
Note: Shading indicates measures that are below the identified passing threshold. The performances are based on an average of the segments comprising the identified corridor.
1. Local bus routes along Rainier Avenue S. typically turn left at S. Jackson Street, so there are very few local routes along the segment of Rainier Avenue S. between S. Jackson Street and Yesler Way. Therefore the frequency value along this segment appears much higher than others.

Information in Table 3-38 indicates that most of the studied corridors meet the service frequency thresholds, and most have a relatively long period of day when transit service is available. However, in some of the more congested corridors, travel speeds fall below the passing thresholds. Also, several of these corridors are rated as deficient in passenger loading performance. Travel speeds are influenced by Downtown congestion, longer dwell times and closely spaced intersections. Passenger loading ratios indicate relatively crowded conditions during peak times on a majority of these corridors. However, if standing room was factored into the ratio, most of these corridors would probably be able to meet the passenger loading threshold standard. See Appendix G for a lengthier discussion of these measures of bus performance for existing conditions. Also, note the following update information:

- As part of the Transit Speed & Reliability Corridor Improvements proposal for Route 7, upgrades for TSP have been proposed on Rainier at S. Dearborn Street and S. Jackson Street, along with bus bulbs at applicable stops on Jackson between 5th and Rainier and on Rainier Avenue S. from S. Jackson Street south (SDOT, 2008).
- Portions of 1st Ave S. and 4th Ave S. are options that King County Metro and SDOT are considering for Rapid Ride and other increased bus access to Downtown during AWV construction. Additionally, the new permanent SR99 condition will likely help determine RapidRide and other bus routes into Downtown. Final routings will likely see improvements made to upgrade transit operations. Improvements could include significant parking removal, transit lanes, and other measures (SDOT, 2008).

FREIGHT MOVEMENT

This section provides information about the type and volume of truck trips observed on study area corridors, existing major freight routes and their operating conditions. South Downtown (including south of the study area) contains a large amount of industrial lands, including Port of Seattle properties and container ship yards, railroad intermodal yards, and other businesses that rely upon the movement of trucks and freight. The arterials within the study area provide an important connection for freight transportation and are heavily used by trucks.

Freight Generators

The study area and surrounding areas generate a substantial amount of freight and truck traffic. Currently the mix of general industrial and industrial/commercial land uses comprise about half the total land surface within the study area. Many industrial and warehousing businesses are located in the vicinity along with other commercial activities and public services that use trucks or rail. The Greater Duwamish Manufacturing and Industrial Center is another major truck generator adjacent to the study area. This center is expected to accommodate at least 10% of Seattle's new employment over the next 20 years, or nearly 15,000 new jobs. Besides providing a home for the Port of Seattle's container terminals, the Greater Duwamish area is also home to King County International Airport (KCIA), located five miles south of Downtown Seattle. The Greater Duwamish and South Downtown areas also include several operations facilities that support city municipal functions. These agencies, including Seattle Public Utilities, City Light and Seattle Department of Transportation (SDOT), run truck fleets that operate all over the City. The businesses and companies in the study area and the Duwamish provide warehousing, distribution, and construction services necessary for residential, commercial and industrial land uses throughout the region.

The study area is adjacent to a major truck generator: the Port of Seattle. In fact, the Port of Seattle as of 2006 is ~~one of the top three~~ the eighth largest containerized cargo load center in the nation ~~Western Hemisphere~~, and accommodates six container terminals. One of the terminals, T-46, is located along Alaskan Way S. at the western boundary of the study area. Other major terminals such as T-25 and T-30 are located along E. Marginal Way. The Port anticipates opening T-25 and T-30 for container uses in the near future. The increased future activities for these terminals will result in additional truck traffic through the study area. However the additional truck trips due to the reactivation of T-25 and T-30 are assumed to have minimal impact along corridors such as S. Atlantic Street as illustrated in the *Terminal 30 Cargo Reactivation Report*[1].

Most freight is shipped through the port by intermodal containers that are transferred to or from railcars or trucks on the dock. At the intermodal yards, containers are transferred to and from railcars. Trucks

[1] *Terminal 30 Cargo Reactivation*, Heffron Tranportation, Inc, September 18, 2006.

transport the cargo to and from Port terminals and the warehousing and distribution centers. In 2002, Terminal 46 produced an average of 1,250 daily truck trips[2] with approximately 30 percent of those trips having a regional destination. Regional access to the terminal is provided by SR 519 and S. Spokane Street from both the viaduct level and the surface roadway, then along surface streets.

The City's arterial street system is crucial to a functioning regional international trade system. Major truck streets have been identified by the City to maintain acceptable freight mobility and access to the area (see Figure 3-42). Major arterials such as 1st Avenue S., 4th Avenue S., S. Atlantic Street, S. Dearborn Street and Airport Way S. provide access to the industrial businesses within and surrounding the study area. Many of the businesses that generate a majority of the truck trips are located outside the study area, but depend on travel through the study area to access the regional highway system, Southeast and Central Seattle neighborhoods, Downtown Seattle and areas north of Downtown.

Major Truck Routes

The City of Seattle and WSDOT have defined several of the major corridors within the study area as major truck routes. These designated truck routes provide access between the industrial lands within the study area and the state highway system, while also facilitating travel between the industrial lands and the Port terminals.

Truck Route Designation (WSDOT)

The Washington State Freight and Goods Transportation System (FGTS) is a classification system adopted by WSDOT and used to classify state highways, county roads and city streets according to the average annual gross truck tonnage they carry. The FGTS classifies roadways using five freight tonnage classifications, T-1 through T-5, as follows:

- **T-1:** more than 10 million tons per year
- **T-2:** 4 million to 10 million tons per year
- **T-3:** 300,000 to 4 million tons per year
- **T-4:** 100,000 to 300,000 tons per year
- **T-5:** at least 20,000 tons in 60 days

Among those five classes, the system has distinguished "Washington's Strategic Freight Corridors" that carry four million or more gross tons of freight annually (i.e., T-1 and T-2 classes). Tonnage values are estimated from truck traffic count data and converted into average weights by truck type. The FGTS 2005 update designated 43 strategic freight corridors in Seattle, some of them located in the study area. These corridors are listed in Table 3-39.

[2] *Container Terminal Access Study, Year 2003 Update*, Heffron Transportation, Inc., October 2003

Table 3-39
WSDOT Designated "Strategic Freight Corridors"

Route Name	Begin	End	2005 FGTS Class[1]
4th Ave S	E Marginal Way S	S Royal Brougham Way	T-1
Airport Way S	4th Ave S	S City Limit S	T-1
Alaskan Way S	E Marginal Way S	Yesler Way	T-1
S Dearborn St	Airport Way S	Rainier Ave S	T-1
S Royal Brougham Way	4th Ave S	Airport Way S	T-1

Source: *Washington State Freight and Goods Transportation System 2005 Update*
1. FGTS = Freight and Goods Transportation System

Major Truck Streets Designation (City of Seattle)

The City of Seattle designates all arterials as truck streets and has also identified certain streets as Major Truck Streets. The Major Truck Streets are defined as primary routes in the Transportation Strategic Plan for the movement of good and services and serve both local and non-local truck traffic. They accommodate freight movement through the City, and to and from major freight traffic generators. Trucks in excess of 10,000 pounds of Gross Vehicle Weight are discouraged from using non-arterial (local) streets unless they have a justifiable reason for traveling there. The City uses the street designation as an important criterion for street design, traffic management decisions, and pavement design and repair. The Major Truck Streets across the study area are shown in Figure 3-42. Almost all major north-south arterial streets (Alaskan Way, 1st Avenue S., 4th Avenue S., 6th Avenue S., Airport Way S., and Rainier Avenue S.) have been designated as Major Truck Streets. Rainier Avenue S. is an important arterial that provides truck connections to southeast Seattle neighborhoods. Four east-west arterials (S. Dearborn Street, S. Royal Brougham Way, and S. Holgate Street) are also designated as Major Truck Streets. These routes support and facilitate travel to I-5, the Alaskan Way Viaduct, and SR 519. Since the TSP was adopted prior to S. Atlantic Street being extended to SR 519, it is not officially a Major Truck Street. The City plans to include this corridor as a Major Truck Street when the TSP is next updated. Other corridors such as Colorado Avenue S. may also be considered at that time.

The freight and trucking community is very concerned about activities or projects that might impact the Major Truck Streets. It is important that these corridors continue to serve trucks and freight and provide efficient access to the major industrial land uses within and surrounding the study area. They are key corridors that provide access to the regional highway system and other City neighborhoods, and should accommodate the unique operations and maneuverability that large trucks require.

Truck Volumes

Vehicle classification count surveys were conducted in early 2007 for several of the major truck routes throughout the study area. A list of the corridors is shown in Table 3-40. Traffic was classified by tube counters based on the Federal Highway Administration (FHWA) vehicle classification system. In addition, 24-hour video was conducted along Airport Way S. and 6th Avenue S. to validate the information. Table 3-40 summarizes the total truck volumes for each corridor.

Table 3-40
Average Daily Truck Volumes and Percent of Total Daily Traffic

Corridor	Truck Volume NB	Truck Volume SB	Truck Volume Both Directions	% of Total Daily Traffic[2]
North-South Corridors				
Airport Way S (e/o[3] 5th Ave)	100	155	255	2.9%
1st Ave S (n/o[3] Royal Brougham)	800	540	1,340	4.1%
1st Ave S (s/o[3] Atlantic St)	525	955	1,480	7.1%
4th Ave S (n/o[3] Royal Brougham)	490	560	1,050	4.9%
4th Ave S (s/o[3] Atlantic St)	875	480	1,355	5.3%
6th Ave S (s/o[3] Airport Way S)	50	50	100	1.9%
East-West Corridors	**EB**	**WB**		
S Atlantic St (w/o[3] 4Th Ave)[1]	1,000	495	1,495	8.0%
S Dearborn St (e/o[3] 6th Ave)	225	315	540	6.0%
S Royal Brougham Way (w/o[3] 4th Ave)[1]	295	555	850	7.2%

Source: Based on field traffic counts (2007)
1. Based on 2005 traffic count
2. Daily truck volume divided by total daily traffic volume
3. e/o = east of; n/o = north of; s/o = south of; w/o = west of

In general, trucks represent between 2 and 8 percent of all vehicles over a 24-hour weekday. The largest numbers of trucks are along the S. Atlantic Street, 1st Avenue S. and 4th Avenue S. corridors. These corridors provide access to SR 99 and SR 519 and therefore serve more trucks throughout the day. The traffic count data also indicate that corridors such as S. Dearborn Street and Airport Way S. serve a somewhat lesser volume of truck traffic than the other corridors evaluated. This is likely because the section of Airport Way S. north of S. Royal Brougham Way primarily provides access to the Downtown area, while S. Dearborn Street connects with I-5 and the Rainier Valley and has less regional truck trips. Even though the S. Dearborn Street corridor serves just over 500 trucks a day, that number represents nearly 6 percent of all vehicles and is a higher percentage than many of the other corridors. The distribution of daily truck traffic over a 24-hour timeframe is shown in Figure 3-43 for each corridor.

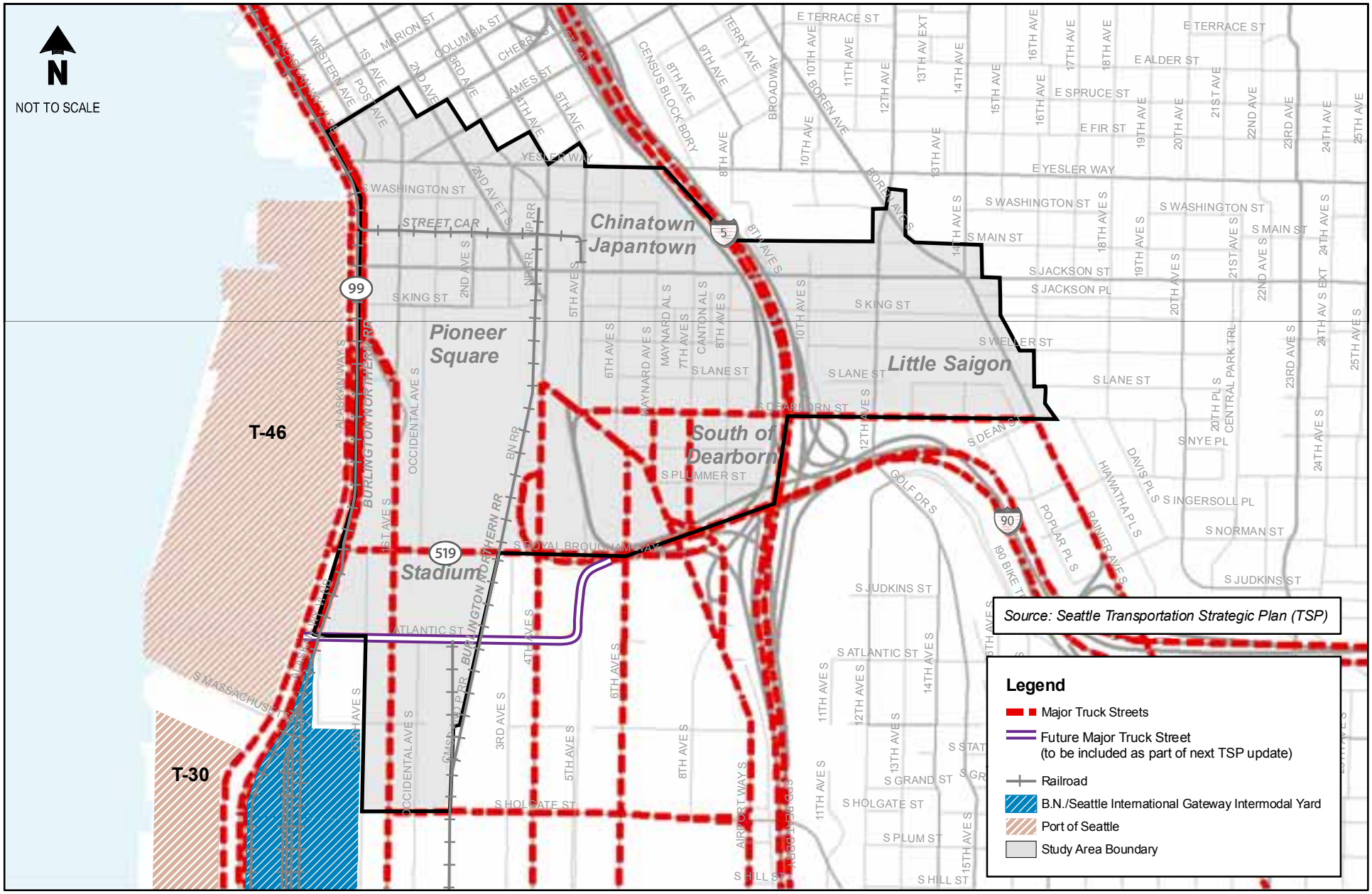
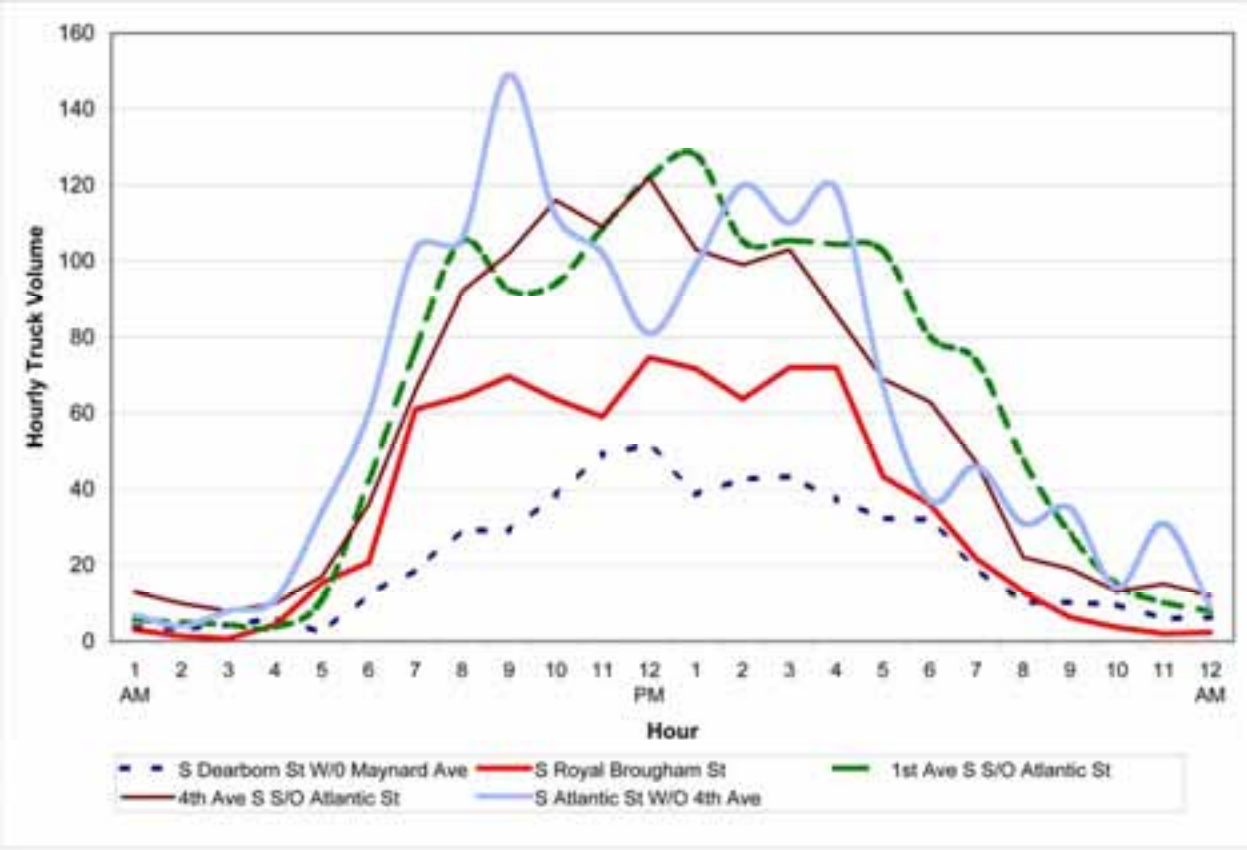


Figure 3-42

Livable South Downtown

Major Truck Streets

Figure 3-43
Daily Distribution of Trucks
(hourly truck volumes)



Source: Based on field traffic counts (2007)

The data indicate that truck activity mostly occurs during daytime hours between 8:00 am and 4:00 pm. Generally, truck volumes decline between the hours of 4:00 pm and 7:00 pm and represent a small fraction of afternoon peak commuter traffic. The truck peak occurs almost in the middle of the day whereas the peak for all traffic occurs in the afternoon commuting hours. Table 3-41 provides truck peak hours and truck peak volumes with corresponding percent of total traffic in the same periods along the major arterials in the study area. The truck percent reported in Table 3-41 is highest during the day and can comprise of 10 to 11 percent of the total vehicular traffic.

Table 3-41
Truck Peak Hour Volumes and Corresponding Percent of Total Traffic

Corridor	Truck Peak Hour From	Truck Peak Hour To	Truck Volume Both Directions	% of Total Truck Peak Hour Traffic[2]
North-South Corridors				
Airport Way S (e/o[3] 5th Ave)	11:00 am	noon	23	4.0%
1st Ave S (n/o[3] Royal Brougham)	9:00 am	10:00 am	126	5.1%
1st Ave S (s/o[3] Atlantic St)	noon	1:00 pm	128	9.0%
4th Ave S (n/o[3] Royal Brougham)	11:00 am	noon	73	6.6%
4th Ave S (s/o[3] Atlantic St)	11:00 am	noon	122	7.0%
6th Ave S (s/o[3] Airport Way S)	10:00 am	11:00 am	14	3.1%[4]
East-West Corridors				
S Atlantic St (w/o[3] 4Th Ave)[1]	8:00 am	9:00 am	149	11.1%
S Dearborn St (e/o[3] 6th Ave)	11:00 am	noon	52	8.0%
S Royal Brougham Way (w/o[3] 4th Ave)[1]	11:00 am	noon	75	10.1%

Source: Based on field traffic counts (2007)
1. Based on 2005 traffic count. 2. Truck peak volume divided by total traffic volume in the same period.
3. e/o = east of; n/o = north of; s/o = south of; w/o = west of 4. Based on counts in 2002 and adjusted to 2007

Truck Classes

The Federal Highway Administration (FHWA) Vehicle Classification system defines vehicles based on type of vehicle and the number of axles and wheels. The classification system uses 13 categories. Trucks are typically classes 5 through 13. Motorcycles, passenger cars, pickups, and buses are classes 1 through 4.

For the purpose of this study, the truck classes 5 through 13 have been grouped into two main categories to simplify the reporting of information. The two categories include:

- **Single-Unit Trucks** - Includes single-unit (light to medium) trucks for FHWA classes 5 to 7.
- **Multi-Unit Trucks** - Includes heavy truck types for FHWA classes 8 to 13.

A more detailed analysis of the classification data reveals that, on average, more than two-thirds of the counted trucks are either light or medium trucks (single-unit trucks). These types of trucks are typically used for local or regional delivery rather than interstate travel. Heavy trucks (single- and multi-trailers) make up less than one-third of the total number of trucks counted within the study area. Table 3-42 presents the truck distribution results for each of the surveyed locations.

Table 3-42
Daily Truck Distributions Along Corridors

Corridor	Direction	Truck Distribution[2] Single-Unit	Multi-Unit
North-South Corridors			
Airport Way S (e/o[3] 5th Ave S)	NB	86%	14%
	SB	88%	12%
1st Ave S (n/o[3] S Royal Brougham Way)	NB	68%	32%
	SB	76%	24%
1st Ave S (s/o[3] S Atlantic St)	NB	67%	33%
	SB	72%	28%
4th Ave S (n/o[3] S Royal Brougham Way)	NB	40%	60%
	SB	65%	35%
4th Ave S (s/o[3] S Atlantic St)	NB	63%	37%
	SB	69%	31%
6th Ave S	NB	77%	23%
	SB	68%	32%
East-West Corridors			
S Atlantic St (w/o[3] 4th Ave)	EB	65%	35%
	WB	64%	35%
S Dearborn St (e/o[3] 6th Ave S)	EB	69%	31%
	WB	69%	31%
S Royal Brougham Way (w/o[3] 4th Ave S)[1]	EB	72%	28%
	WB	68%	32%

Source: Based on field traffic counts (2007)
1. Based on 2005 traffic count
2. Percentages of single-unit and multi-unit trucks out of the total number of daily trucks
3. e/o = east of; n/o = north of; s/o = south of; w/o = west of

Railway and Intermodal Facilities

Freight movement across the study area is also served by railway and intermodal facilities that support shipping to and from the port terminals and allow container transfer to railcars.

The railway maintains two mainline tracks through the study area, paralleling I-5 to the south and running to the north between 1st and 4th Avenues S, crossing S. Holgate Street and S. Royal Brougham Way (SR 519) at-grade. North of S. Royal Brougham Way and adjacent to S. Jackson Street is the King Street Station and a tunnel under the Downtown area that emerges north of the Pike Place Market. The railway then follows the waterfront north to Everett.

Rail crossings on truck routes are obstacles for truck movement and general traffic, especially in South Downtown where the BNSF mainline railroad, Amtrak, and Sounder Commuter Rail are located. There are approximately 63 train movements on the mainline tracks per day across the east/west arterial streets. These train volumes and associated traffic delays are expected to increase in the future. Additional freight, Amtrak, and Sounder Commuter Rail service will be using the tracks in the future, resulting in the at-grade crossings being closed more often throughout the day. The City of Seattle has very limited capability to control the frequency or the length of time the trains block street crossings.

In the study area, the S. Holgate Street and S. Royal Brougham Way corridors are two major east-west arterials that cross the BNSF, Amtrak, and Sound Transit commuter rail lines. A WSDOT study issued in 2003 showed the average time per train crossing to be 3 minutes, 10 seconds. Table 3-43 presents a

summary of the 2003 daily train volumes crossing S. Holgate Street. The same study calculated the total vehicular delay due to train crossings encountered by vehicles crossing the S. Holgate Street railway for both the AM and PM peak hours using the approach traffic volumes and the average train crossing duration during the same time period. The results indicate that the total delay due to train crossings during the AM peak hour is 5.87 vehicle-hours and 16.32 vehicle-hours during the PM peak hour. This total delay is derived by multiplying the traffic volume in the peak hour by the average delay at crossing in this period.

Table 3-43
Number of Train Crossings per Day at S. Holgate Street (2003)

Type of Service	Number of Train Crossing Movements
Sounder (3 trains)	12
Amtrak Cascade (3 trains)	9
Freight (BNSF)	42
TOTAL	**63**

Source: *S Holgate Street Railway Crossing Closure Traffic Impact Analysis*, WSDOT, December 2003

BNSF predicts annual growth in freight rail volumes of five to ten percent per year. This would translate into an annual increase of two to three trains per day. Therefore, by 2030, approximately 100 freight trains are anticipated to cross the study area during a typical weekday. Unlike passenger rail, freight rail schedules are more flexible; therefore, it is not possible to accurately predict freight rail activities at crossings during a specific time period. However, it is likely that a proportional increase in peak period delay at crossings will occur, with up to four trains crossing during each peak hour.

Amtrak conducted another study in 2005 for the S. Holgate Street crossing[3]. The study showed that the crossing is typically blocked for 4 hours and 24 minutes each weekday. During the peak hours, the crossings are closed about 25 percent of the time. The study anticipated longer blocking time at the crossing in the future, where analysis indicates that blockages are expected to increase to 70 percent of the time by year 2027.

Freight Operating Conditions

The efficient movement of freight through the study area is an important statewide goal for promoting economic growth and international trade. Facilitating trucks and the movement of freight is an important consideration and is evaluated in this section based upon a set of qualitative and quantitative assessments, which include:

- **Truck Connections:** Ability of current facilities to provide proper connections and circulation options for trucks.
- **Major Truck Street Travel Speed:** Travel speed on designated Major Truck Streets.
- **Design Standards:** Qualitative assessment of design standards that would facilitate truck operations.

Truck Connections

This section addresses the ability of trucks to efficiently circulate through the study area and access locations such as the state highway system, the Port, and other industrial areas.

[3] *Analysis of Train Operations Across S Holgate Street, Seattle, WA*, Amtrak, HDR Engineering, January 2005.

The current Major Truck Streets provide reasonable access to I-5 and the Alaskan Way Viaduct as well as to I-90. Port properties are accessed via S. Atlantic Street, S. Royal Brougham Way, and Alaskan Way S. Currently, trucks must use at-grade mainline railroad crossings at S. Holgate Street, S. Royal Brougham Way, and S. Lander Street. In addition, there are tail tracks between 1st Avenue S. and Alaskan Way S. that occasionally close S. Atlantic Street and S. Royal Brougham Way. Tail tracks are track extensions beyond the end of ~~a transit mainline~~ the SIG Yard tracks, and are used to build up trains. Closures of the tail track crossings, while not as frequent as closures of the mainline crossings, are also anticipated to increase in proportion to freight rail using the mainline, causing additional delays for traffic along S. Atlantic Street and S. Royal Brougham Way corridors with closure duration of up to 20 minutes. Access to Duwamish and Harbor Island industrial areas is provided by connections at S. Spokane Street south of the study area from the 1st Avenue S. and East Marginal Way corridors.

There are several planned improvements in the study area that will improve truck connections such as SR 99 improvements, completing SR 519 Phase 2, Spokane Street Viaduct that includes widening the Viaduct, closing the westbound off ramp at 4th Avenue S and adding a westbound on and off ramp at 1st Avenue S. and an eastbound loop ramp to 4th Avenue S., Alaskan Way S./S. Atlantic Street intersection improvements, and S. Lander Street Grade Separation. A more detailed description of the planned improvements is provided in Appendix G. The improvements are expected to provide more direct access to the Port properties and the north SIG yard from the regional highway system. In addition, a dedicated roadway is planned to provide direct access between T-46 and the north SIG yard to avoid conflicts with traffic along the City arterials.

Major Truck Street Travel Speed

The travel speed performance measure for trucks is similar to that of general traffic. It reflects the operating conditions of street segments and intersections along the truck corridors. Higher travel speeds along the corridors could result from improving the flow of vehicles and reducing the delays at intersections. The travel speeds for the Major Truck Streets were reported previously for corridor operations. It must be noted that trucks often have slower travel speeds than regular passenger vehicles due to reduced accelerating speeds and increased delay when making turns. Trucks can further be delayed at unsignalized intersections or driveways because longer gaps in traffic are needed to ~~safely~~ turn into or cross traffic on the major street.

Even though truck travel speed is a bit longer than that of the general traffic, the corridor operations and level of service (LOS) represents a reasonable indicator for freight operation performance. If corridor operations decline, it is assumed that truck operations will also decline proportionally, at a minimum. In addition, for an individual trucker, the time to access a specific port gate or intermodal terminal could be affected by other factors such as the operation of the gate or terminal. Such additional delays caused by those factors are not included in the analysis.

Design Standards

Not all streets in the study area have been designed to accommodate large trucks with single- or multi-unit trailers. Therefore, truck traffic often experiences operational problems on arterials due to design related issues such as short curb radii, narrow streets or travel lanes, utility poles that are close to the curb, pavement conditions on truck access routes, and signal control operations that do not assist truck turning movements.

The streets in the study area have limited rights-of-way and are shared by various transportation modes including cars, buses, bicycles and pedestrians. Such interaction, accompanied with the lack of proper street design and congestion, can create conflicts between truck traffic and other motorized and non-motorized transportation modes.

Data are not readily available to evaluate all the locations with design issues that contribute to poor truck operations. As part of the Alternatives evaluation, improvements that are commonly a part of higher density development, in addition to any mitigation strategies, are reviewed to identify potential design issues that could impact the operation of trucks.

PEDESTRIANS AND BICYCLISTS

This section summarizes pedestrian and bicycle conditions across the study area. The discussion in Appendix G provides greater detail, including pedestrian counts at several locations.

Pedestrian Facilities

Chinatown/Japantown

This neighborhood has a considerable amount of infrastructure for pedestrians, and at least one major pedestrian generator (a bus tunnel entrance). Nearly all intersections (both signalized and unsignalized) have marked crosswalks and there is a mid-block crossing along 5th Avenue S. between S. Weller Street and S. Dearborn Street. Sidewalks exist on most streets in this area. There is high pedestrian activity in this district, including high volumes of crosswalk use.

Along streets like 4th Avenue S. and S. Jackson Street, the combination of high traffic volumes and high pedestrian volumes increases the potential for pedestrian-vehicle conflicts. This includes the 8th Avenue S./S. Jackson Street vicinity where there are transit stops on both sides of the street. Also in this vicinity, the quality of street lighting on S. Jackson Street and S. King Street is of interest for the ~~overall safety~~ benefit of pedestrians and the public using the vicinity in and under I-5. Along the southern edge of Chinatown, S. Dearborn Street and Airport Way S. near the former INS building are perceived to be challenging pedestrian crossing areas. While there are signalized intersections along most of S. Dearborn Street, the width of the street and amount of traffic that flows on the street may increase its perception as a pedestrian barrier, particularly for people that move more slowly.

Steeper slopes along 6th Avenue S., S. Washington Street and Yesler Way create impediments to pedestrian movement, particular for senior citizens that live in the vicinity. Sidewalks along some street segments in this area are missing, in need of repair or have blockages that impede pedestrian travel. These deficiencies may result in pedestrian use of the street, thereby increasing the potential for pedestrian/ vehicle conflicts. On other streets just north of S. Jackson St., sidewalks are present but the slopes increase the need for pedestrian respite. Improvements are planned along Maynard Ave. S that will provide resting spots and natural features to improve aesthetics and pedestrian comfort.

Pioneer Square

This neighborhood has a considerable amount of pedestrian infrastructure. It has two major pedestrian generators (King Street Station and an access to the bus tunnel), as well as several mid-block crossings. In addition, Occidental Avenue S. is a pedestrian corridor that runs parallel to 1st Avenue S. and 2nd Avenue S. from S. Jackson Street to S. Washington Street. Most intersections have marked crosswalks. Sidewalks are present on most streets in the area.

The Pioneer Square area has a very high level of pedestrian activity, due to its mix of retail, restaurant, employment and residential uses. Also within and adjacent to the district are government centers of employment that generate pedestrian traffic. Nearby to the west is the Colman Dock ferry terminal that generates a lot of pedestrian traffic, including on a footbridge that connects to 1st Avenue.

Stadium Area

This vicinity has sidewalks on most streets, particularly near the major pedestrian generators such as Qwest Field, Safeco Field, and the Event Center. It also has the key pedestrian connection of the Weller Street bridge, which links the Chinatown area to the Stadium Area. At S. Royal Brougham Way near 3rd Avenue S., the at-grade railroad crossing is an identified pedestrian safety issue because fatalities have occurred at this location in the past due to collisions with trains. The vicinity is subject to other pedestrian challenges, some due to street and parking configurations and some due to the unique manner in which event patrons use Occidental Avenue S. and other streets.

- The parking arrangement on the west side of Occidental Avenue S. approximately south of Railroad Way S. includes perpendicular parking interspersed with business entries and no sidewalk. Although a sidewalk is present on the east side of Occidental Avenue S., pedestrians may instead use the street.
- Due to longstanding habits and the attractions of street-side vending, event patrons have long perceived Occidental Avenue S. south of S. King Street as being a pedestrian promenade, traveling on foot in any part of the street at almost any time. This unique trait creates a condition where pedestrians and vehicles share the roadway, with potential for conflicts. During stadium events, traffic control is typically in place at several key locations and overall safety is maintained despite some mixing of pedestrians and vehicles.
- Stadium event-related pedestrian traffic also contributes to heavier use of various street segments in the vicinity, which can challenge the capacity of the sidewalks and can occasionally result in spill-over of pedestrians onto curbside lanes and jaywalking. This can occur along portions of 1st Avenue S. in the Stadium Area, particularly near Safeco Field, on S. Atlantic Street, and 4th Avenue S. near S. Royal Brougham Way. During high attendance events, pedestrians may also be more prevalent near Alaskan Way S. and S. Atlantic Street. The combination of higher traffic volumes, possible higher-speed traffic and the potential for jaywalking at S. Atlantic Street near 1st Avenue S. means this is a notable area with potential pedestrian safety issues. There is similar potential for such issues near 1st Avenue S./S. Royal Brougham Way.
- Near the existing SR 99 access ramp on the west side of 1st Avenue S, the ramp infringes on the sidewalk such that one segment is quite narrow and sheltered from view of passersby, contributing to possible ~~public safety~~ criminal activity concerns.

South-of-Dearborn

Sidewalks are provided on most streets, some with weeds and cracked conditions. Some streets have sidewalks crossing past business entry doors and perpendicular parked cars in between, which contributes to potential pedestrian safety challenges. Airport Way S. and S. Dearborn Street, wider streets with higher speed traffic, are perceived as more difficult to cross. The characteristics of the corridors and less frequent crossing locations may contribute to potential pedestrian ~~safety~~ crossing challenges. Pedestrian activity in this area is minimal, though it often does increase when there is an event at Safeco or Qwest fields due to the dispersal of event-related parking in this vicinity.

Little Saigon

Sidewalks are provided on most streets, some with weeds and cracked conditions. Pedestrian activity is highest near the intersection of 12th Avenue S. and S. Jackson Street. There are a number of locations where relatively high traffic volumes combined with pedestrian activity and physical characteristics may contribute to pedestrian safety challenges:

- 12th Avenue S./S. Jackson Street intersection vicinity
- 12th Avenue S./S. King Street intersection vicinity

- 12th Avenue S./S. Weller Street vicinity
- Mid-block vicinity on S. Jackson Street between 12th Avenue S. and Rainier Avenue S.
- Rainier Avenue S./Boren Avenue S./S. Jackson Street intersection vicinity
- Rainier Avenue S./S. Dearborn Street vicinity

Bicycle Facilities

Within the study area several roadways have infrastructure for bicycles. The infrastructure mainly consists of bicycle lanes striped onto existing roadways. Bicycle lanes are located on 2nd Avenue S. (in the Pioneer Square district), S. Dearborn Street (in the Little Saigon and south-of-Dearborn vicinities), and S. Jackson Street (in the Little Saigon vicinity). There are also several identified bicycle routes in the area, as well as multi-use paths. The multi-use paths are along Alaskan Way S. (along the border of the Stadium Area and Pioneer Square vicinities), along 5th Avenue S. (south of the south-of-Dearborn vicinity), and along I-90 to I-5 (south of the Little Saigon vicinity). Bike routes are prevalent in all vicinities. Regional bicycle connections are provided by several paths and trails in the area. The Alaskan Way trail west of the study area provides access north through the Downtown waterfront area to Magnolia. The bicycle lane along S. Dearborn Street within the Little Saigon vicinity connects to the I-90 trail, which provides connections across Lake Washington to Mercer Island and areas east of Lake Washington

To promote and encourage greater bicycle use, the City of Seattle has completed a Bicycle Master Plan. The plan identifies existing facilities, recommends improvements, discusses ways to educate the public, and identifies funding for the improvements. Several major improvements are discussed, including several miles of on-street bicycle facilities, trail connections and a signed bicycle route system. The plan also discusses the need for improvements at roadway crossings and on arterial roadways.

EVENT TRAFFIC ~~MANAGEMENT~~

Within the study area there are three large event facilities: Safeco Field, Qwest Field, and the Qwest Field Event Center (QFEC). The main types of events held in these facilities are sporting events, held in either Safeco Field or Qwest Field, and consumer trade or flat shows. Major parking areas for all three facilities are the Safeco parking garage (south of Safeco Field), the QFEC parking garage (south of Qwest Field), the large surface lot north of Qwest Field, and the Union Station Garage (northeast of Qwest Field across Fourth Avenue S.). In addition to these major off-street parking areas there are other surface lots and on-street parking spaces available throughout the study area. King Street Station northeast of Qwest Field provides access to passenger trains, and there are numerous bus stops in the immediate area to facilitate transit use to and from events. In Appendix G.1 to this Final EIS, Figure 4-12 shows the current bus staging locations for stadium events.

Types of Events

There is a wide variety of events that occur at each event facility throughout the year. These range from flat shows to professional football and baseball games. The wide variety of events draws hundreds of thousands of vendors, patrons, suppliers, and visitors to the area each year. The number of attendees per event varies significantly depending on the type of event and time of day. Not only are there the actual events themselves, but there are days spent preparing for each event requiring significant move-in and move-out of materials and supplies. Large event move-in and move-out can last for up to a week and can entail numerous truck trips to and from the event facilities each day. This requires adequate street facilities, along with staging and parking, to accommodate these oversize vehicles.

Sporting Events

There are three principal types of team sporting events which occur in these facilities: baseball games in Safeco Field and football and soccer games in Qwest Field. Baseball games are most often scheduled for

7:05 PM on weekdays, while football games are typically held on Sundays, although there are a growing number of football games on weekdays that impact evening peak hours of travel. In recent years, the Seattle Sounders of the United Soccer League have played 15 to 20 games at Qwest Field with an average attendance of around 3,000 people, ranging up to as high as 10,000 people. This year, the Sounders will play only two games at Qwest Field. In 2009, the new "Sounders FC" team will play around 20 games at Qwest Field as part of Major League Soccer, with expected average attendance of around 15,000 people ranging up to about 25,000 people (Young, 2008).

Average attendance for a baseball game during the 2006 season was 33,000 people (according to data provided by Safeco Field in their 2007-2008 Transportation Management Plan), and for a football game it was approximately 58,000 people (according to data provided by Qwest Field in their 2006-2007 Transportation Management Plan). On average there are between 250 and 300 cars per thousand attendees for both types of games, with arrivals beginning roughly three hours prior to game time and ending roughly 30 minutes after the game begins. Other arrivals include charter buses (between 15 and 40 for either type of game) and Metro special service buses (between 15 and 25 for baseball and roughly 100 for football), all of which arrive in the same timeframe as mentioned previously.

Both football and baseball games run an average of three hours, although that can range between two hours and five hours for baseball games. Exiting from surrounding garages can take one to two hours for both sporting events. Soccer games run for about 2 to 2.5 hours and will be expected to have a shorter exiting time due to a lower expected average attendance. Qwest Field also attracts a few exhibition soccer matches every year, often with international teams that draw sellouts or large attendance. Other sporting events held annually include the Supercross motorcycle event.

Flat Shows

Flat shows refer to events usually held for the public that cater to a specific recreational topic of interest. Some of the larger flat shows include the Seattle Home Show, the Seattle International Auto Show, the Seattle RV and Outdoor Recreation Show, and the Seattle Boat Show. These events typically run a few days to a week in length, from 8 AM to 9 PM. They can attract anywhere between 20,000 to 65,000 people, with attendee arrival at a fairly steady flow throughout the day. Attendee departure is also fairly steady throughout the day, though it does get heavier when shows close at the end of the day.

There are several smaller flat shows as well, including the Pacific Marine and Fish Expo, the Seattle Roadster Show, the Northwest Women's Show, the International Gem and Jewelry Show, the Seattle Ski Fever and Snowboard Show, as well as golfing, dog, and motorcycle shows. These events usually run for a few days or over a weekend, from 8 AM to 9 PM. Attendance at the shows ranges from 5,000 to 20,000 people, with arrival and departure patterns the same as larger flat shows.

Because arrivals and departures for flat shows do not conflict as greatly with traffic as arrivals and departures for sporting events, fewer traffic control measures are usually necessary. For all types of flat shows, there are typically no restricted movements or police-controlled intersections, though there are typically some brief road closures during the setup and takedown of events.

Concerts

Qwest Field typically hosts around two or three large concerts per year in the stadium bowl, but also hosts 25 to 30 concerts in the WAMU Theater at the Event Center (Young, 2008). The largest concerts typically involve load-in and load-out of large stage setups over a number of days.

Event Conditions

During large sporting events at Safeco Field and Qwest Field, a variety of transportation modes provide access to the facilities. The two major modes of transportation are passenger vehicles and transit. There are specific roadways that serve as the major access points to the facilities for these modes, along with regular transit services provided through the study area and special transit services subsidized by each facility. The following describes the major access roadways to the event facilities, along with general change in traffic volumes that have been observed compared to non-event days. Descriptions of the transit services and bus layover sites are also provided.

Event Travel Patterns and Traffic Volumes

On average, most attendees of sports events come by passenger vehicle. A survey carried out for a football game on a weekend day in December 2005 showed that automobiles carried about two-thirds of the total number of attendees, with an average of 367 cars per 1,000 attendees (Transportation Management Program, Plan Year 2006 to 2007, Qwest Field Event Center).

The typical routing of traffic for each sporting event facility is shown in Appendix G.1, on Figures 4-8 (ingress) and 4-9 (egress). It includes the use of the following highways and streets for primary inbound and outbound travel movements:

1. I-90
2. I-5
3. Highway 99
4. First Avenue S.
5. Second Avenue S.
6. Fourth Avenue S.
7. Sixth Avenue S.
8. S. Jackson Street
9. Airport Way S.
10. S. Royal Brougham Way
11. S. Atlantic Street
12. S. Holgate Street

As a result of this primary routing, a total of up to 37 locations are shown to have traffic control in the Qwest TMP and up to 20 locations in the Safeco TMP. This traffic control includes police officers directing vehicular and pedestrian traffic as well as turn restrictions and/or lane closures. At most of the traffic control locations, police officers work in concert with the traffic signal timing for those movements that are still permitted. For a few intersections, the police officers override the signal timing with these usually occurring at the S. Royal Brougham Way/Occidental Avenue S. and S. Royal Brougham Way/ 4th Avenue S. intersections.

Traffic control staffing for regular evening baseball games is less than the afternoon games that end during PM rush hour timeframes. For example, regular evening baseball games have 27 police officers and 12 parking enforcement officers, compared to 44 police officers and 15 to 20 parking enforcement officers for afternoon games that end during the weekday PM rush hour.

Due to the location of each stadium, the Qwest Field traffic control setup extends as far north as S. Washington Street, south to S. Holgate Street and east to 5th Avenue S. The Safeco Field traffic control setup extends as far north as S. King Street, south to S. Holgate Street, and east to 4th Avenue S. Much of the traffic exiting from parking garages is directed toward the east and I-90/I-5, with some directed north toward SR 99 or south along surface streets. In Appendix G.1, Figures 4-10 and 4-11 provide a general

summary of where existing traffic control is provided on typical event days for both Safeco (attendance above 35,000) and Qwest Fields. The locations of the police postings may change based on changes in background conditions, but the number of postings for the events themselves does not change.

Post-game vehicle movement prohibitions usually begin in the 8th inning for baseball games at Safeco Field, which is typically around 9:30 pm for a 7:05 game. The goal of the post-game traffic control is to empty the major parking garages in less than one hour after a baseball game has ended.

Traffic count information was collected in Spring 2005 to capture the changes in traffic volumes on many of the primary routes that provide access to the event facilities. The event traffic counts were collected during the PM peak hour for a 7:05 PM baseball game at Safeco Field. These data were assembled as part of the Seattle Department of Transportation's study to evaluate the potential impacts of closing S. Holgate Street between 3rd Avenue S. and Occidental Avenue S. The resulting event traffic volumes were compared to traffic counts collected during a non-event day during the same time period to highlight the change in travel patterns and traffic volumes caused by increased traffic to the event facilities along with the pre-game traffic controls. Table 3-43A highlights the percent change observed on several of the major routes surrounding the event facilities for pre-game traffic conditions generally occurring between 4:30 and 5:30 PM. A positive change indicates a location that has more traffic on event days, whereas a negative change reflects locations that have less traffic.

Table 3-43A
Event Pre-Game Traffic Volumes by Corridor – PM Peak Hour

Corridor / Arterial	Extent	Dir	2005[1]		
			Non-Event	Event	Percent Change[2]
North-South Corridors					
1st Avenue S	S Holgate St to S Royal Brougham Way	NB	1,485	1,310	-12%
		SB	1,205	1,220	+1%
4th Avenue S	S Holgate St to S Royal Brougham Way	NB	950	885	-7%
		SB	1,555	1,255	-19%
East-West Corridors					
S Royal Brougham Way	1st Ave S to 6th Ave S	EB	320	330	+4%
		WB	500	570	+15%
S Atlantic Street	1st Ave S to 4th Ave S	EB	1,090	900	-17%
		WB	325	450	+38%

1. All 2005 traffic data collected as part of the SDOT *South Downtown Railroad Corridor Study*. Event data collected for a 7:05 pm baseball game in mid-May for the peak hour between 4:00 and 6:00 pm. Number indicates average of counts along each roadway segment.
2. Indicates relative change between event and non-event traffic counts.

The data suggest that during the PM peak hour, pre-game time period for a typical baseball game, the major corridors surrounding the event facilities carry few additional vehicles, with some specific locations having a reduction in traffic. The corridors serving fewer vehicles include 4th Avenue S., northbound direction of 1st Avenue S., and the eastbound direction of S. Atlantic Street. The reduction in vehicles carried by these corridors is likely due to an increase in traffic congestion in the area resulting from the following conditions:

- Police postings at major intersections resulting in closed streets and turn restrictions.
- Additional pedestrian traffic, resulting in the inability to make right-hand turns.
- Additional conflicts between background traffic and event traffic.

- Vehicle queuing from parking garage entrances at the Qwest Field Event Center or Safeco Field Garage.

The remaining corridors and roadway segments listed in Table 3-43A, such as S. Royal Brougham Way, the westbound direction of S. Atlantic Street, and the southbound direction of 1st Avenue S., generally carry more vehicles on event days than non-event days during the PM peak hour. The increase in vehicles along these corridors is likely because they provide direct access to major parking areas or drop-off locations.

Event Transit Service

The regular bus routes that travel into or out of Downtown Seattle via 1st Avenue S., 4th Avenue S., the E-3 Metro Bus/Rail Way and Tunnel, 6th Avenue S., or S. Jackson Street serve the area during game periods and drop people within walking distance of the event facilities. However, the scenario is different during weekday games that start after 5:00 pm, and during all Saturday and Sunday games. In these cases, regular Metro and Sound Transit Regional Express bus service that is normally scheduled to operate via 1st Avenue S. and 4th Avenue S. is rerouted 90 minutes before the start of the game to operate instead via the E-3 Bus/Rail Way and Airport Way S. in both directions between the Safeco Field area and Downtown Seattle.

Qwest Field has developed charter bus packages and established on-site charter bus parking on the east side of the north parking lot. Charter buses enter the lot from S. Royal Brougham Way and travel along the east access road to the north lot and exit out the northwest gate of the north parking lot. Qwest Field is also promoting several transit programs: Charter Boat Service, Event Day Rail Service (to serve people coming from Portland and the south), and a special rail program with Sound Transit (to serve the Green River Valley and Tacoma to the south as well as Everett to the north). In addition, Metro Transit is providing non-stop shuttle service for Seahawks home games from five area park-and-ride lots to Qwest Field for $3.00 each way.

Safeco Field has an agreement with King County Metro to lease game bus service. Under this agreement, Metro provides transit service between Safeco Field and park-and-ride facilities around Puget Sound and credits the cost for leased buses by collecting a fare of $3.00 per trip. This is the same program for Qwest Field. Staging locations for Metro buses to Mariners and Seahawks games are shown in Appendix G.1 on Figure 4-12. It should be noted that in 2008 a federal rule to promote charter bus competitiveness may prevent or discourage the ability to continue such service by transit agencies unless changes are made either to the rule or the method service is provided (DPD, 2008).

Event Management

Event traffic management summarized in this section refers primarily to transportation management programs (TMPs), updated on an annual basis, that were required by City conditioning of permits for the two athletic stadiums, Safeco Field and Qwest Field. City decisions to permit the construction of these facilities recognized that the number of large events, their potential overlap, and their interaction with typical daily traffic in the vicinity would create substantial traffic volumes that could result in occasional severe traffic congestion. This congestion can and does result in adverse traffic delays and impaired functioning of streets and transit systems.

The TMPs include several strategies (see lists in Tables 4-24 and 4-25 in Appendix G.1) that are meant to minimize the frequency, extent and duration of traffic congestion that is influenced by event-related traffic, as well as measurable goals and other required contents. For example, the TMPs define a policy that prevents large events from simultaneously occurring at the stadiums, and requires other "special" TMPs for some added events such as playoff games that may or may not occur. Another focus of each

TMP is on the immediate neighborhoods adjacent to each stadium, to discourage parking and extraneous traffic circulation within the TMP boundaries. The specific objectives for Qwest and Safeco Fields generally overlap and are mostly consistent between the two plans. Some of the specific measures are required as part of the entitlements for each venue whereas some of the other measures are done to provide incentives for patrons to carpool and travel via alternative mode versus single occupant vehicle.

Plans for both Safeco and Qwest Field relate primarily to achieving a number of vehicles per thousand attendees for each event to help reduce the amount of traffic congestion and parking impacts as a direct result of the events themselves. The planning boundary for the Qwest Field TMP is the area bounded on the north by Pioneer Square and Chinatown/International District and on the east by I-5, and the south by the South Downtown/North Duwamish area. The goal of the Qwest TMP is divided into weekend and weeknights. For Qwest Field the weekend single event goal is 277 vehicles per 1,000 attendees and the weeknight single event goal is 307 vehicles per 1,000 attendees. The Safeco Field TMP does not have specific boundaries but generally covers the area south from S. Lander Street north to the Central Business District (CBD) and east to the Metro Busway. The Safeco Field regular season single event TMP goal for a baseball event with an attendance of up to 38,500 is no more than 325 vehicles per 1,000 attendees.

Some of the listed objectives in each TMP include:

- Limiting event-related traffic congestion
- Ensuring adequate access to area residences and businesses
- Reducing event-related on-street parking in the neighboring areas
- Encouraging the use of alternative modes of transportation
- Directing event-related parking toward the Central Business District.

Over time, it has become clearer that transportation management practices for each stadium work somewhat differently, with different characteristics that respond to the particular needs created by their events, and differences in event-goers' characteristics that can affect traffic patterns. Observations about these differences include the following:

- The Qwest Field Event Center TMP addresses fewer large events than Safeco Field's TMP.
- The physical location of each stadium and its parking facilities results in somewhat different traffic patterns. Qwest Field tends to generate traffic in Pioneer Square, and to/from its parking facilities near S. King Street and on 4th Avenue S. Safeco Field tends to generate southern-oriented traffic volumes where parking resources may be more accessible to event-goers. Given these patterns, there is relatively more concern for potential pedestrian-vehicle conflicts ~~safety~~ in locations such as the 1st Avenue S. and S. Atlantic Street vicinity during baseball games (as compared to football games) due to the proximity of Safeco Field, the number of baseball games, and crowd behavior that may induce more jaywalking. These patterns also influence the distribution of police postings ~~to maintain safety~~.
- Regionally, Qwest Field football events draw many fans from southern suburbs to its weekend day events. Safeco Field baseball events draw fans more evenly from within the region, along with fans walking from Downtown jobs on weekdays. These differences influence different patterns of arrival and pedestrian activity, e.g. "tailgating" before football events, and crowds walking south on Occidental Avenue S. for baseball games.
- Safeco Field events typically have included five to seven weekday day games that can create overlap with PM peak commuting periods, depending upon the starting times and eventual ending times of the baseball games. Experience has led authorities to favor start times that avoid games ending around the PM peak hour commuting period. However, scheduling practices of Major League Baseball and the need for occasional rainout make-up games can lead to day game schedules that are mostly beyond the control of the City and the Mariners.

Several elements of the access to each stadium will be altered as a result of specific planned transportation improvements, such as SR 519 Phase 2 and access improvements to SR 99 as part of the Alaskan Way Viaduct replacement project. Key at-grade pedestrian-vehicle conflicts in the immediate vicinity of both Qwest and Safeco Fields will be eliminated with improvements at S. Royal Brougham Way as part of the SR 519 Phase 2 project because SR 519 will be rerouted away from S. Royal Brougham Way. This transportation improvement will also affect how ingress and egress to the garage at Qwest Field is provided. The result of the improvement will likely be a re-allocation of resources related to pedestrian and traffic control.

ENVIRONMENTAL IMPACTS

This section describes future 2030 conditions for the transportation systems within the study area under the No Action and Action Alternatives. The future transportation system conditions were established based on forecasts of regional population and employment developed by the City of Seattle and PSRC and reflected in the City's travel demand model for the No Action Alternative. The No Action Alternative establishes the baseline information for system performance against which the Action Alternatives are compared. For each of the Alternatives, a consistent set of new transportation facilities and services were assumed to be in place by 2030 and accounted for in the development of the 2030 travel forecasts. For the Preferred Alternative, findings have been made by comparing anticipated growth amounts (refer to Tables 3-25 and 3-26 in the Population and Employment section of this chapter), and inferring the range of probable impacts on transportation. This is facilitated by the relatively close ranges of findings determined for the other Action Alternatives (DPD, 2008).

TRAVEL FORECASTS

The No Action and Action Alternatives were evaluated under 2030 travel conditions. These conditions assume an increase in travel as the result of forecasted increases in population and employment in the Puget Sound region and the study area. The travel forecasts are estimated based on the expected number of person trips per day generated by the future land uses. This information is calculated using the City of Seattle EMME/2 travel demand model. The model is a refined version of the Puget Sound Regional Council (PSRC) regional model with a greater emphasis on travel within the City of Seattle. The model includes smaller transportation analysis zones (TAZs) to provide more sensitivity to local arterials, but has also incorporated other specific enhancements such as updates to the local transit network. The model was utilized to forecast the number of vehicle trips and non-auto trips in the study area for the No Action and Action Alternatives based on the 2030 horizon year.

The AM and PM 3-hour peak periods were used to evaluate 2030 travel conditions. The model runs were completed by beginning with the No Action Alternative and confirming regional and study area land uses along with the future transportation network assumptions. Once the assumptions had been confirmed and/or included, the model was run for each of the Action Alternatives. The only modifications to the model for each of the Action Alternatives included revisions to the land uses for the study area TAZs. No other modifications to the model were made under each Alternative.

The model includes a four-step modeling procedure which comprises trip generation based on the land uses, trip distribution among the TAZs, modal split among the various modes available, and trip assignment on the model network. The results from the trip generation and trip distribution components of the model are described below along with a summary of the mode share and trip assignment. Much of the model data described in this section has been compared to the base year model, which was calibrated to 2005 conditions.

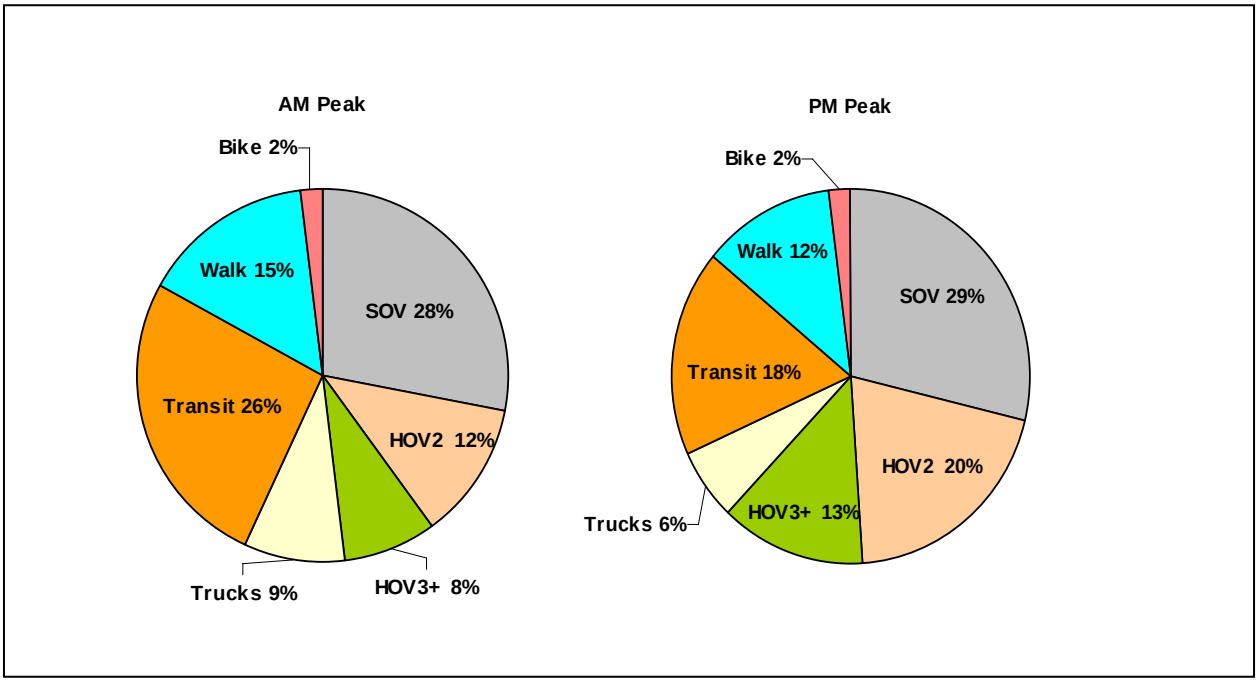
Trip Generation and Mode Share

The model estimates the number of person trips generated (produced or attracted) by each TAZ based on the types of land uses within the specified zone. Residential development is typically the "producer" of daily trips, whereas employment is typically the "attractor" of daily trips. The model includes a series of residential and employment land use categories by which it estimates travel. DPD staff developed and provided the land use information to include in the model for each of the Alternatives (see Table 5-1 in Appendix G).

The mode choice component of the model estimates the allocation of person trips among the various travel modes. Special attention was given to mode share results to assess the shifts in travel modes between the Alternatives or even over the study horizon compared to the base year travel characteristics. Figure 3-44 illustrates the six primary modes within the model and the approximate mode share for the study area TAZs under the 2030 No-Action Alternative.

The mode share results show an increase in transit share from the 2005 base year model. During the AM peak period, the percentage of transit trips increases from 24% in 2005 to 26% in 2030, while during the PM peak period transit trips increases from 16% in 2005 to 18% in 2030 under the No-Action Alternative. This shift in mode share is particularly associated with limited parking spaces in the study area and the consequent increase in parking costs.

Figure 3-44
Modal Splits for AM & PM Peak 3 Hour Periods (2030 No Action)



The number of person trips during the AM and PM peak periods has been summarized by mode in Table 3-44. The 2030 travel characteristics have been compared to the 2005 base year information for illustrative purposes. The TAZ boundaries within the model do not match the extents of the study area. Therefore, Table 3-44 also includes data for areas just outside the study area (see Figure 5-2 in Appendix G).

Table 3-44
Peak Period Travel Characteristics[1] (Base Year vs. No-Action)

	AM Peak Period[2]			PM Peak Period[2]		
	2005	2030 No-Action	% Change from 2005	2005	2030 No-Action	% Change from 2005
Average Person Trips to/from Study Area	18,200	32,100	76%	28,100	46,600	66%
Average Vehicle (Auto) Trips[3] to/from Study Area	9,100	14,600	61%	14,800	23,500	59%
Percent of Study Area Person Trips made by Transit/Walk/Bike (Non-Auto)	37%	43%	--	26%	32%	--
Study Area Person Trips made by Transit/Walk/Bike (Non-Auto)	6,800	13,600	101%	7,200	13,900	94%
Percent of Study Area Person Trips made by Vehicle (Auto)	63%	57%	--	74%	68%	--
Average Auto Occupancy	1.74	2.19	--	1.68	1.99	--

Source: City of Seattle Travel Demand Model (April 2007)
1. The information displayed in this table is based on the Model TAZ boundaries which include some areas that are outside the identified study area as shown in Figure 5-2 of Appendix G.
2. AM and PM peak periods in the SDOT Model are defined as 3 hours each.
3. Vehicle (Auto) Trips includes single occupancy vehicles, high occupancy vehicles, van pools, and trucks

2030 No Action Alternative (Alt. 4)

During both the AM and PM peak periods, the percent increase in person trips is higher than the percent increase in vehicle trips. This explains the shift in mode share between 2005 and 2030. During the AM peak period, approximately 57% of person trips are by automobile in 2030 compared to 63% in 2005. During the PM peak period, the automobile share is approximately 68% of the total trips compared to 74% in 2005. Automobile trips include single-occupancy vehicles (SOV), high-occupancy vehicles (HOV), vanpools and trucks. The increase in non-auto mode (transit/walk/bike) usage is largely attributed to the increase in parking costs in the study area and Downtown Seattle in general. Since the rate of increase in person trips is higher than that of vehicle trips, the average auto occupancy within the study area increases from 1.74 passengers per car for the AM peak period in 2005 to 2.19 in 2030. During the PM peak period, the study area average auto occupancy increases from 1.68 in 2005 to 1.99 in 2030.

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

The mode share information from the model for each of these Action Alternatives is listed in Table 3-45. Similar to the No Action Alternative, a mode shift is observed from the 2005 conditions illustrated earlier. Yet, the percent of trips made by non-auto modes under each of these Action Alternatives remains similar to the No-Action Alternative. While the model is predicting a substantial increase in both auto and non-auto modes relative to the No Action Alternative, it does not indicate that non-auto travel modes will comprise a higher proportion of the travel generated within the study area. It is observed from Table 3-45 that Alternative 3 provides a slightly higher percentage of non-auto mode users.

Based on comparison of total residential and employment growth amounts under the Action Alternatives, the probable range of vehicle trips generated to and from the area in the AM peak period would be 17,250-17,400 vehicle trips [38,000-39,000 person trips], and in the PM peak period would be 27,300-27,500 vehicle trips [54,500-55,500 person trips] (DPD, 2008). These amounts lie between Alternatives 2 and 3 in vehicle trips generated (see Table 3-45).

Table 3-45
Peak Period Travel Characteristics[1] (Action Alternatives)

	AM Peak Period[2]			PM Peak Period[2]		
	Alt 1	Alt 2	Alt 3	Alt 1	Alt 2	Alt 3
Average Person Trips to/from Study Area	37,790	38,270	38,790	54,080	54,550	55,250
Average Vehicle (Auto) Trips[3] to/from Study Area	17,090	17,230	17,380	27,060	27,250	27,430
Percent of Study Area Person Trips made by Transit/Walk/Bike	43%	43%	44%	31%	31%	31%
Study Area Person Trips made by Transit/Walk/Bike	16,290	16,610	16,890	16,560	16,860	17,160
Percent of Study Area Person Trips made by Auto	57%	57%	56%	69%	69%	69%
Average Auto Occupancy	2.22	2.23	2.25	2.01	2.01	2.03

Source: City of Seattle Travel Demand Model (April 2007)
1. The information displayed in this table is based on the Model TAZ boundaries which include some areas that are outside the identified study area as shown in Figure 5-2 of Appendix G.
2. AM and PM peak periods in the SDOT Model are defined as 3 hours each
3. Vehicle (Auto) Trips includes single occupancy vehicles, high occupancy vehicles, van pools, and trucks

Trip Distribution and Assignment

The allocation or distribution of trips among the various TAZs in the model was estimated using the destination choice model (gravity model) which allocates trips based on impedances between the TAZs. For trips generated in the study area during the AM peak period, approximately 51 percent of the trips are heading to the north, 24 percent to the south, 6 percent to the east, and 1 percent to the west. The remaining 18 percent stay within the study area. In the PM peak period approximately 41 percent of the trips would head to the north, 35 percent to the south, 11 percent to the east, and 1 percent to the west. The remaining 12 percent stay within the study area. See Appendix G for further discussion of trip assignment.

ARTERIAL STREET SYSTEM IMPACTS

This section summarizes the 2030 future year conditions along the arterial street system and compares the performance of the Alternatives, focusing on differences between the Action Alternatives and the No Action Alternative. The evaluation assumes completion of planned and programmed improvements (see Section 5.2 of Appendix G), which means arterial facilities are assumed to be identical under the Alternatives.

2030 Forecast Traffic Volumes

The forecast traffic volumes were developed using the City of Seattle Travel Demand Model, leading to detailed AM and PM peak hour traffic estimates for the 2030 No Action and Action Alternatives 1, 2 and 3 for the major corridors throughout the study area.

AM Peak Hour

2030 No Action Alternative (Alt. 4)

During the AM peak period, the travel demand model forecasts higher growth rates for westbound and northbound traffic than other travel directions, attributable to Downtown employment center growth. For various travel directions, this traffic growth would represent total increases of approximately 17% to 37% in traffic volumes between the 2005 base year and 2030. This translates to an approximate 1% annual growth rate, which is consistent with the historical traffic growth in the study area. Figure 3-45 illustrates

the AM peak hour forecast volumes. The highest traffic growth is seen along westbound S. Atlantic Street, due to shifts in traffic from SR 519 ramp improvements. Other streets with relatively high growth rates include S. Dearborn Street, S. Jackson Street, Rainier Avenue S., 12th Avenue S., and portions of 1st Avenue S. and 4th Avenue S. See Appendix G for further evaluation.

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

The traffic forecasts for the Action Alternatives in the Pioneer Square neighborhood and Chinatown/ Japantown vicinity west of I-5 forecast an expected traffic growth of less than 5 percent above the No Action Alternative forecasts. Greater amounts of forecast traffic growth would occur in Little Saigon and South of Dearborn and to a lesser extent in the Stadium Area neighborhood, where traffic volumes are to increase another 5 to 15 percent above the No Action forecasts. The Action Alternative traffic forecasts for the AM peak hour are similar to one another, only differing by a few percentage points along the major corridors. See Appendix G for further evaluation. Similar results would be expected under the Preferred Alternative, with most results under this alternative similar to Alternative 2, except within the 1st Avenue S corridor where results would likely be between those of Alternatives 1 and 2, based on comparison of amounts of employment growth (DPD, 2008).

PM Peak Hour

2030 No Action Alternative (Alt. 4)

During the PM peak hour, the travel demand model forecasts higher traffic growth along the corridors serving commuter traffic leaving Downtown. An approximate 1-1.5% annual growth rate is forecast. For various travel directions, this traffic growth would represent total increases of approximately 21% to 40% in traffic volumes between 2007 and 2030. Figure 3-46 illustrates the PM peak hour forecast volumes.

Large increases in projected traffic volumes would be observed along both directions of S. Atlantic Street, reflecting the new SR 519 off-ramp, closure of S. Holgate Street and Alaskan Way improvements. The forecast PM peak traffic volumes increase along S. Atlantic Street from 1,165 and 380 vehicles per hour in 2007 for the eastbound and westbound directions, respectively, to 1,825 and 865 vehicles per hour in 2030. Forecast growth in traffic volumes is also significant along eastbound S. Dearborn Street, which is influenced by projected Little Saigon developments and traffic leaving Downtown. Westbound S. Jackson Street also would see a significant increase in traffic volumes due to growth in Downtown.

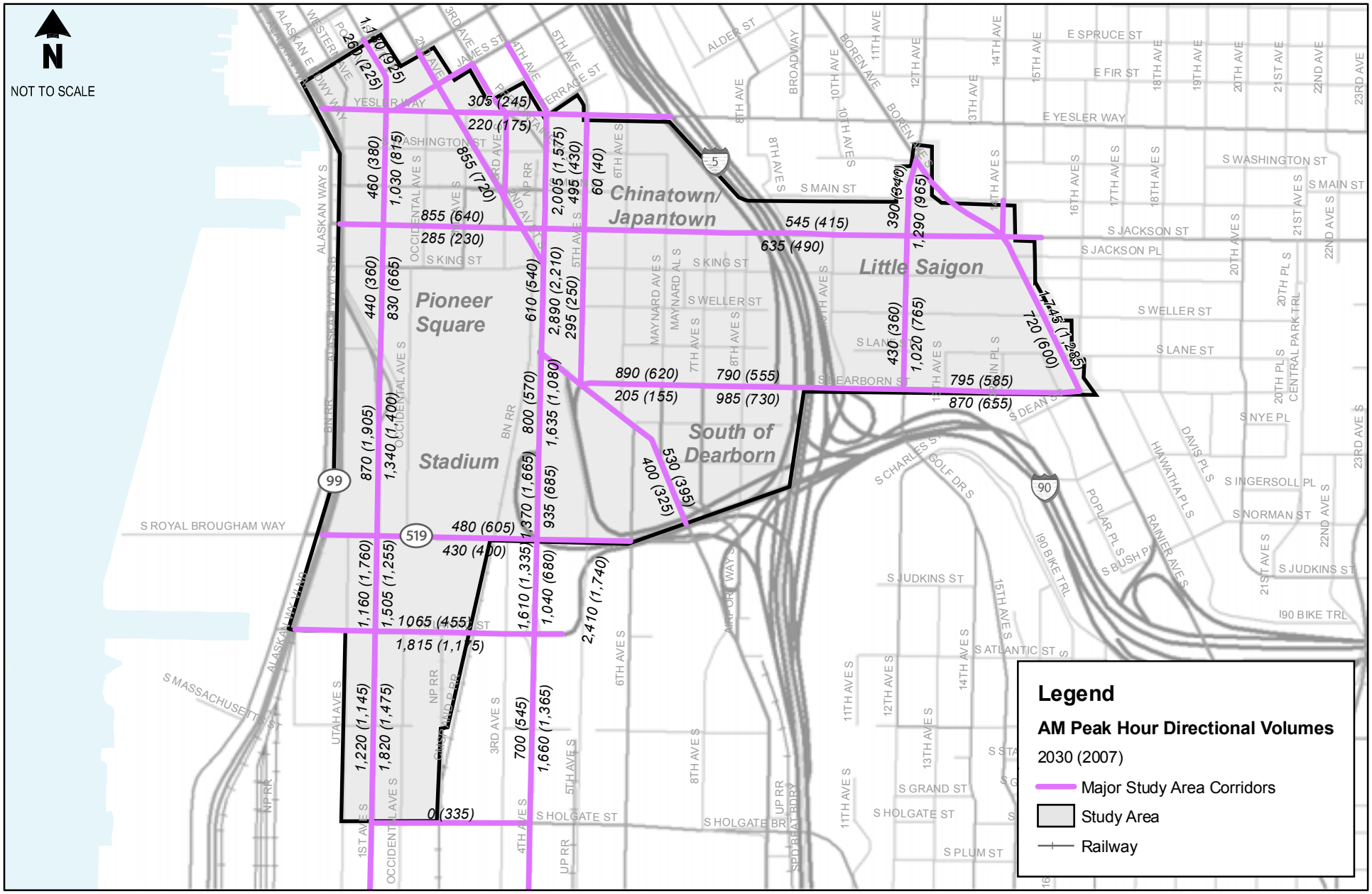


Figure 3-45

Livable South Downtown

AM Peak Hour Traffic Volumes (2030 No Action Alternative)

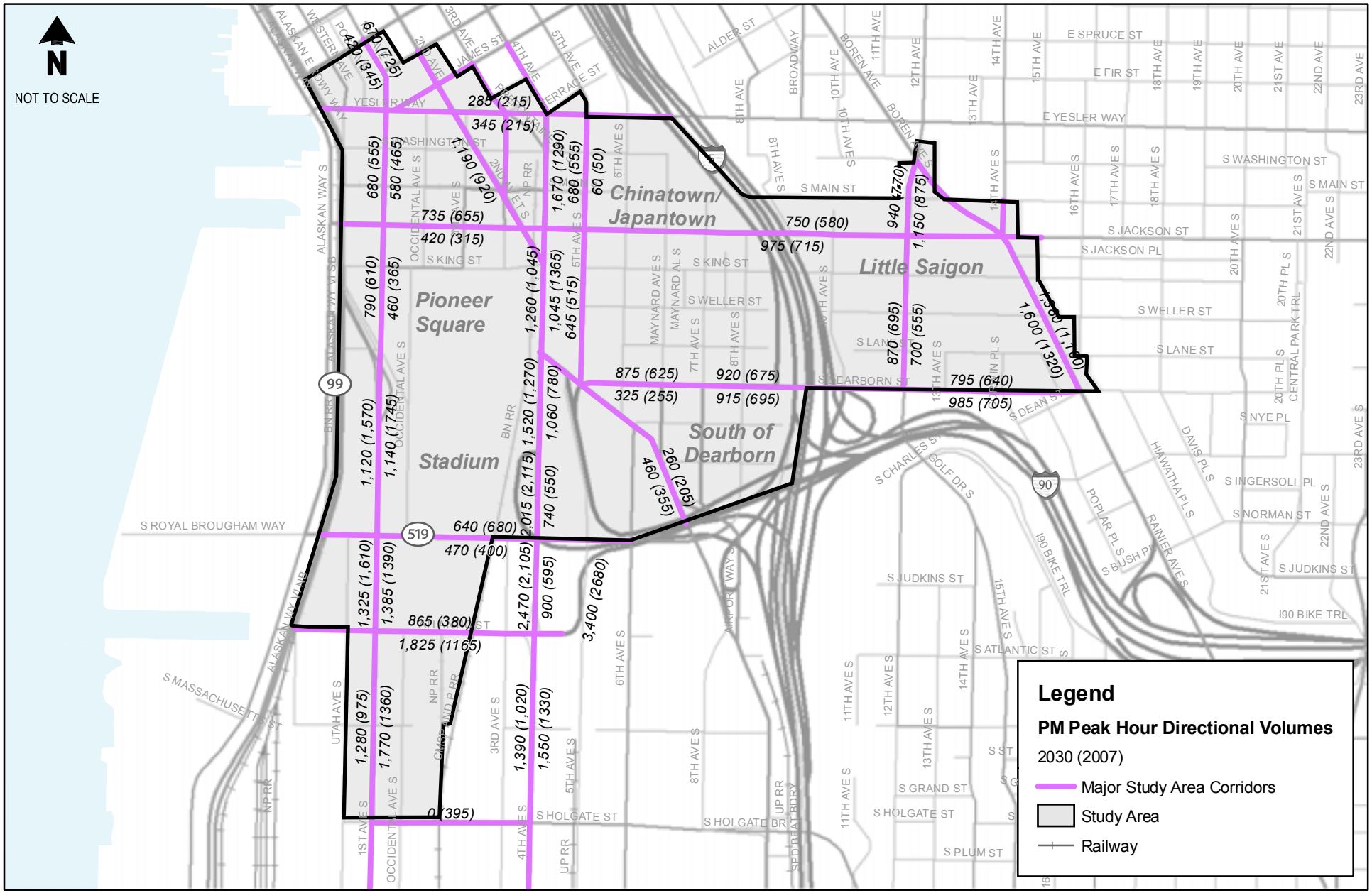


Figure 3-46

Livable South Downtown

PM Peak Hour Traffic Volumes (2030 No Action Alternative)

In the north-south corridors, general traffic growth would be slightly higher along the southbound approaches of most corridors. Along 1st Avenue S., traffic volumes would drop north of S. Atlantic Street and south of S. Jackson Street due to shifts in traffic to new "frontage" roads along SR 99 assumed with Alaskan Way Viaduct improvements. Forecast traffic growth on Rainier Avenue S. would be higher for the northbound direction, influenced by increased commercial development in Little Saigon and Downtown.

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

The Action Alternatives' traffic volume forecasts for the PM peak hour are similar to one another and to the No Action Alternative. The greatest forecast increase in traffic growth above the No Action Alternative would take place in Little Saigon and to a lesser extent in south-of-Dearborn, due to projected development. Similar results would be expected under the Preferred Alternative, with most results under this alternative similar to Alternative 2, except within the 1st Avenue S corridor where results would likely be between those of Alternatives 1 and 2, based on comparison of amounts of employment growth (DPD, 2008).

Vehicle Travel Characteristics

Given its location, many of the vehicle trips along the South Downtown study area roadways do not have an origin or destination within the study area. These trips, referred to as external trips, use South Downtown roadways to travel between their origins and destinations.

2030 No Action Alternative (Alt. 4)

The travel patterns in the 2030 No-Action Alternative would be similar to those estimated in 2005, with about 10 percent of the total traffic on roadways within the study area having an origin or destination within the study area. Nine out of 10 vehicles use study area roadways without stopping in the study area at a residence or business. These travel characteristics are similar for both the AM and PM peak periods.

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

The travel patterns are identical under the Action Alternatives, including the Preferred Alternative, indicating that the increase in vehicle trips caused by future development does not result in a significant shift in the external pass-through trips to other roadways.

Corridor Operations and Travel Speeds

This section presents peak hour arterial level of service (LOS) and average travel speeds for corridor segments under the No Action and Action Alternatives. These are the primary criteria to measure performance along study area corridors. The corridor LOS is based upon the roadway's functional classification and the amount of time it takes a vehicle to navigate the length of the identified corridor. Results are based on the average delay per vehicle expected at each signalized intersection along the corridor. Existing timing of traffic signals was a starting point for the 2030 analysis, but where appropriate signal timings were optimized, with the same signal timing assumptions made for the No Action and the Action Alternatives.

AM Peak Hour

2030 No Action Alternative (Alt. 4)

Table 3-46 summarizes corridor operations (arterial LOS) and travel speed results for the weekday AM peak hour conditions in 2030 under the No Action Alternative, with existing conditions listed for comparison. The corridor LOS and travel speeds are expected to decline or stay the same for all corridors

except along S. Royal Brougham Way, where a grade-separated structure (part of SR 519 Phase 2) would eliminate delays caused by the existing at-grade rail crossing, and traffic would shift away from S. Royal Brougham Way to S. Atlantic Street, due to a new off-ramp from I-90 (also part of SR 519 Phase 2). This would reduce volumes using the 4th Avenue S. off-ramp that would then head westbound on S. Royal Brougham Way. The shifts in traffic to S. Atlantic Street are the primary reason why travel speeds are projected to decrease significantly along S. Atlantic Street compared to existing conditions. Westbound travel speeds on S. Dearborn Street are also projected to decrease significantly, probably related to development Downtown and on the Goodwill properties.

Table 3-46
Corridor Operations and Travel Speeds—AM Peak Hour (2007 vs. 2030 No-Action)

Corridor / Arterial	Extent	Direction	Arterial LOS[1] 2007 Existing	Arterial LOS[1] 2030 No-Action Alternative
North-South Corridors			**Travel speeds in parentheses (mph)**	
1st Avenue S	Yesler Way to S Spokane Street	NB	D (15)[2]	E (13)
		SB	C (19)	D (16)
2nd Avenue Extension S	James Street to 4th Avenue S	SB	F (8)	F (5)
3rd Avenue S	James Street to S Jackson Street	NB	D (12)	D (11)
		SB	D (10)	E (8)
4th Avenue S	S Washington Street to S Spokane Street	NB	D (15)	F (7)
		SB	D (17)	F (8)
Rainier Avenue S	S Jackson Street to S Dearborn Street	NB	E (12)	F (3)
		SB	E (13)	E (11)
East-West Corridors			**Travel speeds in parentheses (mph)**	
S Jackson Street	Alaskan Way S to Rainier Avenue S	EB	E (12)	E (11)
		WB	F (10)	F (9)
S Dearborn Street	Airport Way S to Rainier Avenue S	EB	E (11)	E (11)
		WB	E (11)	F (6)
S Royal Brougham Way	Alaskan Way S to 4th Avenue S	EB	F (7)	F (9)
		WB	F (5)	F (5)
S Atlantic Street	Alaskan Way S to 4th Avenue S	EB	E (11)	F (5)
		WB	F (7)	F (2)

Source: The Transpo Group (July 2007)
1. Arterial Level of Service based on 2000 *Highway Capacity Manual* methodology for urban arterials.
2. Arterial speed in miles per hour which includes the average speed delay encountered at each signalized intersection along the corridor as well as delays at mid-block sections (which are graded by the letter assignment, i.e., "A" – "F").

Each north-south corridor would experience reduced corridor operations and travel speeds. More than half of the studied corridors are forecast to operate at LOS F conditions in 2030, including Rainier Avenue S., 4th Avenue S. and the 2nd Avenue Extension S. Volumes at the Rainier Avenue S./S. Dearborn Street intersection are the primary contributor to the LOS F arterial operations northbound, and the intersection with S. Jackson Street also contributes to the corridor's reduced performance. Projected travel speeds would decline from 12 mph currently to 3 mph in 2030. Along 4th Avenue S., increased volumes related to interchange improvements at S. Spokane Street, and increased delays at the Airport Way S. intersection would contribute to the corridor's reduced performance. Along 2nd Avenue Extension S., increased traffic volumes, particularly at the S. Jackson Street intersection, would cause a reduction in travel speed. Slight declines are also noted along 1st Avenue S. due to additional traffic south of S. Atlantic Street, and also along 3rd Avenue.

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

Table 3-47 summarizes corridor operations (arterial LOS) and travel speed results for the Action Alternatives in the weekday AM peak hour, also comparing to the No Action Alternative. Only a few differences are noted between the No Action Alternative and among all of the Action Alternatives. Additional assumed traffic trips from development in the Little Saigon vicinity in the Action Alternatives contributes to the 1-2 mph difference from the No Action Alternative for the Rainier Avenue S. and S. Jackson Street corridors. The large amount of traffic passing through the area (9 out of every 10 trips), contributes to the minimal differences among the alternatives' results. See Appendix G for further evaluation. Results for the Preferred Alternative would be similar to findings for the other Action Alternatives (DPD, 2008).

Table 3-47
Corridor Operations and Travel Speeds—AM Peak Hour (2030 No-Action vs. Action Alternatives)

Corridor / Arterial	Extent	Direction	2030 Arterial LOS[1]			
			No-Action	Alternative 1	Alternative 2	Alternative 3
North-South Corridors			Travels speeds in parentheses (mph)			
1st Avenue S	Yesler Way to S Spokane Street	NB	E (13)[2]	E (13)	E (12)	E (12)
		SB	D (16)	D (16)	D (16)	D (16)
2nd Avenue Extension S	James Street to 4th Ave S	SB	F (5)	F (5)	F (5)	F (5)
3rd Avenue S	James Street to S Jackson Street	NB	D (11)	D (11)	D (11)	D (11)
		SB	E (8)	E (8)	E (8)	E (8)
4th Avenue S	S Washington Street to S Spokane Street	NB	F (7)	F (6)	F (6)	F (6)
		SB	F (8)	F (8)	F (8)	F (8)
Rainier Avenue S	S Jackson Street to S Dearborn Street	NB	F (3)	F (2)	F (2)	F (2)
		SB	E (11)	F (9)	F (9)	F (10)
East-West Corridors			Travels speeds in parentheses (mph)			
S Jackson Street	Alaskan Way S to Rainier Ave S	EB	E (11)	E (11)	E (11)	E (11)
		WB	F (10)	F (9)	F (9)	F (9)
S Dearborn Street	Airport Way S to Rainier Ave S	EB	E (11)	E (11)	E (11)	E (11)
		WB	F (6)	F (6)	F (6)	F (6)
S Royal Brougham Way	Alaskan Way S to 4th Ave S	EB	F (9)	F (10)	F (10)	F (10)
		WB	F (5)	F (5)	F (5)	F (5)
S Atlantic Street	Alaskan Way S to 4th Ave S	EB	F (5)	F (5)	F (5)	F (4)
		WB	F (2)	F (2)	F (2)	F (2)

Source: The Transpo Group (July 2007)
1. Arterial Level of Service based on 2000 *Highway Capacity Manual* methodology for urban arterials.
2. Arterial speed in miles per hour which includes the average speed delay encountered at each signalized intersection along the corridor as well as delays at mid-block sections (which are graded by the letter assignment, i.e., "A" – "F").

PM Peak Hour

2030 No Action Alternative (Alt. 4)

Corridor operations trends for the PM peak hour are similar to those projected for the AM peak hour. Table 3-48 summarizes the results for the No Action Alternative. Corridor LOS and travel speeds would decline or stay the same for all corridors except S. Royal Brougham Way.

Table 3-48
Corridor Operations and Travel Speeds—PM Peak Hour (2007 vs. 2030 No-Action)

Corridor / Arterial	Extent	Direction	Arterial LOS[1] 2007 Existing	Arterial LOS[1] 2030 No-Action Alternative
North-South Corridors			**Travels speeds in parentheses (mph)**	
1st Avenue S	Yesler Way to S Spokane Street	NB	D (16)[2]	D (16)
		SB	D (16)	E (12)
2nd Avenue Extension S	James Street to 4th Ave S	SB	F (9)	F (8)
3rd Avenue	James Street to S Jackson Street	NB	C (14)	D (10)
		SB	E (8)	E (8)
4th Avenue S	S Washington Street to S Spokane Street	NB	D (16)	E (12)
		SB	E (13)	F (8)
Rainier Avenue S	S Jackson Street to S Dearborn Street	NB	E (12)	F (6)
		SB	F (9)	F (8)
East-West Corridors			**Travels speeds in parentheses (mph)**	
S Jackson Street	Alaskan Way S to Rainier Ave S	EB	E (11)	E (11)
		WB	E (11)	F (9)
S Dearborn Street	Airport Way S to Rainier Ave S	EB	F (9)	F (7)
		WB	F (8)	F (9)
S Royal Brougham Way	Alaskan Way S to 4th Ave S	EB	F (8)	F (9)
		WB	F (7)	F (5)
S Atlantic Street	Alaskan Way S to 4th Ave S	EB	E (11)	F (5)
		WB	F (10)	F (8)

Source: The Transpo Group (July 2007)
1. Arterial Level of Service based on 2000 *Highway Capacity Manual* methodology for urban arterials.
2. Arterial speed in miles per hour which includes the average speed delay encountered at each signalized intersection along the corridor as well as delays at mid-block sections.

Declines in corridor operations and average speed would be mainly associated with traffic leaving Downtown. Almost all of the east-west corridors would operate at an arterial LOS F, and approximately one-half of the north-south corridors would operate at LOS F. One of the corridors with the greatest difference in travel speed compared to existing conditions is S. Atlantic Street, particularly in the eastbound direction. A significant number of vehicles from Downtown and points south of the study area will continue to access regional freeways from this street. Eastbound traffic on S. Dearborn Street would also see a reduction in travel speed.

Reduction in travel speeds is also observed along southbound and northbound approaches of the north-south corridors. Although most traffic in the PM peak hour is southbound leaving Dowtnown, travel speeds also drop along northbound approaches, due to traffic signal priority given to southbound traffic. This is observed along 3rd Avenue (James to S. Jackson Street). Major reductions in travels speeds are also observed along Rainier Avenue S., attributed to developments in Little Saigon and the Rainier Valley. See Appendix G for further discussion.

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

Table 3-49 summarizes corridor operations (arterial LOS) and travel speed results for the Action Alternatives in the weekday PM peak hour, also comparing to the No Action Alternative. Except for locations within Little Saigon, there are few predicted differences in travel speeds and arterial LOS between the Action Alternatives and the No Action Alternative. As noted for the AM peak hour, the large

amount of traffic passing through the area (9 out of every 10 trips), contributes to the minor amount of differences among the alternatives' results.

Rainier Avenue S., S. Jackson Street, and S. Dearborn Street are corridors with indicated declines in average travel speeds for certain traffic movements, when comparing the Action Alternatives to the No Action Alternative. The lower average speeds under the Action Alternatives for these corridors is believed to be attributable to increased traffic generated by greater amounts of projected development within the Little Saigon and south-of-Dearborn areas.

Alternative 1 conditions are similar to the No Action Alternative in corridor operations and travel speeds. The most significant difference between these alternatives is expected along Rainier Avenue S., where southbound travel is predicted to decline from an average operating speed of 8 mph to 2 mph in the PM peak hour under Alternative 1. Increased traffic volumes at this avenue's intersections with S. Jackson Street and S. Dearborn Street are predicted to create significant delays along the corridor. A 2 mph decline in travel speed (from 7 mph to 5 mph) is also observed in eastbound traffic on S. Dearborn Street.

Alternative 2 conditions are similar to Alternative 1 conditions with the primary measurable difference in eastbound traffic on S. Dearborn Street, with a predicted 5 mph decline in travel speed (from 7 mph to 2 mph). This further reduction in average speeds compared to Alternative 1 is believed to be attributable to additional amounts of projected development within the south-of-Dearborn vicinity under Alternative 2.

Alternative 3 conditions would have comparatively the greatest impact on corridor operations and travels speeds among the Action Alternatives. The measurable difference is for eastbound traffic on S. Dearborn Street, with a predicted 6 mph decline in travel speed (from 7 mph to 1 mph). Also, under all Action Alternatives, travel speed would decline along Rainier Avenue S. to 2 mph from the 8 mph that would occur in the 2030 No Action condition. This further reduction in average speeds compared to Alternative 1 is believed to be attributable to projected developments in Rainier Valley and the south-of-Dearborn area, which would contribute to increased delays at the Rainier Avenue S. intersections with S. Jackson Street and S. Dearborn Street.

Projected growth patterns under the Preferred Alternative would likely contribute to impacts similar to those of Alternatives 2 and 3, with worst-case effects as described above for Alternative 3.

Table 3-49
Corridor Operations and Travel Speeds—PM Peak Hour (2030 No-Action vs. Action Alternatives)

Corridor / Arterial	Extent	Direction	2030 Arterial LOS[1]			
			No-Action	Alternative 1	Alternative 2	Alternative 3
North-South Corridors			Travel speeds in parentheses (mph)			
1st Avenue S	Yesler Way to S Spokane Street	NB	D (16)[2]	D (16)	D (16)	D (16)
		SB	E (12)	E (12)	E (12)	E (12)
2nd Avenue Extension S	James Street to 4th Ave S	SB	F (8)	F (8)	F (8)	F (8)
3rd Avenue S	James Street to S Jackson Street	NB	D (10)	D (10)	D (10)	D (10)
		SB	E (8)	F (7)	F (7)	F (7)
4th Avenue S	S Washington Street to S Spokane Street	NB	E (12)	E (12)	E (12)	E (12)
		SB	F (8)	F (8)	F (8)	F (8)
Rainier Avenue S (NB)	S Jackson Street to S Dearborn Street	NB	F (6)	F (4)	F (4)	F (4)
		SB	F (8)	F (2)	F (2)	F (2)
East-West Corridors			Travel speeds in parentheses (mph)			
S Jackson Street	Alaskan Way S to Rainier Ave S	EB	E (11)	E (11)	E (11)	E (11)
		WB	F (9)	F (8)	F (8)	F (8)
S Dearborn Street	Airport Way S to Rainier Ave S	EB	F (7)	F (5)	F (2)	F (1)
		WB	F (9)	F (9)	F (9)	F (9)
S Royal Brougham Way	Alaskan Way S to 4th Ave S	EB	F (9)	F (10)	F (10)	F (10)
		WB	F (5)	F (5)	F (5)	F (5)
S Atlantic Street	Alaskan Way S to 4th Ave S	EB	F (5)	F (5)	F (5)	F (5)
		WB	F (8)	F (8)	F (8)	F (8)

Source: The Transpo Group (July 2007)
1. Arterial Level of Service based on 2000 *Highway Capacity Manual* methodology for urban arterials.
2. Arterial speed in miles per hour which includes the average speed delay encountered at each signalized intersection along the corridor as well as delays at mid-block sections.

Intersection Operations

The signalized intersections along the studied corridors were evaluated for intersection performance during the AM and PM peak hours, using LOS measures that rate the average delay encountered by vehicles entering the intersection. The analysis includes new intersections and improvements assumed to be created by the SR 519 Phase 2 and the Alaskan Way Viaduct Replacement projects. See Appendix G for further details, including Tables A-1 through A-5 at the end of that appendix.

AM Peak Hour

2030 No Action Alternative (Alt. 4)

Table 3-50 summarizes the intersections along each corridor that would operate at LOS E or F in the AM peak hour, allowing for comparison among the Alternatives of the relative congestion at intersections along each corridor. The table's totals count some intersections more than once if located on two corridors. Without double counting, the analysis indicates that a total of seven intersections are predicted to operate at LOS E or F under the No Action Alternative, of the 49 signalized intersections evaluated. Of these seven, five intersections would operate at LOS F:

- 1st Avenue S./S. Spokane Street
- 1st Avenue S./S. Atlantic Street
- 4th Avenue S./S. Spokane Street

- 4th Avenue S./Airport Way S.
- Rainier Avenue S./S. Jackson Street

The intersections of Rainier Avenue S./S. Jackson Street and 4th Avenue S./Airport Way S. would deteriorate from LOS D and C under 2007 existing conditions to LOS F under the 2030 No-Action Alternative. The predicted decline in operations is attributed to increases in through-traffic generated by external regional land use growth that would use Rainier Avenue S. and 4th Avenue S. to access Downtown. In addition, increased amounts of projected development in Little Saigon would further increase traffic volumes, including at these intersections.

The 1st Avenue S./S. Atlantic Street intersection in 2030 would operate at LOS F despite the widening of the intersection as part of the SR 519 Phase 2 project. This is predicted due to the shift in traffic from S. Royal Brougham Way to S. Atlantic Street and the assumed closure of S. Holgate Street, which would likely more than offset the capacity improvements at the intersection.

Table 3-50
Intersection Operations—AM Peak Hour

Corridor/Arterial	Number of Intersections[1]	Number of Intersections Operating at LOS E or F in 2030			
		No-Action	Alternative 1	Alternative 2	Alternative 3
North – South Corridors					
1st Avenue S	**10**	**2**	**2**	**2**	**2**
2nd Avenue Extension S	**5**	**0**	**0**	**0**	**0**
3rd Avenue	**2**	**0**	**0**	**0**	**0**
4th Avenue S (NB)	**10**	**3**	**3**	**4**	**4**
4th Avenue S (SB)	**7**	**3**	**3**	**4**	**4**
Rainier Avenue S	**2**	**1**	**2**	**2**	**2**
East – West Corridors					
S Jackson Street	**10**	**1**	**1**	**1**	**1**
S Dearborn Street	**9**	**0**	**1**	**2**	**2**
S Royal Brougham Way[2]	**4**	**1**	**1**	**2**	**2**
S Atlantic Street[2]	**5**	**1**	**1**	**1**	**1**

Source: The Transpo Group (July 2007)
1. Number of signalized intersections along the corridor segment.
2. Includes new signalized intersections constructed as part of the SR 519 Phase 2 and the Alaskan Way Viaduct reconstruction.

The intersections predicted to operate at LOS E in the AM peak hour under the 2030 No Action Alternative are located at 4th Avenue S./S. Weller Street and at the SR 99 "frontage" road where it would meet S. Royal Brougham Way. At the 4th Avenue S./S. Weller Street intersection (with a pedestrian crossing and garage entry), the predicted decline in LOS from B under 2007 existing conditions to LOS E in 2030 would be due to increased traffic volumes in the northbound direction. The predicted operations at the SR 99 "frontage" road/S. Royal Brougham Way intersection would be the result of a large amount of traffic using the Alaskan Way Viaduct to/from Downtown and to/from areas to the south.

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

Table 3-50 also describes the number of intersections operating at LOS E or F for the Action Alternatives in the 2030 AM peak hour, allowing for comparison with findings for the No Action Alternative. Trends similar to the No Action Alternative are predicted.

Under Alternative 1, one additional intersection would operate at LOS E, at Rainier Avenue S./S. Dearborn Street. The LOS at this intersection would decline from LOS D under the No Action Alternative to LOS E, likely due to increased traffic volumes from projected development in the Little Saigon neighborhood. A total of eight intersections would operate below an LOS D, including five at LOS F and three intersections at LOS E.

Under Alternative 2, three additional intersections would operate at LOS E compared to the No Action Alternative. This would include Rainier Avenue S./S. Dearborn Street, Airport Way S./S. Dearborn Street, and 4th Avenue S./S. Royal Brougham Way, likely due to increased traffic volumes from projected development in the 4th Avenue S., south-of-Dearborn and Little Saigon vicinities. Also, the 4th Avenue S./S. Weller Street intersection would further decline to an LOS F, compared to LOS E under Alternative 1 and the No Action Alternative. A total of ten intersections would operate below an LOS D, including six at LOS F and four intersections at LOS E.

Under Alternative 3, three additional intersections would operate at LOS E or worse, compared to the No Action Alternative. The ten intersections predicted to operate at LOS E or F would include the same locations as identified under Alternative 2. However, the SR 99 "frontage" road/S. Royal Brougham Way intersection would further decline to an LOS F, while the 4th Avenue S./S. Weller Street intersection would operate at LOS E. These differences from Alternative 2 conclusions would likely relate to differences in the projected development patterns in the Stadium Area vicinity. A total of ten intersections would operate below an LOS D, including six at LOS F and four intersections at LOS E.

Under the Preferred Alternative, the probable worst-case impacts would be in the range of those identified for Alternatives 2 and 3 (DPD, 2008).

PM Peak Hour

2030 No Action Alternative (Alt. 4)

Table 3-51 summarizes the intersections along each corridor that would operate at LOS E or F in the PM peak hour, similar to the AM peak hour analysis. The analysis indicates that a total of seven intersections are predicted to operate at LOS E or F under the No Action Alternative, of the 49 signalized intersections evaluated. Of these seven, five intersections would operate at LOS F:

- Rainier Avenue S./S. Jackson Street
- Rainier Avenue S./S. Dearborn Street
- 4th Avenue S./S. Royal Brougham Way
- 1st Avenue S./S. Lander Street
- 4th Avenue S./S. Spokane Street

Intersections predicted to operate at LOS E in the PM peak hour would be 1st Avenue S./S. Royal Brougham Way, and 4th Avenue S./S. Lander Street.

Commuting patterns away from Downtown employment centers would be a primary reason for these intersections' operations. Each of these intersections is located along principal arterials that connect with the regional freeway system and provide access to south Seattle and west Seattle neighborhoods. Other traffic would continue to use 1st Avenue S. and 4th Avenue S. to access I-5 and eastbound I-90, creating congestion at the identified intersections. Intersections along Rainier Avenue S. are expected to decline in LOS from LOS D currently to LOS F under the No Action Alternative, likely due to projected development in south Seattle, central Seattle and Little Saigon.

The intersection at 1st Avenue S./S. Atlantic Street would improve from LOS E currently to LOS D under the No Action Alternative, due to planned SR 519 Phase 2 improvements that will add dual southbound turn lanes along 1st Avenue S.

The predicted LOS F and LOS E at 1st Avenue S./S. Lander Street and 4th Avenue S./S. Lander Street intersections, respectively, would relate to assumed 2030 conditions including the closure of S. Holgate Street at the railroad tracks and a prohibition of a northbound left turn at the 4th Avenue S./S. Atlantic Street intersection as part of the SR 519 Phase 2 project.

At S. Spokane Street, the proposed interchange configuration would shift traffic at the intersection with 4th Avenue S. from the westbound approach to the northbound approach, which would probably result in an LOS F. However, it should be noted that signal timing and phasing were assumed to be the same as existing conditions despite changes in geometric configuration at this intersection.

Table 3-51
Intersection Operations—PM Peak Hour

Corridor/Arterial	Number of Intersections[1]	Number of Intersections Operating at LOS E or F in 2030			
		No Action	Alternative 1	Alternative 2	Alternative 3
North – South Corridors					
1st Avenue S	**10**	**2**	**3**	**3**	**3**
2nd Avenue Extension S	**5**	**0**	**0**	**0**	**0**
3rd Avenue S	**2**	**0**	**0**	**0**	**0**
4th Avenue S (NB)	**10**	**3**	**3**	**3**	**3**
4th Avenue S (SB)	**7**	**3**	**3**	**3**	**3**
Rainier Avenue S	**2**	**2**	**2**	**2**	**2**
East – West Corridors					
S Jackson Street	**10**	**1**	**2**	**2**	**2**
S Dearborn Street	**9**	**1**	**2**	**2**	**2**
S Royal Brougham Way[2]	**4**	**2**	**3**	**3**	**3**
S Atlantic Street[2]	**5**	**2**	**2**	**2**	**2**

Source: The Transpo Group (July 2007)
1. Number of signalized intersections along the corridor segment.
2. Includes new signalized intersections constructed as part of the SR 519 Phase 2 and the Alaskan Way Viaduct reconstruction.

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

Table 3-51 also describes the number of intersections operating at LOS E or F for the Action Alternatives in the 2030 PM peak hour, allowing for comparison with findings for the No Action Alternative. During the PM peak hour, the same intersections operating at LOS E or F under the No Action Alternative would continue to operate at such levels. However, under each of the Action Alternatives, a total of twelve intersections would operate at LOS E or F, five more than under the No Action Alternative. These additional five intersections are:

- 12th Avenue S./S. Jackson Street
- Airport Way S./S. Dearborn Street
- SR 99 "frontage" road/S. Royal Brougham Way
- SR 99 "frontage" road/S. Atlantic Street
- 1st Avenue S./S. Atlantic Street

The Airport Way S./S. Dearborn Street intersection would operate at LOS F under the Action Alternatives, while the other intersections listed above would operate at LOS E. Traffic from development projected to occur in the Little Saigon vicinity under each of the Action Alternatives would contribute to additional traffic along corridors such as S. Jackson Street, 12th Avenue S., S. Dearborn Street, and Rainier Avenue S. The LOS E at 12th Avenue S./S. Jackson Street under the Action Alternatives in the PM peak hour would compare to an LOS D under the No Action Alternative.

Traffic from development projected to occur in the Stadium Area would contribute to the SR 99 "frontage" road intersections to decline to LOS E operations. These intersections would provide access to SR 99 so they are anticipated to serve a significant volume of vehicles during the PM peak hour. The LOS E at 1st Avenue S./S. Atlantic Street under the Action Alternatives in the PM peak hour would compare to an LOS D under the No Action Alternative. The intersection of 1st Avenue S./S. Royal Brougham Way would operate at LOS E for Alternatives 1 and 2, but would decline to LOS F under Alternative 3 due to increased projected development in the Stadium Area vicinity.

In summary, during PM peak hours, Alternative 1's traffic patterns at intersections would be most similar to the No Action Alternatives in terms of the number of intersections operating at LOS E or F. Alternative 2's and 3's traffic patterns at intersections would perform similarly, with Alternative 3 generating more impacts in the Stadium Area than Alternative 2. Under the Preferred Alternative, the probable worst-case impacts would be in the range of those identified for Alternatives 2 and 3 (DPD, 2008). The overall predicted differences in intersection operations among the alternatives are not very significant, because traffic operations would be greatly influenced by external traffic from development outside the study area, and because South Downtown acts as a gateway to Downtown.

TRANSIT

The transit analysis summarizes 2030 transit service conditions and evaluates the performance of the Urban Village Transit Network corridors under each of the Alternatives. The transit performance measures are consistent with those developed as part of the Seattle Transit Plan. The analysis focuses on:

- local bus routes, which are expected to serve a majority of the study area's transit needs;
- expected growth in and distribution of transit ridership and corresponding impacts on local bus service; and
- differences between the Action Alternatives and the No Action Alternative.

The analysis assumes completion of planned and programmed improvements identified in section 5.2 of Appendix G, including completion of Sound Transit Phase 1 and portions of Phase 2 (the East Link). Other improvements include those projects identified in Metro's 6-year Transit Development Plan, along with those identified as part of the Transit Now Initiative that was passed by voters in 2006.

Increased Transit Ridership

Expected increases in transit investments and land use density within Seattle are expected to result in increased demand for transit. This demand is summarized in Table 3-52.

Table 3-52
Study Area Transit Demand Growth in Person Trips (AM Peak Period)[1]

Neighborhood	2007[2]	2030			
		No Action	Alternative 1	Alternative 2	Alternative 3
Pioneer Square/ Chinatown/Japantown	5,250	10,400	11,750	11,800	11,800
Stadium Area/South of Dearborn	150	250	350	350	500
Little Saigon	550	1,200	2,100	2,050	2,000
Total	**5,950**	**11,850**	**14,200**	**14,200**	**14,300**
Growth vs. 2007 Existing		99%			
Growth vs. 2030 No-Action			20%	20%	21%

Source: City of Seattle Travel Demand Model (April 2007)
1. The information displayed in this table is based on the Model TAZ boundaries which include some areas that are outside the identified study area.
2. Based on King County Metro ridership data (Fall 2006) adjusted to 3-hour period and distributed based on model distribution pattern.

The transit ridership forecasts are based primarily on the City's travel demand model developed for the AM peak hour extending from 6 AM to 9 AM.

2030 No Action Alternative (Alt. 4)

Within the study area, transit alightings and boardings are expected to increase by approximately 99% over today's conditions. While much of the growth in transit trips is expected to occur in Pioneer Square and Chinatown west of I-5, the highest forecast increase on a percentage basis is for the Little Saigon area, with ridership more than doubling over 2007 conditions. This would relate to projected residential and commercial growth in that area. In addition, Little Saigon is a farther distance from Downtown than the other study area vicinities, thereby increasing the attractiveness of transit to walking.

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

Future development related to the Action Alternatives would generate more transit trips, as summarized in Table 3-52. Each of the Action Alternatives, including the Preferred Alternative, would increase transit demand by approximately 20 to 21 percent, due to residential and employment growth. Alternatives 1, ~~and~~ 2, and the Preferred Alternative (DPD, 2008) would likely generate similar levels of increased transit trips, and Alternative 3 would generate slightly greater increases in trips in the Pioneer Square, Chinatown, Stadium Area and south-of-Dearborn areas.

Transit Travel Patterns

North-south flows would be the dominant directions for transit trips generated by the study area land uses. During the AM peak hour, approximately 78% of trips produced by the study area would be destined for areas to the north, such as Downtown Seattle and the University of Washington. Approximately 17% of transit trips would be oriented to the south, 4% to the east and 1% would stay within the study area. During the PM peak hour, the inverse of these patterns is assumed. This pattern suggests bus routes serving northerly areas would be more likely affected than routes serving other travel directions.

Transit trips destined for the study area during the AM peak hour would include 38% and 39%, respectively, from the north and south, and 11% each from the west and the east. During the PM peak hour, the inverse of these patterns is assumed. This pattern suggests bus routes serving areas to the north and south would be more likely affected than routes serving other travel directions.

Bus Performance Measures

Future conditions were evaluated using the measures described in the Affected Environment discussion above, and in Appendix G.

Frequency

2030 No Action Alternative (Alt. 4)

Similar to existing conditions, two locations with deficient service are not anticipated to have additional service that would meet the 15-minute frequency threshold. These occur along Yesler Way, and the segment of Rainier Avenue S. between S. Dearborn Street north to S. Washington Street. All of the other studied corridors are anticipated to continue to meet the 15-minute frequency threshold in 2030.

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

Due to no assumed differences in local bus service, conclusions for the Action Alternatives are the same as identified for the No Action Alternative.

Span of Service

The 12th Avenue S. corridor is anticipated to continue to receive service levels similar to today. Metro's long-range plans do not identify increases in this corridor's span of service. All of the other studied corridors are anticipated to continue to meet the current span of service threshold in 2030. (The span of service thresholds would need to be increased gradually in the future to meet the objective set by the Seattle Transit Plan of 16 hours per day.)

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

Due to no assumed differences in local bus service, conclusions for the Action Alternatives are the same as identified for the No Action Alternative.

Travel Speed

Increases of approximately 30% on average in other traffic volumes are expected by 2030, which would contribute to lower speeds and more delays along arterials. Anticipated congestion would create a heavier burden on transit operations and deteriorate the reliability of service. Increased dwell times at bus stops and increased ridership were factored into an anticipated transit speed calculation. The "passing" threshold for this measure is for buses to operate at an average of 30% of the posted speed limit (%PSL). Table 3-53 describes the results for the No Action and Action Alternatives.

Table 3-53
Transit Travel Speed Indicator for UVTN Corridors

Origin	From	To	2030 Travel Speed as Percentage of Posted Speed Limit[1]			
			No Action	Alternative 1	Alternative 2	Alternative 3
1st Ave S	Yesler Way	S R. Brougham Way	24%	23%	20%	23%
1st Ave S	S R. Brougham Way	S Holgate St	19%	18%	15%	16%
2nd Ave Ext S	Cherry St	4th Ave S	9%	9%	9%	9%
3rd Ave	James St	S Jackson St	14%	14%	14%	14%
4th Ave S	Yesler Way	S R. Brougham Way	17%	16%	16%	15%
Rainier Ave S	S Washington St	S Dearborn St	10%	6%	6%	6%
S Jackson St	1st Ave S	8th Ave S	16%	16%	16%	16%
S Jackson St	8th Ave S	Boren Ave S	14%	10%	10%	10%
City of Seattle Passing Threshold			**30%**			

Source: The Transpo Group (July 2007)

1. Based upon anticipated arterial congestion and increase in transit boardings and alightings.

2030 No Action Alternative (Alt. 4)

All UVTN corridor segments within the study area are expected to operate below the minimum acceptable standard of 30% of the posted speed limit under the No Action Alternative. This would include the corridors that are currently operating at acceptable operating speeds such as 1st Avenue S., 4th Avenue S. and Rainier Avenue S. The results account for the future operational conditions of the corridor segment combined with the dwell time at bus stops. The corridor with the lowest operating speed is 2nd Avenue Extension S. It is expected to decline from 22% in 2007 to 9% under the No Action Alternative. The other corridors are forecast to operate below 20% except the 1st Avenue S. section between Yesler Way and S. Royal Brougham Way which is expected to operate at 24% of the posted speed limit. Lower running speed due to higher delay along corridors and at intersections are the main reasons leading to the deterioration of transit operating speed.

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

Most of Action Alternatives are expected to operate at even lower speeds than those under the No-Action Alternative. The reduced speeds would be the result of increased delays along the arterials combined with additional bus passengers that increase dwell times. All corridor travel speed indicators are forecast to drop several percentage points under each of the Action Alternatives, except for the S. Jackson Street section between 1st and 8th Avenues S., and 2nd Avenue Extension S. and 3rd Avenue (south of James Street), that are expected to remain operating almost at the same operating speed as the No-Action Alternative. This is due to similar arterial operations and travel speeds in the future. Travel speed along 1st Avenue S. is most affected by Alternative 2. Alternative 3 would result in a further slight decline in transit speed along 4th Avenue S., due to increased projected commercial growth on the corridor that would create more congestion and delays for buses. The probable effects of the Preferred Alternative would likely be similar to Alternative 2, due to similarities in the proposed zoning and growth scenarios analyzed in this EIS (DPD, 2008).

Passenger Loading

The passenger loading factor reflects the quality of trip in terms of convenience and comfort. This is expressed as the ratio of passengers to the corridor service capacity. The corridor service capacity is calculated by multiplying the bus frequency by the average number of bus seats. The minimum passing threshold is 90% of seated capacity as defined by the Seattle Transit Plan.

To determine the passenger loading factors, the growth in transit person trips was assessed for the study corridors. Based on the model forecasts, all transit corridors will experience some growth by 2030 except

the E3 Busway/5th Avenue S segment, where bus ridership will drop by almost one half along the transit way due to trips moving to Light Rail. The corridors with the highest growth rates include 3rd Avenue (south of James Street) and a segment of S. Jackson Street. The resulting passenger loading ratios are listed in Table 3-54. These assume no increase is introduced to the operation levels of local bus services along the corridors.

Table 3-54
Passenger Loading Ratio by UVTN Transit Network Corridor

				2030 Passenger Loading Ratio			
Origin	**From**	**To**	**2007**	**No Action**	**Alternative 1**	**Alternative 2**	**Alternative 3**
1st Ave S	Yesler Way	S R. Brougham Way	1.20	1.31	1.27	1.26	1.31
1st Ave S	S R. Brougham Way	S Holgate St	1.27	1.43	1.40	1.40	1.40
2nd Ave Ext S	Cherry St	4th Ave S	1.01	1.37	1.39	1.40	1.36
3rd Ave S	James St	S Jackson St	0.91	1.52	1.53	1.53	1.48
4th Ave S	Yesler Way	S R. Brougham Way	1.30	1.49	1.50	1.52	1.49
5th Ave S	S R. Brougham Way	S Holgate St	1.15	0.64	0.64	0.65	0.63
Rainier Ave S	S Washington St	S Dearborn St	0.60	0.75	0.74	0.74	0.75
S Jackson St	1st Ave S	8th Ave S	0.86	1.67	1.63	1.65	1.61
S Jackson St	8th Ave S	Boren Ave S	0.99	1.18	1.17	1.17	1.10
City of Seattle Passing Threshold				**0.90**			

Source: City of Seattle Travel Model (April 2007) and current transit capacity.

2030 No Action Alternative (Alt. 4)

Almost all corridors will experience growth in loading during the peak period. This growth will result from growing population and employment not only in the study area but also in the region. Regional (or through) trips represent a high share of the loading factor of transit routes crossing the study area. Due to this growth, the existing passenger loading ratios will exceed the 90% threshold of seated capacity on almost all north-south corridors, except for Rainier Avenue S. and the 5th Avenue S. busway. The 5th Avenue S. loading ratio declines due to trips switching to Light Rail. The new Light Rail service also results in Rainier Avenue S. not having as much growth in transit trips, thus resulting in acceptable passenger loading ratios for the corridor. Corridors such as S. Jackson Street and 3rd Avenue (south of James Street) are expected to decline sharply in the future from increased transit ridership. Similar to 2007 results, 1st Avenue S. and the 2nd Avenue Extension S. will continue to not meet the passenger loading ratio in 2030.

2030 Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

The passenger loading ratios for each of the Action Alternatives are similar to those expected under the No Action Alternative. The passenger loading ratios would change influenced by the location of projected new development under each Alternative. Table 3-54 highlights that corridors such as 5th Avenue S. and Rainier Avenue S. would continue to operate at acceptable load levels, whereas S. Jackson Street segments would be over capacity similar to the other remaining corridors where demand would exceed average seated capacity of buses. Since local demand represents only a small percentage of total transit ridership, large differences between the Action Alternatives are not observed. Impacts of the Preferred Alternative likely would be similar to the other Action Alternatives (DPD, 2008).

FREIGHT MOVEMENT

This section provides information about the future 2030 freight operating conditions for the No Action and Action Alternatives. Efficient movement of freight and truck traffic within the study area is critical to the region's economic development due to proximity to the Port of Seattle, Intermodal Rail Yard, and the Greater Duwamish Manufacturing and Industrial Center. The freight evaluation focuses on the expected growth and distribution of freight traffic and the impacts on the Major Truck Streets under each of the Alternatives. The evaluation is based on a set of qualitative and quantitative assessments that compare freight operating conditions against those under the No Action Alternative. The assessments include the ability of trucks to efficiently circulate through the study area and access major destinations such as the Port, regional highway system, local businesses and other land uses; the change in travel time expected along the Major Truck Streets; and design standard issues that could impact truck operations and maneuvers.

The evaluation assumes completion of the planned and programmed improvements identified in Section 5.2 of Appendix G. A significant amount of transportation investment is expected to occur by 2030 that will benefit the overall movement of freight within and through the study area. These improvements include projects such as SR 519 Phase 2, Alaskan Way Viaduct, S. Lander Street grade separation, and the Spokane Street Viaduct improvements that include widening the Viaduct, closing the westbound off-ramp at 4th Avenue S and adding a westbound on- and off-ramp at 1st Avenue S. and an eastbound loop ramp to 4th Avenue S. The improvements have been assumed under each of the Alternatives and incorporated into the evaluation results.

Freight Growth

Future freight demand was estimated for future 2030 conditions based in part on Seattle's travel demand model. The model includes a truck component that was adapted from the PSRC regional travel model, which in turn was derived from the FASTrucks Forecasting Model developed in the year 2000 for the Washington State Department of Transportation. The model includes special generators for Port of Seattle terminals and also uses employment categories to estimate light, medium and heavy truck generation. The model results were further adjusted based on forecasts presented in the Container Terminal Access Study completed in 2003 for the Port of Seattle and later updated in 2005[4]. The updated study identified the growth in truck trips from the surrounding container terminals.

In 2004, the Port of Seattle moved 1.8 million twenty foot container equivalent units (TEUs), an increase of 20 percent over 2003. In 2006, there were approximately 2 million TEUs carried. Within the next two years, Terminals T-25/T-30 will be reactivated and anticipated to generate 234,000 TEUs in 2009 and 560,000 TEUs by 2030[5]. Also, it is anticipated that Port volumes would increase to about 4.9 million TEUs by year 2030. This growth results in more truck traffic along the study area arterials. Specific growth rates for Terminal 46, which borders the study area, were noted and included in the forecasts and analyses of the AM and PM peak hour corridor and intersection operations analysis.

The Action Alternatives, including the Preferred Alternative (DPD, 2008), would generate a higher number of local and delivery truck trips as more employment land uses are proposed within the study area than the No Action Alternative. The additional demand generated by the study area land uses of Action Alternatives would range from 16 to 17 percent during the AM peak and from 25 to 27 percent during the PM peak period. This increase in local delivery truck trips coupled with the truck trip growth from the Port of Seattle and the industrial areas south of the study area, will create a need for improved access and circulation throughout the study area. By 2030, truck generation is anticipated to increase by approximately 33 to 34 percent throughout the Puget Sound Region. The study area share of truck trips is

[4] *Port Truck Trips for Transportation Planning Studies*, Memorandum, Heffron Transportation Inc, July 19, 2005

[5] *Terminal 30 Cargo Reactivation*, Heffron Transportation Inc, prepared for Port of Seattle, September 18, 2006

less than 5 percent of the total regional truck activity reflected in the model based on a summary of the model TAZ data. The data indicate the Action Alternatives do not significantly increase the total share of truck trips as compared to the No Action Alternative.

Truck Travel Characteristics

The model was also used to assist in identifying local and regional truck travel characteristics based on the distribution of commercial land uses throughout the region. It is expected that each of the 2030 Alternatives (including No Action and the Preferred Alternative) will have similar travel patterns. Figure 3-47 illustrates the distribution of truck trips to and from the study area based on the 2030 model trip tables. The travel characteristics are for all types of trucks from delivery trucks to semi-trucks. The study area only includes a portion of the Port of Seattle container yards, but no other regional truck distribution centers. Figure 3-47 shows that approximately ~~80~~85 percent of trucks will be originating or destined for locations north or south of the study area in the AM and PM peak hours. Truck trips to the Eastside will comprise 12 percent. ~~Another 3 percent will connect to areas in Kitsap County and beyond.~~ Truck trips that are produced and attracted within the study area will be approximately 4 percent of the total truck trips generated by the study area land uses.

Freight Performance Measures

Improved freight mobility is a major goal of the State of Washington and the City of Seattle. Efficient movement of goods and services through the study area is critical for the economic success of major industrial stakeholders within and bordering the study area such as the Port of Seattle. The future performance of freight transportation was assessed using the performance measures identified in Chapter 2 of Appendix G. These measures include Truck Connections, Travel Speed on Major Truck Streets, and Street Design Standards. These indicators provide a mechanism to measure the impacts the Alternatives might have on freight and compare them against one another on a relative basis.

Truck Connections

This performance measure addresses the ability of trucks to efficiently circulate through the study area and access locations such as the regional highway system, the Port of Seattle container yards, and other local industrial businesses. The City of Seattle designated Major Truck Streets are a system of streets that are meant to serve both local and non-local truck traffic. The circulation of trucks is primarily served by these streets. The Major Truck Streets were previously highlighted in Section 4.3.2. As discussed in Chapter 4, the existing Major Truck Streets provide good access to I-5 and the Alaskan Way Viaduct, as well as I-90. Arterials such as 1st Avenue S., 4th Avenue S., S. Royal Brougham Way, S. Atlantic Street, and S. Dearborn Street provide much of the truck circulation throughout the study area.

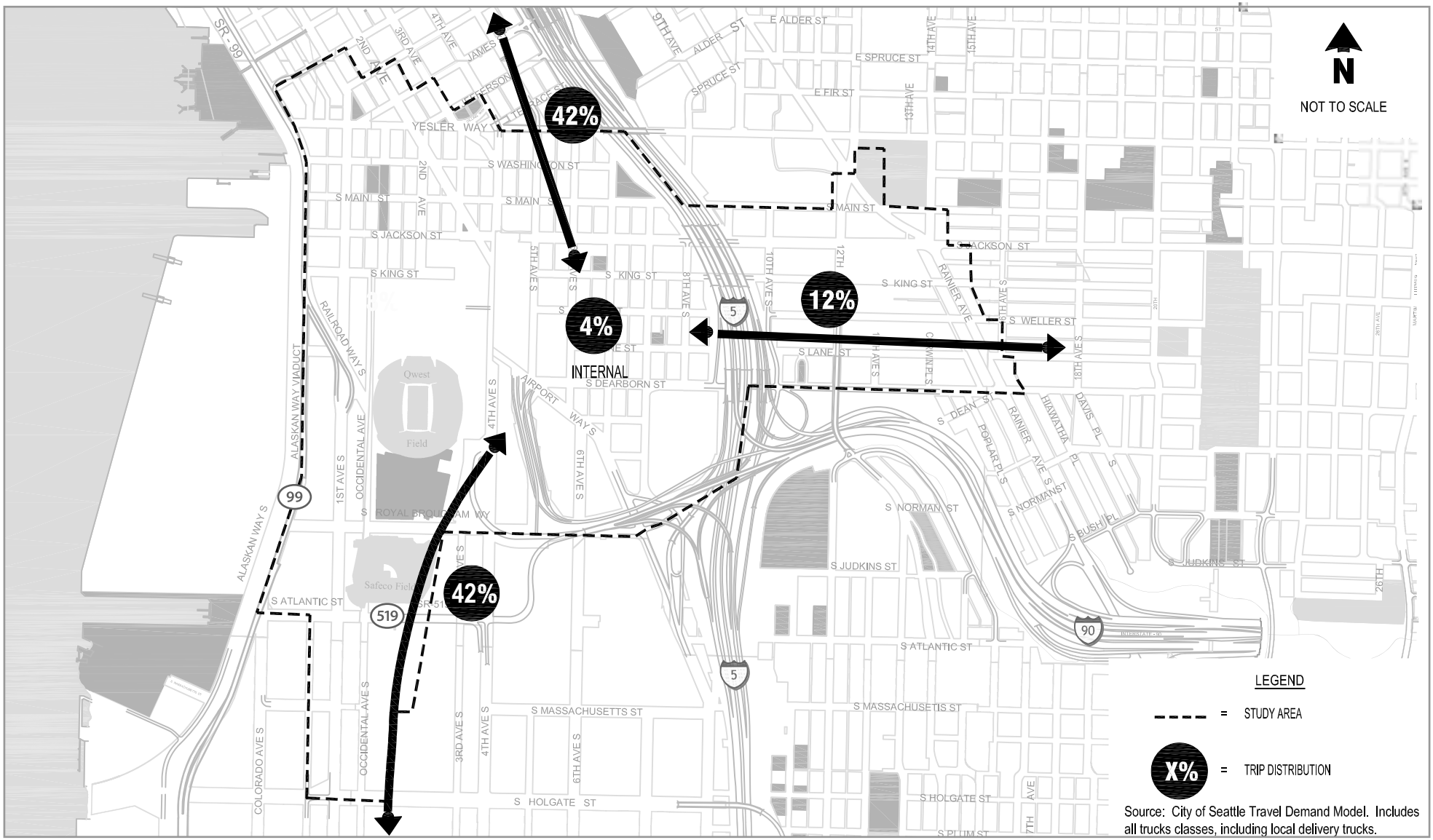


Figure 3-47

Livable South Downtown

Study Area Truck Trip Distribution (2030)

No-Action Alternative (Alt. 4)
East-west connectivity between I-5, I-90, the Port, and the other industrial lands in South Downtown is expected to be improved by 2030 with the completion of SR 519 Phase 2. The project will provide direct westbound access from I-5 and I-90 to the S Atlantic Street corridor. This project provides improved access to Terminal 46 and the 1st Avenue S. corridor, eliminating the need for trucks to exit onto 4th Avenue S, but allowing them to use a new westbound off-ramp that connects directly to S Atlantic Street. ~~possible delays caused by trains along S. Royal Brougham Way. Trucks would no longer have to use the S. Royal Brougham Way corridor to access the waterfront after exiting at 4th Avenue S.~~

Improvements as part of the Alaskan Way Viaduct Replacement project will improve regional access to the south with the completion of new freeway ramps along the S. Atlantic Street corridor just west of 1st Avenue S. Trucks heading to/from the south will be able to connect to the Alaskan Way Viaduct, which is not possible today at that location. Other improvements in truck connections are those just outside the study area such as the S. Lander Street overpass and the 1st Avenue S. and 4th Avenue S. ramps to the Spokane Street Viaduct. The S. Lander Street overpass will reduce delays caused by train activity and the 1st Avenue S. and 4th Avenue S. ramps to the Spokane Street Viaduct will provide improved access to the regional highway system.

The only improvement likely to negatively impact truck connections is the possible closure of S. Holgate Street. Truck trips between 4th Avenue S. and 1st Avenue S. will be negatively impacted as there will be fewer connections crossing the railroad tracks in this area. However, the City of Seattle has not yet committed to this project and is still evaluating the feasibility and impacts. Even with the assumption of S. Holgate Street being closed between 3rd Avenue S. and Occidental Avenue S., the other freight improvements within the study area will result in improved truck connections under the No Action Alternative.

Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)
The Action Alternatives, including the Preferred Alternative, are not likely to limit or change the available connections to trucks. While an increase in intensity of land use may impact the total volumes and delays encountered along the Major Truck Streets, the Major Truck Streets will still provide the connections needed to serve the study area. The arterials not designated as Major Truck Streets will also assist in providing local delivery routes to access the new commercial and residential land uses.

The Action Alternatives in the study area would create additional commercial and employment-oriented land uses, which would also generate more demand for local deliveries. The greatest amount of additional non-residential development is ~~forecast~~ projected for the Little Saigon neighborhood under Alternative 1 and in the ~~Stadium Area neighborhood~~ "south-of-Dearborn" vicinity under Alternatives 2, ~~and~~ 3 and the Preferred Alternative. Quite a bit of non-residential growth is also projected along the 1st Avenue S. corridor for all the Action Alternatives (DPD, 2008). Under any of those Action Alternatives, the increase in land use intensity would result in additional delivery trucks on S. Dearborn Street and Rainier Avenue S. to access the Little Saigon neighborhood and on 1st Avenue S., 4th Avenue S., S. Royal Brougham Way and S. Atlantic Street corridors to access the Stadium Area neighborhood. These corridors are designated as Major Truck Streets and provide primary access to the neighborhoods for local deliveries.

However, the increase in land use intensity would make it more difficult for local delivery trucks and other locally generated truck traffic to access the Major Truck Streets. The additional general vehicle traffic would cause more delay to trucks that are accessing the Major Truck Streets from local streets or vice versa. There would likely be fewer gaps in traffic, making it difficult for trucks to access the Major Truck Street system from local streets or driveways within the study area. Moreover, the higher residential and employment densities would add more non-motorized trips (bicycles and pedestrians) on

streets and would create more interaction with general traffic, including trucks, at crosswalks and bicycle lanes, thus creating further frictions and impediments for trucks on study area arterials. These findings are applicable to all of the Action Alternatives, including the Preferred Alternative (DPD, 2008).

Travel Speed on Major Truck Streets

Travel speed is an indicator of the operating conditions along Major Truck Streets. Higher travel speed means smoother flow along routes and shorter delays at intersections. Since trucks are sharing streets with other types of vehicles, truck speed is directly affected by the operating speed of the general traffic. Usually, posted speed for trucks on highways is lower than that for other vehicles. This is true for I-90 and I-5 mainline freeways. Posted speeds along the arterial streets in the study area, which are much lower than the freeway speeds (30 to 35 mph), do not assign speeds for trucks different from those assigned to the general traffic. It is expected that trucks move slower than general traffic because of the mechanical characteristics of these large vehicles. Trucks have slower acceleration speeds and take more time to maneuver. However, the results of the arterial and intersection traffic analysis provide a reasonable indicator of each Alternative's relative impacts to truck travel speeds.

The majority of truck trips occur during the mid-day hours along routes within the study area. While the mid-day hours have the highest truck volumes, they have lower passenger vehicle volumes than are observed in the AM and PM peak hours. The increase in land use intensity within the study area would have more of an impact during the peak hours when there is less roadway capacity available, but not as much impact during the mid-day when less congestion occurs, thereby impacting the majority of truck trips proportionately less.

Existing and future travel speed conditions reported by this study are based on an integrated analysis that takes into consideration both link running speed and delays at intersections. The analysis is consistent with the corridor operations data presented in this section and Section 5.4 of Appendix G, except that it focuses on specific truck corridor segments. Table 3-55 shows the analysis results of travel speed along the Major Truck Streets for AM and PM peaks hours, based on the worst 15-minute analysis.

No-Action Alternative (Alt. 4)

Travel speeds along most of the truck routes will generally decline by 2030 compared to 2007 existing conditions. The reduction in speed is the result of the increase in traffic volumes of approximately 30 percent or greater expected under the No Action Alternative, combined with little or no additional roadway capacity. The exceptions are northbound traffic at 1st Avenue S. and eastbound traffic at S. Royal Brougham Way due to completion of the Alaskan Way Viaduct frontage roads and grade separation of S. Royal Brougham Way. East-west routes along S. Dearborn Street and S. Royal Brougham Way will likely operate with average speeds of 10 mph or less. North-south routes show relatively better performance than the east-west routes, while 1st Avenue S. is expected to operate at speeds higher than any other route, mostly due to shifts in traffic to the new Alaskan Way Viaduct frontage roads.

Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

Generally, all Action Alternatives would result in slightly lower average speeds on truck routes than the No Action Alternative as increased development generates additional traffic. The PM peak hour speeds are much lower than those expected in the AM peak hour. The AM peak hour travel times would likely have the most impact on truck trips, since more truck trips normally occur in the morning than in the early evening. However most of the truck trips occur outside both the AM and PM peak hours during the mid-day when travel speeds are typically higher due to less overall traffic volumes along the corridors.

Table 3-55
Travel Speed along Major Truck Streets

Corridor	Extents[1]	Speed Limit (mph)[2]	Direction	2007	2030 Travel Speeds (mph)[2] No-Action	Alternative 1	Alternative 2	Alternative 3
AM Peak Hour								
1st Ave S	S King St to S Holgate St	35	NB	12	14	14	12	12
			SB	19	16	16	15	14
4th Ave S	S Dearborn St to S Holgate St	30	NB	17	10	9	9	9
			SB	15	14	13	12	11
S Dearborn St	5th Ave S to Rainier Ave S	30	EB	11	11	10	10	10
			SB	11	6	6	6	6
S Royal Brougham Way	1st Ave S to 4th Ave S	30	EB	7	10	10	10	10
			WB	5	5	5	5	5
S Atlantic St	1st Ave S to 4th Ave S	30	EB	11	6	6	5	5
			WB	7	13	13	13	12
S Holgate St	8th Ave S to Boren Ave S	30	EB	11	CLOSED			
			WB	11				
PM Peak Hour								
1st Ave S	S King St to S Holgate St	35	NB	15	18	17	17	17
			SB	17	12	12	12	11
4th Ave S	S Dearborn St to S Holgate St	30	NB	18	16	16	16	15
			SB	11	9	9	9	8
S Dearborn St	5th Ave S to Rainier Ave S	30	EB	9	7	5	2	1
			WB	8	9	9	9	9
S Royal Brougham Way	1st Ave S to 4th Ave S	30	EB	8	9	10	10	10
			WB	7	5	5	5	5
S Atlantic St	1st Ave S to 4th Ave S	30	EB	11	8	7	7	6
			WB	10	10	10	10	9
S Holgate St	8th Ave S to Boren Ave S	30	EB	10	CLOSED			
			WB	12				

Source: The Transpo Group (July 2007)
1. The corridor extents are for the street segments that are within the study area boundaries. These extents differ slightly than those reported for the corridor operations results in Section 5.4 to be more specific on the impacts to the Major Truck Streets.
2. Miles per hour

The Action Alternatives' travel speeds along Major Truck Streets are similar to one another. Alternative 3 would have the greatest impacts compared to the other Alternatives especially along the S. Dearborn Street corridor, which would be congested due to poor intersection operations along the corridor and especially at the Rainier Avenue S. and Airport Way S. intersections. Alternative 3 would generate a higher number of trips on study area streets than the other Alternatives which would result in higher congestion and delays. Corridor speeds in Alternatives 1 and 2 are similar even though Alternative 1 shows slightly higher speeds along 1st Avenue S. in the AM peak hour and along S. Dearborn Street in the PM peak hour. Impacts of the Preferred Alternative would likely be higher than Alternative 2 but less than Alternative 3, which define a narrow range of findings as shown on Table 3-55 (DPD, 2008).

There is little sensitivity predicted between the Action Alternatives in the time it takes to travel the Major Truck Streets through the study area. However, the future analysis indicates truck operations would

encounter low average speeds, similar to the general traffic, along the Major Truck Streets for each of the Alternatives, including the Preferred Alternative (DPD, 2008). Reductions in truck travel speed would increase the costs of moving freight within and through the study area regardless of the Alternative.

Design Standards

There is the potential for increased development within the study area to impact the design and function of the designated Major Truck Streets. A greater amount of residential or retail development will create additional demand on the City's sidewalk system due to an increase in pedestrians, while also requiring additional vehicle access points to the arterial street system. In other cases, bike lanes have been targeted for Major Truck Streets such as 4th Avenue S. as part of the Bicycle Master Plan. Each of these items has the potential to introduce alternative roadway designs to better accommodate other modes of travel. For example, additional pedestrians could warrant new crosswalk locations or curb bulb-outs to reduce the crossing distance and exposure to pedestrians, while bike lanes could reduce the width of lanes (or eliminate lanes altogether) to provide right-of-way for bicyclists. Each of these design treatments might impact the ease of truck navigation through the study area.

However, a primary focus of many of the transportation investments in the South Downtown area has been to better facilitate the movement of freight, whether it is more direct access to the regional highway system or eliminating conflicts between trains and passenger vehicles. Improvements such as SR 519 Phase 2, Alaskan Way Viaduct, S. Lander Street grade separation, and S. Spokane Street ramps are expected to include all design elements required for appropriate truck movements such as lane width, bridge vertical clearance, pavement structure, and minimum turning radii. The project designs will also include treatments for non-motorized elements, such as including a pedestrian pathway along the S. Royal Brougham Way structure, in addition to the truck design elements. While none of the land use alternatives has specifically identified impacts to roadway designs, it is reasonable to assume that there is the potential for design treatments to be introduced as part of specific development projects that could affect the movement of trucks.

In addition, oversized heavy vehicles are routed to and though the study area periodically. One primary example is the special event venues where equipment and shows have over-dimensional trucks that need special routing to accommodate the larger loads, operating under a permit. Not all study area streets are designed to accommodate these types of vehicles. The Right of Way Improvement Manual suggests that a 20-foot high by 20-foot wide envelope be maintained on routes that the City decides to maintain for these kinds of trips.

No-Action Alternative (Alt. 4)

A growing number of trucks will be traveling through the study area due to future growth at the Port of Seattle and other industrial businesses within and surrounding the study area under the No Action Alternative. The growth in the neighborhoods will have the potential to introduce unfavorable design treatments for trucks. For example, the No Action Alternative assumes additional residential and commercial development for the Pioneer Square, Chinatown/Japantown, and Little Saigon areas. The future growth could potentially impact designs along S. Dearborn Street, which is the southern border to the Chinatown/Japantown and Little Saigon areas. These could include reduced lane widths and/or turning radii to accommodate additional turn lanes or wider sidewalks. On the western side of the study area, growth in the Pioneer Square neighborhood could impact design treatments along 1st Avenue S. New mid-block crosswalks, bike lanes, or even dedicated transit lanes could reduce lane widths along the corridor. Other than the S. Dearborn Street and 1st Avenue S. corridors, most other Major Truck Streets only pass through the Stadium Area and South-of-Dearborn neighborhoods, both of which would remain largely unchanged in land use in this alternative.

Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

As part of the Action Alternatives, the same background growth in industrial land uses and regional truck traffic will take place adjacent to the study area as assumed under the No Action Alternative. However, as part of the Action Alternatives, increased residential and commercial land development would be located across the study area and would need to be served by commercial vehicles of different sizes depending on the type of business activity. It is anticipated that light, medium and heavy trucks would need to have good circulation and access to the arterial street system based on the regional and local land use growth.

Additional land use within the study area along with growth in surrounding land use intensity would result in more trucks primarily through the South-of-Dearborn and Stadium Area vicinities. These neighborhoods are bisected or adjacent to Major Truck Streets such as S. Dearborn Street, Airport Way S., SR 519, 1st Avenue S. and 4th Avenue S. Traffic growth along these corridors would not be limited to trucks only. More cars and non-motorized movements would occur along these corridors as more people and businesses would be located in the study area. This would pose challenges to provide the proper streetscape design to accommodate all users. Better visibility, adequate non-motorized facilities, signage and improved street lighting are a few examples of streetscape design features that could be incorporated into the roadway prism. Similar to the No Action Alternative, there are design treatments that can impact truck movements and make it more difficult for trucks to circulate through the study area. Currently there are no specific street design revisions that are assumed to occur in the future to support the Action Alternatives, but such revisions could be considered to mitigate possible impacts in the future.

PEDESTRIANS AND BICYCLISTS

This section summarizes and compares the impacts to pedestrians and bicyclists under each of the Alternatives. Qualitative performance measures used for pedestrians and bicycles are as follows: how well the current facilities would serve the new pedestrian and bicycle population resulting from development in the study area; how accessible pedestrian attractors are to new and existing pedestrian and bicycle users; and how pedestrians and bicyclists would be affected by growth in traffic volumes from new development.

By 2030, several pedestrian and bicycle improvement projects are planned to be completed as part of each of the Alternatives. These projects include the Link Light Rail Stadium Station and the planned pedestrian/bicycle pathway nearby; the SR 519 project, with grade separation at the S. Royal Brougham Way railroad crossing; and grade separation of the S. Lander Street railroad crossing. The grade separation at Royal Brougham is an important project as there have been a number of railcar/pedestrian collisions at that location, one in 2005 which resulted in a fatality.

The analysis focuses on the differences between the Action Alternatives and the No Action Alternative. To compare the different Alternatives, the amount and location of proposed land uses were considered, because new pedestrian and bicycle trips would be generated by the new land uses.

Pedestrians

A portion of the new trips generated by future land use development would be pedestrian in nature. These trips would include walking trips between land uses, as well as trips to/from transit stops. The primary facilities that will support increased pedestrian travel include the City's sidewalk system, crosswalks, signals and multi-use trails. Impacts to the existing pedestrian facilities are summarized below.

No Action Alternative (Alt. 4)

The No Action Alternative assumes the existing zoning for the area will continue. The largest amount of growth projected to occur would be in the Little Saigon, Chinatown/Japantown, and Pioneer Square neighborhoods, all of which currently serve a large number of pedestrians. In Pioneer Square, the projected growth is mainly focused in the vicinities along 1st Avenue S. and S. King Street. Both roadways currently provide sidewalks for pedestrian use, except at locations near the present SR 99 ramps (which are anticipated to be removed in the future). Chinatown/Japantown is projected to experience mainly residential growth, which would be spread throughout the neighborhood. The streets in this area provide sidewalks to serve pedestrians. In Little Saigon, the projected growth would be mainly along S. Dearborn Street, which provides sidewalks. However, the infrastructure on other roadways in Little Saigon is currently less conducive to pedestrians, specifically S. King Street and S. Weller Street, due to poor conditions from overgrown vegetation and tripping hazards from heaving and cracking.

Two other areas anticipated to experience growth where there is currently not as much pedestrian activity on a daily basis are the South-of-Dearborn and Stadium Areas. The Stadium Area growth would likely be mostly along 1st Avenue S., which provides sidewalks to serve pedestrians except in the location of the existing SR 99 ramps as noted above. The growth forecast in the South-of-Dearborn area is more likely to occur west of 7th Avenue S. including 6th Avenue S. and along Airport Way S. While sidewalks are present on these roadways, they have cracks and are in need of improvement. In addition, east-west movement is difficult from this area as it is bounded on one side by I-90 and the other by 4th Avenue S. and the I-90 off-ramps.

Pedestrian access to existing major attractors is expected to remain largely similar to current conditions. The Stadium and Pioneer Square areas will have good access to Colman Dock, King Street Station, the bus tunnel entrances, and event facilities near S. Royal Brougham Way. The neighborhoods east of 4th Avenue S. will most likely continue to access these facilities via current major pedestrian crossings, along 4th Avenue S. near King Street Station and at S. Jackson Street. Pedestrians in the South-of-Dearborn area will have the most difficulty traveling to major area attractors as connectivity to/from the west is poor, with S Royal Brougham Way at the very south of the South of Dearborn neighborhood providing the closest east-west connection. In addition, while the Link Light Rail Stadium station will be located just off 5th Avenue S., south of S. Royal Brougham Way, some sidewalk segments connecting to the station site, such as along 6th Avenue S. and parts of Airport Way S., are in poor condition.

Future development would increase traffic, pedestrian and bicycle volumes, and may result in a potential increase in vehicle/pedestrian and vehicle/bicycle conflicts. However, planned improvements, particularly the grade-separation of pedestrians at S. Royal Brougham Way, will help minimize impacts and separate motorized transportation from non-motorized transportation. Other future development would also be expected to result in improved sidewalk conditions over time, which would eliminate a number of deficiencies.

Action Alternatives (Alts. 1, 2, 3 <u>and the Preferred Alternative</u>)

The Action Alternatives disperse residential growth in the area, though the majority of the growth is focused in the Chinatown/Japantown, Little Saigon, and Pioneer Square areas. This is similar to the No Action Alternative; however, the amount of growth planned under the Action Alternatives is greater. The corridors that would experience the most growth are also similar to the No Action Alternative (S. Dearborn Street, 1st Avenue S., and 6th Avenue S.), along with the addition of 4th Avenue S. and S. Jackson Street. The majority of these three neighborhoods have good pedestrian connections including S.

Jackson Street and sections of 4th Avenue S. However, some areas could use improved pedestrian access, particularly on the west side of 4th Avenue S. near the I-90 off-ramp which lacks sidewalks.

As discussed for the No Action Alternative, access to major pedestrian attractors is expected to remain similar to existing access conditions. A large amount of growth is projected for the western portion of the study area, which is near the majority of the pedestrian attractors. However, there is also quite a bit of growth projected in the Little Saigon and South-of-Dearborn neighborhoods under all Alternatives. This implies that east-west pedestrian movement needs in the area would become greater. Potential conflicts with traffic volumes could occur along roadways with lesser non-motorized connections, particularly in the South-of-Dearborn neighborhood and along sections of 1st Avenue S. and 4th Avenue S.

The Alternatives' pedestrian impacts summarized:

- Zoning change leading to residential uses where none currently exist, such as the "south-of-Dearborn" vicinity under Alternative 3, ~~neighborhood,~~ would suggest a need for improved pedestrian crossings of S. Dearborn Street to access Chinatown/Japantown and the many services in this neighborhood.
- Under the No Action Alternative, current facilities and planned improvements should accommodate most of the expected growth in pedestrian activity, with the exception of probable needed improvements in the South-of-Dearborn neighborhood.
- The increase in growth under the Action Alternatives could lead to an increase in conflicts between pedestrians and motor vehicles, particularly in neighborhoods with new types of land use being introduced.
- In terms of pedestrian activity and impacts over the entire study area, there is no substantially distinguishable difference between the Action Alternatives, including the Preferred Alternative (DPD, 2008).

Bicyclists

The City of Seattle Bicycle Master Plan (BMP) identifies several bicycle improvements in the South Downtown area. The BMP goals are to increase the use of bicycling and improve bicycle safety in Seattle. These goals are to be met by developing a system of bicycle facilities (including "sharrows"—pavement markings designating bicyclists' use of the roadway, bike lanes, and multi-use paths), providing supporting facilities for bicyclists, identifying partners to assist in bicycle education and enforcement, and obtaining funding to execute the identified improvements. The completion of all of these projects will improve regional and local connectivity and enable easier movement around the South Downtown area and to major attractors (for example, Qwest Field and Colman Dock) for non-motorized travel.

No-Action Alternative (Alt. 4)

The largest amount of growth is planned in the Little Saigon, Chinatown/Japantown, and Pioneer Square neighborhoods. Bicycle facilities exist in these areas to serve that growth. In particular, bike lanes exist along S. Dearborn Street, 2nd Avenue S., and a portion of S. Jackson Street. In addition, there are several roadways designated as bike routes in each of the areas, (parts of 1st Avenue S., 4th Avenue S., 6th Avenue S., 7th Avenue S., 12th Avenue S., Maynard Avenue S., and S. Jackson Street), but there are no markings communicating this to motorists.

The Stadium and South-of-Dearborn areas currently do not have the same level of bicycle activity as the other three areas, but a projected increase in growth will likely result in an increase in bicycle activity. Both of these neighborhoods do not have very good bicycle connections, particularly the Stadium Area. The only designated bike route in that area is along 1st Avenue S., with no east-west connection available. The South-of-Dearborn area does have more bike routes (6th Avenue S., 7th Avenue S., Maynard Avenue

S., and Airport Way S.), as well as a bike lane nearby along S. Dearborn Street. However, the majority of these routes are north-south and the S. Dearborn Street bike lane stops at 6th Avenue S. to the west. This leaves no direct bicycle connection to the west, which is the direction of several major attractors. It also leaves no direct connection to the Link Light Rail station, though the bike route along 6th Avenue S. travels close to the station.

The changes in land uses are expected to increase traffic volumes. The increase in vehicular volumes should proportionally increase the potential for conflicts between bicycles and vehicles. The planned improvements, particularly those as part of the Bicycle Master Plan, will help minimize conflicts between vehicles and bicyclists.

Action Alternatives (Alts. 1, 2, 3 and the Preferred Alternative)

As stated previously, the corridors that will experience the most growth under the ~~three~~ Action Alternatives are also similar to the No Action Alternative (S. Dearborn Street, 1st Avenue S., and 6th Avenue S.), with the addition of 4th Avenue S. and S. Jackson Street. All of these corridors have at least a portion designated for bicycle use, with S. Dearborn Street and S. Jackson Street having bicycle lanes. Still, the growth in these areas would contribute to a need for additional improvements, particularly to better facilitate east-west connections.

As further growth is anticipated in all Alternatives in all the neighborhoods, the effects of existing bicycle deficiencies defined previously would be further felt with future development under the Action Alternatives, including the Preferred Alternative (DPD, 2008). Conflicts with traffic are likely to occur where bicycle facilities are absent, particularly in the southern (Stadium Area and South-of-Dearborn) vicinities.

The Alternatives' bicycle impacts summarized:

- All ~~four~~ five alternatives assume projected growth is focused in Chinatown/Japantown, Little Saigon, and Pioneer Square, which have some bicycle facilities to accommodate growth. The other two neighborhoods are in need of bicycle facilities to support growth.
- The increase in growth under the Action Alternatives, including the Preferred Alternative, would most likely intensify existing bicycle facility deficiencies. The increase also could lead to an increase in conflicts between bicyclists and motor vehicles, particularly in neighborhoods with few or limited bicycle facilities.
- In terms of bicycle activity and impacts over the entire study area, there is no substantially distinguishable difference between the Action Alternatives, including the Preferred Alternative (DPD, 2008).

EVENT TRAFFIC ~~MANAGEMENT~~

Future development in the South Downtown study area and anticipated transportation improvement projects ~~road network impacts~~ would alter traffic patterns and access routes over time. This would likely create additional conflicts in the area between background traffic and event traffic and result in some changes in how event traffic is managed. Changes to event traffic management needs and programs will likely take place in stages as new development and street network changes occur. This will likely result in a need to progressively adapt the TMPs for the stadium and event venues in the Stadium Area, as happens each year already, but with the City or new stakeholders generated by new development possibly taking on more responsibility in implementing additional features.

Conceptually, the Action Alternatives ~~this evolution over time~~ could affect event traffic ~~management~~ in several ways, and evolve over time as additional development takes place. For this event analysis, these potential effects are categorized as:

- *Event Conditions* such as changes in event traffic routing; increased vehicle traffic volumes and congestion; and changes in pedestrian traffic flow patterns, and the potential for increased and decreased pedestrian-vehicle conflicts;
- *Event Management* such as changes in event traffic control and resources devoted to managing event traffic.
- ~~Changes in event-goers' vehicular traffic routing and destinations, arising from changes in the street network and differences in parking availability;~~
- ~~Changes that might arise due to future development in specific locations; and~~
- ~~Changes in the definition of police postings and related traffic operational issues.~~

Event Conditions

Future development surrounding the event facilities, such as in the north half of Qwest Field's north parking lot, would introduce new land uses into the area. The new land uses would increase travel demand in the area, alter vehicle circulation and routing, and could also alter pedestrian flow patterns to some degree. The most significant changes to event routing and traffic volumes relate to the future transportation improvements in the study area that are anticipated to be completed by 2030. These include SR 519 Phase 2, new Link Light Rail, Alaska Way Viaduct Replacement, and the possible closure of S Holgate Street. Each of the improvement projects are generally envisioned to enhance overall traffic flow in the vicinity, or address the larger transportation needs. With or without their implementation, the fundamental impact of the density increases associated with the Action Alternatives would be the increased localized travel demand. Shifts in traffic due to the improvement projects would occur with or without the Action Alternatives and are not inherently an impact. The ultimate event management strategy for the area will require consideration of the changing infrastructure with or without the density added under the Action Alternatives. Based on the level of anticipated traffic increase associated with the Action Alternatives, it is expected that potential traffic shifts due to changing infrastructure will be more significant than those associated with the Action Alternatives.

Vehicle Traffic Patterns

The anticipated increases in peak-hour congestion in many of the corridors near the Stadium Area could alter how event-goers access the area and which parking or alternate transportation modes they choose. For example, event traffic that may use 4th Avenue S. from the I-90 off-ramps and S. Royal Brougham Way may divert to S. Atlantic Street and 1st Avenue S. In addition, potential availability of free or lower-cost parking could result from future development and road network construction. This could cause a reorientation of many event-goers' intended destinations, perhaps to locations further south, north or east of the immediate stadium vicinity. Depending on how police choose to control traffic flows, it may be more difficult for some event-goers to reach their original intended destination. Until event-goers would learn new patterns, this would probably create driver confusion and additional congestion in the stadium vicinity. These factors would probably be most adverse to traffic conditions if they occurred prior to weekday afternoon and evening baseball games or weekday evening football games, when other pass-through traffic is at peak or near-peak levels. The added traffic associated with the Action Alternatives could contribute to this impact. As noted in Section 5.4.2 of Appendix G.1, locally generated traffic is only a portion of the overall growth expected. In addition, shifts in traffic due to infrastructure changes are likely to have a greater impact on overall patterns than those anticipated due to the marginal increases in traffic from the Action Alternatives.

~~Increased~~ Vehicle Traffic Volumes

~~Because~~ The SR 519 Phase 2 improvements will include changes on S. Atlantic Street and S. Royal Brougham Way, with S. Atlantic Street ~~will become~~ becoming the vicinity's primary route to and from I-90 and I-5. These improvements will be combined with new access to SR 99 to and from the south along S. Atlantic Street on the west side of 1st Avenue S. Both these improvements will focus more vehicle traffic onto the S. Atlantic Street corridor, but provide more direct access to the event facilities and surrounding parking garages. The anticipated increases in traffic volumes in the 1st Avenue S./S. Atlantic Street vicinity will alter traffic flow patterns, increasing congestion and use of street capacity.

It is expected that PM peak hour event traffic in the area on a typical weekday, when traffic congestion is greatest and more conflicts arise with background traffic, will continue to increase due to the increase in development in the area and throughout the region as discussed earlier in the section entitled "Corridor Operations and Travel Speeds.**"** The change in traffic volumes from each of the Alternatives when compared between event and non-event days will likely be similar to the relative changes that are observed today and highlighted in Table 3-55A. For example, the corridors immediately surrounding the event facilities are expected to continue to serve similar proportions of vehicles as those observed in 2005 between non-event and event days. In some instances, event traffic volumes may shift to other surrounding corridors such as Airport Way S. or 6th Avenue S. as happens today, but to a greater extent in the future due to greater congestion around the stadiums.

Table 3-55A
Event Pre-Game Traffic Volumes by Corridor – PM Peak Hour (2005 vs. 2030 No Action)

Corridor / Arterial	Extent	Dir	2005[1] Non-Event	2005[1] Event[2]	2030 No-Action[3] Non-Event	2030 No-Action[3] Event[4]
North-South Corridors						
1st Avenue S	S Holgate St to S Royal Brougham Way	NB	1,485	1,310 (-12%)	1,580	1,390 (-12%)
		SB	1,205	1,220 (+1%)	1,305	1,320 (+1%)
4th Avenue S	S Holgate St to S Royal Brougham Way	NB	950	885 (-7%)	1,225	1,140 (-7%)
		SB	1,555	1,255 (-19%)	1,930	1,560 (-19%)
East-West Corridors						
S Royal Brougham Way	1st Ave S to 6th Ave S	EB	320	330 (+4%)	335	350 (+4%)
		WB	500	570 (+15%)	605	695 (+15%)
S Atlantic Street	1st Ave S to 4th Ave S	EB	1,090	900 (-17%)	1,825	1,505 (-17%)
		WB	450	325 (+38%)	865	1,200 (+38%)

1. All 2005 traffic data collected as part of the SDOT *South Downtown Railroad Corridor Study*. Event data collected for a 7:05 pm baseball game in mid-May for the peak hour between 4:00 and 6:00 pm. Number indicates average of counts along each roadway segment.
2. Parenthesis indicates relative change between event and non-event traffic counts.
3. Based on average of traffic forecasts for each roadway segment.
4. Percentage based on the same relative percentage estimated using the 2005 traffic count data.

The S. Atlantic Street corridor will continue to serve a higher number of vehicles in the westbound direction during events as opposed to non-events because it is the primary access to the area due to the SR 519 Phase 2 project, new access ramps to SR 99, and the redistribution of traffic from closure of S. Holgate Street. This will create the need to provide improved access control and possibly restrict some movements along 1st Avenue S. between S. Royal Brougham Way and S. Atlantic Street to increase capacity on S. Atlantic Street during event conditions.

4th Avenue S. currently has available capacity to handle additional traffic volumes and with the new SR 519 westbound off-ramp from I-90 and I-5, some traffic will be rerouted directly to S. Atlantic Street. Continued police postings at the intersection with S. Royal Brougham Way will provide for acceptable operations, along with reduced delays from train crossings due to the new grade-separated bridge over the railroad tracks along S. Royal Brougham Way. With these improvements and re-routing of traffic, it is expected that 4th Avenue S. will operate no worse than 2030 No-Action non-event conditions.

The Action Alternatives would increase the traffic volumes along each corridor another 50 to 150 vehicles in each direction depending on the alternative. The additional vehicles under the Action Alternatives are expected to impact traffic operations along each corridor by the same relative amount as discussed earlier in the portion of this section entitled "Corridor Operations and Travel Speeds." It is important to note again that one of the reasons the expected differences between No Action and Action Alternatives are not more significant is the fact that a small percentage of the non-event vehicles traveling along study area roadways would have an origin or destination within the study area as described earlier in the portion of this section entitled "Vehicle Travel Characteristics." Overall, it is expected that traffic volumes and related congestion, will increase in the future due to general background growth, growth in traffic due to the increased density associated with the Action Alternatives, and due to shifts in traffic induced by changing infrastructure. The impact of the Action Alternatives would be incremental and cumulative in this regard. However, it is important to point out again that all of the same issues, to a marginally lesser extent, will occur under the No Action Alternative.

~~The higher traffic volumes could increase the potential for pedestrian-vehicle conflicts, particularly for baseball events with large attendance. It could also conceivably alter how traffic is controlled by police during events both in the evenings and for weekday afternoon games. These factors suggest a need to evaluate strategies that would improve pedestrian safety controls in this area. These could involve physical improvements as well as improvements in event traffic management practices by the police.~~

~~Possible Changes in Vehicle Traffic Patterns~~

~~The anticipated increases in peak-hour congestion in many of the corridors near the Stadium Area could alter how event goers access the area and which parking or alternate transportation choices they choose. For example, event traffic that may use 4th Avenue S. from the I-90 off-ramps and S. Royal Brougham Way may divert to S. Atlantic Street and 1st Avenue S. In addition, availability of free or lower-cost parking could result from future development and road network construction. This could cause a reorientation of many event attendees' intended destinations, perhaps to locations further south, north or east of the immediate stadium vicinity. Depending on how police choose to control traffic flows, it may be more difficult for some event goers to reach their original intended destination. Until event attendees would learn new patterns, this would probably create driver confusion and additional congestion in the stadium vicinity. These factors would probably be most adverse to traffic conditions if they occurred prior to weekday afternoon and evening baseball games or weekday evening football games, when other pass-through traffic is at peak or near-peak levels, or large concert or exhibition events where attendees may be unfamiliar with access routes.~~

~~Possible Changes in~~ Pedestrian Flows ~~Traffic Flow Patterns~~

With increases in future development under the various alternatives, different configurations of pedestrian facilities might result. For example, the "over-tracks" development might conceivably provide a new pedestrian promenade route from the north, accessing Qwest Field and potentially Safeco Field as well. This type of facility, specifically associated with a development, could ~~would~~ be of great benefit to pedestrian comfort ~~and safety~~, and provide additional routes for pedestrians, such as improved connections from the Qwest Field north parking lot to points east. Under the No-Action Alternative, this "over-tracks" development would not likely occur and the additional pedestrian connection would not be in place.

The future development condition also may generate additional pedestrian volumes from points further north, south or east with available parking supply spread further from the Stadium Area. The longer pedestrian travel distances will likely result in more street crossings and an increase in the potential for pedestrian-vehicle conflicts. The higher traffic volumes could increase the potential for pedestrian-vehicle conflicts, particularly for baseball events with large attendance. It could also conceivably alter how traffic is controlled by police during events both in the evenings and for weekday afternoon games. These factors suggest a need to evaluate strategies that would improve pedestrian controls in this area. These could involve physical improvements as well as improvements in event traffic management practices by the police.

The planned S. Royal Brougham Way improvements would generate some probable pedestrian benefits, in that portions of ~~that~~ the street would have much less traffic, affording safer pedestrian conditions. Also, an elevated route over the railroad tracks would reduce the potential for train-pedestrian conflicts, which are a known existing safety hazard.

There would probably also be a need to examine how pedestrian routing near large construction sites can be established during construction periods. This could be controlled by providing sufficient sidewalks in high-traffic areas, and prudent adjustments in police control practices along certain street segments and

intersections. These will need to be evaluated on a year-by-year basis, anticipating and proactively planning for how event traffic can coexist with pedestrians as well as vehicular traffic seeking access to the new development.

In summary, general increases in traffic, as well as increases in background (non-event) pedestrian activity may result in increases in the potential for pedestrian/vehicle conflicts, as would extending the "reach" of event parking to more remote areas. However, in other cases, local development could result in enhanced pedestrian infrastructure, resulting in more pedestrian route options, as well as locally improved pedestrian conditions.

~~Possible Changes Related to Future Nearby Development~~

~~Future development, such as in the north half of the Qwest Field north parking lot, would introduce new land uses into the area. The new land uses would alter pedestrian flow patterns to some degree and also could alter vehicle circulation needs as well. This could create additional potential for pedestrian-vehicle conflicts. This could be controlled by providing sufficient sidewalks in high-traffic areas, and prudent adjustments in police control practices along certain street segments and intersections. These will need to be evaluated on a year-by-year basis, anticipating and proactively planning for how event traffic can safely mix with pedestrians as well as vehicular traffic seeking access to the new development. There would probably also be a need to examine how safe pedestrian routing near large construction sites can be established during construction periods.~~

Event Management

~~Possible Changes in Police Postings~~

~~Related to all of the above influences on event traffic, changes over time in pedestrian and vehicular traffic patterns and the road network itself~~ The above changes in travel patterns and traffic volumes on event days, along with the road network changes themselves, would probably create a need to adjust police posting patterns and management of traffic flows. The police postings would likely need to be evaluated every year for each of the venues' TMPs based on the expected conditions for the upcoming year. Conceivably, this could generate a need for additional police resources to be engaged if a more widespread area is subject to higher traffic volumes, parking access, and potential pedestrian-vehicle conflicts. Any additional event management resources needed to address impacts of the Action Alternatives or changes in background traffic will need to be led and implemented by the City and/or stakeholders associated with new development that takes place and which impacts the existing event facilities.

POSSIBLE MITIGATION STRATEGIES

A range of possible mitigation strategies are presented in this section. Mitigation strategies conceptually include approaches such as reduction in travel demands, implementation of funding mechanisms, construction of physical improvements, and traffic and parking management policies. Due to the growth in regional and local traffic and planned development projects alone, future conditions would benefit from implementation of ~~most~~ several of the mitigation strategies described in this section even under the No Action Alternative. While reference is made to mitigating the Action Alternatives, the City may wish to consider incorporating some of these strategies regardless of which Action Alternative is selected, if any.

Impacts to travel are forecast within the study area by 2030 with or without the Action Alternatives' projected changes to land use and zoning. As the region continues to grow, more travel will take place within the study area since it acts as a gateway to Downtown Seattle. Growth in vehicle trips, combined with increased transit and freight traffic, will increase delays for all users of the transportation system. In most of the neighborhoods, except Little Saigon, projected traffic volumes under any of the Action Alternatives are not likely to be more than four percent higher than those expected under the No Action Alternative. This overall pattern is reflected in the analysis of performance measures such as arterial travel speeds and transit passenger loading, where the Action Alternative results are very similar to those under the No Action Alternative. However, within the Little Saigon neighborhood transportation impacts are likely to be more noticeable than in other neighborhoods, regardless of the specific Action Alternative.

In order to reduce the future impacts to the transportation system, a series of mitigation strategies could be implemented over time as development occurs. While some strategies would improve mobility for multiple modes of travel, other mitigation strategies may improve one mode of travel but have negative effects on another mode (see Table 6-1 in Appendix G for further portrayal of tradeoffs).

Transportation Demand Management

The transportation system consists of two basic components: the supply side, which is usually the road infrastructure and transit system, and the demand side, which are the travelers using the system. Due to right-of-way limitations and City policies, expansion of the roadway system is not a strategy that the City is encouraging. Therefore, mitigation strategies are more focused on reducing the number of single-occupancy vehicles entering the study area than increasing roadway capacity.

The City has implemented aggressive transportation demand management strategies (TDM) in Downtown Seattle that have helped reduce the percentage of workers driving alone to Downtown. These same strategies could be used in connection with future development within the South Downtown study area. Continuing and strengthening these strategies would help reduce the impacts to the arterial corridors, while also reducing overall parking demand. The following strategies could continue to be promoted throughout the study area:

- Promoting carpooling or car sharing
- Incorporating flex-car with subsidies
- Providing discount transit passes
- Expanding use of vanpools
- Supporting increased use of telecommuting
- Encouraging alternative travel modes like walking and biking
- Requiring preferential parking for carpools and vanpools
- Discontinuing parking subsidies
- Providing a guaranteed ride home program
- Providing incentives for using alternative modes

Area Specific Land Use Modifications

Recommendations for rezones in parts of the study area could be influenced by the transportation impact conclusions. This could allow for zoning and future land uses that would generate lesser levels of peak hour traffic impacts.

~~**Transportation Mitigation Payment Program**~~

Development Mitigation Payment Approach for Transportation Impacts

The City of Seattle could pursue a predominantly SEPA-based approach to identifying developer mitigation payments to address significant adverse transportation impacts. Such mitigation should be defined in proportion to the development project's relative impacts. This approach could rely upon (but is not limited to) the findings of project-specific transportation impact analyses, subarea transportation analyses, City-recognized functional plans (such as the Bicycle Master Plan), and/or other City agency analyses to identify impacts and responsive mitigation actions. ~~develop a program which would require new development in the area to share in the funding and implementation of a system of improvements or program enhancements to help address the need for increased mobility within the study area. A transportation mitigation payment program would define the process where developers would contribute their fair share in costs of their identified impacts. This could take the form of a transportation impact fee program, a local improvement district (LID), a transportation benefit district (TBD), or SEPA traffic mitigation. A mitigation payment program could be multi-modal and focus on transit, pedestrian, bicycle, and freight improvements, including additional programs or strategies to promote these travel modes. Such a program would provide developers and the City with more certainty of what mitigation fees would be, and provides an appropriate funding source for needed improvements.~~

Arterial Street System Strategies

This section describes mitigation strategies that are identified to help reduce impacts to arterial and intersection traffic operations, and to facilitate mobility for all users of the arterial street system. The strategies identified are not tied to specific developments but are policy-oriented measures or programs to enhance traffic circulation and operations.

Access Management

Access management policies would restrict or prohibit direct access to and from major corridors, such as 1st Avenue S. and 4th Avenue S. north of S. Royal Brougham Way, or Rainier Avenue S. north of S. Dearborn Street. Installation of traffic signals or left-turn lanes to serve specific developments could be restricted or prohibited. New traffic control such as signals or turn lanes would reduce the capacity of the corridor and increase overall delays. Full access would only be provided at existing intersections or along the surrounding collector or local street system, where capacity exists or is provided by the developer. If a major corridor is the only option for access, then access could be restricted to right-in/right-out only.

Signal Timing Optimization & Phasing

Monitoring and continuous updating of signal plans is a vital aspect to improving arterial and intersection operations. As traffic volumes shift or grow due to new development and increases in through-traffic, the periodic re-timing or synchronizing of traffic signals is critical. By doing so, movements into and out of the City during the AM and PM peak periods would be accommodated by providing more signal green time and appropriate signal cycle lengths that respond to peak directional flow while facilitating local circulation needs. The mitigation program could provide additional funding that would allow for more frequent analysis and updates for signal timing. The mitigation program also could help fund investments in traffic signal equipment to support improved coordination. The improvements to signal phasing and coordination must be balanced against the need to reduce vehicular delay with pedestrian safety and mobility.

Seattle Traffic Management Center/Intelligent Transportation Systems (ITS)
Expanding the existing Seattle Traffic Management Center (TMC) and increasing its funding is another important measure in improving signal operations within the study area. Enhancing the TMC would enable faster response to incidents and help off-set the consequences of the daily variations in traffic patterns and volumes. This is particularly important in the Stadium Area during events. Traffic along the arterials would be able to be monitored more frequently and signal timing plans could be adapted to changing travel patterns or to facilitate unusually heavy traffic flows. Dynamic message signing could help direct drivers through the area and assist visitors in finding available parking.

Additional Time of Day Restrictions / On-Street Parking Removal
On-street parking serves multiple purposes ranging from providing short-term parking resources to providing a physical buffer between pedestrians and passing automobile traffic. The City carefully considers whether on-street parking arrangements should be changed, and prioritizes the reasons to support such actions, which may occur most importantly to provide for improved peak-hour transit flow. Over time, the City could consider imposing additional time-of-day restrictions that might help maintain adequate peak-hour capacity, if local conditions warrant. On a case-by-case basis, the City could also consider removal of on-street parking along the minor street approaches at intersections with key arterials to provide for additional turn lanes or vehicle queuing storage space. New turn lanes on the minor street approaches could allow the City to consider providing longer signal cycle lengths and more green time for traffic on the intersecting major arterial. More efficient signal operations also could be a benefit of having additional turn lanes on the minor streets. These issues would have to be studied on a case-by-case basis taking into consideration the impacts of these measures on parking supply, pedestrian crossings, and transit. Possible locations would be within the Chinatown/Japantown and Little Saigon neighborhoods. ~~Locations should be considered closely when evaluating traffic impact assessments for new developments. Time of day restrictions, such as are currently in place on several Downtown streets, can also be imposed on existing zones in order to avoid peak hour capacity reductions.~~

Transit Strategies

~~Without the Action Alternatives,~~ The performance of the transit system is expected to decline ~~significantly~~ due to the growth in demand, coupled with the increase in traffic congestion and delays along the UVTN corridors. The differences in performance of the transit system under the 2030 No Action Alternative and the Action Alternatives would be very similar, with small differences noted along key corridors such as 4th Avenue S. and Rainier Avenue S.

This section describes the mitigation strategies to reduce impacts to the transit system, and provide more people-moving capacity throughout the study area, sometimes at the expense of other traffic. Transit mitigation is grouped into three categories focusing on frequency and span of service, travel time, and passenger comfort and convenience. The most significant measures focus on improving transit speed and reliability along the transit corridors, as most are anticipated to be operating below UVTN performance standards.

Local Bus Frequency and Span of Service
Work with King County Metro to increase the level and availability of transit service along key UVTN corridors. For example, increasing the frequency of bus service along the Rainier Avenue S. and Yesler Way corridors can provide continual 15-minute bus service during most times of the day and therefore, would meet the minimum performance standards. In addition, expanding the span of service along the 12th Avenue S corridor by a few hours would be required to meet the ~~12-hour~~ span of service threshold. The increased frequency and longer span of service is needed to mitigate additional development in the Little Saigon neighborhood under each of the Alternatives or under the No Action Alternative.

Increases in peak hour transit capacity are generally needed in all of the major corridors except Rainier Avenue S. and 5th Avenue S. This could be achieved by either providing larger transit vehicles or higher frequency (shorter headways) along the corridors. Alternatives 1 and 2 require more capacity than Alternative 3 for the S. Jackson Street corridor, 2nd Avenue Ext S., and 3rd Avenue S. sections north of S. Jackson Street. Ultimately, transit improvements in the study area could be addressed at an area-wide level and will provide the most benefit when transit speed and reliability can be better predicted and not impacted as much by arterial congestion.

Dedicated HOV or Bus Lanes

~~Without additional transit facilities to improve the speed and reliability of the transit system, additional bus service will be difficult to fully implement.~~ Significant revisions to the arterial street system would likely be needed to improve transit reliability and operations to accommodate increased person trips within the study area, while also accommodating transit trips that pass through the study area. Dedicating lanes for transit along the most congested corridors ~~would be needed to meet~~ could help meet ~~travel~~ speed ~~and passenger loading~~ performance measures. This could be accomplished by the removal of general purpose lanes or on-street parking to provide the width required to accommodate a dedicated transit lane. Candidate corridors are 1st Avenue S., 4th Avenue S., Rainier Avenue S., and S. Jackson Street which all currently accommodate at least five lanes. Yesler Way is another potential corridor, which currently has three lanes with on-street parking on both sides.

Removal of on-street parking through Pioneer Square on 1st Avenue S. and S. Jackson Street corridors could create a dedicated lane for transit or other high-occupancy vehicles (HOVs). However, removal of on-street parking would have a major impact on area businesses and would also increase the forecast parking deficiencies within the neighborhood. Conversion of general purpose travel lanes along 1st Avenue S., 4th Avenue S. north of S. Royal Brougham Way, and Rainier Avenue S. would improve transit speed and reliability but would also significantly impact arterial and intersection operations for non-transit vehicles, including freight. The decision of switching a general purpose lane to a transit lane should be considered based on a thorough analysis of the person-carrying demand and capacity of the two options. These measures could be studied in conjunction with other transportation modes to assess their impact on overall operations and circulation. Freight mobility is very important in the area, so any modifications that further restrict freight could be investigated and studied further. Moreover, the final decision on introducing HOV/bus lanes could be taken based on more thorough examination and analysis of impacts along the candidate corridors outside the limits of the study area and their connections to the regional transportation system.

Transit Signal Priority

Implementing transit signal priority can also improve transit mobility on City streets. Mitigation could be provided, in part, through investments in technologies to better facilitate transit vehicles along the UVTN corridors such as 1st Avenue S., 4th Avenue S., S. Jackson Street, and Rainier Avenue S. Queue bypass lanes complemented with transit signal priority treatments, could be installed in locations where buses have to often wait through multiple signal cycles.

Bus Bulbs / In-line Stops

Provision of bus bulbs at transit stops can make for easier and faster arrival, access, and departure for buses. This mitigation measure is site-specific and would be best applied on corridors with at least two lanes per direction. The bus bulbs also would allow for additional space on sidewalks for installing shelters and other transit amenities at the bus stops. In-line bus stops would likely increase delays along the corridor for other vehicles and freight, so they could be primarily explored for locations that minimize impacts to other modes of travel. Note that the bulb-outs may reduce some on-street parking if located in parking lanes, due to needed tapers.

Real-Time Information & Transit Amenities
Transit mitigation also could include providing transit kiosks at major transit stops. In addition, amenities such as improved transit shelters and benches can be useful in improving passenger comfort, ~~and~~ convenience and ridership. Additional right-of-way for wider sidewalks also would be desirable where these facilities are located.

Freight Strategies

Impacts to freight are expected under the No Action Alternative due to increased congestion within the study area. The most direct mitigation impacts to freight movement would be to increase travel speed. Other strategies address roadway and intersection design standards and truck circulation needs. However, many of the mitigation strategies for other travel modes could impact freight operations and could be balanced against the needs for freight mobility. Items such as curb bulb-outs, narrow travel lanes, new crosswalks or signals, and driveway access locations all can adversely impact truck operations and maneuverability. These types of other mitigation could be discouraged along the Major Truck Streets to promote the efficient movement of goods and services, and reduce delays to trucks, knowing that many major streets also serve other uses and modes especially in the denser urban neighborhood. As individual capital projects are undertaken to maintain and enhance streets for multiple users, the City could evaluate various transportation needs, including those for freight movement. Final design decisions will be guided by adopted plans, the Right of Way Improvement Manual, and the recently passed Complete Streets Ordinance.

Traffic Management Strategies
These strategies ~~would~~ could include incorporating traffic management strategies, such as providing signal priority along freight corridors through the use of specific traffic signal plans, which ~~would~~ could improve truck mobility along City surface streets. One strategy ~~would~~ could be to devote a higher percentage of signal green time to serve established freight movements at the expense of competing movements, particularly outside of major commute peak hours. This strategy could be applied along S. Dearborn Street, Airport Way S., 1st Avenue S., 4th Avenue S., or S. Atlantic Street corridors; however, the primary corridor would have to be chosen for those corridors that intersect such as 1st Avenue S. and S. Atlantic Street. These timing strategies would only be implemented after studying the impact to transit operations or other modes of travel. ~~Another strategy would be to introduce technologies that improve communications to better manage logistics including dispatching of commercial vehicles and dissemination of real-time traffic information to avoid delay where possible.~~

Fund Major Truck Streets ~~Route~~ Design Improvements
A dedicated funding program could be established to improve existing Major Truck Streets ~~routes~~ by upgrading street infrastructure to better facilitate truck operations and movement. This could include establishment of a program to fund regular improvements to the Major Truck Streets to accommodate wider turning radii, signal upgrades, relocation of utility poles or other obstacles, and more frequent pavement overlays. Poor pavement conditions also result in an increase in road noise and vibrations that are disruptive to people in adjacent buildings, in particular, sensitive residential, educational and health care land uses. Other funds could go toward installing concrete on Major Truck Streets that front new development to prolong the life of the street and reduce the amount of maintenance required.

~~**Performance Standards**~~
~~The City could develop and adopt performance standards for the major freight corridors. This would help in identifying operational thresholds for Major Truck Streets and better identifying impacts to freight movement. For example, one criterion might establish truck travel speed standards (expressed as an absolute minimum speed or as percent of the posted speed) similar to those developed for transit. This system-wide action plan would create a measurable threshold that would help maintain minimum level of~~

~~system performance to support freight movement. The performance standards also could be used in prioritizing capital and maintenance improvements within the City.~~

Local Truck Access

New development could comply with delivery trucks requirements for proper access, maneuvering and operations. Where sizeable facilities are planned to serve light trucks (like utility trucks) and heavier delivery trucks, on-site spaces could be planned for loading zones and docks to allow adequate accessibility, loading and maneuvering. Limited number of loading/unloading zones could be provided for light delivery trucks to serve adjacent small shops and businesses that can not be accessed off-street. Intersections at local streets could have turning radii that provide for reasonable access by fire trucks, sanitation trucks, and light delivery vehicles. Curb parking on both sides of the local street must not obstruct accessibility of delivery and utility trucks to land uses. Where the right-of-way or free space allows, controls or special lanes and spaces could be imposed to separate and channelize the heavier trucks away from areas designed for automobiles and pick up trucks.

Pedestrian and Bicycle Strategies

All of the Alternatives would generate increased pedestrian and bicycle activity throughout the study area, with the Action Alternatives, including the Preferred Alternative, likely to contribute a higher proportion of pedestrians and bicyclists than under the No Action Alternative. Pedestrians and bicyclists impacts could be addressed with these identified strategies.

Sidewalk Improvements & Maintenance

The City and/or property owners could develop a program to help fund improvements to the sidewalk system including sidewalk maintenance, installation or replacement of ADA curb ramps, and filling in missing sidewalks. ~~to address existing trip hazards, locations not meeting ADA requirements, and to construct missing linkages. Improvements also could include the installation or replacement of non-code compliant curb ramps, and resurfacing of sidewalks to provide safer travel.~~ Developers also could be required to include these measures on their street frontage where improvements would be beneficial. ~~substandard facilities exist~~ The City is currently completing a citywide study of the pedestrian system, which will include recommended projects to improve the sidewalk and trail system including ~~covering~~ the study area.

Pedestrian Crossings and Linkages

Enhancing pedestrian linkages to the Stadiums, waterfront, and adjoining neighborhoods ~~will~~ could help mitigate and support the higher pedestrian volumes under the Action Alternatives, including the Preferred Alternative. Installing a pedestrian crossing along 4th Avenue S. near S. Atlantic Street to join in to the pedestrian staircase leading up to the elevated S. Atlantic Street overpass is one of the specific improvements that have been identified. Other pedestrian crossings also should be considered or enhanced along 1st Avenue S. north of S. Royal Brougham Way. Other locations for new crossings or enhancements to existing facilities could be located along Airport Way S. and S. Dearborn Street to facilitate easier pedestrian access to and from the South-of-Dearborn area. As development occurs along major corridors such as 1st Avenue S., Airport Way S., and S. Dearborn Street, additional opportunities for pedestrians to ~~safely~~ cross the corridors could be provided. Linkages to the waterfront trail along Alaskan Way could be promoted and improved. ~~Attractive and safe~~ Improved pedestrian access to neighborhood activity centers (community centers, health care facilities, active retail and cultural amenities) could be emphasized and provided. The use of all-way walk signals within the Pioneer Square, Japantown/Chinatown, and Little Saigon neighborhoods could be explored. These ~~will~~ could allow for improved pedestrian crossings while also potentially improving vehicle operations.

Pedestrian Scale Facilities
Programs to improve the pedestrian environment with ~~decorative~~ lighting, ~~more~~ landscaping treatments, and street furniture, such as benches, throughout the neighborhoods could be required of new developments. Allow for increased sidewalk width to accommodate these facilities. These facilities would encourage increased pedestrian travel. ~~by enhancing safety and comfort~~. In larger developments, providing for convenient pedestrian passage through the site may be beneficial.

Bicycle Lanes and Sharrows
~~Mitigation measures~~ Improvements to accommodate bicyclists are ~~included~~ identified in the Seattle Bicycle Master Plan. While these measures may eventually be incorporated, increased development in the study area would make them even more critical. They are included as mitigation strategies here because future development may provide the opportunity to incorporate these measures specifically when frontage improvements are incorporated. The Bicycle Master Plan lists the following specific improvements:

- **Installation of bike lanes**
  - 7th Avenue S (I-90 trail extension to S. Dearborn Street)
  - Airport Way S. (I-90 trail extension to 6th Avenue S.)
  - S. Royal Brougham Way (up to the new pedestrian structure associated with the SR 519 Phase 2 project).
- **Striping sharrows** (pavement markings designating bicyclists use of the roadway)
  - 6th Ave. S. from Airport Way S. to S. Jackson St. and S. Washington St. to Yesler Way
  - 7th Avenue S. from S. Dearborn Street to S. Jackson Street
  - Yesler Way from Alaskan Way S. to 2nd Avenue and from 3rd Avenue to 8th Avenue
  - S. King Street from 5th Avenue S. to Rainier Avenue S.
  - 4th Avenue S. (from S. Jackson Street to Yesler Way)
  - S. Jackson Street (from Alaskan Way S. to 5th Avenue S.)
  - Maynard Avenue S. (from S. Dearborn Street to S. Jackson Street);

Multi-Use Path
Extending the I-90 multi-use trail from its current terminus to completion, as included in the Bicycle Master Plan would provide a better regional connection to serve additional bicycle traffic generated under the No Action and Action Alternatives.

Event ~~Management~~ Strategies

Mitigation strategies to address the possible worsening of congestion during event-traffic conditions are important to consider for all Action Alternatives, as well as the No Action Alternative. Alternative 3's more intense projected development levels in the stadium vicinity means it may have the greatest needs for this type of mitigation among the Action Alternatives, although through-traffic would also continue to be an important contributor to future traffic conditions.

In order to effectively contribute to existing event management processes and proactively coordinate demand management strategies applicable to new development, a Transportation Management Association (TMA) could be formed. (Such a TMA is already present in the Duwamish area south of this study area.) Participation in a TMA could be included as part of development conditions in future development. The TMA's role could involve:

- monitoring evolving traffic conditions;
- information-gathering and sharing;
- defining cooperative alternative transportation strategies among area residents and businesses;
- advocating for service and facility improvements;

- pooling resources to implement strategies and capital improvements; and
- providing advisory input to agencies and coordinating boards (such as the Parking and Access Review Committee [PARC] convened by the City for TMP review).

It is important to note that the role of the TMA would be advisory, and would not fundamentally change the bases or manner in which event traffic management levels are determined. If future event-traffic conditions warrant, the TMA could assist in identifying supplemental strategies to be considered by decisionmakers such as the PARC committee. While these may need to be coordinated with the event venues' traffic management plans, such measures should not be considered as the funding or impact-mitigation responsibility of the event venues.

~~As the South Downtown area continues to change and more development occurs, the appropriate allocation of resources to achieve the TMP goals is the primary mitigation strategy for events. The resources could be focused on how event traffic and parking will be managed based on the expected impacts of the Alternatives. Mitigation strategies for each Alternative are dependent on the specific timing and nature of the proposed developments and capital transportation improvement projects (such as SR 519).~~

~~Mitigation strategies for event management are important for all Action Alternatives, as well as the No Action Alternative. These measures may need to be most aggressive under Alternative 3 due to more intense projected development levels assumed in the immediate area of the stadiums, compared to the other Action Alternatives.~~

Parking and Traffic Control

Increased development and density in the immediate vicinity of each stadium combined with added development along the major corridors providing access to the stadiums would create additional pressures on the accessibility of each venue, under any Alternative. This may at some point result in ~~would require~~ additional revisions to traffic controls being desirable depending on the nature of the parking supply changes that could occur. If, and to the extent that additional resources are required to meet the evolving transportation management needs of the area, the City of Seattle, or even possibly a TMA, may need to contribute more resources ~~would need to be contributed~~ to better direct traffic to and from the events, while also providing local access to close-in areas.

For example, the increased development in the South-of-Dearborn and Stadium Area would require a certain level of accessibility to be maintained. As a result of increased development density along 1st Avenue S., an increased program of pedestrian and traffic control, along with further access restrictions, ~~would~~ may be necessary to ensure continued accessibility during ~~efficient~~ events. ~~traffic management.~~ While difficult to accurately predict, ~~Overall, it is expected~~ it is also possible that the area and number of intersections where traffic control is provided would also benefit from changes or expansion ~~need to be expanded~~ based on the increase in level of development and background growth. ~~with Alternative 3 requiring the highest level of resources~~ If that were to occur, the City, a possible TMA, and event venues could work together to determine if changes can be achieved given the current level of event traffic management commitment by the venues, or if additional resources from the City or TMA would be the catalyst for an expansion of coverage.

Parking Restrictions and Enforcement

During major events, additional parking restrictions and enforcement measures in the South-of-Dearborn and Stadium Area could be necessary given the intensity of development under the Action Alternatives. Increased signage would need to be installed to assure that appropriate parking restrictions are in place during events to accommodate the continued needs of surrounding residences and businesses. Higher

levels of parking enforcement also would be desirable if issues occur that impact the adjacent businesses and/or residential areas.

~~**Pre-Sell of Parking**~~

~~Continuing and enhancing a program of pre-selling parking would help to offset impacts associated with continued development around each stadium. The pre-sold parking permits would reduce the overall traffic volumes created by the additional circulation associated with searching for parking.~~

Intelligent Transportation Solutions

Additional measures to mitigate the impacts to events ~~traffic management~~ would include potential Intelligent Transportation System (ITS) solutions such as parking guidance, variable message signs, and additional camera installations to assist with security and traffic management.

Pedestrian Improvements ~~Safety~~

The City and a TMA ~~event managers~~ could work to provide additional traffic control measures during events to increase pedestrian access ~~safety~~ and efficiency along the surrounding corridors such as 1st Avenue S. and 4th Avenue S. ~~during events.~~ Increased development in the study area would generate additional pedestrian demand, which could ~~would~~ require more resources in place to ~~safely~~ direct combined event and resident pedestrian traffic.

~~**Subsidized Transit**~~

~~Additional subsidies for use of transit to/from events would help to reduce the overall impacts of increased development on event traffic and parking. This could be explored as part of the annual review and update of the TMPs.~~

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Alternatives 1, 2, ~~and~~ 3 and the Preferred Alternative would accommodate additional amounts of future development within the study area which would contribute to additional travel demands and congestion along arterial corridors. The additional development would also increase traffic access and circulation in the area, reducing the efficiency of through-traffic. This added congestion would contribute to measurably poorer performance of the transportation network, in terms of slower average speed of movements along corridors and somewhat worse performance at several intersections that would experience LOS F conditions. It would also contribute to declines in bus transit efficiency, ~~and~~ freight mobility and event conditions within the study area.

PARKING

AFFECTED ENVIRONMENT

OVERVIEW

Appendix G to the Draft EIS includes a parking impact analysis that is summarized in this section. The analysis reviews on-street and off-street parking resources, focusing on the vicinities most likely to be affected by the alternatives' zoning changes and future development to the year 2030.

OFF-STREET PARKING

The surveyed off-street parking consists mainly of paid parking available to the public, though some of the lots include reserved parking for nearby uses. Most of the parking is available for hourly parking, with some available for monthly permit parking. The surveyed off-street parking serves employees, clients and customers of businesses, many of which do not have parking on their properties. Table 3-56 summarizes the parking supply and estimated utilization at the surveyed off-street parking lots. The mid-day non-event utilization for off-street parking ranges from approximately 60-90%, with the exception of the Stadium Area neighborhood. Highest utilization was observed in the Pioneer Square neighborhood, which is closest to the Downtown business district and contains a significant amount of existing office and retail land use.

Table 3-56
Surveyed Off-Street Surface Parking Supply and Utilization (2007)[1]

Neighborhood[2]	Parking Supply[3]	Parking Utilization[4]
Chinatown/Japantown	900 stalls	70%
Pioneer Square	500 stalls	90%
Stadium Area	400 stalls	10%
South of Dearborn	400 stalls	80%
Little Saigon	350 stalls	60%

Source: Field observations, March 2007
1. Survey was visual in nature, estimating the approximate supply and utilization.
2. Neighborhoods defined by DPD staff.
3. Supply is approximate and does not account for specific-use parking garages, such as the garages for Safeco Field and Qwest Field. Rounded to nearest 50.
4. Utilization is approximate and was observed during weekday mid-day hours, with no events underway at the stadiums.

- **Chinatown/Japantown**: This neighborhood's surveyed supply consists of mostly public hourly parking lots and reserved parking lots.
- **Pioneer Square**: The majority of this neighborhood's surveyed supply is in public hourly parking lots.
- **Stadium Area:** This neighborhood has fewer public hourly parking lots than other districts (excluding the stadium garages). Daytime utilization of these lots is low, but during typical stadium events the utilization is high.
- **South of Dearborn:** Most of the parking is available to the public, with some private lots dispersed through the area.
- **Little Saigon**: In this neighborhood, the off-street parking is mainly private or reserved.

ON-STREET PARKING

The on-street parking throughout the study area is highly utilized during the weekday. Types of on-street parking include: free hourly, paid hourly (including paystations and meters), and unrestricted. The most prevalent are paid hourly and free hourly, with time limitations on the free hourly ranging from 1 hour to 4 hours. In all of the neighborhoods, several 3-minute passenger loading zones are dispersed throughout the blocks, as well as 30-minute loading zones. These loading zones are more prevalent in areas where businesses are located curbside. Table 3-57 summarizes prevalent on-street parking types and observed utilization rates. At utilization rates of 80 percent and above, the public typically perceives there is no excess capacity available.

Table 3-57
Prevalent On-Street Parking Type and Observed Utilization (2007)[1]

Neighborhood[2]	Dominant Parking Type[3]	Parking Utilization[4]
Chinatown/Japantown	Paid Hourly	90%
Pioneer Square	Paid Hourly	90%
Stadium Area	Free Hourly/Unrestricted	80%
South of Dearborn	Unrestricted	90%
Little Saigon	Free Hourly/Unrestricted	80%

Source: Field observations, March 2007
1. Survey was visual in nature and did not document exact number of spaces by type, but gathered approximate utilization by type.
2. Neighborhoods defined by DPD staff.
3. Dominant parking type is based on field observation.
4. Utilization is approximate and was observed during mid-day hours.

- **Chinatown/Japantown:** This neighborhood primarily has paid hourly on-street parking, with some blocks having free hourly and unrestricted hourly parking. A few areas have dedicated bus zones. The mid-day unrestricted parking was observed to be nearly 100 percent utilized, while the other types were approximately 80 to 90 percent utilized.
- **Pioneer Square:** This neighborhood also has primarily paid hourly on-street parking, with more bus zones than Chinatown/Japantown. In addition, along certain blocks the parking is restricted during one or both of the peak commuting hours (7:00 am to 9:00 am or 4:00 pm to 6:00 pm) in order to increase travel lane capacity for peak hour demand. These restrictions occur primarily along 1st Avenue S. The mid-day utilization in this neighborhood was observed to be high, at approximately 90 to 100 percent.
- **Stadium Area:** In this neighborhood, the on-street parking is generally either free hourly or unrestricted. Bus zones along certain blocks, mainly on 1st Avenue S, reduce on-street parking supply. In addition, the parking is restricted during one or both of the peak commuting hours (7:00 am to 9:00 am or 4:00 pm to 6:00 pm) in some locations in order to increase travel lane capacity to serve peak hour demand. Mid-day parking utilization was slightly lower than other neighborhoods, at approximately 70 to 80 percent.
- **South of Dearborn:** This neighborhood has nearly all unrestricted on-street parking, with a couple of blocks having free hourly parking. The mid-day utilization is high in this area, at approximately 90 to 100 percent.
- **Little Saigon:** This neighborhood has mainly unrestricted and free hourly on-street parking, with some bus zones as well. The unrestricted parking has a high mid-day utilization, at approximately 90 to 100 percent, while the free hourly parking mid-day utilization is slightly lower, at approximately 70 to 80 percent.

ENVIRONMENTAL IMPACTS

The parking impact analysis for this programmatic EIS focuses on the potential displacement of parking that could occur with future infill development to the year 2030, and related trends that might affect how on-street and off-street parking are impacted. Future development patterns assumed for each EIS alternative were identified by DPD staff. This provides an understanding of the magnitude of parking loss that could occur and its geographic distribution among the neighborhoods. Other parking losses, such as those due to major road construction, are also described.

OFF-STREET PARKING

Because the properties available for future infill development are primarily those in surface parking uses, future construction of new buildings would displace existing parking supply. While redevelopment of these areas would probably include replacement stalls (including replacement of 491 spaces currently at the Qwest Field north parking lot), a portion of the new parking spaces would likely be reserved solely for the users of the building. The parking utilization of those spaces available to the public that are predicted to be displaced under each of the EIS alternatives is summarized in Table 3-58. This represents the displaced demand for parking.

Table 3-58
Off-Street Study Area Parking (Currently Utilized) Potentially Displaced by Future Development[1]

Neighborhood	No-Action	Alternative 1	Alternative 2	Alternative 3
Chinatown/Japantown	360	610	610	510
Pioneer Square	410	410	270	410
Little Saigon	10	0	0	0
South of Dearborn	60	100	120	250
Stadium Area	0	20	20	20
Total	**840**	**1,140**	**1,020**	**1,190**

Source: Field observations, March 2007.
1. Numbers rounded to the nearest 10.

2030 No Action Alternative (Alt. 4)

Future development under the No-Action Alternative would displace approximately 850 utilized parking spaces, primarily affecting Pioneer Square and Chinatown/Japantown west of I-5. Some of the displaced parking demand could be satisfied in other locations such as public parking in the Stadium Area. Such parking is more likely to be used by employees who park for the entire work day and are willing to walk longer distances. Other parking users such as retail or restaurant patrons are not typically willing to walk longer distances for parking. Because on-street parking is already highly utilized in the study area, it likely could not absorb much of the displaced parking demand. Some demand could be eliminated with shifts to transit, ridesharing, or non-motorized travel modes when available parking becomes sparser and more expensive.

The series of projects associated with SR99/Alaskan Way Viaduct ~~replacement project's~~ construction ~~is~~ are also likely to eliminate a substantial amount of surface parking capacity, both on-street (approximately 220 to 650 spaces) and off-street (approximately 50 to 120 spaces). This is likely to noticeably impact parking within the study area, particularly in the Stadium Area and Pioneer Square neighborhood due to spill-over of displaced demand. The timing and final design of the Viaduct replacement are not yet determined.

2030 Action Alternatives (Alts. 1, 2, 3)

As shown in Table 3-58, the Action Alternatives would likely displace approximately 1,000 to 1,200 parking spaces by year 2030, which would be 200 to 400 more spaces than under the No-Action Alternative. This would generate additional amounts of "spill-over" demand for parking in other locations, and would probably also result in some shift to alternative modes of transportation, if available parking supply is reduced, is more difficult to find or is more expensive. The overlap of stadium facility event-related parking demand also would influence the availability and cost of parking during days with events.

Figure 3-48 illustrates the potential loss of utilized parking in each neighborhood per Action Alternative. Alternative 1, which concentrates more development in the Chinatown/Japantown and Pioneer Square neighborhoods would result in the highest loss of parking in those neighborhoods. Alternative 2 is similar to Alternative 1 but with lesser projected parking losses by 2030 per its growth scenario. Alternative 3 could lead to higher levels of parking loss in the South-of-Dearborn area than in the other alternatives, and is indicated to have the greatest potential amount of parking spaces lost per its growth scenario.

Based on a review of projected development under the Preferred Alternative, it could potentially result in a total of approximately 1,200 to 1,300 off-street parking spaces displaced, 60-160 spaces more than Alternative 1, due to added potential for parking loss projected in Little Saigon. However, this does not consider the probable replacement parking that would likely be present with an additional mixed-use development project anticipated for Little Saigon (DPD, 2008).

Parking Supply for New Development

The City of Seattle has developed unique parking requirements for developments in Downtown zones. Downtown is an area roughly bordered by Denny Way on the north, the waterfront on the west, I-5 on the east and S. Dearborn Street on the south. Zoning Downtown recognizes the role the area plays as the densely developed urban core of the City, accommodating high-rise buildings, a large workforce, shopping and entertainment, and multifamily residential uses. The Downtown is well served by transit and some vehicular congestion is expected. All study neighborhoods except Little Saigon, South-of-Dearborn and part of the Stadium Area are covered by Downtown rules. Land uses within the Downtown zones are not required to provide any off-street parking and non-residential uses are limited to providing a maximum of one space per 1,000 square feet. Table 3-59 provides a comparison of Seattle City Code requirements for off-street parking with peak parking rates from the Institute of Transportation Engineers.

These requirements, along with good transit service and a free-ride zone have helped to create a low single-occupant vehicle (SOV) commute mode in central Downtown. The personal cost of parking is one of the most influential variables that influences travel mode[1]. In 2000, the SOV rate for Downtown Seattle was about 40 percent[2]. Over time, as utilized parking is displaced and if new development puts in little or no parking due to zoning limitations, a similar shift in commute mode would be anticipated if supported by expanded and improved transit service and other supportive programs. Retail and restaurant patrons would be more difficult to shift away from vehicular modes than urban office workers and residents.

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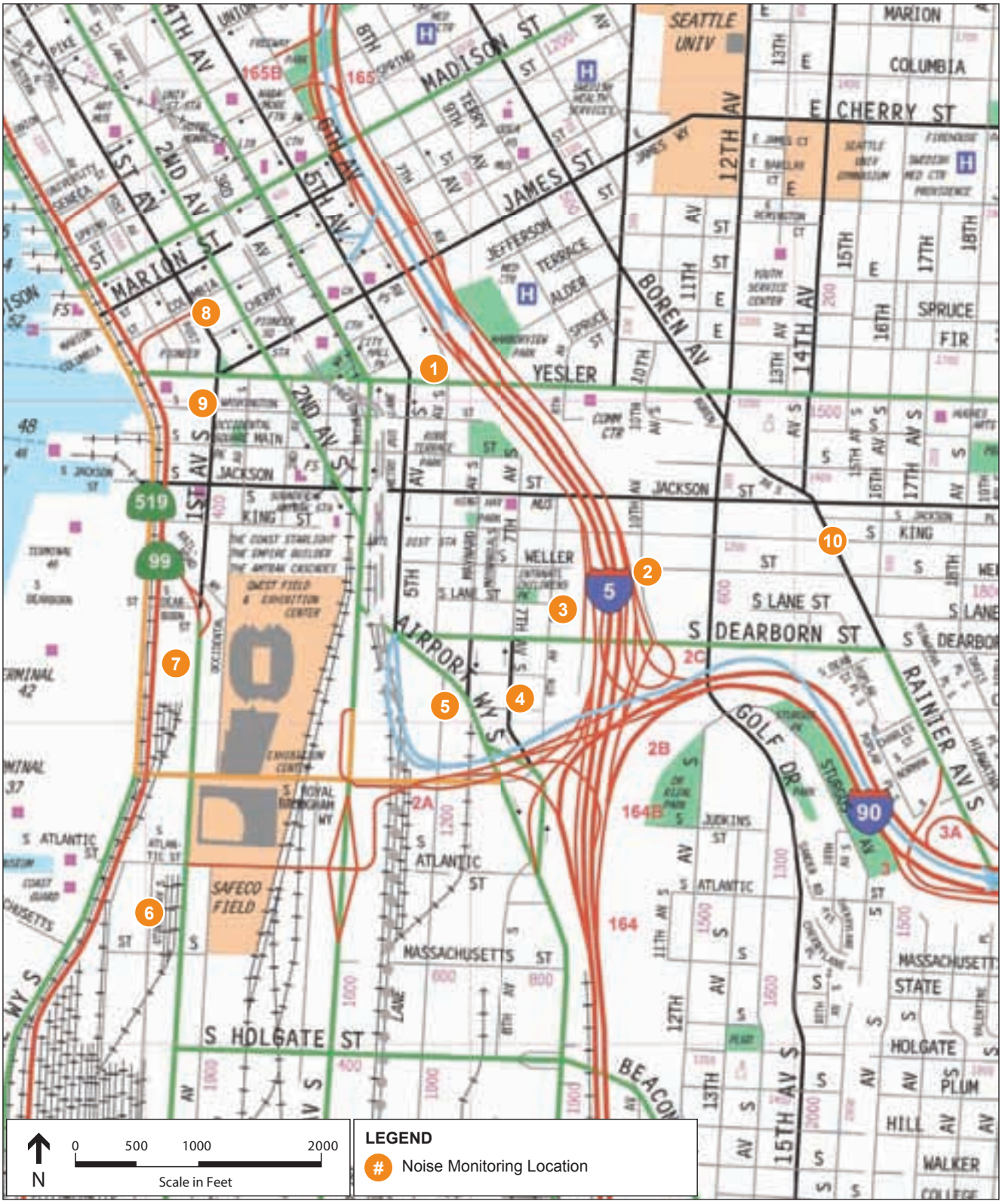

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CREATED BY: JAB / DATE LAST UPDATED: 03/26/07

MAP: Rand McNally & Company, 2006.
SOURCE: ESA Adolfson.

Figure 3-38
Noise Monitoring Location Map

Livable South Downtown

0 2 4 6 8 10
Scale in 100 Feet
N

2030 No Action Alternative (Alt. 4)

Due primarily to planned development projects in the Pioneer Square and the Chinatown/Japantown neighborhoods, parking supply that currently accommodates the demands generated by other uses in the neighborhoods will be lost, over time, directly displaced by infill development. Therefore, those businesses whose customers and employees currently rely on parking in those surface lots are likely to be negatively impacted.

Table 3-59
Seattle Parking Code by Land Use

Land Use	Downtown Zones[1]	Other Zones[2]	ITE Peak Demand Rates
Residential (per unit)	0[3]	1.0[3]	1.0
Office (per ksf)	1.0	1.0	2.4
Hotel (per room)	0.25	0.25	0.91
Retail	1.0	2.0	2.65
Restaurant (per ksf)	1.0[4]	4.0	7.3

Source: Seattle Municipal Code and *ITE Parking Generation*, Third Edition.
1. All study zones except Little Saigon, South of Dearborn and part of the Stadium Area. Rate for hotel is standard for Seattle, as no maximum per room is specifically defined for Downtown Zones.
2. Little Saigon and South-of-Dearborn neighborhoods.
3. While the Downtown zones have no minimum or maximum requirement for residential uses, for other zones, for purposes of simplicity, one parking space per unit is assumed. Seattle code actually has varied requirements depending on the total number of units in a development, number of bedrooms in the units and income level (reductions allowed for low income housing).
4. For Chinatown/Japantown, restaurant requirements are 2 spaces per 1,000 for area over 2,500 sf.

2030 Action Alternatives (Alts. 1, 2, 3, and the Preferred Alternative)

Under all of the Action Alternatives, the largest projected loss of utilized spaces due to development would be in the Chinatown/Japantown neighborhood, followed by the Pioneer Square neighborhood. Alternative 3 would result in some additional lost parking in the South-of-Dearborn neighborhood. Parking associated with office land use, as opposed to general commercial land use, would result in less of a disparity between parking demand and parking supply due to:

- The ability to shift office related travel modes to non-SOV alternatives compared to commercial related travel modes; and
- The disparity between the maximum requirements for off-street parking under the Land Use Code in Downtown zones and typical maximum parking demand for office and retail/restaurant land uses. In Downtown zones, non-residential uses may provide no off-street parking or up to a maximum of 1 space per 1,000 square feet. While parking demand Downtown appears to be much lower than the rates provided by ITE due to good transit service, the high cost of parking and limited parking supply, retail and restaurant parking demand are expected to generate a higher demand per square foot than office uses.

Alternative 1 has more office development identified than Alternative 3. Alternative 3 has the largest potential for non-office commercial development. Therefore, the development impacts to the availability and price of off-street parking would be more noticeable for Alternative 3 than Alternatives 1 and 2.

ON-STREET PARKING

With future infill development and other losses incurred through road construction projects, demand for on-street parking would increase. However, due to its high existing utilization, it could not satisfy much

of the demand. Given these demands, it is likely that currently unrestricted on-street parking would be converted to time-restricted paid parking, to encourage frequent turn-over. High turn-over spaces are suited to addressing retail customer needs but not employee needs for the work day. This strategy works well as travel alternatives like transit or biking are less feasible for retail customers than long-term employee commuters, as long as adequate transit service and bicycle facilities are provided. This strategy is echoed in Seattle's Comprehensive Plan parking goals, parking quantity policies and parking development standards policies.

2030 No Action Alternative (Alt. 4)

Some on-street parking will be eliminated with the completion of the SR 519 Phase 2 project. Parking for approximately 100 vehicles on both sides of 3rd Avenue S., south of S. Royal Brougham Way will be eliminated by this project. The lost parking is a result of traffic being rerouted to 3rd Avenue S. to access the S. Royal Brougham Way grade-separated structure across the railroad tracks. Another 10 to 15 spaces would be lost along the west side of 1st Avenue S., north of S. Atlantic Street due to planned improvements at the S. Atlantic Street intersection.

Additional on-street parking will be eventually lost with the replacement of the Alaskan Way Viaduct. While the central waterfront portion of the viaduct is still under discussion, any Alternative will result in lost on-street and surface parking that is currently available to the public. According to the EIS for the project, approximately 220 to 650 on-street parking spaces and up to 120 off-street parking spaces would be lost. Some of these will be in the Pioneer Square neighborhood and Stadium Area. The Surface, Bypass and Tunnel alternatives result in the greatest loss, while the Rebuild and Aerial alternatives lose the least amount of parking. The City is considering aggressive parking management strategies, especially during the construction phase, to support transportation and transit speed and reliability.

The planned major projects are likely to include modifications to the management of the on-street parking where on-street parking is currently unlimited and/or free. For example, the free unrestricted and free hourly parking in the Little Saigon vicinity may convert to paid parking in order to ensure the turn-over and availability critical to new commercial needs. Other impacts to on-street parking from planned projects would depend on access, new loading zones, etc. For example, if a planned project required an additional access drive in an area that currently offers curbside parking, some of that curbside parking would be lost in the area of the new driveway and the surrounding clear zone.

2030 Action Alternatives (Alts. 1, 2, 3, and the Preferred Alternative)

Impacts to on-street parking would include those identified in the No-Action Alternative.

Alternative 1 concentrates development within the northernmost neighborhoods. On-street parking is mostly time-limited and paid parking in the Pioneer Square and Chinatown/Japantown neighborhoods. As such, there is only a modest opportunity to improve turn-over for on-street parking by conversion of free and unlimited parking. Some conversion however, is likely in the Chinatown and Little Saigon areas.

Alternative 2 is likely to convert more free and unlimited on-street parking to paid and time-limited parking in the Little Saigon and South-of-Dearborn vicinities than under the No-Action and Alternative 1 scenarios. Alternative 2 would likely include more conversion of on-street parking to paid and time-limited parking in the Stadium Area vicinity than any of the other Alternatives.

As with the No-Action Alternative (Alternative 4), some on-street parking would be potentially lost with new development projects if access points (curb-cuts) are moved or added in an area where on-street parking is currently available. Therefore, with Alternative 1, on-street parking is at risk in the Pioneer Square and Chinatown/Japantown neighborhoods. Under Alternative 2, more on-street parking is at risk

in the Little Saigon and South-of-Dearborn areas than the other neighborhoods. Under Alternative 3, more on-street parking is at risk in the Stadium Area and South-of-Dearborn than in the other areas.

In addition to the conversion of free and unlimited on-street parking to higher turnover time-limited and paid parking, or the potential loss of parking due to new or moved curb-cuts, other impacts may result from transportation-related mitigation measures that could be implemented. For example, if, as a mitigation measure, some curb-side parking is converted to a transit lane, that on-street parking would be lost for use by the general public. The following list identifies some possible mitigation measures that have the potential to impact the supply of on-street parking:

- Pedestrian bulb-outs that are installed at intersections or mid-block crossings in order to narrow the crossing distance for pedestrians as well as make crossing pedestrians more visible to approaching traffic. They are often installed where on-street parking is provided because the curb lanes are not used for through-traffic. Bulb-outs usually increase the clear zones from the intersections and can result in the loss of one to two parking spaces on each side, depending on the existing configuration.
- Transit related modifications that take on-street parking, such as additional transit stops, or bus queue bypass lanes at intersections. The greatest potential impact from transit related mitigation would be the conversion of curb lanes to transit lanes, in which case entire block-faces of on-street parking could be lost.
- Curb lanes which currently allow parking may be converted to general purpose through-lanes for added capacity. This would have a similar impact to on-street parking as the conversion of curb-lanes to transit lanes (see above).

Essentially all of the above findings about impacts of the alternatives are applicable to the Preferred Alternative, which represents a hybrid of the higher levels of change proposed under Alternatives 1 and 2 across the study area.

MITIGATION STRATEGIES

Adverse parking-related impacts could be addressed by two approaches: reducing demand, and managing the supply, that are described by the following possible mitigation strategies. (Also, refer to the Transportation section in this chapter for other discussion and mitigation strategies related to event parking.)

POSSIBLE MITIGATION STRATEGIES

Reduce Parking Demand

Seattle has been successful in reducing parking demand in the Downtown core area. This is a result of several factors: limited parking supply, high parking prices, extensive transit coverage, free ride transit zone, bicycle services, pedestrian connections and TDM requirements for larger employers or newer buildings. Likewise, the demand for parking within the study area could be reduced by increasing transit service, providing pedestrian and bicycle improvements, and working with employers and developers to provide aggressive TDM programs. Another option could be to limit maximum permissible amounts of certain kinds of parking (such as commuter parking) in this portion of Downtown. Reduced availability of parking supply typically results in increased parking costs. The shortfall in parking and/or higher parking costs would result in more people shifting modes. Incorporating flex-cars as part of TDM measures also would help reduce resident reliance on individual cars.

Parking Management

The City could expand management measures for on-street parking in order to support commercial businesses in the area. This could be done by instituting time limitations and paid hourly parking where appropriate. Added enforcement may be required to maximize effectiveness. Neighborhoods adjacent to

the study area neighborhoods under development could be monitored for impacts of spill-over parking. Time restrictions and special restricted parking zones could be needed to discourage the spread of displaced parking demand to neighboring areas.

Along with converting free on-street parking to paid parking, the City also is able to install all-day paid parking that would effectively allow commuters and employees to park on-street in an area for a fee. The City would need to look at installing a combination of all-day and short-term parking in specific areas of South Downtown, such as Chinatown/Japantown and Little Saigon, in order to best manage the on-street parking. ~~The revenues from the on-street parking could be used to help fund area-wide parking management programs (although this would require a change in current City policy with respect to use of parking revenues).~~

Short-Term Parking

The City is looking at ways to enhance short-term (typically up to 2 ~~to 4~~ hours) parking supply in Downtown, Pioneer Square and Central Waterfront buildings that is currently sold as commuter or monthly parking. This program, called the Center City Parking Program, will help to address the parking losses from the SR99/Viaduct replacement construction. The cornerstone of that mitigation program is an Electronic Parking Guidance System (see following paragraph), negotiating with Downtown building owners and major employers to convert existing off-street parking from commuter parking to short-term visitor use, and creating marketing tools that provide a consistent system for supporting short-term parking.

Dynamic Parking Signage (Electronic Parking Guidance System)

The City can install variable message signs to indicate the location of available off-street public parking. Signs could be located at off-ramps from the highway system to help drivers navigate vehicles toward public parking areas. This strategy could also reduce excess circulation associated with searching for parking, while also assisting in managing parking on event days.

Curb Lane Management

This strategy would aim at establishing standards for new developments whereby loading zones are located in alleys or side streets rather than on major streets. This would allow for additional space for on-street parking or eliminate additional on-street parking from being removed as a result of new development.

Pay Stations

The remaining parking meters in the study area could be removed and replaced with pay stations. The pay stations allow greater flexibility in the form of payment. Additionally, it is easier to collect parking revenues and manage parking conditions with the pay station technology.

Modify Development Caps to Accommodate Lost Public Parking

The City may want to consider a modification to increase the current parking caps in the Downtown zones to allow developers to provide additional short-term public parking to partially address ~~the public~~ on-street and off-street parking losses. This approach could be more strongly encouraged through provision of incentives to provide such parking, or mandated by requiring provision of some of the displaced parking. Legal and financial aspects of such programs or requirements need to be explored further.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts are identified.

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U.S. Dept of Housing & Urban Development
U.S. Environ. Protection Agency Region 10
U.S. Fish & Wildlife Service, Pacific Region
U.S. Federal Aviation Administration
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Native American
Muckleshoot Indian Tribe
Duwamish Tribe
Suquamish Tribe
Tulalip Tribes of Washington
United Indians of All Tribes Foundation
Seattle Indian Services Commission

State
Washington St. Dept. of Ecology
Washington St. Dept. of Fish & Wildlife
Washington St. Dept. of Social & Health Services
Washington St. Dept. of Archaeology and Historic Preservation
Washington St. Dept. of Community Development
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Office of Economic Development
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Public Utilities
Parks and Recreation
Schools
Fleets and Facilities, Emergency Management
Planning Commission, Design Commission

Other
Historic Seattle

Chapter Four

Response to Comments on the Draft EIS

CHAPTER FOUR

RESPONSE TO COMMENTS ON THE DRAFT EIS

Comment Letters
Submitted by Agencies, Groups and Individuals

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13. Inter*Im Community Development Association	93 of 135	4-30
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Comment Letters

Letter #1

From: "Woehler, Kerri" <WoehleK@wsdot.wa.gov>
To: <gordon.clowers@seattle.gov>
Date: 12/17/2007 7:50 AM
Subject: EIS for the Livable South Downtown Planning Study

Mr. Clowers,

Thank you for the opportunity to comment on the draft Environmental Impact Statement for the Livable South Downtown Planning Study. Building heights are a concern in this area given its proximity to King County International/Boeing Field Airport and Harborview Medical Center's helipad. We recommend that the county work closely with these two stakeholders to avoid airspace conflicts. We also recommend that the county advise developers in this area of their obligation under Federal Aviation Regulations Part 77 to review and complete, if necessary, Form 7460-1, Notice of Proposed Construction or Alteration. 1

WSDOT Aviation provides technical assistance to support communities working to address airport land use compatibility. Please do not hesitate to contact me at 360.651.6312 or woehlek@wsdot.wa.gov if you have any questions or need assistance.

Sincerely,

Kerri Woehler
Aviation Planner
WSDOT Aviation
360.651.6312
www.wsdot.wa.gov/aviation

pscleanair.org
Puget Sound Clean Air Agency

Working together for clean air

December 17, 2007

City of Seattle Department of Planning and Development
PO Box 34019, 700 Fifth Avenue, Suite 2000
Seattle, WA 98124-4019
Attn: Gordon Clowers

RE: Draft Environmental Impact Statement for Livable South Downtown Planning Study

Dear Mr. Clowers,

Thank you for the opportunity to comment on the draft Environmental Impact Statement for the Livable South Downtown Planning Study. We concur that "air quality should be a consideration in evaluating overall land use compatibility, especially where residential uses would be located in proximity to highways, railroads, port and industrial sources".

The South Downtown Planning area contains many of the features vital for creating air and climate friendly communities including mixed uses, the potential for higher density and a variety of transportation choices. Those same features also can adversely impact public health and global climate. For example, the variety of transportation choices in the area is also a source of air pollution including air toxics and fine particulates. The challenge is to find the balance between creating the features vital to the desired community and protecting public health and air quality. 1

We have two general comments intended to generate additional information to assist decision makers in achieving that balance:

- The area of most concern for the impact of air pollution from transportation facilities on residential uses, such as I-5 and the rail lines, should be increased to 200 meters.
- The plan for South Downtown should include features that protect public health, air quality and global climate, such as diesel emissions reduction programs, increased vegetation in public areas and green roofs on buildings.

A copy of our policies "Growth Management Strategies for Air and Climate Friendly Communities" and information on the health effects of diesel particulate matter and fine particulate matter is enclosed to provide additional context for our comments.

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We can provide the City with technical assistance to address these comments in the Final EIS and look forward to further discussions.

Sincerely,

Paul Carr
Air Resource Specialist

Attachments

cvp

Healthy People, Healthy Places, Healthy Planet:

Growth Management Strategies for Air and Climate Friendly Communities

Overview

The choices jurisdictions make when building public facilities and transportation systems, permitting development, and adopting and implementing growth management plans affect where people live, the types of homes they live in, how far they travel, and whether they drive alone or travel with others.

All these public and private choices have an effect on public health, air quality and global climate. As more knowledge about the connections between land use, transportation and air quality becomes available, it is essential that the Puget Sound Clean Air Agency and other jurisdictions share what we know and work together.

The historical reliance on the Puget Sound Clean Air Agency, Washington Department of Ecology and the Environmental Protection Agency to address air quality through technology, such as new motor vehicle emission standards, is no longer sufficient to provide healthy air for our citizens, our communities and our planet.

While we have been successfully reducing many sources of air pollution, such as carbon monoxide, many threats to public health and air quality remain, and the nature of the problem is changing. Climate change is happening, and human actions, primarily fossil fuel burning, are the key cause of the problem.

As more people live in the Puget Sound region and more development occurs, air pollution, greenhouse gases and public health risks could increase. Living, working or attending school too close to air pollution sources may increase both cancer and non-cancer health risks.

Because of these concerns, we are increasing our focus on fine particulates and air toxics and are asking other jurisdictions to do the same. Mitigation of the construction impacts of diesel engines may also be warranted where staging areas could unduly impact residences or businesses, or where construction periods for major projects will be prolonged or involve large numbers of hauling trucks or pieces of construction equipment.

With increasing levels of mixed use development, infill and redevelopment of brownfield sites, mitigation of potential air toxics and odor problems and proper separation of land uses that emit harmful emissions from concentrations of people is becoming more significant. The Clean Air Agency cannot resolve these issues alone.

Jurisdictions should consider air quality when addressing incompatibility issues in growth management policies and land use codes, issuing construction and occupancy permits and creating developments. Communication and coordination between the Clean Air Agency and

other jurisdictions on these air quality compatibility issues will help to achieve proper separation and appropriate mitigation.

Communities must consider air quality and public health along with their housing needs, economic development priorities, transportation needs and other quality of life issues. We believe that with careful location and planning, growth management concepts that benefit regional air quality and address climate change can be compatible with protecting the health of individuals at the neighborhood level.

We acknowledge the uniqueness of communities – that there is no "one size fits all" solution – and are committed to working with jurisdictions to implement solutions that are best for their communities. This commitment extends to all jurisdictions that are involved in growth management issues, including cities and counties, regional governments, transit agencies and special purpose districts such as port authorities and fire districts.

The following clean air policies for local growth management planning are intended to guide the agency and other jurisdictions so that growth management actions in the region will promote public health, clean air and climate protection. The policies focus on six key action areas:

- Air and climate friendly development
- Cleaner travel
- Reducing exposure to air pollution
- Cleaner heating
- Environmental justice
- Using environmental laws for better public health and air quality

The first application of these policies is at the planning level of growth management for integration into regional, comprehensive, transportation and other plans. Secondly, they can be applied at the regulatory level, incorporated into development regulations, providing guidance for revising development regulations and standards. The third application of the policies is at the site specific level of growth management, such as during the design and construction of individual projects, because they provide useful guidance for building and site design monitoring.

Many, if not most, community decision makers will find that their existing policies and plans are consistent with these policies. Much of that consistency reflects earlier efforts incorporating air quality considerations into growth management plans. And much of that consistency reflects the growing consensus for development patterns, such as urban centers and higher density, which are also beneficial to air quality and the climate.

Policies

1. *Implement air and climate friendly design, construction and operation*

Urban development, whether large or small, residential or commercial, public or private, will individually and cumulatively impact public health and air quality in the region and the global climate. Recent urban design research has demonstrated that compact, denser development in transit-friendly urban centers can reduce auto trips and resultant air pollution and greenhouse gases. Well-conceived and coordinated growth management

planning and design can be an important element in efforts to protect public health, ensure good air quality and protect global climate. Sustainable-building and energy-efficiency standards and practices and construction mitigation measures can reduce greenhouse gas emissions and other air quality impacts.

Air and Climate Friendly Design, Construction and Operation Policies:

Guide growth to urban and industrial centers featuring

- mixed land uses and higher densities.
- orientation around transit service.
- safe, easy pedestrian access.
- a balance of transit, pedestrian, bicycle and automobile transportation options for a variety of trip types, e.g. work, shopping, school.

Promote cleaner, less polluting development by

- increasing the use of low emission construction equipment and practices, e.g. avoiding idling.
- using site and building designs, technology, and practices that reduce or eliminate harmful emissions, e.g. forested open space and green-building concepts.
- analyzing and mitigating cumulative impacts on air quality and climate from development occurring across the region and over time and from multiple projects within a sub-regional area, e.g. urban growth area, harbor area, travel corridor, valley.
- collaborating on transportation and land use projects that reduce emissions from mobile sources.

2. Promote cleaner travel choices

Driving a private car is the most polluting daily activity of a typical citizen. Local actions can promote cleaner travel choices including cleaner fuels and vehicles and non-drive alone modes. Local land-use and transportation plans can ensure that people have transportation choices that offer congestion relief, do not require driving alone, support efficient movement of goods and services and reduce harmful emissions.

Cleaner Travel Policies:

Promote less polluting travel by

- creating developments and subdivisions that incorporate pedestrian access and create opportunities for walking or taking transit for daily shopping needs.
- creating opportunities for carpooling and car sharing.
- increasing the use of low or zero emission vehicles, vessels, equipment and fuels.
- retrofitting diesel vehicles, vessels and equipment with emission reduction equipment.
- changing how vehicles, vessels and equipment are operated, e.g. no idling.

Promote transportation investments that reduce vehicle and vessel emissions by

- reducing the miles traveled or trips taken.
- reducing congestion that contributes to air pollution.
- improving transit service and facilities.
- increasing pedestrian and bicycle facilities.
- improving connections between modes of transportation.

- improving freight movement without encouraging drive-alone travel.
- creating opportunities for car sharing by businesses and residents.

3. Reduce exposure to air pollution

The agency supports mixed-use, higher density and increased intensity development. However, such development can result in new uses encroaching on existing uses, such as homes encroaching on farms and businesses encroaching on homes, which can result in concentrations of people being exposed to harmful air emissions.

Additionally, the increasing use of mixed-use and denser development to accommodate growth, while beneficial to regional air quality, requires greater care in making sure land uses and high-volume travel corridors that produce harmful air emissions are appropriately separated from residential uses and other concentrations of people to avoid air quality related health impacts to sensitive populations and nuisances such as odors, overspray, dust and smoke. Communities can benefit if these air quality related incompatible land use considerations are addressed in local policies, procedures and ordinances.

Air Quality Incompatible Land Use Policies:

Discourage

- locating concentrations of people near uses or facilities producing significant odors or harmful emissions and vice versa.
- building and site designs that expose people to sources of harmful pollutants, such as loading docks and vents.

4. Install cleanest fireplaces and stoves in new single- and multi-family developments

Wood-burning fireplaces and stoves can cause health and nuisance impacts in residential environments when improperly used. These impacts are intensified when they occur in higher-density residential areas, within urban growth areas, or in outlying residential areas that are developed at urban densities.

Cleaner Heating Policies:

Promote cleaner, healthier residential environments by

- promoting natural gas or propane fireplaces and stoves in new residential developments.
- maximizing use of natural gas, propane or electric fireplaces and stoves in new residential and mixed-use developments inside urban growth areas and residential areas that are developed at urban densities.

5. Support environmental justice

Too often, land uses that produce odors or harmful emissions and transportation facilities that contain high volumes of vehicles are located close to sensitive and vulnerable populations, such as the elderly and the young, or close to people of a particular race or ethnicity, age, income, ability or gender, exposing them to increased air pollution and health risks. Local governments can prevent new or expanding uses from having a disproportionate impact on these populations and people and mitigate the impact of the existing uses.

Environmental Justice Policies:

Support environmental justice by

- guiding development and transportation so as not to endanger the health of sensitive, and vulnerable populations and people of a particular race or ethnicity, age, income, ability or gender or disproportionately expose these populations or people to transportation associated emissions.
- promoting land use and transportation actions that reduce emissions of toxics, fine particulate matter, ozone and greenhouse gases.
- setting emission reduction goals and support standards and regulations that protect public health, improve air quality, improve visibility and address climate change.

6. *Use the State Environmental Policy Act (SEPA) as a tool and a safety net*

The SEPA process provides an excellent tool for addressing specific and emerging issues and introducing mitigation measures that might not be addressed under existing planning policies, development regulations or permit processes. Local governments can use SEPA as a tool and a safety net for identifying and addressing incompatible land use and development impacts related to air quality.

SEPA Application Policies:

Promote environmental analyses of air quality impacts that

- address all harmful pollutants, (e.g. fine particulates, toxics, greenhouse gases), and identify mitigation.
- comply with all environmental regulations including NEPA, SEPA and state and federal conformity regulations.
- use consistent and comparable impact assessment methodologies.
- use approved data sources, such as the agency's emission inventories and air quality data.
- identify disproportionate air quality impacts on sensitive and vulnerable populations and people of particular race or ethnicity, age, gender, income or ability and provide mitigation of environmental justice impacts.

Attachment B
Health Effects of Diesel Particulate Matter (DPM)
and Fine Particulate Matter ($PM_{2.5}$)

Numerous human and animal cancer and non-cancer studies are referenced in California EPA's diesel exhaust risk assessment, which shows multiple health endpoints associated with diesel exhaust. These endpoints include deleterious effects on lung function, exacerbation of asthma and allergies, and lung cancer.
Dawson, et al. Health Risk Assessment for Diesel Exhaust: Part B. Office of Environmental Health Hazard Assessment, California Environmental Protection Agency. May 1998.

A study of children showed that exposures to elevated concentrations of fine particulate matter between the ages of 10 and 18 was associated with clinically and statistically significant reduction of lung function.
Gauderman, et al. The Effect of Air Pollution on Lung Development from 10 to 18 Years of Age. The New England Journal of Medicine, Volume 351: 1057-1067, Number 11. September 9, 2004.

A study of cystic fibrosis patients showed that exposures to elevated particulate matter levels were associated with reduced lung function and an increase in the odds of a patient having two or more exacerbations.
Goss, et al. Effect of Ambient Air Pollution on Pulmonary Exacerbations and Lung Function in Cystic Fibrosis. American Journal of Respiratory Critical Care Medicine. Volume 169: pp 816-821. January 12, 2004.

A regional air toxics evaluation estimated that approximately 85% of cancer risk from air pollution comes from diesel exhaust, a component of fine particulate matter. Up to 95% of cancer risk from air pollution comes from mobile sources.
Keill and Maykut. Final Report: Puget Sound Air Toxics Evaluation. Puget Sound Clean Air Agency in conjunction with Washington State Department of Ecology. October 2003.

A study of patients with cardiovascular disease showed a statistically significant association with transient exposure to traffic and the onset of a myocardial infarction within one hour afterward.
Peters, et al. Exposure to Traffic and the Onset of Myocardial Infarction. The New England Journal of Medicine. Volume 351: 1721-1730. Number 17. October 21, 2004.

A U.S. EPA School Bus Idling Fact Sheet states that diesel exhaust is among air pollutants that pose the greatest health risk. Diesel exhaust is linked with lung damage, respiratory problems, exacerbation of asthma and allergies, and likely long-term increase in risk of lung cancer. The fact sheet also comments on the particular vulnerability of children, who breathe 50% more air per pound of body weight than adults.
U.S. EPA. What You Should Know About Diesel Exhaust and School Bus Idling. Air Pollution and Kids. April 2003.

Diane Sugimura
Director, Department of Planning and Development
Seattle Municipal Tower
700 – 5th Avenue, Suite 2000
Seattle, WA 98124-4019

December 14, 2007

Dear Ms. Sugimura:

Please accept this letter as the Port of Seattle's comments regarding your DRAFT Environmental Impact Statement (DEIS) for Livable South Downtown Planning.

The Port appreciates the city's efforts to encourage housing and job-related development in the south downtown area, a goal that follows the regional policy of focusing growth in existing urban areas. The Port supports that goal as well. We also acknowledge statements by the City that the south downtown planning effort will respect the character of this highly diverse area of Seattle, including the Port's heavy industrial activities.

However, the Port has serious concerns with some of the Alternatives proposed in this DEIS and with the City's analysis of the likely adverse environmental impacts under the State Environmental Policy Act. We find the DEIS fails to adequately study impacts that could limit or forestall Port operations and impair our ability to create jobs and economic opportunities for the City and region.

More than 34,000 jobs in our region are supported by Port of Seattle Seaport operations, a major source of the region's stable, family-wage jobs. Some of the DEIS alternatives could create traffic congestion and other conflicts with Port operations, and businesses that support the Port, which in themselves will have negative environmental consequences.

1

What follows in this letter are specific requests, and our reasoning for such requests, for DPD to:

a) Remove entirely the WOSCA property as part of this planning endeavor. Instead evaluate potential zoning changes via the process of Neighborhood Planning Updates (your Council Resolution 31026 being germane), or…

b) Retain the current IC zoning at the WOSCA property.

c) Analyze the likely adverse cumulative noise, light, glare and gentrification impacts of the four alternatives.

d) Adopt the DEIS recommendation to develop freight mobility performance standards for major truck streets, maintaining mobility and giving priority to trucks on major truck routes through the study area, especially the Stadium Overlay Zone.

e) Develop and implement an in-depth freight mobility needs analysis and freight mobility project implementation plan for the Duwamish MIC (possibly as part of the work to be carried out under Resolution 31026).

Attached to this letter is a more technical discussion supporting these requests.

The last several months have seen exciting and intense discussions and planning actions related to the preservation of our city's industrial character. Recognizing that our Port facilities rely on an adjacent thriving industrial area, we have supported restrictions on office and retail uses that pose conflicts with industrial uses. 1

The over-arching, long term land use goals of the Port are to maintain excellent freight access between our terminals, nearby rail yards and highway networks. Further, the Port will always insist upon buffers to protect residential uses from the inevitable traffic impacts, noise, light and glare caused by the industrial operations at our facilities.

Good transportation connections and the ability to conduct our industrial-based businesses around the clock are the core essentials of the Port's land use policy. The Port operates in a highly competitive global economy, where our success depends on fast and efficient movement of cargo. The requests contained in this letter and the supporting attached discussion emanate from this policy. We wish to continue working with the City to achieve our mutual goals of a healthy, growing community while also strengthening our working waterfront. If you have questions, please contact Eric Hanson, Manager, Seaport Planning, at (206) 728-3879

Deleted:

Sincerely,

Charles Sheldon
Port of Seattle
Managing Director Seaport

The following outlines our rationale for making the requests outlined above. Our request to either take the WOSCA site out of the Livable SODO planning process or to retain its existing zoning of the WOSCA property is based upon these concerns:

The analysis in the DEIS of economic / business interests fails to address likely adverse impacts on Terminal 46:

The DEIS concludes that "recommended changes can be accomplished without significantly impairing the economic functions provided by the Port of Seattle" (p. 3-64). Yet, a review of the DEIS and its Appendices reveals that the potential impacts of gentrification on existing industrial land uses next to the Stadium Overlay Zone were not adequately evaluated. This is because the likely impacts were not examined with sufficient detail to support a conclusion of nonsignificance. The focus of the analytical effort was upon Little Saigon, Chinatown, the ID, and the area south of Dearborn (pages 3-49 to 3-61, Appendix C). The analysis does not include the western side.

Part of this analytical deficiency arises from the failure of the DEIS to consider the likely adverse cumulative impacts of (can we better define gentrification?) near existing industrial land uses. The likely adverse significance of gentrification impacts, specifically the proposal to introduce residential uses in close proximity to Terminal 46, cannot be overestimated. Indeed, the most appropriate time to consider these likely cumulative impacts is during this planning phase of the City's review. Otherwise, consideration of these cumulative impacts is evaded because such comprehensive analysis is beyond the scope of environmental review for discrete individual projects. Given this serious deficiency, the FEIS should not be issued until the analysis of the likely adverse cumulative impacts of gentrification upon Port property, is undertaken.

Furthermore, because the DEIS failed to adequately identify the likely significant adverse environmental impacts of gentrification upon existing industrial uses, the DEIS also failed to identify whether appropriate mitigation measures could be developed to address these impacts. Accordingly, the DEIS should be revised to include an appropriate mitigation analysis as well.

2

Alternatives 1 and 3, which call for the removal of the industrial buffer for Terminal 46, are inconsistent with the Duwamish Neighborhood Plan and the City's other efforts to preserve industrial lands:

One of the objectives for the Livable SODO planning effort listed on page 2-3 is to, "respect neighborhood character and neighborhood plans." The Port of Seattle supports this objective. However, both Alternatives 1 and 3 do not fulfill this criterion because they propose that the WOSCA property be rezoned to a new South Downtown Mixed (SDM) designation. The existing Stadium Area Overlay Zone was developed to provide a buffer for existing industrial uses. Rezoning WOSCA to SDM eliminates that buffer for Terminal 46. Re-evaluation of the industrial buffer should be conducted as part of the update to the Duwamish Neighborhood Plan called for under Council Resolution 31026, including a thorough analysis of the potential impacts on adjacent industrial property. The Stadium Area Overlay Zone and its role should be evaluated in the context of the future of the neighborhood, and the industrial uses, for which it provides this buffer function.

3

The DEIS fails to adequately identify the significant adverse impacts of the noise, glare, and light from the existing and reasonably industrial foreseeable operations of Terminal 46 upon the proposed residential uses at the WOSCA site:

The DEIS concedes that if residential uses are introduced at WOSCA, there will be serious problems with noise (p. 3-140 to 3-145). The DEIS estimates the existing day night noise levels (LDN) on the WOSCA site to be in the high 70s, while levels of 45 LDN are usually recommended for residential uses (p. 3-145). Unfortunately, even this alarming conclusion underestimates the likely adverse noise impacts from Terminal 46 because noise was measured in two days in March which is the off-peak season for cargo uses. Cargo operations, including nighttime operations, typically peak during November. To accurately measure the likely adverse noise impacts from the existing industrial uses at Terminal 46, the peak cargo uses, including nighttime operations should be measured. 4

Besides underestimating the existing noise impacts from Terminal 46, the DEIS is further deficient because it fails to consider the foreseeable noise impacts that will be caused by an increase in activity at Terminal 46. This is another example of where the DEIS neglects to consider adverse cumulative impacts of the proposed alternative as required by SEPA. Cargo volumes are growing. With this growth, round-the-clock terminal activity will also increase. The DEIS should have taken into account this growth as part of its analysis of the likely adverse environmental impacts of the proposed alternatives.

The DEIS also makes brief notice of the fact that "exposure of residential uses to light and glare is an unfavorable condition" (p. 3-21) but fails to properly identify and quantify the overall significance of these impacts upon the proposed new residential uses at the WOSCA property. We are concerned that the existing viaduct acting as a visual buffer between WOSCA and Terminal 46 may not be there in the future, compounding this issue further.

The proposed mitigation measures for the adverse light, noise and glare impacts of the industrial operations at Terminal 46 as identified in the DEIS are insufficient and impractical:

Besides failing to adequately identify the likely adverse light and noise impacts, the DEIS fails to identify adequate mitigation measures. The DEIS incorrectly concludes that the adverse impacts of light and noise impacts could be mitigated by limiting the orientation and location of residential uses, or by using appropriate materials and/or construction techniques. In our experience, the existing and reasonably foreseeable adverse impacts from the light and noise of terminal operations will make any residential use of the WOSCA site inappropriate, even if the residences face away from the terminal. (p. 3-46). We also find it difficult to believe that a viable residential development would be designed to specifically avoid the spectacular westerly views associated with this location. Nor is it likely that a building would be designed with windows that cannot be opened, since decks facing west would be highly desirable. Furthermore, given the fact that the DEIS underestimated the existing noise impacts at Terminal 46, the adequacy of these proposed noise mitigation measures is simply unfounded. The inevitable conflicts between the proposed residential uses and the existing industrial uses at Terminal 46 can only be avoided by not rezoning the WOSCA site to allow residential uses. 5

The mitigation proposed in the DEIS is based on flawed assumptions because it does not consider WSDOT's recent purchase of the western half of the WOSCA property and long term lease:

The proposed changes for WOSCA outlined in Alternatives 1 and 3 appear to be dated before the western portion of the WOSCA property was sold to WSDOT for AWV construction staging and future ferry holding. It should also be noted that the un-sold portion of WOSCA is on a 15 year lease to WSDOT presumably for use as a construction lay down area. As a consequence, the un-sold portion of the WOSCA lot that is available for development is now much narrower. This change in configuration makes the design of housing that entirely avoids westerly exposure even more difficult. Open space amenities that would likely be required for any new development would also be very challenging to provide.

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Given these changes, it appears to the Port that the WOSCA property will be for many years engaged in truly intense industrial use. It is also reasonable to expect that this industrial activity will be round-the-clock activity. The Port recognizes that the Livable South Downtown Planning endeavor is meant to take a long range view. The Port further recognizes that the actuality of residential being built on WOSCA while Viaduct construction is in progress is a remote possibility. Nonetheless, a change of land use that allows residential on a parcel of land that will for years be heavily industrial and that will always be adjacent to industrial and transportation uses is extremely contrary to established zoning practices.

In light of these changes, DPD should not allow residential zoning on the WOSCA site.

The Port is also concerned about the traffic analysis, and the recommended mitigation measures:

The traffic analysis conducted for the Livable SODO planning process points to serious deficiencies in future freight mobility along routes necessary for use by trucks serving Port of Seattle facilities:

7

The economic viability of our terminals and the Duwamish MIC in general, depends on adequate freight mobility. Previous comment letters by the Port of Seattle have expressed concerns about the adverse transportation impacts of increased density. Of particular importance to the Port is S. Atlantic St. which has the highest truck volumes in the entire study area. The conditions on Atlantic in 2030 are alarming (App. G, p. 86 & 89, Tables 5-6 to 5-9). S Atlantic St speeds are shown as 7 mph & 2 mph for some alternatives.

The traffic analysis conducted for the DEIS shows that the Port's concerns are well founded. It indicates that all alternatives under consideration would contribute to significantly increased congestion in the study area, with related impacts on freight mobility. It shows that greater densities would cause deterioration from existing conditions even under current zoning, even if all transportation projects currently contemplated for the area were to be implemented (p. 1-5, App. 114-115). The increased densities proposed by Livable SODO make the problem worse. While a significant amount of these new trips is likely to be made by non-SOV modes, SOV trips will increase, causing a deterioration of existing conditions. The transportation chapter and Appendix G both point to the fact that needed accommodation of safety and capacity measures for bicycles, pedestrians, and transit have the potential to further compromise freight mobility. There will be significant pressure to implement such measures (p. 3-225, App. G p. 90, 115). This is particularly true for the Stadium Overlay Area, where the City envisions a much more pedestrian-friendly environment and much higher densities.

Consequently, we support the DEIS recommendation to adopt performance standards for Major Truck Streets. Truck mobility on major truck streets, such as Atlantic, must be protected, it should not be allowed to deteriorate. We also concur with the suggestion that new development should mitigate its impacts on freight, and help pay for necessary improvements.

7

The mitigation measures identified in the DEIS do not protect existing major economic drivers, like the Port, from the traffic impacts of new development:

In recent years, the City has made great progress in supporting freight mobility needs with annual updates of the Freight Mobility Strategic Action Plan, revisions to the Right of Way Improvement Manual, and the truck-specific provisions of the Complete Streets Ordinance. The transportation section of DEIS contains a list of potential measures that can serve as a starting point, but falls short of developing a more comprehensive program that protects the Port and other industrial business in the Duwamish MIC from the traffic impacts of new non-industrial development (p. 3-234 to 3-235, App. G p.134-135).

8

However, efforts to date appear insufficient in addressing freight mobility problems in the Stadium Overlay Area. The limited DEIS analysis shows a serious problem with freight mobility and access to the Port's terminals and industrial businesses in the Duwamish by 2030 under any scenario. Yet freight cannot move to alternate modes, it is dependent on the functionality of the street system. Some of the alternatives outlined in the DEIS further compound an already dismal situation. This does not even account for the fact that some of the basic assumptions for the traffic analysis are now void: Viaduct south end Alternative 10C has changed to Option 6. Without the frontage roads of 10C, there will be significantly more traffic on 1st Ave S., compounding problems at the intersection at 1st and Atlantic. Additionally, with the failure of Prop 1, there is no visible funding for the Spokane St. Viaduct and Lander St grade separation. Under these circumstances—with the amount of traffic identified as pass through traffic, and the lack of alternative routes for that traffic—any further development and concurrent increase in congestion within the SoDo area may risk a violation of the concurrency requirements of the Growth Management Act.

The limited analysis contained in the DEIS shows a more comprehensive approach to determining and implementing needed freight mobility improvements for the Duwamish MIC is required no matter what alternative is chosen. The DEIS also points to conflicts between mitigation strategies for freight and transit, yet it does not show conclusively that these problems can be adequately mitigated. We request conducting such an effort as part of the work to be carried out under Resolution 31026. 8

In reviewing the document, we also identified some technical points you may wish to consider amending:

- Seattle by itself is not the 3rd largest container load center, Seattle-Tacoma combined fulfills that function (p. 3-184, App. G p. 38). By itself, Seattle was the nation's 8th largest container handling port in 2006. 9
- Figure 3-43 (p. 188) is missing Atlantic St. in the graph—compare to App. G p.44.
- SIG is made up of the Main Yard and the North Yard each with its own separate access. The planned dedicated truck route provides access only to the North SIG Yard (p. 3-192).
- Please review Figure 3-47, Truck Trip Distribution (p. 3-220). It may be useful to revise the location of arrows to more accurately depict actual traffic flows. We are also not quite sure about the 3% east-west flow forecast west of 4th. Currently Atlantic has the highest truck volumes of any facility reviewed—will the future be that different? See Table 4-12, App. G, p. 43. 10
- Since the traffic analysis was conducted, WSDOT selected a new alternative for the South End of the AWV, Option 6 (App. G, p. 69). The FEIS should reflect this change. 11
- The discussion (and apparently the model) does not seem to differentiate truck traffic from TAZ 361 (T-46 & T-30) although there is qualitative discussion of trucks and their differing maneuverability and reference to a model component derived from the FAST Trucks study. 12
- App. G, p. 48: The definition of tail track: in this case, the tail track is that portion "beyond the Yard tracks" not "beyond the transit mainline" 13
- App. G, Fig 4.4: Colorado should be categorized as a major truck street in the update (as Atlantic St will be updated) 14
- App. G, p. 108: Trucks currently have ability to use Atlantic St in lieu of RBW when the RBW crossing is blocked by a train. 15
- App. G, p. 114 Table 5-15: S. Atlantic St shows an increase in corridor speeds in the Westbound AM, which contradicts p. 86 & 88 Tables 5-6—5-7. 16

WASHINGTON STATE
PUBLIC STADIUM AUTHORITY

December 17, 2007

City of Seattle Department of Planning and Development
P.O. Box 34019
700 Fifth Avenue, Suite 2000
Seattle, WA 98124-4019
Attn: Gordon Clowers

Re: Comments on the Draft Environmental Impact Statement for the Livable South Downtown Planning Study

Dear Mr. Clowers:

The Washington State Public Stadium Authority (PSA) appreciates the opportunity to review and comment on the draft environmental impact statement (draft EIS) for the City's Livable South Downtown Planning Study. The PSA is the public agency that owns Qwest Field and Event Center, and it is charged by state law with being the steward for and protecting the public's $300 million state-wide investment in these facilities. The PSA has participated actively in the South Downtown planning process as a member of the Livable South Downtown Advisory Group, and it commented previously on the City's Phase 1 staff report and the scope of the draft EIS (*see* June 8, 2006 PSA letter to DPD).

The PSA appreciates all of the effort that has been put into the draft EIS; it contains much information that should be helpful to decision makers considering the South Downtown plan. Unfortunately, the draft EIS is lacking in a number of broad areas, and it understates the impacts of the largest rezone ever considered in the history of the City of Seattle. The draft EIS:

- Fails to demonstrate the need for the level and intensity of growth analyzed in the draft EIS. The residential growth targets for all of the action alternatives analyzed in the draft EIS are three times (3X) the targets established in the City's most recent Comprehensive Plan, and the employment growth targets are more than doubled. This inconsistency with the City's Comprehensive Plan is neither acknowledged nor explained. While the PSA supports the City's goal of increased density in the South Downtown area, the PSA believes that goal can be obtained without all of the impacts inherent in the alternatives proposed in the draft EIS. The PSA encourages the City to include in the final EIS an action alternative that provides for a less intense level of development, consistent with the City's Comprehensive Plan. 1

- Fails to adequately identity the significant adverse impacts to transportation, parking, and public infrastructure that will result from the proposed zoning changes. The South Downtown area already suffers from inadequate infrastructure, and the transportation network in particular is already overburdened. The proposed density increases will only make the existing situation worse by increasing traffic and congestion, and by targeting 2

800 Occidental Ave. S #700 • Seattle, WA 98134 • (206) 381-7940 • (206) 381-7949 Fax • www.stadium.org

existing parking for in-fill development. Moreover, once these zoning changes are adopted, they will become determinative of the availability and adequacy of public facilities for all future development. If the City proceeds with the rezone based on the current EIS, the City will be left without a key tool to require future development to mitigate its adverse impacts on the community, neighborhoods, and on public and private infrastructure. 2

- Fails to acknowledge and adequately analyze the existence of the Qwest Field and Event Center (and its sister facility, Safeco Field), as well as the Stadium Transition Area Overlay District adopted by the City in 2000. At a minimum, adverse impacts on the Qwest Field and Event Center should be specifically analyzed in the EIS sections on Economic and Business Impacts, Public View Protection, Parks and Recreation, Transportation, and Parking. The alternatives' inconsistency with the Stadium Transition Area Overlay District and the City's Comprehensive Plan also should be acknowledged and explained. 3

- Fails to identify and analyze the significant adverse impacts on public views that will result from the rezone alternatives. An assessment of view impacts is a key element of the rezone criteria established by City Code, and the State Environmental Policy Act (SEPA) requires disclosure of significant impacts before decision makers can act upon a proposal. Yet the draft EIS contains only a one-paragraph acknowledgement of these requirements and no analysis. A preliminary view impact analysis was made available to the City for inclusion in the draft EIS, but that offer was declined. This error must be remedied, and a comprehensive analysis of view impacts must be included in the final EIS. 4

- Fails to identify appropriate, meaningful mitigation measures to address the impacts of the proposed rezone. The mitigation measures contained in the draft EIS are inadequate to deal with the significant adverse impacts of the proposed rezone, and they inappropriately seeks to shift mitigation responsibility to existing uses in the South Downtown area. The final EIS must examine mitigation measures that ensure that future development—rather than existing users—are responsible for mitigating the impacts created by the rezone. 5

These inadequacies of the draft EIS are serious and need to be addressed in the final EIS. If they are not, the PSA is concerned that the final EIS will not meet the standards for adequacy established by the State Environmental Policy Act (SEPA) and the City's own SEPA rules. Each of these items is discussed in more detail below in our section-by-section comments on the draft EIS. As with our scoping comment letter, our comments focus on the area around Qwest Field and Event Center. While we have concerns with the impacts caused by the rezone proposal on areas outside the stadium district, we will let others address those issues. The comments that follow track the order of the draft EIS; they are not arranged in order of importance.

EIS Location:	Comment:
Chapter 1: Summary	
Elements of the Environment p. xi;	The PSA requested in its scoping comments that impacts on Light, Glare, Air, Shadows and Wind Effects be analyzed in the EIS. The City required that these impacts be analyzed when Qwest Field and Event Center was built. Because the tall, dense development allowed under the City's rezone alternatives will likely have significant adverse impacts on light, glare, air, shadows, and wind effects, all of these elements of the environment should be analyzed in the final EIS.
Summary / Introduction p. 1-1, para. 4	While the South Downtown planning study "acknowledges" some of the "vision" contained in the relevant neighborhood plans, it is inconsistent with the growth targets established for the neighborhoods in the City's Comprehensive Plan. It also generally ignores other applicable overlay districts, including the Stadium Transition Area Overlay District. These omissions should be corrected in the final EIS.
Summary / Alternatives & Growth Scenarios p. 1-1, para. 5-6	As discussed in more detail below, the range of alternatives analyzed in the draft EIS is not reasonable, because all of the alternatives assume an artificially high growth rate that is inconsistent with the City's Comprehensive Plan assumptions. This is contrary to the Growth Management Act planning requirements and the tenets of good planning. The result is to pit neighborhood against neighborhood on where the intense growth should be located, rather than using the EIS as an opportunity to evaluate the impacts of ranges of development. The final EIS should include alternatives that consider a broader range of growth targets and varying intensities of new development.
Study Area p. 1-2; Figure 1-1	Most of the maps in the draft EIS fail to include or identify the location of Qwest Field and Event Center or our sister-agency's facility, Safeco Field. Qwest Field and Event Center represents a $300M investment of state money in a public facility. The public investment in Safeco Field was more than $400M. These public facilities should be clearly identified on the study area and other maps in the final EIS.
Topics Addressed p. 1-3	Update this section in the final EIS, consistent with the revisions to the scope of review, as suggested in the comments below.
Major Conclusions p. 1-3	We agree that "rezone choices across the study area should be carefully made," but the remainder of the conclusions will require significant updating to reflect the analysis in the final EIS. For example, the conclusions on height, bulk and scale should reflect that while the undesirable impacts of building bulk can be avoided through less intensive

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	zoning and lower height limits, design review and other processes can do little to reduce the height, bulk, and scale of 240' zoning. It should also note that development standards (including height and bulk controls) have not yet been drafted for the south downtown area.	11
	The conclusions on business/economic impacts should be updated to include the impacts of the rezone proposal on the operations and economics of Qwest Field and Event Center (QFEC), including an evaluation of the impact on the 20% Event Center profit sharing with the State Common School Fund. The current economic analysis does not even mention Qwest Field and Event Center, much less analyze impacts on it from the rezone.	12
	The conclusions on transportation and parking impacts should be updated to reflect the additional analysis included in the final EIS, and to reflect that these impacts are likely significant. The conclusions should also include some express, objective findings regarding rezone impacts on event traffic and parking.	13
Comparative Summary of Alternative Impacts Table 1-1	Update to reflect new analysis and conclusions in the final EIS, including significant adverse impacts on land use, height/bulk/scale, transportation, parking, event management, parks and recreation, and public views, as described in the comments below.	
	Any conclusions regarding the new SDM zone should make clear that zoning regulations and controls have not yet been established, and that the mitigation measures discussed are theoretic.	14
	Restate p.m. peak hour corridor traffic speed changes in both mph and percentage declines (e.g., 86% reduction in travel speeds).	15
	Restate conclusions regarding transit operating speeds to make clear that *all* of the alternatives fail to meet operating speed goals, and that these impacts are significant.	16
Chapter 2: Description of Alternatives		
Figure 2-1	Study Area map should be updated to include Qwest Field and Event Center.	17
Objectives for Planning Area, p. 2-3.	Please revise to reflect the input made through the South Downtown advisory group process and to DPD staff, including protecting the public's $700M investment in Qwest Field and Event Center and Safeco Field.	18
Summary of Draft Planning Recommendations, p. 2-4	Update in final to reflect Staff Planning recommendations and the staff preferred alternative.	19

p. 2-7	Reference at bottom of page (and throughout document) should be corrected to reflect the proper name of the Stadium Transition Area Overlay District.	20
Figure 2-3, p. 2-8	Add Qwest Field and Event Center and WAMU Theater to the list of properties identified.	21
Description of Alternatives, p. 2-10	The final EIS should add an alternative that considers less intense development and lower growth targets than the current alternatives, as described in more detail below.	22
Figures 2-4 to 2-6	All of these figures require corrections so that they match the text descriptions of the alternatives and indicated (with underlining) where height limits are changed from the no-action alternative. For example, for all three action alternatives, the height allowed in the 1st Avenue S. corridor west of Qwest Field is 120' rather than the existing 85'/120'. Consistent with the key on these figures, the PSM 120' should be underlined to indicate this change in allowable height. On Figure 2-6, the IC 85' zone at Qwest Field and Event Center should be underlined (reflecting the height change from the current 65'.	23
New SDM Zone, p. 2-12	The details of the new SDM zone need to be much better established in the final EIS so that the impacts of the change can be evaluated.	24
Alternative 4, No Action, p. 2-17	The description of the no action alternative should be updated to reflect the discussion below regarding growth targets and expected growth.	25
Benefits of Reserving Implementation, p. 2-17	Add a bullet describing the benefits of reserving action on the WOSCA property, as follows: "Reserving action on the WOSCA property would allow for resolution of design decisions for the Central Waterfront portion of the Alaskan Way Viaduct project (tunnel/surface/aerial), before making zoning decisions affecting this adjacent parcel."	26
Summary of Zoning Alternative Details, pp. 2-19 to 2-23	This table contains numerous errors and inconsistencies with the alternatives shown in Figures 2-4 to 2-7 and the text of chapter 2. For example, for Alternative 2, Qwest Field North Lot, the figure and text says "PSM 150'/240'" and the summary table says "85'/240'." Similarly, for the "Over-Tracks" property and the "Stadium Area" property, the table shows a base zoning of 85' and 65' respectively, which is not shown on the figures or described in text. It is also not clear whether this summary is intended to add to or modify the discussion of the alternatives elsewhere in the document. This should be clarified on p. 2-17, where Table 2-1 is first referenced.	27

Chapter 3: Affected Environment, Impacts and Mitigation Strategies	
Land Use, p. 3-3	The description of the Stadium Area should be revised to reflect that stadium events occur nearly every day of the year, rather than being "intermittent" (as described in the draft EIS). Qwest Field and Event Center and the WAMU Theater are existing uses that should be treated as an integral part of existing conditions.
Land Use, p. 3-6	The elements and purpose of the Stadium Transition Area Overlay District should be described in greater detail.
Land Use, p. 3-7	The discussion of the "studied alternatives" suggests that the only questions to be answered are "where should infill development occur" and "how much growth" should be allowed. These questions are answered in the City's Comprehensive Plan, whose growth targets have apparently been ignored in developing the EIS alternatives. This inconsistency with the comprehensive plan should be acknowledged and explained.
Land Use, Stadium Area, South Half Lot comp. plan changes, p. 3-8	Staff recommends rejecting zoning changes to the south half of the Qwest Field north parking lot that would provide for consistent zoning for all of Qwest Field and Event Center. While the PSA disagrees with the reasoning here, we note that all of the action alternatives shown in the draft EIS require changes to the City's Comprehensive Plan for this area, because each "squares off" and eliminates the curved zoning boundary that was established by the limits of the former Kingdome.
Land Use, p. 3-10	Qwest Field North Parking Lot. This paragraph should be revised to reflect that the transition from existing heights to either 180' or 240' would result in significant adverse impacts. While the trusses of Qwest Field reach to 265', the exterior concourses of the facility respect and are compatible with the surrounding 85' zoning. The 180' height of Alternative 1 more than doubles that height, and the 240' height for Alternative 2 is almost triple the height of surrounding buildings. Even with yet undefined "controls," smooth transitions from these heights to the lower surrounding blocks and the parking lot on the south half of the North Lot is nearly impossible.
Land Use, p. 3-13	While the discussion of the proposed changes in Stadium area zoning correctly acknowledges that this represents a "significant shift" in the City's land use policy, this section should also acknowledge that these changes are inconsistent with the existing Stadium Transition Area Overlay District.
Land Use, p. 3-14	Is the City serious in suggesting that to mitigate the impact of siting residential uses adjacent to industrial facilities (in this case the Port of Seattle's Terminal 46), that the City would "constrain their location and orientation" so that the residences would not face Puget Sound, the Olympic Mountains, and

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	(unfortunately) the Port? *See also*, Mitigation Strategies on p. 3-15.	34
Land Use, p. 3-15	4th Ave. S. Corridor: For the reasons discussed in more detail below, the PSA is concerned that impacts resulting from the zoning and density changes proposed for this corridor (IG2 to IC or SDM, and height increases from 85' to 125' or 160') have not been appropriately analyzed (in terms of transportation, public services, and view impacts). We believe that the impacts resulting from these changes are likely to be significant, and we have serious doubts about the ability of this corridor to accommodate this level of development without significantly impairing freight and general traffic. The paragraph discussing the no action alternative should be revised to reflect that the WOSCA property *will be used* for construction staging for SR 99 construction and is not likely to be available for any other uses for more than a decade.	35 36
Height, Bulk, Scale p. 3-21	Stadium Area: Correct attendance numbers to reflect that Qwest Field events can draw as many as 68,000 people. Revise text and tone to reflect that Qwest Field and Event Center is an existing use and add a discussion of the incompatibility of the proposed 180'/240' zoning with the edges of Qwest Field. (*See also*, Land Use, p. 3-10, above).	37
Height, Bulk, Scale p. 3-21	The "Light and Glare Compatibility" and "Shadows" analysis are completely inadequate. For an example of a concise, adequate analysis of visual and aesthetic resources, light and glare, shade and shadow, and view impacts, *see* Football/Soccer Stadium and Exhibition Center Project, Final EIS (April 1998), Section 3.8 Aesthetics. This analysis should include the impacts of the proposed alternatives in all of these areas on Qwest Field and Event Center, as we requested in our scoping letter.	38
Height, Bulk, Scale p. 3-23	Qwest Field North Parking Lot: Revise paragraph to reflect that the proposed zoning alternatives reflect a doubling or nearly tripling of existing allowed heights. Under any definition, these constitute "large" differences in scale and will result in significant adverse impacts. Please identify in sufficient detail those "controls" that would be used to "mitigate" these height, bulk and scale impacts below the significance threshold.	39
Height, Bulk, Scale p. 3-24	Over-Tracks Properties: We agree that all of the proposed alternatives will result in significant adverse impacts. Please identify with specificity the mitigation strategies the City would propose to reduce these impacts.	40
Height, Bulk, Scale Figures 3-3, 3-4	It is disappointing that the height and bulk drawings of the North Half Lot do not reflect existing limitations and at the same time *understate* the potential impacts of the rezoning alternatives. For example, King County's agreement with Opus/Nitze-Stagen for the development of the North Half Lot includes a view corridor that limits heights to 70' in an area 60' to the east and west of the 90'	41

	wide easement for the extension of 2nd Ave. S. This easement and these height limits should be reflected in the figures, rather than the City-assumed 40'/60' height limits that are shown. At the same time, the proposed rezoning alternatives allow development to 180'/240'/150' over the whole of the North Lot. The full extent of these heights should be reflected in the figures so that the complete impacts of the rezoning can be understood by decision makers. At a minimum, the dotted line/maximum building envelope approach used on figures 3-5 to 3-7 should be used to illustrate the maximum building envelope allowed by the proposed height limits. If density limits and bulk controls are being formulated that will prevent developers from building to the edge of the envelope, those limits and controls should be included and evaluated in the EIS.	41
Height, Bulk, Scale p. 3-40	Stadium Area: We agree that Alternatives 1 and 3 would result in significant adverse impacts, as would Alternative 2 if view impacts to and from public facilities are taken into account (see below). The conceptual mitigation proposed for the new SDM zone is insufficient in detail to allow for meaningful evaluation of its effectiveness.	42
Height, Bulk, Scale p. 3-40	4th Ave. S. Corridor: We agree that Alternative 2 (240') would result in significant adverse impacts, as would Alternatives 1 and 3 if view impacts are taken into account.	
Height, Bulk, Scale Figures 3-18 & 3-19	The building envelopes shown on the figures do not appear to match the zoning described for the alternatives. For example, Figure 3-18, Alternative 1 does not appear to include the 125' zoning in the southern Over-Tracks area (*c.f.*, same Figure, Alternative 2). Same for Alternative 3 in Figure 3-19, which does not include the 85' zoning. Please recheck the content of each figure for accuracy.	43
Height, Bulk, Scale p. 3-46	Update the conclusions regarding shadow impacts after an adequate analysis of those impacts is prepared.	44
Height, Bulk, Scale p. 3-46	Update mitigation strategies after meaningful land use controls or development regulations have been identified with specificity.	45
Business and Economic Impacts, pp. 3-49 to 3-3-61	Missing entirely from this analysis is any evaluation of the business and economic impacts of the rezoning alternatives on Qwest Field, Qwest Field Event Center, the WAMU Theater, or other publicly owned facilities. While we appreciate the detailed analysis provided for the Chinatown/ID neighborhood area, Japantown and Little Saigon businesses, we believe that some analysis of the business and economic impacts of the rezone on Qwest Field and Event Center is required. That analysis should include an evaluation of the impacts of rezoning on the 20% Event Center profit sharing with the State Common School Fund. Again, for an example of such an analysis, *see* Football/Soccer Stadium and Exhibition Center Project, Final EIS (April 1998), Section 3.13 Economic, Fiscal, and Local Business Impacts.	46

Relationship to Plans and Policies, pp. 3-62 to 3-74	This section fails to acknowledge that the proposed South Downtown Plan is fundamentally inconsistent with the basic growth assumptions made for this area in the City's Comprehensive Plan (both for household and employment growth). It also fails to analyze and acknowledge the inconsistency of the proposed rezoning with the Stadium Transition Area Overlay District. These inconsistencies need to be both acknowledged and explained.
	For example, as shown in Table 3-22, the 2005 comprehensive plan growth targets for additional residential households in the planning area are 1,000 households for Pioneer Square, 1,000 households for the Chinatown/International District, and zero households for the Greater Duwamish Manufacturing and Industrial Center. This is a total of 2,000 new households for the 2004-2024 planning horizon. (Interestingly, this growth target represents a *decline* for these areas from the 3,400 household growth target established in the City's earlier Comprehensive Plan for the period from 1994-2014, even though the more recent Comprehensive Plan was revised to accommodate an additional 47,000 households overall). Instead of using the growth target established in the Comprehensive Plan, the South Downtown Planning Study sets out on its own and establishes a household growth target of 6,000, which is three times (3x) the target established in the Comprehensive Plan. Similarly, the South Downtown Planning Study sets a higher growth target for jobs in these areas than is established in the Comprehensive Plan (more than 2.5X). At a minimum, these inconsistencies need to be disclosed and explained to decision makers. We also believe that the final EIS should analyze alternatives that evaluate the impacts of less aggressive growth assumptions.
Consistency Analysis, pp. 3-65 to 3-71	The (in)consistency between the zoning alternatives and the Stadium Transition Area Overlay District should be analyzed in detail in the final EIS. All of the alternatives are inconsistent with the 65' height limit established by the District, and none appear to preserve the pedestrian-oriented elements of the District, such as the two-dozen "pedestrian street buffers" required at specific intersections identified in the District. (*See* SMC 23.74; Exhibit 23.74.010A).
Relationship to South Downtown Planning, p. 3-73	We agree with the conclusions in paragraph three that height limits of 180' and 240' on the North Half lot would result in significant adverse impacts. We disagree with the suggestions that a height limit of 150' would not result in significant adverse impacts, in particular when impacts on public views are taken into account. (See below).
Other Land Use and Transportation Planning, p. 3-74	The section on Alaskan Way Viaduct Planning should be revised to reflect WSDOT's taking of the western ½ of the WOSCA property for transportation purposes and the agency's long-term lease of the remainder of the property for construction staging. The SR 519 discussion should be updated to reflect that an Environmental Assessment (rather than an EIS) is being prepared. The industrial lands section should be updated to reflect the City Council's recent code changes, which are inconsistent with the direction of some elements of the South

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	Downtown plan.
Housing, p. 3-75 to 3-93	The PSA publicly supports the City's goal of increased density in the South Downtown neighborhood, and it welcomes new residential and commercial development in the area.
Comp Plan, p. 3-80; Growth targets for the alternatives, p. 3-82	As discussed above, the EIS should acknowledge and explain the inconsistency between the growth targets included in the Comprehensive Plan and the much higher targets established for all of the alternatives. Also explain how the No Action Alternative, which provides capacity for 4,414 new households, fails to meet the growth target of 2,000 new households established in the Comprehensive Plan. If the No Action Alternative provides more than double the capacity established in the Comprehensive Plan, please explain why additional density is required. Please explain also the purpose and need underlying the growth targets for the alternatives.
Table 3-25, p. 3-99	Please explain why the projected residential growth distribution is not expected to vary among the alternatives for the North Lot and Over-Tracks property, despite the significant variations in zoning (85' to 240'/85' to 180', respectively).
Table 3-27, p. 3-101	Please explain where in this table the development capacity for the North Lot is accounted for, by alternative and subarea.
Historic Resources, p. 3-109	We agree that the 180' height limit under Alternative 1 for the railroad gap properties would result in "probable significant adverse height-related impacts." We expect that the same is true for the Qwest Field North Lot, which shares a similar border with the existing PSM 100' zoning.
Public View Protection, pp. 3-115 to 3-136	In our EIS scoping letter (June 8, 2006), we laid out in detail the importance of analyzing view impacts to and from Qwest Field in the EIS. We also discussed the issue at length with City staff and others, and we presented preliminary view modeling analysis from various locations at Qwest Field demonstrating the significance of these view impacts. That preliminary view analysis was offered to the City for inclusion in the draft EIS, but that offer was declined. This error must be remedied, and a comprehensive analysis of view impacts must be included in the final EIS. Qwest Field was sited, designed, and constructed in a manner to showcase the dramatic views of the downtown skyline, Puget Sound, and the Olympic Mountains from the stadium. In addition, the stadium has become an icon recognized world-wide as part of the Seattle skyline. These views to and from the stadium help market our city, region, and state. The loss of these views is threatened by each of the rezone alternatives evaluated in the draft EIS. All of the action alternatives result in a devastating loss of public views to the west (by converting the existing PSM 85'/120' zoning to PSM 120', and by converting the zoning on the WOSCA property from 65' to up to 160'); the alternatives for the

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	North Lot threaten towers up to 240' (nearly 3X the predominant building height in the vicinity); and the Over-Tracks alternatives to the east range in height from 150' to 240'. Even the parcels farther to the east, including the "Frye Property" (85' to up to 160'), threaten stadium views, if the Over-Tracks property is unable to be developed. The loss of views threatened by the rezone alternatives constitutes a significant adverse impact that must be evaluated in the EIS. The EIS notes only that view blockage may be taken into account following publication of the EIS (p. 3-121). This is inadequate to meet the legal requirements of the State Environmental Policy Act (SEPA) and the City's own SEPA rules. SEPA provides that the environmental impacts of a proposed action must be disclosed to decision makers before they take action on the proposal. Impacts are broadly defined and include direct, indirect, and cumulative effects. SEPA expressly notes that the range of impacts to be evaluated "may be wider than the impacts for which mitigation measures are required." WAC 197-11-060(4)(e). The City turns this notion on its head by suggesting that, because the City's mitigation policies for the downtown area limit the cases in which the City can impose mitigation for view impacts to certain defined circumstances, those circumstances are the only cases in which view impacts need to be considered. The illogic of this is apparent, as is its inconsistency with the SEPA requirement that *all* impacts be evaluated before decisions on policies or programs are made. Consideration of view impacts is also a key element of the rezone criteria established by the City Land Use Code, SMC 23.34.009 B. For a hint of how devastating the impacts on views can be from some of the alternatives, see Figure 3-37, which shows the effect of Alternatives 1, 2, and 3 on views of the east side of Qwest Field from 4th Avenue. See also the text note, which states that the "upper portion of the building [beyond] 180' is not visible." Alternative 2 extends even higher to 240'. An adequate analysis of the impacts of the alternatives on views to and from Qwest Field from multiple vantage points must be included in the final EIS.
Environmental Health / Noise, pp. 3-137 to 3-142	The draft EIS fails to contain any analysis of the noise impacts of zoning alternatives that would allow the construction of a box canyon of tall buildings around Qwest Field, an existing venue well known as a noise generator. Buildings constructed in the North Lot and Over-Tracks area will be directly affected by this noise, and buildings located farther to the east and west will be indirectly affected. In addition, there is the potential for noise from Qwest Field to reflect off of future adjacent tall buildings and cause noise impacts on surrounding uses. All of these noise impacts should be studied in the final EIS.

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Public Services, pp. 3-150 to 3-155; Utilities, pp. 160-171.	The PSA is concerned that the impact analysis for public services (police protection, fire protection, and emergency services) and utilities (water, sewer, storm water, and energy) understates the impacts of the zoning changes. This understatement will have long-term consequences for the City, because under the Growth Management Act (GMA), the adoption of zoning regulations and other rules "shall be determinative of . . . [the] availability and adequacy" of public facilities and services required by the GMA. The PSA is concerned that by understating impacts here (and elsewhere in the draft EIS), the City may give up an important GMA tool for ensuring that the impacts of future development are adequately mitigated, that necessary infrastructure is provided concurrent with new development, and that the cost of that future development is not borne by existing users.
Parks & Recreation, pp. 3-156 to 3-159	Qwest Field, Qwest Field Event Center, and the WAMU Theater are all recreational facilities. They should be included in the impact analysis in this section.
Transportation, pp. 3-176 to 3-238	In 2006, there were more than 270 events held at Qwest Field and Event Center. Many of these events spanned multiple days (and some overlapped), resulting in a total of 409 event days at the facilities. (This is a more than 20% increase from the 340 event days in 2005). In addition, there were 122 days spent on move-in/move-out for these events in 2006. Combined, there were 531 total days of event-related activity in 2006. Instead of quantitatively assessing the impact of increased density on event traffic specifically, or on the Qwest Field and Event Center generally, the draft EIS contains only two pages discussing "Event Management" and one page discussing "Event Management Strategies." This is not even close to the "careful study" of traffic impacts that we asked for in our scoping comment letter. In addition to being completely inadequate, the focus on event management and event management strategies is disturbing because it suggests that the City may be looking to the Qwest Field and Event Center to deal with the consequences of increased density that will result from the rezone proposal. As noted throughout this comment letter, Qwest Field and Event Center is an existing use. It should be studied as part of the baseline condition, and the impacts of the alternatives on that condition must be adequately analyzed. The transportation analysis in the draft EIS does not do so. Instead, it seems to treat Qwest Field as an element that may be subject to additional mitigation as future conditions change. This is completely inconsistent with the concept of SEPA mitigation (where mitigation can only be imposed to the extent attributable to the identified adverse impacts *of a project or proposal*, which in this case is the rezone and *not* Qwest Field), and it is inconsistent with the GMA, which requires that new development mitigate its own impacts.

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Finally, there seems to be a stunning incongruity between the conclusions at the end of the transportation chapter and individual statements made throughout the chapter about the degradation of traffic conditions. The conclusions state (in part) the impacts of approximately 6,000 new households and 15,000 new jobs resulting from the rezone as follows (p. 3-238, underlining added):

> "Alternatives 1, 2 and 3 would accommodate additional amounts of future development within the study area which would contribute to additional travel demands and congestion along arterial corridors. The additional development would . . . reduce the efficiency of through-traffic . . . [and] contribute to measurably poorer performance of the transportation network."

How much worse will it get? Some digging in the body of the traffic analysis reveals that:

- One dozen (12) intersections in the study area travel corridors will operate at LOS F in the pm peak. LOS F is characterized by urban street flows "at extremely low speeds," with high delays, high volumes and extensive queuing. (Table 3-49 and p. 3-178)

- Average operating travel speeds on some corridors in the study area will be reduced from
  - 8 mph to 2 mph (a 75% reduction)(Alternative 1)
  - 7 mph to 2 mph (a 71% reduction)(Alternative 2)
  - 7 mph to 1 mph (an 86% reduction)(Alternative 3)

  See p. 3-208.
- Transit operating speeds for *all* of the alternatives will fail to meet established goals.

Are these conditions fairly summarized as "accommodation," "reduced efficiency," and "measurably poorer performance."? These conditions sound like a nightmare for someone trying to move through the study area. All of these are significant adverse impacts that should be clearly disclosed to decision makers, rather than being buried in overly generalized conclusions that suggest an absence of problematic impacts.

In short, the transportation analysis in the draft EIS is deficient and needs to be substantially revised if the final EIS is to be adequate. These revisions need to include recognition of Qwest Field and Event Center as an existing condition, and they need to provide meaningful, objective analysis of the impacts of the rezone alternatives on Qwest Field and Event Center operations.

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Parking , pp. 3-239 to 3-247	The land use section notes that one of the purposes of the South Downtown plan is to encourage in-fill development of "non-contributing" properties in the Pioneer Square and International Districts. The largest number of non-contributing properties consists of surface parking lots. So the goal of the plan is to convert these parking lots into other uses. The draft EIS does not analyze in detail how or where these parking lots will be replaced, nor does it analyze the impacts on short-term parking. As we noted in our scoping letter, parking for neighborhood businesses has always been a challenge in and around Pioneer Square. The impacts of lost parking in the square due to in-fill development, combined with the cumulative impact of the parking lost with the Alaskan Way Viaduct project, should be analyzed in the final EIS.

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Finally, we have reviewed and join in the comments of our master tenant, First & Goal, Inc. (FGI). The PSA and FGI are united in our desire that the City make substantial changes to the draft EIS and produce an adequate final EIS for consideration by decision makers. We hope that these comments assist you in that effort.

The PSA appreciates the opportunity to comment. If you have questions or would like to discuss any of these issues further, please contact Ann Kawasaki Romero, our Executive Director. We look forward to reviewing the final EIS, and to working with the City on these important issues.

Sincerely,

Lorraine Hine

Lorraine Hine, Board Chair
Public Stadium Authority

Cc: PSA Board Members
Ann Kawasaki, Executive Director
Diane Sugimura, Director, Department of Planning and Development

FIRST & GOAL
INCORPORATED

December 17, 2006

Mr. Gordon Clowers, Urban Planner
City of Seattle
Dept. of Planning and Development
700 Fifth Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019

Re: Livable South Downtown Planning Study DEIS
Comments from First & Goal Inc.

Dear Mr. Clowers:

First & Goal Inc. (FGI) appreciates the opportunity to provide comments on the City's draft environmental impact statement (DEIS) for the Livable South Downtown Planning Study. The scope of the potential zoning changes in the DEIS would create huge changes in the Livable South Downtown study area. FGI supports overall goals of the Livable South Downtown study – increased density that will fortify the region's residential-employment base - if planned correctly. However, it is critical that the planning for this increased density be consistent and compatible with Qwest Field and Event Center (QFEC) operations, to protect both the public's investment in that facility and the sizeable economic contributions that the facility provides for Seattle and the surrounding region, along with Safeco Field. Ensuring that future development is consistent and compatible with QFEC and Safeco activities is also critical to creating the desired livability goals set forth in the planning study.

Unfortunately, the DEIS does not adequately reflect or address the scope of events and activities, both current and anticipated, at QFEC. More importantly, the DEIS completely ignores critical impacts that would affect the operations and events at QFEC, as well as the impacts that QFEC activities will have on the expected future development. As discussed below, the DEIS is inadequate to inform the City's decision makers of the true environmental impacts of the potential zoning changes envisioned by the Livable South Downtown study.

As the Master Tenant of the Washington State Public Stadium Authority (PSA), FGI operates QFEC. FGI agrees with and supports the comments submitted on the DEIS by the PSA, and writes separately to underscore the critical information gaps in the DEIS.

FGI is proud of the fact that, in partnership with the PSA, we are delivering on the promises made when the public made its $300 million investment in QFEC. That promise was to bring hundreds of events every year to QFEC, making our facility a

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vibrant part of the South Downtown area and an economic engine for Seattle and the surrounding region. The sports, entertainment and event facilities at QFEC are the result of a successful public/private partnership that, among other benefits, provides 20 percent of the annual net profit from the Event Center to the Washington Common School Fund.

A key to the success of QFEC is the wide variety of events that draw hundreds of thousands of vendors, patrons, suppliers, and visitors. While the QFEC is well known at the home of the Seattle Seahawks, and football (both professional and college) may be the most high-profile aspect of QFEC operations, football only accounts for five (5) percent or less of the total event activity at the QFEC.

- In 2009, we will also be home to a new Major League Soccer franchise, with 15 to 20 matches annually, drawing as many as 25,000 fans per match.
- We host other large stadium events, such as the annual Supercross event, the Kenny Chesney concert (the largest-attended country and western concert in Seattle history) and last year's Rolling Stones concert and Real Madrid soccer event.
- We are home to the region's four largest consumer shows – the Home Show, the Boat Show, the Auto Show, and the RV Show.
- We host hundreds of smaller events at QFEC – nearly 30 shows and events in the first 14 months of operation of the new WaMu Theater, along with corporate meetings, smaller trade shows, high school and college graduations, social events, etc.

This means that QFEC is busy *almost every day of the year*. On average, we have over 500 "event days" per year. "Event days" include the day(s) of the actual event, as well as the days required for event move-in and move-out. (There are more then 365 "event days" in a year because QFEC sometimes hosts multiple events on the same day, or hosts an event while another event is staging to use the facility.) Large event move-in and move-out can last for up to a week each, and can entail literally hundreds of truck trips to and from QFEC each day. This type of facility use requires adequate surface street capacity, staging and parking, and cannot be reduced by use of transit.

The use and popularity of our facilities have been growing for the past few years, and we anticipate continued growth in the future. As noted above, our new MLS franchise will bring as many as 25,000 fans to each of the expected 15-20 matches per year. Our visitors come from all over the region and, on occasion, from around the country and around the world – not just Seattle and its suburbs. While we strongly encourage our visitors to use transit, we are currently constrained by lack of available buses and trains, especially for weeknight events. It is not reasonable to assume that traffic associated with future growth in this area will be offset significantly by increased use of transit by our event patrons.

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As our neighbors will agree, it can be a challenge to be located near such a large facility that attracts so many events. But we have worked hard to build good working relationships with neighborhood organizations in Pioneer Square, SODO, the Chinatown/International District and other areas. The challenges created by placing commercial, retail and residential uses in the same area as two large sports and event venues can only be overcome by proactive participation among the City and neighborhood stakeholders. These challenges will not be positively resolved by ignoring them in the planning stage.

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Across the entire document, the DEIS ignores the scope of activity at QFEC and focuses almost entirely on football event days – ignoring the different uses and scheduling/attendance profiles of the other events that use QFEC. Our concerns are not new; we have outlined them in comments provided during the scoping process for the DEIS. Thus, it is particularly disappointing to see that the DEIS does not adequately address them. The DEIS fails to inform the City's ultimate decision makers of either the compatibility of QFEC operations with the potential zoning changes, or the likely impacts of expected development on QFEC's operations (and the impact of QFEC's operations on that future development).

1. **Transportation and Parking.**

The DEIS does not adequately consider the annual background volume of events and attendance at QFEC. General catch-all phrases such as "heavier use of various street segments" by pedestrians fails to assess or convey to the City decision makers the very significant levels of vehicular and pedestrian congestion in the QFEC area before, during and after events. Many of those events require the closing of Occidental Avenue S in order to accommodate pedestrians, as well as extensive traffic management coordinated among Seattle Police, SDOT and QFEC management.

More importantly, there is no mitigation suggested to alleviate the impacts on access to QFEC events by the new numbers of vehicles and pedestrians introduced to the area as a result of the proposed zoning changes. The DEIS shows that significant impacts will surely result from the scale of development contemplated. As previously mentioned, events in our venue often entail major move-in and move-out efforts, lasting days at a time with hundreds of truck trips. Our visitor base is regional, and sometimes national/international. While increased reliance on transit is desirable, the DEIS does not analyze current or future transit capacity in conjunction with meeting expected event traffic demand along with the demands of a larger number of businesses and residents in the area. Nor does the DEIS identify a need for or propose other mitigation measures to address the challenges of large event staging.

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The DEIS' only suggestion is that there will be a "need to progressively adapt the TMPs for the stadium and event venues in the Stadium Area." This is not mitigation, but simply places the burden of dealing with all the new traffic directly on QFEC and Safeco Field. The Transportation Management Plans (TMPs) for QFEC and for Safeco Field are detailed and require significant funding by QFEC and Safeco Field to execute. More

importantly, these TMPs require approval and coordination with City agencies and other area stakeholders. Solving the problem of greater traffic and pedestrian congestion on event days cannot be made the exclusive burden of the sports and event venues. The DEIS shows that the proposed new development will generate thousands of new trips into the area and then suggests that QFEC and Safeco Field will have to address them (and, presumably, bear the additional costs) by revising their TMPs. At a minimum, the DEIS should identify specifically the mitigation measures that will require City participation and approval, and require new development to fund a proportionate share of the increased costs of event day transportation management required to execute the future TMPs. 2

2. **Noise and Lighting.**

The DEIS ignores noise from the QFEC and Safeco Field events. The DEIS correctly notes that there are many noise sources from traffic and aircraft in the area, and describes how new residential buildings will be impacted by that noise. However, the DEIS fails to document the noise sources from events at QFEC and Safeco Field. In fact, Qwest Field is nationally famous for being a noisy site for sporting events. Residential buildings, especially nearby buildings of significant height, could be impacted from the noise from sporting events and crowds. The same could be true of event lighting for nighttime events for residential structures in the areas close to the QFEC. The DEIS should recognize this "coming to the nuisance" effect and consider building heights that are not impacted – for the benefit and quality of life of future residents and businesses in the area 3

3. Views and View Connections.

The DEIS ignores the impacts of future development on views of and from the public facilities at QFEC and Safeco Field, by simply referencing the City's SEPA mitigation policies. Under the City's SEPA mitigation policies, when reviewing projects, the City limits its mitigation in the downtown area. The problem with this approach is that the SEPA mitigation policies only limit where the City will impose mitigation, when the City is a permitting authority (SMC 25.05.665). Those SEPA mitigation policies do not limit the scope of impacts that the City is required to assess in an environmental impact statement. 4

QFEC is the result of a significant public investment and functions as an important public gathering space for over a million visitors each year. The siting and design of QFEC was very specifically intended to create an iconic structure that enhances the Seattle skyline. The views of QFEC have become important public views in Seattle, and serve a critical wayfinding function in the Stadium Overlay District. In addition, the views from QFEC represent unique assets to the public who helped pay for the facility. The DEIS fails to model and assess the visual impacts on those views resulting from the proposed zoning changes and alternatives. The DEIS is required to assess those viewsheds, but does not. In order for City policy makers to make the necessary choices that balance the needs of existing uses with the goals for future uses, these view impacts must be acknowledged and assessed.

4. Compatibility.

The DEIS assessment of compatibility of the proposed uses with the QFEC operations is flawed for the reasons cited above – the DEIS fails to recognize the scale and scope of operations and events at the QFEC. 5

5. Shading Impacts.

The DEIS error noted in #3 is compounded by the flawed premise of relying on the City's SEPA mitigation policy on shading to limit its investigation of impacts. Similar to the City's SEPA mitigation policy on views, the City's SEPA mitigation on shading limits the mitigation that the City will require when it permits projects in the downtown area. That does not limit the scope of impacts that the City must consider, however, especially when the City is proposing legislation that will create significant shading impacts on the publicly used spaces at QFEC. 6

Thank you for the opportunity to comment on the DEIS for the Livable South Downtown Planning Study. FGI looks forward to working with the City to fully inform the City Council decisions on this important legislative initiative.

Very truly yours,

Martha Fuller, Senior Vice President and Chief Financial Officer
First & Goal Inc.

Cc: Washington State Public Stadium Authority Board Members
Ann Kawasaki, Executive Director, Washington State Public Stadium Authority
Diane Sugimura, Director, Department of Planning and Development
John Rahaim, City Planning Director

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December 17, 2007

City of Seattle, Dept. of Planning and Development
700 Fifth Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019
Attn: Mr. Gordon Clowers

Re: PFD Comments on Livable South Downtown Planning Study Draft Environmental Impact Statement

Dear Mr. Clowers:

The Washington State Major League Baseball Stadium Public Facilities District (PFD) submits the following comments on the draft environmental impact statement (draft EIS) for the Livable South Downtown Planning Study. The PFD is the public agency that oversees the public's ownership of Safeco Field, and it is charged with protecting the public's investment in this magnificent public facility. Among other things, we are responsible for ensuring that Safeco Field remains an excellent and attractive baseball park that is an asset to the community and the region, now and into the future.

The PFD has been clear from the beginning of the planning process that it supports appropriate redevelopment of the South Downtown area, and we are pleased that the City is addressing this area as a whole. However, we continue to be deeply concerned about the dramatic increases in heights and densities proposed for the areas surrounding Safeco Field, specifically to the west. These changes, if implemented, will have significant adverse impacts that will severely diminish our community's use and enjoyment of this great public facility. 1

We are disturbed that, despite our repeated calls through the South Downtown Advisory Group, meetings with planning staff, and our EIS scoping comment letter, the impacts on views to and from the ballpark were not studied in the draft EIS. Likewise, we are concerned that traffic evaluations in the draft EIS underestimate the impacts of greatly increased density in the South Downtown area, and they fail to adequately study the impacts of these changes on the operation of Safeco Field. The draft EIS also fails to objectively evaluate the effects of the rezone on event traffic to and from Safeco Field and our neighbor Qwest Field. These events are not merely a special occasion. Between Safeco Field and Qwest Field and Event Center, these facilities are hosting or preparing for at least one event almost every day of the year. 2

All of the action alternatives in the draft EIS represent a significant departure from the zoning that was in place when the PFD chose the present location for the construction of the ballpark, and the draft EIS repeatedly fails to acknowledge the existing Stadium Transition Area Overlay District that currently governs development adjacent to the ballpark. Other special zoning areas—such as Pioneer Square, the International District, and the Greater Duwamish Manufacturing and Industrial Area—are recognized repeatedly in the draft EIS, while the stadium overlay district is barely acknowledged. Similarly, Safeco Field and our neighbor Qwest Field and Event Center are scarcely acknowledged as existing conditions. The needs of these major facilities are important to accommodate and study in relation to any major change in development in this area. In our view, the draft EIS fails to do that. 3

These errors and omissions in the draft EIS are significant, and they are discussed in more detail below in our comments on each chapter. These matters need to be addressed in the final EIS. If they are not, we have grave concerns about the adequacy of the alternatives evaluated and the adequacy of the impacts analysis under the State Environmental Policy Act (SEPA).

General Comments:

- All three of the "build" alternatives evaluated in the draft EIS result in significant changes to density and heights, especially in and around the stadiums. This results in significant impacts in a variety of areas, some of which are appropriately disclosed in the summary Table 1-1. The final EIS should include an evaluation of at least one alternative that includes less density and lower heights, especially in the area of the Stadium Transition Area Overlay District (see discussion below). 4
- Current zoning (including the stadium transition overlay) preserves spectacular ballpark views enjoyed by 3 million people each year. The zoning alternatives proposed in the draft EIS would obliterate many of these views and transfer others to the wealthy few who could afford the high-priced condominiums that would wall off the ballpark views. This loss of public views is a significant adverse impact that must be analyzed in the EIS. Failure to include such analysis in the final EIS will render it inadequate under the State Environmental Policy Act (SEPA). . 5
- Mitigation measures discussed throughout the draft EIS are generally inadequate to meaningfully reduce the impacts of some of the alternatives evaluated. For example, it is difficult to imagine how the height, bulk, and scale impacts of rezoning property from 65' to 240' can be mitigated using "design controls," "special review processes," or "other measures." These measures need to be spelled out in detail in the final EIS, if their effectiveness is to be adequately evaluated. 6

Corrections to Maps / Figures / Tables:

- Many of the maps and figures in the draft EIS appear to contain small errors and omissions that, on a cumulative basis, cast doubt on the adequacy of the analysis. For example, Figures 2-4 to 2-7 defining the alternatives evaluated contain errors on what constitutes changes in height limits and what heights are consistent with existing conditions (including the stadium overlay district). Subsequent figures—especially those contained in the Chapter 3 Impact section on height/bulk/scale—do not appear to match some of the elements of the alternatives (including heights), as set out in Chapter 2. All of these errors and omissions need to be corrected in the final EIS. 7

Specific Comments:

Chapter 1:

- This chapter consists largely of a summary of the materials that follow. It will need substantial updating in the final EIS to respond to the comments, questions, and revisions suggested below. 8
- Figure 1-1, Study Area: The figure should be updated to show the boundaries of the existing Stadium Transition Area Overlay District, and the location of Safeco Field and its associated parking garage. 9
- Major Conclusions, pp. 1-3 to 1-5: We do not agree with many of these conclusions, nor do we believe that enough detail is provided in the draft EIS to assess the effectiveness of mitigation strategies proposed to address significant adverse impacts. (See discussion below). 10
- While we will leave this topic to others, the effectiveness of bonus and transfer of development rights (TDR) programs is uncertain, and their ability to expand affordable housing programs (even "over time") is in doubt. 11
- The conclusions on business and economic impacts should be updated to reflect an analysis of the impacts of the rezone alternatives on the operation of Safeco Field. 12
- Transportation and parking impacts: Given that the growth assumptions for all of the alternatives are the same, it is not surprising that there are few differences among them in terms of their impacts on transportation. A more diverse range of alternatives would include a variety of growth assumptions that would allow for effective comparisons among alternatives with different impact levels 13
- Comparative Summary of Impacts, pp. 1-6 to 1-22. The table will require updating to reflect additional analysis of impacts on ballpark views, economic and business impacts, and transportation. 14
- P. 1-11, Stadium Area: We strongly disagree that significant adverse impacts on the 1st Avenue S. corridor can be avoided under Alts. 1 and 3 through the use of "special review" processes for the new South Downtown Mixed (SDM) zone. Those processes are currently ill-defined. We also disagree regarding the impacts of Alt. 2 for this corridor. 15

Chapter 2:

- General: The descriptions of the alternatives and Table 2-1 are vague and lacking in detail necessary to evaluate potential impacts. For example, the summary descriptions do not acknowledge critical elements that are revealed later in the document, such as allowing residential land uses on the west side of 1st Ave. S. under Alternatives 1 and 3, or allowing hotel uses south of Royal Brougham under Alternative 3. This should be corrected in the final EIS. 16
- Pages 2-1 and 2-3: The lists of objectives and key issues should be revised to include the objectives identified by the PFD and the Mariners in this course of the planning process, including preserving the value of the public's $400M+ investment in Safeco Field and ensuring adequate transportation and transit access, parking, and pedestrian safety for baseball fans and other facility users. 17
- Figure 2-3: Revise to reflect that the "WOSCA Property" is now ½ as wide as shown because the western half of the property was recently sold to WSDOT for highway purposes and is unavailable for future development. 18
- Table 2-1: The description of the "Stadium Area" WOSCA property should be expanded to recognize in Alternative 2 the area zoned 65' north of S. Royal Brougham Way. 19
- Table 2-1: The last row in the table suggests that some of the zoning south of Royal Brougham remains at 65', but the maps for Alternative 1 shows zoning at 85' and 125' for this area, and the map for Alternative 2 shows zoning only at 85' for this area. Alternative 2 reports "No change from existing zoning", but the map shows the westernmost portion of the area south of Royal Brougham changing from IG2 U/85' to IC 85'. These inconsistencies need to be resolved and corrected. 20

Chapter 3:

Land Use

- Stadium Area, p. 3-6: The description of the existing zoning pattern for the Stadium Area should be expanded, including more detail regarding the purpose of the Stadium Transition Area Overlay District. At a minimum, this section should explain that the Stadium Transition Area Overlay District was created for the purpose of supporting large sports and entertainment facilities and providing a safer pedestrian environment for those attending events. SMC 23.74.002.A. It should also note that the district provides a broad transition between the residential and commercial uses in Pioneer Square to the north, the Duwamish Manufacturing and Industrial Center to the south, and the Port of Seattle's facilities to the west. In addition, the Stadium Transition Area Overlay District should be shown on at least one map or figure in the EIS (e.g., Figure 2-1, Study Area). 21
- Stadium Area, p. 3-7: The elements of the proposed "South Downtown Mixed (SDM)" zone need to be spelled out in much greater detail in order that the impacts of this proposed new zoning can be evaluated adequately. 22

- Stadium Area, p. 3-13: We agree that the comprehensive plan and zoning changes for the west side of 1st Avenue S. constitute a "significant shift" from the existing comprehensive plan and City land use policy. The significance of these changes should be highlighted in the introductory and summary materials as well as elsewhere in the document. We do *not* agree that there are any effective strategies available for avoiding the land use incompatibilities inherent in allowing residential uses adjacent to an industrial zone and working waterfront. 23
- 1st Ave. S. Corridor, p. 3-14: This discussion should acknowledge the recent changes to the WOSCA property, which involved the sale of the western half of the property to WSDOT for transportation purposes and the long-term lease of the eastern half of the property for construction staging for the Alaskan Way Viaduct project. As the City well knows, construction of the viaduct project is expected to last between 7-10 years, and the construction on the central waterfront portion is not expected to begin until at least 2012. Given this, there is no reason to proceed with the rezoning of property that is likely to be unavailable for redevelopment for at least 15 years. 24
- We strongly disagree with the statement that the proposed changes along the 1st Ave. S. Corridor would not have any significant adverse land use impacts. This statement ignores the fact that the proposed height increases are inconsistent with the view protection purpose of the Stadium Transition Area Overlay District and the 65' height limit it established. 25
- Pyramid Brewery block, p. 3-14: Just to be clear, the PFD absolutely opposes any increase in the height limit for the block due west of Safeco Field. The "taller forms of future development" the City may wish to accommodate would obliterate the westerly views from the concourse level of the ballpark. This impact is certainly significant and adverse. Also, it would be more likely to occur if (incompatible) lodging uses are allowed in this zone, as proposed under Alternative 3. In addition, the "mitigation strategies" proposed on p. 3-16 for addressing these impacts are likely impossible to obtain. 26

Business and Economic Impacts

- The draft EIS recognizes the importance of assessing the business and economic impacts of the rezones on some areas and existing businesses, but it contains no analysis of the business and economic impacts on Safeco Field. Given the EIS's conclusions elsewhere about lost parking, degraded transportation levels of service, declining transit efficiencies, increased travel times and worsened freight mobility, it seems prudent to include in the final EIS an analysis of the impacts of these major zoning changes on existing public facilities. At a minimum, such analysis should address Safeco Field, Qwest Field and Event Center, and the Port of Seattle, and it should include a discussion of mitigation strategies. This information is required so that decisionmakers can adequately assess the impacts of the rezone alternatives. 27

- EIS Alternatives Comparison, pp. 3-54 and 3-58: We appreciate the candid conclusions regarding development momentum and the inverse relationship between some height increases (above 85') and returns on cost. This supports the view that lower zoning heights (85' or lower) can provide a better return on investment (and thus are more likely to occur) than mid-range development (85'-125'). Applied to the 1st Ave. S. corridor, this analysis suggests that keeping heights at 85' or lower is more likely to contribute to development than would the 120' or 160' heights proposed in Alternatives 1 and 3. 28

Relationships to Plans and Policies

- Comprehensive Plan, pp. 3-62 to 3-64: The draft EIS's "big-picture perspective" fails to discuss the inconsistency between the City's existing Comprehensive Plan (with the recent major update in January 2005) and the growth assumptions in the South Downtown Planning Study. For example, the Comprehensive Plan established a household growth target for the South Downtown study area of 2,000 units while the draft EIS analyzes 6,000 units, a 3-fold increase. Similarly, there are substantial differences between the employment growth assumptions contained in the Comprehensive Plan and those assumed in the draft EIS. The draft EIS fails to describe the basis for these assumptions or evaluate other growth scenarios. 29
- Changes in Stadium Area, p. 3-63: We strongly disagree with the notion that the recommended changes in the Stadium Area are "relatively limited." The changes are deeply different from existing zoning, inconsistent with comprehensive plan assumptions, and (apparently) completely displace the current Stadium Transition Area Overlay District (see below). 30
- Economy, p. 3-64: The statement that these changes can be made "without significantly impairing . . . important economic functions" is unsupported. As noted above, no economic analysis has been prepared regarding the impact of these changes on Safeco Field or other existing public facilities. 31
- Infrastructure, p. 3-64: If localized improvements are needed, they should be identified; if transportation measures are needed to" mitigate significant adverse impacts", they should be set out with specificity in the final EIS. 32
- Environment, p. 3-64: There is no support for the conclusion that the growth contemplated by the South Downtown Planning Study is "more efficient" than the growth established in the City's Comprehensive Plan. 33
- Neighborhood Plans, pp. 3-65 to 3-71: This section reviews existing zoning plans for Pioneer Square, Chinatown/International District, and the Greater Duwamish Manufacturing and Industrial Center, and it evaluates whether the proposed zoning alternatives are consistent or inconsistent with these plans. Inexplicably, no similar analysis is included for the Stadium Transition Area Overlay District, which has the same status under the City's zoning code as the Pioneer Square and International Special Review Districts. Such an analysis must be included in the final EIS. 34

- The final EIS should discuss in detail the specific purposes and elements of the Stadium Transition Overlay District. It should explain that the Stadium Transition Area Overlay District was expressly designed to support large sports and exhibition facilities and to provide "a safer pedestrian environment for those attending events." SMC 23.74.002.A. The overlay district development regulations were specifically intended "to create a pedestrian connection with downtown." *Id.* The relationship of the Stadium Transition Area Overlay District with Pioneer Square and First Avenue provided "strong pedestrian and transit links to the north." *Id.* At the same time, the District provides a broader transition between the residential and commercial uses in Pioneer Square to the north and the industrial uses in the Duwamish Manufacturing and Industrial Center to the south. The overlay district development regulations purposefully limited heights and densities in and around the stadium transition area in order to maintain these physical and visual connections between the ballpark and Pioneer Square, First Avenue, and the waterfront and downtown areas farther north. By limiting the height of these properties to the west, north and northeast to 65 feet, the zoning also ensured that the views to and from these public facilities would be preserved. Finally, the EIS should explain the disposition of each of the use and development standards established by the Stadium Transition Area Overlay District under each of the zoning alternatives. 35 36 37

Housing

- As noted above, the inconsistencies between the housing growth targets established in the City's Comprehensive Plan and those studied in the South Downtown Planning alternatives should be explained, and lower growth alternatives consistent with the Comprehensive Plan should be evaluated in the final EIS. 38

Population and Employment

- In general, see the discussion of the Comprehensive Plan growth targets above.
- Residential and Employment Growth Targets, p. 3-97: The headings on this table are reversed. 39

Public View Protection

- The draft EIS completely fails to analyze the view impacts of the zoning alternatives on views to and from Safeco Field. Since opening, an average of 3 million people per year visit Safeco Field, and the sweeping panoramic views from the concourse level and upper decks are available to all. These spectacular views also showcase the City of Seattle to countless other fans and potential tourists across the country and the world, through national and international television broadcasts. Safeco Field was sited, designed, and constructed to take full advantage of these views. Unfortunately, each of the action alternatives included in the draft EIS jeopardizes the public's investment in Safeco Field 40

by threatening the views to and from the ballpark that make it the unique and wonderful destination that it is today.

- The failure to analyze the signature views to and from Safeco Field puts at risk one of the essential experiences for ballpark visitors. Any increase in the zoning from the 65' height limit for the block immediately west of Safeco Field would obliterate views of the working waterfront, Elliott Bay, Puget Sound, and the Olympic Mountains. For the blocks to the north and west of Safeco Field, the proposed height increases (up to 160') threaten to block views of the entire waterfront from the upper concourse. To the north and east, the proposed 240' zoning threatens to establish a towering wall that would eliminate skyline views. 40
- Professional view analyses that clearly show the significance of these impacts were prepared and offered to the City for inclusion in the draft EIS. The City declined to include them.
- If the final EIS is to meet the legal requirements of the State Environmental Policy Act (SEPA), it must include an analysis of all "probable significant adverse impacts." See RCW 43.21C.030. Impacts on views to and from Safeco Field clearly fall into the category of significant adverse impacts and must be evaluated in the final EIS. As we noted in our EIS scoping comment letter, that comprehensive view modeling should include an analysis of lower height alternatives with potentially less significant impacts. 41

Parks & Recreation

- Table 3-33: The South Downtown household growth assumptions used in column two of this table are considerably lower than the growth assumptions set out in the Housing section (p. 3-82). This results in an understatement of the net difference between the comprehensive plan and South Downtown assumptions, which translates into an understatement of the park acreage required. Please explain this inconsistency and understatement of impacts. 42
- Safeco Field is an existing recreational facility. The final EIS should evaluate the impacts of the rezone alternatives on this existing facility. 43

Transportation / Parking

- Table 1-1, at the beginning of the draft EIS, summarizes the impacts of the alternatives. The only conclusion relating to transportation and Safeco Field is a general conclusion that "additional congestion and traffic volumes generated by future development would contribute to adverse traffic conditions during stadium event periods." This conclusion also notes that changes in traffic patterns and road systems "may influence how stadium event traffic and access is managed by the responsible parties." (p. 1-18). 44
- We have been clear since the beginning of the planning process that it is important that the transportation and parking analysis specifically evaluate the impacts of the proposed zoning changes on event traffic to and from Safeco Field during event conditions. The

draft EIS fails to do that. Instead, it contains a short, largely subjective evaluation of event traffic management that is mostly filled with "observations" (pp. 3-195 to 3-196), and later some suggestions of "possible changes" required for managing events. This is inadequate and unacceptable. 44

- Safeco Field is an existing use that has been open for business for more than eight years in South downtown. In addition to hosting 81 home baseball games each year, it serves as a venue for a wide variety of more than 250 other events, with attendance ranging from small groups to gatherings of more than 15,000. The final EIS must include a true impact analysis that objectively evaluates the consequences of the zoning alternatives on the operation of the ballpark and on events. 45
- The transportation analysis should also clarify the measures proposed to mitigate the traffic impacts of the rezone alternatives and specify who will be paying for these measures. As you know, SEPA limits mitigation to impacts caused by new development, not impacts from existing conditions. The mitigation analysis in the final EIS should be revised accordingly. 46

Conclusion

The PFD has long been concerned that the dramatically increased heights and densities in the City's South Downtown rezone proposal will have significant adverse impacts on Safeco Field. We were very disappointed to see that not all of these impacts were appropriately evaluated in the draft EIS. As discussed above, the final EIS needs to correct this error by studying additional impacts and alternatives to those presented in the draft. This additional analysis should be prepared before any further recommendations are put forward on the South Downtown Planning Study. 47

Thank you for your attention to our comments. If you would like to follow-up on any of the issues raised in this comment letter, please contact our Executive Director Kevin Callan at (206) 664-3076.

Sincerely,

José Usitán, PFD Board Chair

cc: PFD Board Members
Kevin Callan, Executive Director
Seattle Mariners

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December 17, 2007

Gordon Clowers
Department of Planning and Development
City of Seattle
PO Box 34019
Seattle, WA 98124-4019

Re: Seattle Mariners Comments on Livable South Downtown Planning Study Draft Environmental Impact statement

Dear Gordon:

The Seattle Mariners have reviewed the Livable South Downtown Planning Study Draft Environmental Impact Statement ("DEIS"), and on their behalf, we provide the following comments, specifically focusing on certain properties west of the ballpark.

Overall Concerns

During the scoping process, the Mariners provided comments on what the DEIS should address in order to be adequate. Many of those topics were not addressed. In fact, the DEIS virtually ignores Safeco Field, Qwest Field and Event Center, and the existing zoning in the stadium area. Although these public facilities attract over four million attendees and visitors per year at events held throughout the year, and are one of the top attractions in the City per surveys done of visitors, the DEIS barely acknowledges these facilities. Given that so little is said about the stadium area as an existing condition, most of our comments focus on what is lacking in the DEIS. 1

For example, the DEIS barely acknowledges the Stadium Transition Overlay District. That District was specifically created through the Duwamish planning process to recognize the unique circumstances of the stadium area. Height limits for that District were specifically set to preserve the public's spectacular views of the water, mountains and skyline from the ballpark. The proposed increases in height limits for properties west of the ballpark would obliterate those public views. With respect to those properties, the proposed zoning changes are directly contrary to the Comprehensive Plan and

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neighborhood objectives. Moreover, the DEIS fails to assess impacts on the ballpark's operations or the public's enjoyment of that public facility. 1

The second major concern is with the overall approach taken in the DEIS. The DEIS is purportedly based on a "Planning Study." However, there is no planning study that informs this document. All of the action alternatives are based on the same presumption that 6,000 new dwelling units can and should be accommodated in South Downtown. There is no analysis of that planning presumption, even though it represents a tripling of current Comprehensive Plan targets for this area.

In addition, the DEIS only considers *zoning* alternatives of the building heights necessary to accommodate the presumed 6,000 new dwelling units. Those alternatives vary principally only by whether height increases are to be concentrated to the west, north, or east. There are no *planning* alternatives that explore different growth or density options for this area. As a result, since all of the alternatives are based on the same growth presumptions, it is not surprising that there is relatively little difference in impacts from the alternatives, for those topics the DEIS selectively chose to analyze. 2

These are two of the major deficiencies in the DEIS. The unfortunate result of these deficiencies, and others, is that the DEIS does not provide the public or decision makers with good information with which to make land use decisions.

The specific comments below pertain to the zoning changes for the properties west of First Avenue South within the Greater Duwamish Manufacturing and Industrial Center (referred to herein as "First Avenue Properties").

Specific Comments

Introduction, page ii: The first paragraph of the DEIS states that "the idea of encouraging more residents was attractive to city leaders, and is an extension of neighborhood plan objectives for Pioneer Square and Chinatown/I.D." This statement apparently provides the fundamental rationale for the proposal and all action alternatives. Thus, a much fuller explanation is required, and the following specific questions should be answered with respect to the First Avenue Properties: 3

- Who are the "city leaders" being referred to? When was that conclusion reached? On what basis did "city leaders" reach that conclusion?
- Although a residential emphasis may be consistent with neighborhood plan objectives for Pioneer Square and Chinatown/I.D., did "city leaders" consider that a residential emphasis is inconsistent with the Comprehensive Plan and Duwamish neighborhood plan for the First Avenue Properties? If not considered, why not?

- What is motivating a decision to change the land use and heights for the First Avenue Properties? 3

Fact Sheet, page iii: The Proposal is described as "planning recommendations," but there is no document that contains those recommendations, and the summary provided in the DEIS is very brief and general in nature. Moreover, it is often difficult to discern what the recommendations are from the description of the alternatives. Therefore, it is not possible to see if the DEIS fully analyzed those recommendations.

In addition, as described in the Fact Sheet, the DEIS alternatives are actually for a range of "possible rezone actions." In other words, the DEIS alternatives are not based on different types of planning recommendations, such as what the appropriate land use or growth targets should be for the South Downtown area and its sub-areas. Instead, the DEIS skips the planning process that is the logical and customary precursor to zoning decisions, and instead focuses on what building heights should be assigned to rezones of specific parcels. We believe that before focusing on specific rezones, the DEIS first should have assessed different planning options so that real and clear choices were presented to the public and decision makers. 4

Elements of the Environment, page xi: The DEIS is not consistent as to whether shadows on open spaces are analyzed or not. Page xii says this topic was "Not Reviewed" but there is nonetheless discussion of it on page 3-21. Additional comments on that discussion appear below, but the list of the Elements of the Environment should be corrected to indicate this topic was reviewed. 5

Also, the footnotes to the list of Elements make it clear that DPD choose to include certain topics, even though DPD did not believe they were required by SEPA. (This is also described on page 3-51.) Given that discretion, what is the justification for refusing to include an assessment of the public view blockage from Safeco Field? Business and Economic Impacts were discussed, but why not the impacts on the millions of people who attend events at Safeco Field each year? 6

Summary, page 1-1: Paragraph four of the Introduction states that the South Downtown planning project "acknowledges the visions expressed in neighborhood plans" and specifically mentions the Greater Duwamish Manufacturing and Industrial Center Plan. Please correct this statement: the action alternatives "do not acknowledge the vision" of the Duwamish plan. Rather, the action alternatives are *inconsistent* with that Plan with respect to the First Avenue Properties. In addition, the South Downtown planning proposes substantial increases in population and employment growth allocations to South Downtown, as opposed to the current Comprehensive Plan allocations, and this issue specifically needs acknowledgement and discussion. 7

The statement is made that South Downtown planning "pursues the next steps to implement land use-related aspects of these plans." Please correct this statement: the South Downtown planning alternatives do not implement the Duwamish Plan for the First Avenue Properties, but instead represent a fundamental change to the Duwamish Plan with respect to those Properties. 8

The statement is also made in this paragraph that the DEIS "analyzes whether existing conditions warrant a change of direction in order to encourage desirable patterns of growth." It was not apparent that the DEIS actually contained this analysis. Please identify where in the DEIS this specific analysis appears for the First Avenue Properties. If you find that the analysis was not included, then please provide it in the Final EIS. 9

As for the remainder of the Summary section, changes are needed to make it complete, in accordance with the comments provided in this letter.

Chapter Two, page 2-1: This page contains the same statement about what was "attractive to city leaders" and the comments above apply here as well. 10

Page 2-1: Under Background, the statement is made that "DPD staff identified challenges and impediments to desired objectives." With respect to the First Avenue Properties, what are the "desired objectives"? Who determined them, and when? On what basis were those objectives determined to be desirable, and in reaching that conclusion, what alternatives were examined? Why does the DEIS focus on zoning decisions, rather than alternative "desired objectives" for the First Avenue Properties? 11

This same statement refers to "possibly dated land use and zoning designations and regulations" as an impediment. Please specify which designations and regulations the document is referring to. If any of those affect the First Avenue Properties, please specify on what basis DPD concludes the designations and regulations to be "dated." Identify where in the DEIS this issue and conclusion are analyzed. 12

Page 2-3: This page includes the list of objectives for the South Downtown planning process, and states that the list was in part derived from the advisory group of stakeholders. The Public Facilities District and Mariners were members of that advisory group, yet their input as to objectives has not been included. There is nothing in the objectives about respecting the public's investment in the ballpark or other public facilities or maintaining access to these facilities so that millions of people can continue to enjoy them on an annual basis, as they do now. The objectives do recognize the need to accommodate Port activities and mobility needs, and the same should be true for the other public facilities in the study area. 13

In addition, the objectives that are included are much too general in scope. The concept of "more housing and job growth" is described as if it applied uniformly to the 14

entire South Downtown area. That is not the case: the plans for Pioneer Square and Chinatown/I.D. called for additional housing opportunities, but that is inapplicable to the Greater Duwamish Manufacturing and Industrial Center. By blurring these issues, the DEIS obscures the fact that residential use is proposed for the WOSCA property in Alternatives 1 and 3, when this is directly contrary to the objectives of the Duwamish Plan. Why are the Pioneer Square and Chinatown/I.D. plans respected in terms of adding residential units, but the Duwamish Plan prohibition on residential uses is not respected? 14 15

Pages 2-4 and 2-5: This is a summary of draft planning recommendations. Where are the complete planning recommendations that form the proposal being analyzed in the DEIS? 16

Why is there no mention of the ballpark or other event venues in the Overall Vision for the South Downtown area? Please include appropriate references to the functions of these facilities. 17

The text at the bottom of page 2.4 implies that the South Downtown planning process is consistent with the goals of the Comprehensive Plan. Please correct that statement. The planning recommendations represent a substantial departure from the population goals and allocations of the Comprehensive Plan, and furthermore, propose uses that are inconsistent with that Plan with respect to the First Avenue Properties. 18

Page 2-7: Without any explanation, the DEIS assumes that the area south to S. Royal Brougham way is an "emerging area." On what basis was this presumed or decided for the First Avenue Properties? Who determined that actions to increase development capacity, employment growth, and residential development were appropriate for the First Avenue Properties? Where is the analysis for that presumption or decision and what planning alternatives were considered? 19

Also on page 2-7, the DEIS describes the geographic areas that are referred to throughout the document. Several corrections to this list are necessary. First, the WOSCA property is listed separately from the Stadium Area, but it is part of the Stadium Transition Area Overlay District – by explicit choice of the City Council when that District was formed – and thus it is properly included in the Stadium Area. 20

Secondly, the DEIS does not acknowledge that circumstances at the WOSCA property have changed through the transaction and agreements between the property owner and WSDOT. Approximately the western half of the property has been sold to WSDOT for the Alaskan Way Viaduct project and other transportation needs, and portions of the eastern half of the property are to be leased to and used by WSDOT. This fundamental change in the character and function of the WOSCA site needs to be stated in the EIS, and factored into any assessment of appropriate land use and zoning for this 21

site. At present, this is just briefly described on page 3-40, but there is no analysis presented. 21

Thirdly, the text should correctly indicate that the Stadium Transition Overlay is a discrete District in City zoning regulations, and the purpose of that District should be explained so that readers have a context for understanding its significance. For some reason, in those limited instances where the DEIS mentions the Stadium Transition area, the word District is always omitted. Please correct all references to be complete and accurate. 22

Page 2-9: This page includes an explanation of how the alternatives were defined. Please clarify how the action alternatives were selected to approximate DPD's objectives at a lower environmental cost, as required by SMC 25.05.440.D. Since all the action alternatives assume the same level of growth, is the assumption to be made that any other level of growth is inconsistent with DPD's objectives? If true, what is the basis for that view? Why do the alternatives not vary the level of growth in order to represent a range of choices for the area? 23

Description of Alternatives, pages 2-10 through 2-18: The description of alternatives in text and graphics is extremely difficult to follow as the specific changes to existing plans and zoning are not clearly identified. This undermines the ability of the public and decision makers to understand and evaluate the assessment of impacts in the document and the comparison of alternatives. At a minimum, the textual description of each alternative should include a specific list of how each alternative changes existing plans and zoning. 24

In addition, each of the figures needs to be substantially improved. The only way a reader can determine how zoning designations change is to try to compare the graphic depicting each alternative with the graphic of existing zones. Even then, not all of the proposed zoning changes can be identified. It is critical that the graphic depicting each alternative clearly indicate all of the zoning changes proposed for that alternative. This should not just be limited to changes in height limits, but also changes to the zone designations themselves. For example, with Alternative 1, it should be clear what the existing zoning on the WOSCA site is, and that it is proposed to change to a new zone called SDM. 25

Also, as the EIS purports to be a planning document, the graphic depiction of the alternatives in this section needs to identify the plan changes which alternative would necessitate. 26

In clearly indicating the zoning and planning changes inherent in the alternatives, it is also important that you represent the boundaries of the existing Stadium Transition 27

Area Overlay District. The existence of that District cannot be ignored (as the DEIS does) if the City expects the document to be adequate. 27

The description of the alternatives lacks clear identification of proposed uses, heights, zoning and planning changes, but freely describes perceived benefits of the changes in each alternative. As the description of each alternative attempts to explain the benefits of each alternative, it is appropriate to examine those statements closely, and comments are provided below on each alternative.

Alternative 1, pages 2-10 through 2-12: The description of this alternative is deficient because it does not clearly identify that residential use is proposed for the WOSCA property. (This can only be determined by reviewing other sections later in the DEIS.) Paragraphs 1 and 3 need to be revised to indicate this fundamental use change proposed for WOSCA, which is different than what is allowed under the current Comprehensive Plan and zoning designations for the property. 28

Please explain the reasoning for selecting the particular dividing line between the 100 and 160 foot height limits on the WOSCA property. 29

Paragraph 1 states that the proposed changes in this alternative would allow neighborhoods to experience "the benefits of increased residential occupation." Who determined that there were benefits of residential use on the WOSCA property, and on what basis, since that use has not been allowed on this property at any time in the history of modern zoning? 30

Similarly, paragraph 4 states that the zoning changes will encourage a new residential presence "to help revitalize core neighborhoods." Clarify whether this statement is meant to apply to the First Avenue Properties, and if it is, on what basis those properties are considered a "core" neighborhood needing revitalizing through allowances for residential uses.

The end of paragraph 4 notes that properties would need to be removed from the Greater Duwamish Manufacturing and Industrial Center and added to the Downtown Urban Center. This is a significant change to the Comprehensive Plan as it has existed since 1994, and should not be treated as an after-thought. The Mayor and City Council are, at the very time of this writing, taking steps to protect industrial zoning. Nonetheless, the DEIS proposes to convert substantial acreage away from industrial use. This fundamental land use change should be highlighted in the description of the alternatives. 31

Paragraph 5 describes a new South Downtown Mixed zone but provides little information as to the uses and development standards that would make up that zone. 32

Without that information, there is insufficient detail to evaluate the changes proposed for the First Avenue Properties. 32

Paragraph 5 also describes, in non-objective terms, the asserted benefits of the new South Downtown Mixed zone, such as high quality architectural design and pedestrian amenities. Does the DEIS assume that good urban design can be achieved on the First Avenue Properties *only* with height increases? If so, why is that the case? 33

Paragraph 7 refers to retention of industrial zones on the southern periphery of the study area. Given the focus on retaining existing zoning, why are height increases proposed for the Pyramid Brewery block between Atlantic and Royal Brougham? No increase in development capacity is proposed, so what is the justification for increasing height at this location? Such a height increase is directly contrary to the City Council's purpose in specifically establishing a 65-foot height limit for this property, which as documented in our scoping comments, was in order to protect the public views from the ballpark. By downplaying the Stadium Transition Area Overlay District as an existing condition, the DEIS attempts to ignore that Alternatives 1 and 3, in particular, represent a significant and damaging departure from existing zoning. 34

Alternative 2, pages 2-12 through 2-14: The description of this alternative should note that it is the only action alternative consistent with the existing Comprehensive Plan and zoning for the First Avenue Properties. 35

Also with respect to Alternative 2, please explain the reasoning for selecting the particular dividing lines between the 65, 85 and 100 foot areas on the WOSCA property. 36

Alternative 3, pages 2-14 through 2-16: Other than once again referring to "emerging areas," it is not clear why the particular zoning changes for the First Avenue Properties are proposed as they are, in this alternative. Why are height limits in the IC proposed to increase from 65 to 85 feet? What are the public benefits and public concerns with proposing that change? 37

For what reason is hotel use included in this alternative, but not called out for the other alternatives? 38

On what basis was it presumed that increased residential development on the WOSCA property was appropriate, given that this is a significant change to historical zoning and the Comprehensive Plan? The text notes that this proposal would require moving certain properties out of the Greater Duwamish Manufacturing and Industrial Center and into the Downtown Urban Center, but it should be made clear that this is a change to Comprehensive Plan provisions that have been in effect since 1994. 39

Even if the emphasis on residential development on the WOSCA site is explained, why are height increases proposed for that site? What are the public benefits and public concerns with proposing that change? 40

Please explain the reasoning behind selecting the particular dividing line between the 100 and 120 foot areas on the WOSCA site. 41

Alternative 4, page 2-17: The description of this No Action alternative states that the population and employment growth targets established in the Comprehensive Plan through the year 2024 would remain in place. That suggests the following question: why do the action alternatives not reveal that they each involve revisions to the population and employment growth targets established in the Comprehensive Plan? The description of the action alternatives should highlight what change in growth targets are explicit or implicit in each alternative, and explain why a change to the Comprehensive Plan growth targets is considered appropriate at all. 42

Benefits and Disadvantages of Reserving Implementation, page 2-17: This section considers the No Action alternative to be a "lost opportunity" to add density as "envisioned by neighborhood plans within the Downtown Urban Center." As noted previously, that type of justification has no application to the First Avenue Properties. 43

Also noted in this section is that foregoing height increases is a "lost opportunity" to generate revenue for affordable housing and other worthy objectives, since development seeking to use maximum height would have to pay for it. However, the DEIS acknowledges that the development spurred by the zoning changes will result in the loss of hundreds of existing affordable housing units. This tradeoff should be noted. Also, unless the EIS can document that more affordable units would be created due to the zoning changes than lost from those zoning changes, the EIS cannot claim that creation of affordable housing is a benefit of the proposal. 44

An additional benefit of reserving implementation with regard to height and zoning changes on the WOSCA property is that the State's intended and long term use of that property will become clearer as plans progress on the Alaskan Way Viaduct project. Given the uncertain status of use of this property for several years to come, the EIS should note there is a benefit of reserving decisions about whether residential use and increased height limits are appropriate for this property in transition. 45

Finally, we specifically request that the Final EIS acknowledge that a benefit of reserving implementation of zoning changes on the First Avenue Properties is that the public views available to over 3 million annual attendees at the ballpark will be preserved, rather than being lost forever. This should be acknowledged whether or not you agree that these public views are part of the "Public View Protection" to be discussed as an Element of the Environment. 46

Table 2-1, pages 2-19 through 2-23: This table is labeled as a "Summary of Alternative Zoning Details." It should be expanded to include identification of all zoning and Comprehensive Plan changes involved in each alternative, so that the reader can compare the alternatives and understand their differences. 47

Chapter 3, Land Use, Overall Comments: Consistent with prior comments, Figure 3-1 needs to depict the boundaries of the Stadium Transition Area Overlay District, as it is an Existing Zone.

Even more importantly, as we stressed in our comments on the EIS scope, a proper understanding of the purpose of the Stadium Transition Overlay District is essential in order to adequately evaluate the impacts of making changes to that District and its zoning regulations. Thus, the text on page 3-6 must be revised to properly and accurately explain the Stadium Transition Area Overlay District.

The history of how this District came to be established is important. The Greater Duwamish Manufacturing and Industrial Center Neighborhood Plan proposed the creation of a Stadium Transition Area Overlay District, and the District was specifically adopted to implement that Plan. See Ordinance 11972, 2000. Prior to creation of the District, the properties west of First Avenue between South Atlantic and South King Streets were zoned with an 85-foot height limit. However, the appropriate height of these parcels was fully debated as the City considered creation of the Stadium District. In adopting that District, the record is very clear that the City Council changed the height of those parcels from 85 feet to 65 feet, specifically in recognition of the important public views from the sports venues. At 65 feet, those spectacular views of water and mountains were preserved. 48

In the Council consideration of the height and view issue, Councilmember Conlin (who chaired the Committee responsible for the Duwamish Plan and Stadium District) noted, at length, the importance of protecting those views. Councilmember Drago also stated that: "Views from the public stadia are public views held in the public domain." City Council meeting, June 12, 2000. The Council voted 8-1 to decrease the allowable height from 85 to 65 feet in order to protect views from the sports venues.

As part of the Council process, consideration was given to a possible height increase on the WOSCA site. The owner wanted a height increase to allow development over 100 feet tall. The Council instead fixed the height limit at 65 feet, while acknowledging that a future height rezone may be proposed to the Council with strict design and height controls. See Ordinance 119970, 2000.

In explaining the Council's actions, Councilmember Conlin wrote the following:

> The final issue taken up by the Council was the question of views around the stadiums. While these stadiums did not exist two years ago, the views from Safeco Field and the projected views from the football stadiums are part of the atmosphere of the area, and how they are protected can make a difference in how well this area works. The Council's actions have not generally been accurately presented in the media. The Council actually reduced the height limits on the properties to the west and northwest of the two stadiums from the 85 feet formerly permitted to a new limit of 65 feet. In order to provide a transition to the 120 feet permitted zoning in Pioneer Square to the north, and to encourage pedestrian connections to Pioneer Square, the Council allowed the owners of the WOSCA property on First Avenue to craft a development that transitions from the 65 feet near Safeco Field to more varied heights further to the north. This would only be allowed under an unusual provision requiring the developer to return to the Council for design approval in order to ensure that the development does protect views.

Letter from Councilmember Conlin, June 28, 2000.

48

The next step was for the WOSCA owner to submit a rezone proposal. That owner did so in 2001, proposing heights between 72 and 125 feet on the property. As the view analysis revealed that the proposed height limits and development would substantially impair views from Safeco Field, the Mariners and others strongly protested. Based on public comment and its own analysis, the Department of Planning and Development advised the owner that the rezone would not be recommended for approval. Rather than allowing that rezone process to come to its natural conclusion through a public process, the owner has put the application on hold for the last six years.

All of this history matters because it shows that protecting public views from the sports venues has been of enduring importance. The EIS needs to acknowledge, explain, and depict this District in order for the public and decision makers to understand the impacts of the alternatives, and make comparisons between them. Whether or not DPD staff thinks that views from the stadia are subject to discussion under the Public View Protection Element of the Environment, this issue is one of *land use compatibility*. As the DEIS focuses on the impacts of zoning changes, it is critical to note that Alternatives 1 and 3 are fundamentally inconsistent with the height limits set for the First Avenue Properties when the Stadium District was created.

49

In addition, it is interesting how the DEIS treats the Pioneer Square and Chinatown/I.D neighborhood plans differently from the Duwamish Plan. Pioneer Square

and the Chinatown/I.D. are given core neighborhood status. The reasoning for this has more to do with the unique character and needs of those two neighborhoods than it does to any other consideration. Pioneer Square is consistently referenced for its historical character and status, and the Chinatown/I.D. for its ethnicity, as reasons for any number of special considerations in the EIS. However, the Stadium District also has a unique character that, while certainly not the same as either of those two neighborhoods, is no less compelling for separate consideration. The unique needs and circumstances of the stadia area were recognized by the City when the Stadium District was created in the year 2000.

We believe that with the South Downtown rezoning effort, it is appropriate to continue the work of the City and create a unique neighborhood around the stadia that recognizes, as it does with the other two neighborhoods, the unique needs and opportunities the Stadium District presents. The significant differences in land use between the industrial areas to the south and the residential/commercial areas to the north needs to continue to benefit from a transition zone. The Stadium District needs a separate designation to ensure that it develops in a manner that keeps the stadia competitive and accessible, and allows for the development of complementary businesses in the area. 49

To help address land use compatibility issues, we suggest DPD survey the zoning around stadia in other cities, to see what densities are considered compatible with these unique facilities and uses. When a decision was made on siting the new ballpark, a specific consideration for the Safeco Field location was that it was not located in a dense residential area. This history and the experiences in other communities could help DPD address land use compatibility uses.

Finally, certain topics, such as light and glare, were to be covered in the Land Use section (see page xi). We ask you to add to the Land Use section a discussion of any light and glare impacts on the ballpark from the zoning changes. Also, the Mariners' comment letter on the scope of the EIS asked that wind impacts on the ballpark be evaluated, but this was not done. We again ask that wind impacts on the ballpark be assessed. 50

Chapter 3, Land Use, Specific Comments: The discussion of the Stadium Area on page 3-13 for the first time acknowledges that the change to the Comprehensive Plan for the First Avenue Properties is "a significant shift in the City's land use policy." We appreciate the candid disclosure of this impact, and as noted in prior comments, the significance of the impact needs to be identified in the Summary and in Chapter 2 as well. 51

At the top of page 3-14, the claim is made that the significant incompatibility of residential uses on the WOSCA property with nearby Port property and railroad use could be mitigated by constraining the location and orientation to shield residential uses 52

from existing environmental conditions. It is not at all clear that this mitigation could be achieved. Also, given that WSDOT has purchased approximately the western half of the WOSCA property for transportation purposes, how could such mitigation be effectively achieved on a practical level? Further explanation and evaluation of this "mitigation strategy" should be added to pages 3-14 and 3-15. 52

The discussion of the First Avenue S. Corridor on page 3-14 states that there would no significant adverse land use impacts associated with any of the action alternatives, despite the height increases proposed. This fails to acknowledge that the height increases on the First Avenue Properties are fundamentally inconsistent with the purpose of the Stadium Transition Area Overlay District, are a significant change in land use policy, and adversely affect the public enjoyment of public facilities. There is a significant adverse land use impact from the height increases proposed for the First Avenue Properties in the action alternatives, particularly Alternatives 1 and 3. The "mitigation strategies" described will not ameliorate the adverse effects on public enjoyment of the ballpark, and thus a significant, unmitigated impact will occur from the part of the proposal changing zoning on the First Avenue Properties. 53

Page 3-19 notes that the concourse areas at Safeco Field are scaled at approximately 65 feet, and that this massing reflects the proportions of other buildings in the corridor. That concourse height limit was chosen in part for urban design compatibility, as noted, but the text should also note that the concourse height was specifically selected (and the ballpark specifically designed at the concourses and other locations, such as Lookout Landing) to provide views of the water, mountains, and skyline.

Page 3-19 notes that some buildings on the east side of First Avenue South could be built to 120 feet under existing zoning. That statement needs qualification. The EIS should acknowledge that the Silver Cloud hotel on the corner of First and Royal Brougham (the most recent construction in the area) is not at a height of 120 feet, and the EIS should evaluate which buildings on that half block are landmarks or eligible for landmark status, before any intimation can be made that buildings in that half block will likely be built to a height of 120 feet. 54

Page 3-21 under Stadium Area notes that existing zoning limits height to 65 feet north of S. Atlantic Street. As noted previously, explain why the height limit was established at 65 feet. Also, completely absent is any discussion of whether proposed uses and heights are compatible with the ballpark and other nearby public facilities. That discussion must be added for a complete discussion of land use compatibility. 55

Page 3-21 includes a brief discussion of Shadows on Open Spaces, which is confined only to parks in the Downtown area. However, the Downtown boundary stops at Royal Brougham, per prior adopted Downtown Plans. The SEPA Policy on Shadows 56

on Open Spaces is much broader than specific Downtown parks, and the EIS should analyze whether there are any shadow impacts outside of Downtown on the specific types of open space listed in the SEPA Policy (see SMC 25.05.675.Q.2.a). 56

Page 3-46 states that adverse impacts may result from allowing residential uses on the WOSCA property, but then states that: "The severity of this impact would therefore depend on how residential uses would be situated on the affected property." Given that the western half of the WOSCA property has been sold to WSDOT and will be used for transportation functions, how could the location of residential uses on the eastern half of the property be regulated in order to avoid adverse impacts on residential uses? 57

Chapter 3, Relationship to Plans and Policies: The discussion on page 3-63 implies that "big-picture" questions will be addressed in the South Downtown Planning. However, conspicuously absent is any discussion of the City's overall growth strategy. Specific answers are needed to the following questions: 1) why does the South Downtown Planning effort propose to substantially increase the population and employment growth in South Downtown beyond what the existing Comprehensive Plan envisions and plans for this area?; 2) is forecasted City growth able to be accommodated with existing zoning and land capacity in existing Urban Centers, outside of the Greater Duwamish Manufacturing and Industrial Center?; 3) if so, what justification would exist for assigning population growth to the Industrial Center?, and 4) if the City believes that forecasted growth should be accommodated in different areas than called for in the present Comprehensive Plan, where is the planning analysis that informs that belief and where is the assessment of its environmental impacts? 58

Page 3-63 describes the proposed planning and zoning changes for the Stadium area as being "relatively limited" in order to avoid conflicts with Port activities and freight traffic. First, the recommended changes are not "relatively limited" and that statement should be revised. As documented above, the zoning changes are fundamentally different from the existing Comprehensive Plan, Duwamish Plan, and existing zoning for the First Avenue Properties. Second, the EIS analysis needs to consider potential conflicts with existing public facilities in the area, and not just Port facilities. The DEIS contains almost no analysis of how the impacts of the zoning changes will affect operations at and public enjoyment of the ballpark. This is a severe deficiency in the document that must be remedied. 59

As for the discussion of the Duwamish plan on pages 3-70 and 3-71, please add the following to revised EIS text: 1) acknowledge that the Stadium District was adopted to implement this Plan; 2) acknowledge the purpose of the height limits selected for properties west and northwest of the ballpark; 3) describe how many industrially-zoned acres would be eliminated under the alternatives (and also add this to page 3-74); 4) explain how this loss of acreage is consistent or inconsistent with the Duwamish Plan; and 5) in addition to Port facilities, acknowledge that retaining the existing Industrial 60

Commercial zoning and Stadium Transition Area Overlay District would accommodate future development while remaining compatible with the public stadia and exhibition center. 60

Table 3-7 is focuses on analyzing height changes and their relationship to the Duwamish Plan, but this should be revised to consider proposed use changes as well, such as residential uses on the WOSCA property.

Table 3-7 states that the zoning proposals are consistent with the Duwamish Plan, but as you can see from the comment above, we do believe that conclusion is accurate. The Duwamish Plan called for creation of the Stadium District, that District was adopted in order to implement that Plan, and the height increases for the First Avenue South properties are not consistent with that Plan. This is particularly the case for Alternatives 1 and 3, which increase height in direct contradiction to the height limits established for the Stadium District. Please consider how you have filled out Table 3-7, in light of these comments. 61

Chapter 3, Housing: The discussion on page 3-82 makes clear that the South Downtown Planning Study assumes residential growth to the year 2030 of 6,000 dwelling units "in the study area" for all of the action alternatives. No explanation is provided of this planning assumption, and no other growth assumptions are tested. And yet, the entire presumption is that there is a need or desire to accommodate that number of dwelling units in the South Downtown area. Based on that presumption, the text on page 3-82 states that the No Action alternative "does not have enough capacity to meet the projected growth of 6,000 additional dwelling units by 2030." This implies that some upzoning is *needed*. The confusion in that description permeates the entire DEIS: the 6,000 dwelling unit figure is simultaneously treated as a desirable planning goal and also as a real life, fact-based projection. This leads to a number of comments: 62

- Where does the 6,000 dwelling unit figure come from? We believe what DPD has done is take the "high end" growth rate for the Downtown Urban Center (see Appendix D, page 5 of BHC & Property Counselors January 2007 report), and assume that growth rate is desirable for and applicable to South Downtown. Is that the case? If so, what is the logical basis for taking the growth rate for all of the Downtown Urban Center and assuming that it applies equally to South Downtown? If the 6,000 dwelling unit figure comes from a different source, please specify the source.

- Belltown alone accounts for 58% of the total growth in the Downtown Urban Center between 1990 and 2005, which heavily influences the total growth rate for that Urban Center. By applying the growth rate for the Downtown Urban Center to South Downtown, DPD is assuming South Downtown could and would grow at

a rate approximating recent growth in Belltown. Is this accurate and on what basis is such an assumption justified? 62

- For there to be demand for 6,000 units of housing in the South Downtown area, the EIS suggests that demand would be taken from traditionally preferred areas such as Belltown, South Lake Union and the DOC 2 zone that recently underwent its own upzone. These areas have development capacity without extensive demolition of existing structures. 63

- The current Comprehensive Plan target is for 2,000 households in Pioneer Square and Chinatown/I.D. between 2004 and 2024. Thus, current Comprehensive Plan targets for the geographic area most similar to the portion of South Downtown proposed for residential uses is 2,000 new households. Why does the DEIS "project" a growth rate that is three times higher than the current Comprehensive Plan growth targets for South Downtown neighborhoods? 64

- Can the present Comprehensive Plan target of 2,000 households in Pioneer Square and Chinatown/I.D. be accommodated without zoning changes to those areas, based on existing opportunities for development and re-development?

- Do the portions of South Downtown outside of the Duwamish Industrial Center have sufficient capacity under existing zoning to accommodate the 6,000 dwelling units the EIS proposes for South Downtown? If so, why would there be any need to incorporate residential uses in the Industrial Center, as is proposed for the WOSCA site? Why would there be any need to increase heights on the First Avenue Properties? 65

- Given the growth targets in the Comprehensive Plan for the Downtown Urban Center, what effect did the recent downtown upzone have on the ability of the Downtown area to accommodate new units? If Downtown is able to accommodate more than current Comprehensive Plan targets, then why would the allocation of residential growth be presumed to increase in South Downtown? 66

- To achieve the 6,000 new dwelling units proposed, how many existing buildings would need to be demolished, in what locations, and how many existing parking lots/spaces would be lost to redevelopment? Our analysis of the proposed zoning changes suggests that, in order to achieve the suggested housing targets, there would need to be substantial redevelopment of existing structures in addition to the development of undeveloped sites. 67

Page 3-83 describes "housing demand generated by new South Downtown employment." Please clarify whether you assume growth in South Downtown employment will lead to a demand for housing in the South Downtown, as opposed to 68

other areas. If that is assumed, what is the basis for that assumption? Where are the planning studies that show the housing demand from this employment growth cannot already be accommodated under existing zoning in other neighborhoods? 68

Page 3-85 discusses the number of existing affordable housing units that are threatened, with our without zoning changes. It is important for the EIS to identify whether proposed zoning changes will increase that impact, i.e. lead to additional units being threatened. Pages 3-87 and 3-88 provide only a limited assessment of that impact, very carefully confined only to "direct impacts" of the zoning changes. However, SEPA requires that "direct, indirect, and cumulative" impacts be analyzed in an EIS. See SMC 25.05.060.D.4 and 5. Thus, the issue of loss of affordable housing from the proposed zoning changes needs to be expanded also to analyze indirect and cumulative impacts. 69

In addition, we believe that the 1,280 existing affordable units (see page 3-85) that are at risk of potential rent increases is an understatement. We concur that the likelihood that they will be lost is limited as a function of Historic Preservation, however, gentrification will likely occur with planned up zoning and market economics would suggest that the property owners will attempt to achieve prevailing rents and these will be above those currently paid. This clearly defies the Comprehensive Plan goal of increasing affordability *(Seattle's Comprehensive Plan, Toward a Sustainable Seattle 4.1 HG 13/14).*

Pages 3-90 and 3-91 describe new "incentive" or inclusionary zoning requirements to provide affordable housing. However, the "incentive" requirement is only meaningful if a large number of projects are built that take advantage of the increased height or density. On what basis is it assumed that 75% of all new residential projects will take advantage of bonus development capacity, and thus pay the residential density bonus? How many specific residential projects are assumed and over what time frame? These assumptions seem critical, since as the DEIS notes, only two affordable housing projects in South Downtown have used the existing Downtown housing bonus program that has been in place for many years. 70

Expert review of the DEIS leads to the conclusion that reliance on incentive/inclusionary zoning to create new affordable housing is not a sufficient mitigation measure for loss of existing affordable housing units. Inclusionary zoning has repeatedly been shown to not succeed. In a pivotal paper by Professors Benjamin Powell and Edward Stringham, the San Francisco market was examined and the conclusion reached that inclusionary zoning generates little affordable housing production, taxes market rate home buyers and renters, restricts the supply of new homes, and costs government revenues.[1] A form of incentive zoning has been in place in Seattle for

[1] Housing Supply & Affordability: Do Affordable Housing Mandates Work? 2004, the Reason Foundation.

several years and has been under utilized; we question why this would be any different in South Downtown.

The EIS needs to more clearly document the basis for assuming production of a specific number of new affordable units. Also, the EIS needs to compare that figure to the number of existing affordable units lost directly, indirectly, or cumulatively, by the proposed zoning changes. Without this analysis, it is not possible to determine if the proposal has significant adverse impacts on affordable housing. 70

Chapter 3, Public View Protection: Comments submitted on the EIS scope stressed the importance of the EIS assessing loss of the spectacular, panoramic public views available from the ballpark and Qwest Field. The DEIS chose not to assess those public views, saying they would be "taken into consideration when making rezone decisions." Page 3-121. As the purpose of the EIS is to inform decision makers, we believe it is essential for the EIS to have a full assessment of view impacts. We have previously offered you the extensive professional view modeling done by the sports teams, and specifically given you permission to include it in the EIS. Let us reiterate briefly why we believe an adequate EIS must include this information.

The basis of an EIS is to provide decision makers with the information necessary to "make the balancing judgment mandated by SEPA." SMC 25.05.448. Decision makers are not able to "balance" the loss of public views to three million people annually, with other planning objectives, if they are not provided the information on the view impacts of the zoning proposals. 71

Secondly, SEPA directs that "other City policies" are to be "considered together with these SEPA policies to guide discretionary land use decisions such as rezones." SMC 25.05.665.B. An example of a relevant, non-SEPA City policy would be the policy choice made when the Stadium Transition Area Overlay District was created to implement the Duwamish Plan, which was to specifically protect the public views from the ballpark. Another example is the City's rezone criteria that direct consideration of view impacts when height rezones are proposed. Again, to aid decision makers, consideration of more than just the SEPA policies is mandated in the case of rezones.

Thirdly, the list of view protection sites in the SEPA Ordinance is there to limit the mitigation measures that may be imposed on projects. See SMC 25.05.660.A.1. The issue with the South Downtown zoning changes is not to decide what mitigation measures to impose on a particular project, but to provide good information with which to develop the best alternative for zoning and planning changes. The SEPA policy list of view protection sites is not a limiting or preclusive factor for a legislative planning and rezoning proposal.

Fourthly, SMC 25.05.060.D.5 states that the range of impacts evaluated in an EIS may be wider than the impacts for which mitigation can be required. This provision clearly grants DPD the discretion to include public view impacts from the stadia in the EIS. Moreover, we believe DPD is required to so under the SEPA provisions cited above, and also under the provisions of SMC 25.05.400.B and D. Under those latter provisions, it is clear that the purpose of an EIS is to provide impartial and complete information so that good decisions can result. We urge DPD to add to the EIS an assessment of public view impacts from the public stadia. In so doing, it would be abundantly clear that Alternatives 1 and 3, in particular, have devastating impacts on the views of the water and mountains that are enjoyed by millions of people a year. 71

Finally, in terms of the view analysis that DPD did chose to include in the DEIS, we offer the following comments. We first note that the methodology used is rather simplistic. The only graphics provided in this section are simple computer graphics containing models of hypothetical development placed in the context of models of existing development. This approach does not provide enough information to make an informed decision, or presentation, of the possible impacts for the following reasons:

- There is nothing depicting the existing condition, so the reviewer can assess the impact of the proposed development. Helpful graphics would include a computer model of the existing condition supplemented with photographs. 72

- There also needs to be more information on the building models simulating the hypothetical development. Plan views and anaxometric views would be helpful. What is shown in the EIS ranges from:
  - some attempt to develop a building form, to
  - simple massing blocks with no form, to
  - very simple dotted-line drawings.

  What is the rationale for the wide range in forms?

- Many of the viewpoints for the graphics do not portray the true impact that most citizens would experience in everyday life - that is, the view from the sidewalk or the street. Most of the viewpoints are aerial locations. A few are looking down streets, but from elevations above pedestrian eye level. Graphics at pedestrian eye level should be included. 73

Chapter 3, Noise: The DEIS does not include any assessment of whether the proposed construction of taller buildings around the stadia will increase noise inside Qwest Field, and in turn, within the ballpark. There could be a potential for noise to reverberate depending on building height and locations. This is one of the many topics for which there is no discussion of possible impacts on the ballpark, and this needs to be remedied, along with identifying mitigation of any adverse impacts. 74

The DEIS notes that there would be significant adverse noise impacts on residential uses on the WOSCA property. The suggestion is made that future projects could be conditioned based on SEPA authority, to prohibit operable windows and to require use of certain construction materials and methods. The current SEPA policy on Noise is not written with that issue in mind. Would the SEPA policy be changed, and would this change apply on a city-wide basis? 75

Chapter 3, Fire Protection: Given the identification of long term significant impacts on fire/emergency protection services, the DEIS on page 3-152 suggests that impact fees may be imposed on new development. How would this be implemented? Why are impact fees discussed only for fire/emergency protection services and not other areas where increased demands are put on City services? If DPD is going to propose a three-fold increase in the population targets for this area of the City, it seems much more additional analysis is needed of the methods to fund the infrastructure necessary to accommodate that growth. 76

Chapter 3, Police Protection: This section needs to describe how the City provides event traffic control in general. There are well established protocols for determining the type and scope of police protection services based on the size of events, and those are regularly applied to events throughout the City. Police staffing is based on the size of event, not background conditions. This section also needs to address event traffic control at the ballpark, which is a well defined part of the ballpark Transportation Management Plan. 77

Moreover, there is no discussion as to whether the increased vehicle traffic from 6,000 new residential units would affect availability of police protection resources for events at the ballpark or other facilities. This section is inadequate without consideration of that impact, and mitigation of any adverse impacts.

Chapter 3, Parks and Recreation: Table 3-33 contains certain figures for growth assumptions by number of households. These do not match the figures on page 3-82. Please explain or reconcile the differences. 78

Future growth caused by the proposal is expected to increase demands for public open space. Are impact fees to be considered as a possible mitigation measure? 79

The text on page 3-159 suggests that a requirement in a future South Downtown Mixed zone for private open space will lessen adverse impacts from the proposal. This is too generalized of a statement. The analysis would need to determine how many developments would be built in this new zone, and how much private open space they would create, and then compare that to the total population growth in South Downtown. 80

Chapter 3, Transportation: In addition to omitting consideration of public view impacts from the stadia, our deepest disappointment with the DEIS concerns the section on Transportation. The original EIS scope did not include an assessment of impacts on event traffic. We urged DPD to include such analysis, and DPD agreed to do so. The scope of work for the transportation consultant was then revised to include an Event Traffic Analysis, and specifically to: "Assess the impacts of increased higher density land uses within South Downtown and around the stadia venues, and evaluate whether the estimated changes would impact the key access and control points." Transportation EIS Scope, December 2006. Unfortunately, the transportation analysis in the DEIS includes scant analysis of impacts to the ballpark. This is a significant deficiency that must be remedied.

The stadia are an existing condition, and as such, should have been adequately studied and analyzed as a component of the existing conditions. The functioning of the stadia are not inconsequential and are not incidental to the transportation infrastructure. The DEIS implies that the activities and events of the stadia are too intermittent to be thoroughly studied or considered. As the stadia owners and operators have stated many times, event days plus load in/out days occur with regularity throughout the year, on a near-daily basis. Notwithstanding this existing condition, the transportation analysis only has a paragraph here or there acknowledging events at the ballpark and Qwest Field/Event Center. There are a few qualitative, subjective statements about event traffic, but absolutely nothing that resembles an impact analysis in the sense typical for an EIS. 81

For example, the EIS estimates the traffic generated by the proposed density increases, but never overlays those numbers on top of event traffic conditions. Our discussions with DPD about the scope of the EIS specifically requested that the DEIS include an analysis of conditions during events, with proposed traffic growth included, so that the combined or cumulative effects of existing conditions (with events) plus increased traffic from zoning changes could be assessed. It is unfortunate that such analysis was not done. Without it, the few, general, non-quantified statements in the EIS about event traffic are without foundation, specificity, or usefulness.

Instead of adequately analyzing traffic impacts on the operations and functioning of the ballpark and Qwest Field/Event Center, the EIS focuses exclusively on "event traffic management." This discussion contains several troubling references in the conclusions and mitigation strategies that imply that the stadia will be responsible for mitigation of the additional traffic cause by the zoning changes (such as additional police postings and additional transportation subsidies). If that implication is not intended, please so clarify and describe more specifically how traffic impacts will be mitigated, and by whom.

On the other hand, if the DEIS does mean to suggest that the Mariners will need to adjust the ballpark Transportation Management Plan and fund a revised plan in order

to mitigate the impacts of increased traffic from the zoning changes, we insist you reconsider that approach as it is completely unacceptable. It is also inconsistent with the mitigation obligations imposed on the ballpark Master Use Permit, and the City's SEPA authority. New development must mitigate its own impacts; the ballpark is not responsible for mitigating the traffic impacts of 6,000 new residential uses or new employment growth in the vicinity.

The DEIS does not reflect a correct understanding of the ballpark Transportation Management Plan. Under that Plan (as required by the ballpark Master Use Permit), the Mariners are responsible for meeting certain transportation management goals based on attendance at the ballpark. Those goals are for our attendees, and changes to the Plan are not made based upon changes in background conditions. In other words, the ballpark is responsible for mitigating the impacts of *its attendees*, and that mitigation is based on the number of attendees, not background conditions. 81

This is made clear when considering the requirements for the funding of police postings and transit subsidies for events. For example, the *locations* of police postings may change based on changes in conditions, but the *number* of postings the Mariners are responsible for does not change. The reason is that the number of police postings is based on the size of the event in the ballpark, not background traffic. Therefore, it is erroneous to assume, as the DEIS seems to, that because of growth in background traffic, the Mariners would be responsible for additional police postings. The same is true for transit subsidies; that subsidy is based on the number of ballpark attendees and the mode split of attendees. The level of subsidy is not based on transit demands created by other uses.

Because the DEIS fails to account for traffic impacts on the ballpark during events, and because the DEIS seems to assume that the Mariners are responsible for mitigating the traffic impacts of new development resulting from the zoning changes, the DEIS is fundamentally flawed. These flaws must be acknowledged and fixed, and the transportation analysis must be substantially revised in order for the EIS to be adequate.

Conclusion

We offer these comments in order to assist the City in preparing an adequate EIS for the public and decision makers. We believe there is substantial additional analysis that is needed before preliminary recommendations can be developed, and in order to have an adequate Final EIS. We are happy to meet with you at any time to share information.

Thank you for considering our comments.

Very truly yours,

Melody B. McCutcheon

MBM/jlp
E-Mail: MBM@hcmp.com

cc: Seattle Mariners
Washington State Major League Baseball Stadium Public Facilities District
Washington State Public Stadium Authority
First and Goal, Inc.

ND: 15284.002 4845-3210-1890v1

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Planning & Development
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Letter #8

WASHINGTON STATE PUBLIC STADIUM AUTHORITY

FIRST & GOAL INCORPORATED

MARINERS

December 17, 2007

Diane Sugimura, Director
Gordon Clowers, Urban Planner
City of Seattle, Department of Planning and Development
P.O. Box 34019
700 Fifth Avenue, Suite 2000
Seattle, WA 98124-4019

Re: South Downtown Planning Study Draft Environmental Impact Statement

Dear Ms. Sugimura and Mr. Clowers:

Our four organizations are joining together, once again, to express our shared concerns about the South Downtown Planning Study and the recently-issued draft Environmental Impact Statement (EIS).

Our facilities represent a combined public investment of more than $700 million. On an annual basis, more than four million people visit Qwest Field, Qwest Field Event Center, WAMU Theater, and Safeco Field, attending more than 500 events throughout the year. Our combined attendance makes the Stadium area the third most visited destination in the state.

Despite the volume of activity occurring in our venues, their existence is barely acknowledged in the draft EIS. Safeco and Qwest Fields, Qwest Field Event Center, and the WAMU Theater should be clearly recognized as existing conditions. The needs of and impacts on these facilities from the proposed rezoning must be comprehensively analyzed prior to implementing any major zoning change in the study area. While special zoning areas in Pioneer Square, the International District, and the Greater Duwamish Manufacturing and Industrial Area are recognized repeatedly in the draft EIS, the existing Stadium Transition Area Overlay District that governs development adjacent to our facilities is mentioned only in passing. This District was created in recognition of the unique needs and assets of the public sports and exhibition venues, yet the premise for the District as well as the terms of its zoning are essentially disregarded in the draft EIS.

1

We support the goals of Livable South Downtown to increase housing and density in certain areas. However, we believe that these goals can be accomplished without compromising the public's investment in our regional sports and exhibition facilities. Inadequate analysis of the impacts of the proposed zoning changes can result in poor implementation of plan goals. Such a result is in no one's interest.

#8

We remain concerned that the traffic evaluations in the draft EIS understate the impacts of greatly increased density on the operation of our venues, and they fail to adequately and objectively study the impact of additional traffic on the operation of Qwest and Safeco Fields. These facilities are not locations for infrequent special events. Among Qwest Field, Qwest Field Event Center, WAMU Theater, and Safeco Field, our facilities host or are preparing for more than one event every day of the year. For baseball and football games, these facilities draw between 45,000 to 68,000 people, sometimes during periods when business and residential traffic is near peak condition. 2

Existing transportation infrastructure in this area is already overburdened. Leaving the problem to be solved in future stadium Transportation Management Plans is no solution and is inequitable. Without a proactive series of measures to mitigate the impacts on parking, traffic, and transit demands caused by the heights and densities planned under the rezone, the negative impacts on our facilities will be significant, and the quality of life and economic vitality for all area residents and businesses will be highly compromised.

We also remain concerned that, despite our repeated calls through the South Downtown Advisory Group, meetings with planning staff, and our EIS scoping letters, the impact on public views to and from Safeco and Qwest Fields were not studied in the draft EIS. Impacts on public views are required to be analyzed as part of the City's rezone criteria (SMC 23.34.009B.), and such analysis should be included in the final EIS.

Both Safeco and Qwest Fields were specifically designed to feature the spectacular views of Elliott Bay, the Olympic Mountains, and the signature view of the downtown skyline. These views are available not from the high-priced seats, but from the upper concourses, and the less expensive upper deck and outfield seats that are the preferred destination for families and youth and community groups. 3

This proposal suggests that access to these spectacular views enjoyed by as many as four million people each year will be transferred to a wealthy few who can afford high-priced condos or offices in buildings that could wall in the ballpark and football stadium under some rezone proposals. Rather than being public views, these will become private views. No acknowledgement of this issue appears in the draft EIS for consideration by the public or decision makers.

These are issues that we have raised repeatedly, in our comments on the scope of the draft EIS, in meetings with City leaders, and in meetings with staff. It is regrettable that the draft EIS does not address these issues in a substantive way. You will be receiving more comprehensive comments on the draft EIS from each of us. We look forward to your response, and to reviewing the companion planning report to be issued early next year.

Sincerely,

José Gaitan, PFD Board Chair

Lorraine Hine, PSA Board Chair

Bart Waldman, Seattle Mariners
Executive Vice-President and General
Counsel

Martha Fuller, First & Goal, Inc.
Chief Financial Officer

cc: The Honorable Greg Nickels, Mayor
Seattle City Council Members

Letter #9

SEATTLE STEAM COMPANY
1325 Fourth Avenue, Suite 1440, Seattle, WA 98101-2509
Tel 206.623.6366 Fax 206.467.6394
www.seattlesteam.com

December 7th, 2007

City of Seattle
Department of Planning and Development
PO Box 34019
700 Fifth Avenue, Suite 2000
Seattle, Washington 98124-4019

Attn: Gordon Clowers

Subject: Comments on the South Downtown Environmental Impact Statement

Dear Mr. Clowers,

Seattle Steam Company has been providing thermal energy services to downtown Seattle for 117 years. The years have been good to the company: it is healthy, it is growing, and it is a vital part of the community it serves. The steam system that originally served 27 buildings now serves more than 175 buildings in an expanded service area. Seattle Steam is proud to be able to claim that the average length of service to its customers is 40 years.

During the 1990's, Seattle Steam almost doubled the base load of its system and in this decade we see unprecedented growth as the City core grows. Within its service area, the company supplies thermal energy to more than 50 percent of the buildings and heats nearly 66 percent of the total square footage, due to the large size of customers' facilities. Seattle Steam Company serves the central business district and First Hill areas of Seattle, a community continuing to grow. Seattle Steam provides thermal energy to the Pioneer Square portion of this study area and we have an interest in sustainable energy solutions in an increasingly carbon constrained world; one in which the currently leadership of the City of Seattle has taken a leadership position.

South Downtown is an ideal neighborhood to develop a better energy strategy; it is adjacent to existing district energy infrastructure, the proposal for large amount of contiguous, mixed use development makes district energy concept more cost effective. Energy investments today determine our behavior and use patterns for the next 50 years, and although SCL is an admirably carbon free utility today, future marginal resources may well be different - we need to be using what electrical resources we have more appropriately (i.e., fulfill thermal energy needs by other means) so we have adequate clean electrical capacity for future growth needs. Community integrated energy planning is the proven way to ensure sustainable development. Single utility evaluations are past thinking; a sustainable future requires new thought processes. 1

Seattle Steam Company wishes to submit the following specific comments on the EIS:

1. The energy section of the EIS addresses only the supply of electricity. Electricity in this study area represents approximately 50% of the total energy requirements, thermal energy representing the remaining energy use in buildings is not 2

considered in this report. The EIS cannot be limited to just electricity service it needs to address fully the thermal energy uses within the study area.

2. Hot water based thermal energy systems in Europe have demonstrated time and time again their ability to improve community energy usage efficiencies and are therefore a key component of a sustainable community, yet they have not been considered as part of this EIS. 2

3. Except for a brief comment on page 3-163, low carbon energy technologies such as combined heat and power, waste energy recovery and re-use and solar thermal energy from roof tops in the district, are not addressed. 3

4. The EIS should address, as part of the zoning for this neighborhood, the need to have a thermal energy infrastructure in place to ensure a low carbon sustainable community development and waste heat recovery and reuse. It should address the high carbon emissions associated with incremental electricity use especially for thermal energy end use. It should address the tendency of the off-set program to encourage poor carbon reduction practices by offering to subsidize high carbon uses, such as electric based thermal energy. 4

5. The EIS does not address Washington State Governor's Executive Order on Climate Change issues in 2007 and how this community will achieve the specified goals. 5

6. Supplying thermal energy from a district energy system that is powered by biomass or waste heat from industry or electricity generation (CHP) is carbon neutral, so switching heating loads to district energy results in potentially a significant net carbon reduction. The City has identified reduction of natural gas consumption as being key to reducing our carbon footprint. Though the EIS completely ignores this issue, district energy would be an excellent way to achieve this. 6

It is clear to all that both the Mayor and the City Council are strongly committed to fighting climate change, but business as usual will not get us there. A community integrated energy plan, a new thought process, can.

Yours truly,

Stanley Gent P.Eng.
President and CEO

Downtown Seattle Association

Mission
To champion a healthy, vibrant urban core

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Frederick S. Wyse

December 11, 2007

Mr. Gordon Clowers
Land Use Planner, Department of Planning and Development
City of Seattle
P.O. Box 34019
Seattle, WA 98124-4019

Re: Livable South Downtown Planning Study Draft EIS

Dear Mr. Clowers:

Thank you for the opportunity to comment on the Livable South Downtown Planning Study Draft Environmental Impact Statement. The Downtown Seattle Association supports Alternatives 1, 2 and 3, but encourages the City of Seattle to consider increasing the height limits and base FAR in each alternative.

The DSA supports the City of Seattle's efforts to encourage economic growth, transportation investments, new housing and a great urban experience in the downtown core and its nine adjacent neighborhoods. As an organization representing Seattle's downtown businesses and residents we share your goal of a thriving center city. The Livable South Downtown planning effort is essential to ensuring a desirable future for Pioneer Square, Chinatown/International District and the Greater Duwamish Manufacturing and Industrial Center in anticipation of forecasted growth. Those community members and stakeholders involved in the Vision 2030 planning process have exhibited great foresight in their consideration of the future of South Downtown.

Located in the heart of South Downtown is what may be the most significant transit hub in the region – King Street, with access to buses and commuter trains, and in the very near future light rail and possibly streetcars. This multi-modal hub serves as a working example for Seattle's Comprehensive Plan goals to decrease commuting in single-occupancy vehicles by offering alternatives to the automobile. Given the advantages provided by the existing and anticipated transit infrastructure in South Downtown, the DSA questions whether the targets for new jobs and housing set in the Draft EIS are too limited. An already robust transit district soon to be upgraded with a Sound Transit light rail station can leverage more urban infill, transit-oriented development and sustainable growth than what is contemplated by any of the alternatives in the Draft EIS. With that in mind, we encourage the City to reevaluate the height limits and base FAR as currently proposed. In doing so, the City will achieve not only its goals for sustainability, but can also better provide for a balanced mix of housing types and affordability.

1

600 Union Street, Suite 200 · Seattle, Washington 98101-4179 · Tel: 206.623.0340 · Fax: 206.625.1940 · www.downtownseattle.com

Given the rich historical significance of many properties in South Downtown, we also encourage the City to develop and utilize an historic transfer of development rights program. Such a program should allow additional zoning heights for historic buildings, the value of which can be sold for TDR purposes. This would create an incentive for property owners in South Downtown to preserve and restore historic buildings without losing the value from any proposed zoning change. We suggest that the City work with the Pioneer Square and Chinatown-ID communities as it develops a TDR program. 1

The DSA is opposed only to Alternative 4, the No Action Alternative. However, we believe this is a once-in-a-generation chance to shape the future of South Downtown. We urge the City to take full advantage of the opportunity, maintain a commitment to sustainability and make the most of the significant transit investments in the area. 2

Sincerely,

Kate Joncas

Kate Joncas
President

Letter #11

From: "Sara Nikolic" <Sara@futurewise.org>
To: "Gordon Clowers" <Gordon.Clowers@Seattle.Gov>, <susan.mclain@seattle.gov...
Date: 12/17/2007 10:07 PM
Subject: Futurewise comments on South Downtown DEIS

December 17, 2007

Diane Sugimura, Director

City of Seattle Department of Planning and Development

700 Fifth Avenue, Suite 2000

PO Box 34019

Seattle, WA 98124-4019

206-684-8375

CC: Gordon Clowers, Susan McLain, DPD

Dear Director Sugimura,

I am writing on behalf of Futurewise to comment on the Draft Environmental Impact Statement for the Livable South Downtown project. Futurewise is a statewide public interest group working to promote healthy communities and cities while protecting farmland, forests and shorelines today and for future generations. Our Urban Development Program promotes a livable and sustainable urban region that can accommodate growth while providing necessary public amenities and a strong urban sense of place. Our primary objective is to promote policies for affordable, transit-oriented development in our region's urban centers and high-capacity transit areas.

Our region is expected to absorb over 1.5 million additional residents by the year 2040. Responsible land use should direct this growth to urban centers-infill areas that are well served by transit and where the infrastructure and amenities exist to meet the needs of a growing population. Such centers should offer a mix of land uses and vibrant streetscapes, where residents are able to walk, bike, and take public transit to reach jobs, shopping, and residences. Recent research demonstrates that mixed use centers reduce total vehicle miles traveled, thereby helping to curb greenhouse gas emissions; and transit-oriented development has been shown to reduce vehicle trips by 50%.

1

#11

There are few areas in our region that are as well suited to absorb additional growth as the South Downtown area of Seattle. The study area included in the Draft EIS is one of the most transit-rich neighborhoods in the region, including station areas for the Sounder, Amtrak, Washington State Ferries, numerous bus lines, two future Link light rail stations, and the planned expanded Seattle Streetcar. In order to maximize those transit investments, use land and energy resources efficiently, and reduce global warming impacts, we should encourage very dense residential and job growth in the area. 1

We strongly support the protection of historic and culturally significant structures in Pioneer Square and the International District / Chinatown areas, and agree that those properties should be zoned at lower heights to properly protect their historic or cultural significance. However for non-historic or culturally significant properties, including the many surface parking lots scattered through out the area, zoning should allow for very dense development. 2

We also strongly support the protection of industrial lands south of the study area, and understand the concerns that adjacent residential and commercial land uses could put pressure to convert industrial lands to other uses. However we feel that the anticipated Seattle City Council passage of Council Bill 116090 on December 17th to limit the size of non-industrial uses in industrial zones will provide considerable protection of these lands. Accordingly these concerns, while otherwise founded, should not be an argument to limit densities allowed in the South Downtown study area. 3

We commend the Department of Planning and Development and the South Downtown Advisory Group for their comprehensive work to visualize a livable urban center that introduces new density while also acknowledging the needs for improving public amenities, such as parks, and protecting areas of historic or cultural significance. 4

Generally, we are supportive of the proposed upzones described in Alternatives 1-3 in the Draft EIS. However, we encourage the city to move forward with a hybrid alternative that takes the boldest elements of each: perhaps by following the general approach of Alternative 3, which provides for upzones more evenly throughout the study area, but also allowing the more dense development (up to 240 feet) to the north and south of King Street Station permitted in Alternatives 1 and 2, respectively. We feel that such a hybrid alternative would best support the transit, and would offer a more varied and visually appealing skyline.

#11

Furthermore, we hope that the Final EIS and subsequent Council action will give due consideration to the following general principles:

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* Highest densities authorized under the plan should be concentrated adjacent to or near the major transit hubs
* Incentives should be created to promote infill development and provide necessary public benefits
* Green building standards should be required for new or expanded developments
* Public investment should be directed at improving pedestrian connections and creating public spaces, such as parks

Thank you for this opportunity to comment on the Draft EIS for South Downtown. We look forward to working with DPD and City Council on the passage and implementation of the new vision for the area. Please contact us if we can provide any additional information.

Thank you,

Sara Nikolic

Urban Strategies Director

Futurewise

814 Second Avenue #500

Seattle, Washington 98104

206-343-0681 x112

Sara Nikolic
Urban Strategies Director
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Our mission at Futurewise is to promote healthy communities and cities while protecting farmland, forests, and shorelines for this and future generations.

November 29, 2007

Diane Sugimura, Director, DPD
Attn: Susan McLain and Gordon Clowers
City of Seattle, DPD
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124-4019

Dear Diane,

A number of International District community stakeholders have been involved in the City's Livable South Downtown planning process to "encourage economic growth, transportation, new housing and great urban neighborhoods in Seattle's downtown core and the nine centrally located neighborhoods immediately around it." "Vision 2030" is our response to the City's process. This document represents two years of collaboration to develop a shared, comprehensive vision for the District. We are excited to work with the City to ensure planned growth and increased density that will contribute to the livability and economic development of our neighborhood.

At the heart of our vision is a thriving, diverse neighborhood that features a vibrant mix of residential and commercial activity and continues to be the historic cultural and activity hub for the region's Asian Pacific Island communities. We additionally seek to ensure that future development helps maintain significant housing affordability, while supporting our neighborhood's small ethnic businesses, community service organizations, and cultural institutions.

We strongly support a holistic planning approach that will capture public benefits in exchange for development that occurs as a result of increased zoning capacity and density. This holistic planning approach will support aforementioned goals of balanced development and supporting our existing small business climate. Vision 2030 is consequently accompanied by our package of recommendations for financial, regulatory and other tools and programs that will need to be implemented concurrent with land use/zoning changes. We believe our recommendations will increase diversity in housing stock and provide support for our small, ethnic businesses, civic groups and community service agencies that serve as the backbone of the International District/Chinatown/Japantown/Little Saigon community. In sum, our recommendations support the City's goals for downtown while capturing public benefits and minimizing gentrification and displacement. We do not believe our neighborhood vision is attainable through land use/zoning changes alone, and consequently, if these financial and legislative tools are not concurrently established with any substantive land use change, then we believe that any city recommended zoning changes must be reevaluated by our community on that basis. We would also like to emphasize that the development of affordable housing will require additional City resources beyond the public benefits captured from private development.

1

Enclosed is a summary of our Vision 2030 recommendations for the Livable South Downtown planning process, which includes:

- Summary of our neighborhood goals
- Financial Tools
- Legislative/Zoning Tools
- Specific ID Zoning Recommendations

We will provide comments to the Draft EIS prior to December 5, 2008. Based on our review of the Draft EIS, we may have revisions to our current recommendations.

We look forward to discussing our recommendations with DPD and other executive departments. I will contact Susan McClain to arrange a meeting shortly.

Thanks,

Tom Im
Facilitator of the Little Saigon, Japantown, Chinatown – International District Vision 2030 Committee

cc. Seattle Office of Housing: Adrianne Quinn, Rick Hooper
Seattle Office of Economic Development: Susan Shannon, Steve Johnson, Nancy Yamamoto
Department of Planning and Development: Gary Johnson
Office of Policy & Management: Mary Jean Ryan
Mayor's Office: Tim Ceis, Nathan Torgelson

2030 Stakeholder Signatures / Organizational affiliations follows:

Sue Taoka – Seattle Chinatown International District Public Development Authority
Paul Lee – Chong Wa Benevolent Association
Elaine Ko – InterIm Community Development Association
Ken Katahira - InterIm Community Development Association
Don Mar – Marpac Construction LLC
Quang Nguyen – Vietnamese American Economic Development Association
Alan Kurimura – Uwajimaya, Inc.
Joyce Pisnanont – International District Housing Alliance
Sharyne Shiu-Thornton – International District Housing Alliance
Ted Choi-Tam – Greater Seattle Chinese Chamber of Commerce
Tomio Moriguchi – Uwajimaya Inc.
Bob Santos – InterIm Community Development Association
Tam Nguyen – Saigon Bistro
(Hard copy signatures are on the additional page)

Vision 2030 (10.23.07)

Last year, a number of community stakeholders came together to develop a vision, describing how they would like to see the Little Saigon, Japantown, Chinatown-International District develop by the year 2030. In sum, the 2030 vision group wants to see pedestrian-friendly streets safe from illegal activities, more people living in the neighborhood, new and improved open spaces, a diverse array of retail stores, the restoration of derelict buildings, and a balanced mix of neighborhood housing options, ranging from condos for empty nesters to affordable family housing units. The ultimate goal is to improve the current conditions of the community.

We concluded that zoning changes alone could not comprehensively address the many challenges that the neighborhood faces. We believe that the city needs to employ other strategies that would leverage the resources and/or implement the programs needed for our neighborhood to successfully develop as we envision in our 2030 document.

In summary, neighborhood goals stated in Vision 2030 are the following:

1. Healthy Balanced Equitable Development, Increased Density, and Diversity of Housing Choices
    a. Develop financial tools that will encourage a diversity of income levels. By 2030, 1/3 of the housing stock should be targeted for 50% or below median income, 1/3 for 50%-100% median income, and 1/3 for 100% and above.
        i. In the area east of the freeway (Little Saigon) and south of Dearborn street, 20% of the housing stock should be targeted for 50% of below median income, 17% for 50-80% median income, 13% for 80-100% median income, and 50% for 100% median income and above.
    b. Encourage family housing
        i. By 2030, family housing should account for 20% of the neighborhood's housing stock.
    c. Maintain community stability through limiting residential displacement.
        i. By 2030, the number of housing units at 50% or below median income should not fall below the number of low-income units we currently have in the neighborhood.
2. Rehabilitate Substandard Housing and Vacant Buildings
    a. Develop financial tools and legislative programs to encourage the rehabilitation of substandard and vacant buildings.
3. Safe and Dynamic Neighborhood Public Spaces
    a. Improve streetscape through integrating public art, pedestrian amenities, and green elements.
    b. Improve and maintain existing public park space. Acquire new open space for community.
        i. Prioritize acquisition in areas that lack open space, such as the Little Saigon community, as long as the location is determined to be an appropriate site by the neighborhood.
4. Strong, Vibrant Small Business Community and Maintain Cultural Character
    a. The neighborhood is the vital, dynamic economic and cultural center of the Asian-American community. Maintaining and enhancing small business and other cultural elements of the neighborhood (museum, the arts, family associations) are vital in sustaining the integrity of the cultural character of the community.
        i. Increase retail and office space for small and locally-owned businesses in Little Saigon to a total of 400,000 sq ft
    b. Develop financial and legislative tools to support the small business environment.

2

Resources

Many goals were identified by our community stakeholder group. The goals of creating balanced development, rehabilitating derelict buildings, improving our public spaces, and supporting our small business will all need financial support.

3

In our 2030 document, our neighborhood wishes to achieve a 1/3, 1/3, 1/3 split between low-income housing, moderate income housing and market rate units. To achieve this goal, we believe that current financial resources will not be sufficient in building the amount of low-income and moderate units stated in our goals. We conclude

that the increase in land values due to development pressures will make it more difficult to acquire properties for affordable housing purposes. In addition, we fear that existing affordable housing funds will remain competitive and relatively static, making it more imperative to develop additional financial tools to help build affordable housing in this progressively expensive and competitive market.

Of the four goals aforementioned, two of the goals – creating balanced development and rehabilitating derelict buildings – will require vast amounts of financial subsidy or greater participation by the private market. In addition, improving our streetscapes and open spaces, as well as supporting our small business environment will also need financial support. We believe that the City should establish the following financial tools that will help leverage the resources needed to support our various goals. Consequently, zoning changes should not be implemented until the following financial programs are enacted.

- Reestablishing a **growth related fund** can produce significant financial resources on an ongoing basis to help the neighborhood achieve its housing goals, especially considering the growth that is expected in this distressed community. As we understand, the City can currently establish a growth related fund, funded from the General Fund, which will enable a specifically designated area to access a percentage of the increment of increased property taxes in a given area from a current tax, and to utilize these funds for a designated purpose. We recommend:
    - The South Downtown Livable Community study area should be designated by the City for its own targeted growth related fund.
    - 70% derived from this program be designated for affordable housing purposes.
    - 30% percentage of funds should be designated for acquiring and/or improving public open space, enhancing streetscapes, a technical or financial assistance fund for small businesses, and cultural and community facilities.
    - We request the City commence doing an existing tax base and revenue analysis of the Livable South Downtown planning area.
- Utilize **incentive zoning** to leverage resources from development projects throughout the South Downtown planning area to produce affordable housing within the South Downtown community. Residential and mixed-use developments may build these units on-site, or off-site by the payment in lieu of funds. We recommend that these affordable housing units remain permanently affordable.
    - Affordable housing requirement through incentive zoning or upzoning should contribute to addressing the housing production goals advocated in this 2030 plan.
    - Developments may pay into an affordable housing fund in lieu of building the units on-site, however these units must be built with the South Downtown Livable Community planning area.
    - 15% of funds should be designated for acquiring and/or improving public open space, enhancing streetscapes, a technical assistance fund for small businesses, cultural and community facilities. 85% should be designated to affordable housing purposes.
- Utilize existing **Transfer of Development Right program** to support affordable housing goals.
    - We are recommending that TDR's can include vacant properties, as well as Historical buildings.
    - Increase heights in the Chinatown-International District historical core, enabling property owners to capture additional resources to rehabilitate historical buildings. However, this proposal will need to be vetted through legal channels to determine if it is legal to increase heights in an historical area with buildings that cannot be demolished due to its historical significance. In addition, it must be determined if our designation as a historical district is in any way threatened with the change of zoning that would allow an increase in heights.

3

Legislative tools

In addition to leveraging financial resources to support our goals, we are seeking certain legislative tools to help facilitate the rehabilitation of derelict buildings and help preserve the small business environment our community has fostered over the last century. The City should investigate the following legislative tools that can help support the four aforementioned goals.

4

- Besides creating incentive programs, the City should examine more effective code **enforcement of** current building codes, specifically health and safety codes. This strategy will help encourage current

owners of derelict buildings to redevelop their buildings, or to provide disincentives for continued inaction. The City is currently looking at a city-wide program that would increase fines for such buildings. 4

- In supporting the character of our small business community, we would like to examine the zoning code changes which can provide **limitations on the size of retail businesses** that could enter our community, which would help encourage small family operated businesses typical of the community to be built and maintained in the neighborhood. 5
- We can develop an additional process beyond the Review Board for **formula businesses** that wish to locate in this neighborhood to examine if that business is congruent to the character of this neighborhood. 6
- The city needs to initiate a dialogue with Little Saigon's business and property owners on possibly developing a different **design review process**, which is currently, in part, housed in the Southeast Design Review Board. In addition, the current IDSRD review guidelines and process should be reviewed, which may include expanding into areas South of Dearborn Street and east of 12th Avenue. 7
- Allow flexibility of parking uses (shared uses) at all off-street parking lots. 8
  - Ensure there is sufficient parking necessary for the continued residential and commercial vitality of the District, given the anticipated loss of surface parking lots due to development.
  - Also, look into supporting efforts of developing a community parking structure.
- Expand the Free Ride Zone to Rainier Avenue. 9
- Expand the neighborhood's green streets to include Washington Street from Kobe Terrace to 4th Avenue South, King Street from 5th Avenue to Rainier, Weller Street from 5th Avenue to I-5. 10

Additional City Assistance

In addition to the Legislative and Financial Tools aforementioned, the City can dedicate a full time staff person for the neighborhood to look at existing and new programs that can help the community attain its stated 2030 Vision Group goals. The staff person can work on helping to rehabilitate substandard housing in the neighborhood, through providing current property owners with needed technical assistance. In addition, the City staff person can work on issues such as the new Community Preservation District created by the state and other new programs that we are recommending the City incorporate into their South Downtown Livable Community study. 11

Proposal of the 2030 Vision Group
Goals:

1. Healthy Balanced Equitable Development and Increased Density
2. Rehabilitate Substandard Housing and Vacant Buildings
3. Safe and Dynamic Neighborhood Public Spaces
4. Strong, Vibrant Small Business Community and Maintain Cultural Character

Financial tools to support our goals:

1. Growth Related Fund
2. Incentive Zoning
3. Transfer of Development Rights

Legislative tools to support our goals

1. Formula Business Ordinance
2. Retail Size Cap
3. Code Violation enforcement
4. Liberal Parking Rules
5. Zoning Designations that Support Community Goals

ID's current zoning:
WEST OF THE FREEWAY

IDM 100-120 – between 4-5th Avenues and Yesler and Jackson Street
Top Height Proposed: 240'

IDR 150 – between 5th Avenue – Freeway and Yesler and mid-block Jackson/South Main St.
Top Height Proposed: 240' between 5th - 6th Avenue and Yesler-Jackson St, except property on Eastern half of 6th Avenue between S. Washington-Jackson St.
Other properties do not change.

IDM 75-85 – between 5th Avenue – Freeway and S. Jackson- Dearborn St.
Top Height Proposed: Up to 125' between S. Weller- S. Dearborn St except New Central Building. Other properties do not change.

C2-85 – between Dearborn-Charles Street and 4th – Freeway
Top Height Proposed: 125'; also may change land use designation

EAST OF THE FREEWAY

NC3-65, C1-65, IC-65 – between King-Dearborn and Freeway and Rainier.
Top Height Proposed: 125' (between S. King and S.Weller with the exception of Seattle Indian Center site and the block that contains the Seattle Indian Health Board) and 85' which includes the Goodwill site, Marpac, and the Koh property.
One alternative is to change the IC zone to NC or DMC

Zone 1 – Japantown

Area: north of Jackson Street and South of Yesler, between 4th Avenue and I-5.

Current Zoning: IDM 100-120, IDR 150, IDM 75-85

City Proposal – Alternative 1: Up to 240'

Information: The tallest building in the area is Martin Selig's office building (Jackson and 5th), which is 10 stories. 240' would erect a 20+ story building in the area.

Key Goals for this area as described in our 2030 document:

- Increased density, which includes affordable housing
- Urban design consideration to taller buildings in regards to shadows and view impacts
- Development of parking lots with residential buildings and commercial retail at the street level
- Recognize the history of Main Street as the historical hub for the Japanese-American community
- Improved streetscapes

Potential development sites – block between 4th-5th avenues and Washington-Main; ½ block between 5th-6th Avenue and Jackson and Main; ½ block between 5th-6th Avenue and Yesler-Washington; ¼ block next to the Downtowner and Selig building; over the railroad tracks; ¼ block at northeast corner of 5th and Main.

Discussion:

Pro

- Increasing heights in the area may create incentives to develop properties that have remained surface parking lots for decades. Development will create a better pedestrian environment, especially if those developments have active retail storefronts or exceptional landscaped areas.
- Heights will most likely increase the population of the neighborhood. If high rises are built, higher income individuals will most likely inhabit these buildings, possibly helping to create a new market to help support existing businesses or create a new business type in the community. In addition, density may create more vibrancy on the streets, which may additionally support a safer environment – in regards to public safety - for our existing population.
- Taller buildings will support affordable housing through an incentive height program (assuming that it is implemented for our neighborhood). In addition, through a growth related fund, the increase in property value will increase our community's tax base, which may support affordable housing initiatives outside this area, but within the South Downtown community.
- Taller heights may make it feasible for the area east of 4th avenue, where train tracks are exposed, to be developed, consequently providing us an opportunity to improve our pedestrian connections to Pioneer Square.

Cons

- Additional heights will increase land values making it difficult to acquire property in this rezoned area for affordable housing purposes. In addition, retail space will probably be expensive in this area, impacting the type of businesses in this part of the community.
- 240' is more than twice the size of any building in this area – as well as the ID and Pioneer Square communities. Any new building that is erected at this height may not fit into the scale of the rest of the neighborhood, especially considering that there are only a few opportunities/parcels that can build at this height (probably only three, all of which are not in contiguous sites).
- Taller buildings may create view and solar impacts to our neighborhood, which however may be mitigated through Floor Area Ratio controls and/or requiring setbacks.
- Speculation from some existing property owners of unrealistic windfalls may slow down development opportunities.

RECOMMENDATION:

Between 4th and 5th Avenue and Yesler and Jackson - IDM 100' (for any commercial or residential use)/200' (for residential or hotel use above the third floor)

Between 5th and I-5 and Yesler and the Jackson/Main half-way point – IDR 200'

- ❑ However, for properties surrounding the Community Garden, there must be setbacks of 10'-20' (to be determined later) on all sides of the building facing a street (not an alleyway) if the building exceeds 120'; this requirement applies to all floors above 60', and another set back of 5'-10' to all floors above 100' (these set backs can be altered – the idea here is that we are trying to prevent shadows from impacting the Garden, as well as limit view blockages). 12

All height recommendations must be accompanied by programs that will create the balanced development we advocated in our goal statement. These programs must produce the resources that will get us to our balanced housing goals, as well as our open space and streetscape goals. Programs should include TDRs, Growth Related Fund, and Incentive Zoning.

Zone 2 - Chinatown Core

Area: South of Jackson Street and North of Dearborn, between 5th Avenue and I-5.

Current Zoning: IDM 75-85

City Alternative 1 Proposal: 120' south of Weller, with the exception of the New Central building

Information: The tallest building in the area is the International House (Weller and Maynard), which is approximately 80-85'. 120' would erect an 11-12 story building in the area, or 50% taller than the International House.

Key Goals for this area as described in our 2030 document:

- Rehabilitation of dilapidated buildings.
- Infill development
- Balanced development that includes a variety of incomes, unit sizes, and rentals/ownership
- Safe open spaces
- Small, ethnically oriented retail businesses

Potential development sites – Older buildings that need to be rehabilitated; two blocks between 5th and 6th avenues, several quarter block parking lots, and a few non-historical buildings).

Discussion:

Pro

- Increasing heights may create an income source for current property owners to rehabilitate dilapidated buildings. These rehabilitated buildings will create a better perception for our community, greater public safety, and a larger residential base for our businesses.
- Increasing heights can provide additional income to help us achieve our affordable housing goals, if the TDR program is designed in that fashion.
- In addition, the increase in property values will increase our community's tax base, which may support affordable housing initiatives, especially if we integrate a growth related fund program for our community.

13

Con

- Additional heights will increase land values making it difficult to acquire property in this rezoned area for affordable housing purposes. In addition, retail space in new buildings and newly rehabilitated buildings will probably be expensive, impacting the type of businesses in this part of the community.
- 125' is more than two to three times taller than most buildings in this area. Any new building that is erected at this height may not fit into the scale of the rest of the neighborhood, especially in the historical core and if it is built in between two historical buildings or even adjacent to a historical building.
- Speculation from some existing property owners of unrealistic windfalls may slow down development opportunities.

Recommendation:

From 6th Ave. to I-5 and Jackson to Dearborn - IDM 75' (non-residential)-125' (residential or hotel)
- all buildings exceeding 75' must be setback at least 10'-20'; this requirement applies to all floors above 40'.

From 5th Ave. to 6th Ave. and Jackson to Dearborn – IDM 75' (non-residential)-150' (residential or hotel)

- All buildings exceeding 75' must be setback at least 10'-20', this requirement applies to all floors above 40'.
- All buildings facing 6th avenue that exceed 75' must be setback at least 10'-20'; this requirement applies to all floors above 40'. If the building exceeds 120', the building must be set back an

additional 5'-15'; this requirement applies to all floors above 85' (?) on all sides of the building facing a street.

All height recommendations must be accompanied by programs that will create the balanced development we advocated in our goal statement. These programs must produce the resources that will get us to our balanced housing goals, as well as our open space and streetscape goals. Programs should include TDRs, Growth Related Fund, and Incentive Zoning. 13

Zone 3 – Little Saigon

Area: East of I-5.

Current Zoning: C1-65, IC-65, NC3-65

City Alternative 1 Proposal: 85' south of Lane/Weller and 125' south of King and north of Weller/King

Information: Most buildings are 1-3 stories, with the exception of two to three buidlings

Key Goals for this area as described in our 2030 document:

- Increased density, which includes affordable housing
- Increase small retail businesses on King, Weller, and Lane streets
- Preservation of the small business climate
- Increase open space
- Improve streetscape
- Cultural center for the Little Saigon community

Potential development sites – With the exception of the Indian Health Center/Board, Leschi, ARC, Marpac, Victoria Heights, and some parcels on 12th and Jackson, every parcel.

Discussion:

Pro

- Increasing heights may create an incentive for current property owners to develop their properties. Development will create a better pedestrian environment, especially if those developments have active retail storefronts or exceptional landscaped areas.
- Development will increase the population of the neighborhood, helping to support existing businesses or create a new business type in the community. In addition, density will create vibrancy on the streets.
- Taller buildings will support affordable housing through an incentive height program (assuming that it is implemented for our neighborhood). In addition, through a growth related fund, the increase in property value will increase our community's tax base, which may support affordable housing initiatives within the South Downtown community.

14

Cons

- Additional heights will increase land values making it difficult to acquire property in this rezoned area for affordable housing purposes.
- Retail space in new buildings and newly rehabilitated buildings will probably be expensive, impacting the type of businesses that will be developed in this part of the community. In addition, development may increase the currents rents that current business owners are paying on 12th and Jackson streets, thus possibly displacing these businesses.
- Speculation from some existing property owners of unrealistic windfalls may slow down development opportunities.

Recommendation:

ID LSM – This zone is similar to both an IDM and NC2 zone in the following definitions:

- Maintain and protect the International Little Saigon core as an Asian cultural, retail and residential center. (IDM 23.66.304 A)
- To protect, preserve and promote small retail and commercial businesses (IDM 23.66.304 C)
- To encourage development of housing above street level (IDM 23.66.304 D)
- Street-level uses shall not exceed fifty feet of street frontage per use when located within the interior portion of a block, or one hundred forty-five feet of street frontage per use when located on a corner (IDM 23.66.32[illegible] Section D).

- Transparency required for 60% of a street-facing façade (it's 50% in the IDM) and have a minimum height of 13' (10' for the IDM). (NC2 zoning)
- 25,000 sf is the maximum amount of square feet for most uses, except for multi-purpose retail sales facilities which can go up to 50,000 sf. (NC2 zoning)
- Housing above the street level is highly preferred. Other uses are allowed but are not limited to community facilities, community centers, cultural centers, extension of a retail business from the street level, offices, medical services, educational services, entertainment venues such as a movie theater (reinterpretation of IDM 23.66.328).
- Street-level uses: Preferences shall be given to pedestrian-oriented retail shopping and service businesses that are highly visible or prominently display merchandise in a manner that contributes color and activity to the streetscape. (IDM 23.66.326).
- In addition, we wish to develop an additional process for **formula businesses** that wish to locate in this neighborhood to examine if that business is congruent to the character of this neighborhood.
    - Formula retail use is hereby defined as a type of retail sales activity or retail sales establishment which, along with eleven or more other retail sales establishments located in the United States, maintains two or more of the following features: a standardized array of merchandise, a standardized facade, a standardized decor and color scheme, a uniform apparel, standardized signage, a trademark or a servicemark. (San Francisco Formula Business Ordinance) 14

From 1-5 to Rainier and Main to Lane - IDM/NC2 65 (non-residential uses) - 85' (residential) (We would consider heights going up to 150', only on the condition that there is a growth related fund program developed and enacted for the neighborhood).

From 1-5 to Rainier and Lane to Dearborn - IDM/NC2 65' (non-residential) – 150' (residential) – only on the condition that the underlying zone is ID LSM as defined above.

From 1-5 to Rainier and Main to the alleyway between Jackson/King – IDM/NC2 65 (non-residential) - 85' (residential). If the building exceeds 65', the building must be set back 10'-20'; this requirement applies to all floors above 40'.

For all properties east of Rainier within this study, including the Japanese Cultural Center – IDM/NC2 65

All height recommendations must be accompanied by programs that will create the balanced development we advocated in our goal statement. These programs must produce the resources that will get us to our balanced housing goals, as well as our open space and streetscape goals. Programs should include TDRs, Growth Related Fund, and Incentive Zoning.

Zone 4 - South of Dearborn and over the railroad tracks

Recommendation:
NC3 – 180' (non-residential) - 240' (residential)

Key Goals for this area as described in our 2030 document:

- Increased density
- Generate income for affordable housing purposes
- Pedestrian connectivity between the International District with Pioneer Square

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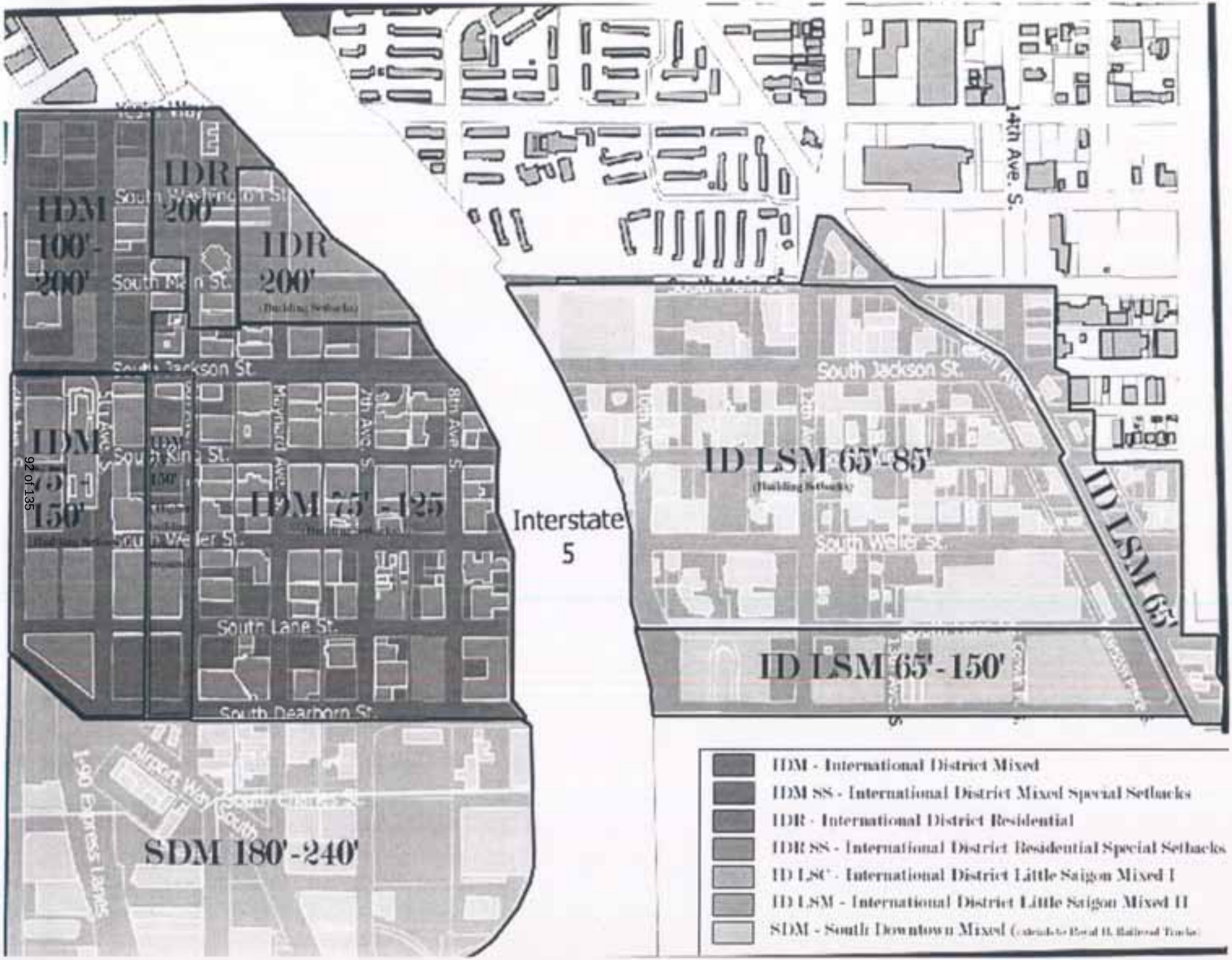
All height recommendations must be accompanied with programs that will create the type of balanced developments we recommended in our goal statement. Programs may include TDRs, Growth Related Fund, and Incentive Zoning.

All height recommendations must be accompanied by programs that will create the balanced development we advocated in our goal statement. These programs must produce the resources that will get us to our balanced housing goals, as well as our open space and streetscape goals. Programs should include TDRs, Growth Related Fund, and Incentive Zoning.

2030 Vision Stakeholder Signatures November 19, 2007

SIGNATURE	ORGANIZATIONAL AFFILIATION
	SCIDPDA
Paul Lee	Chong Wa Bene. Assn / Seattle Chinese Chamber of Commerce
Filaurie Ko	Inter*Im Community Development Associ
	INTERIm COMMUNITY DEVELOPMENT ASSN
	MARPAC CONSTRUCTION LLC
	Vietnamese American Economic Development Assn
	Uwajimaya, Inc.
	IDHA
	IDHA
Ted Choi Tam	Greater Seattle Chinese Chamber
	UWAJIMAYA INC.
	INTERIM COMMUNITY DEVELOPMENT ASSC.
	Saigon Bistro restaurant.
	CIDBIA
	Inter Im Community Development Assoc


IDM 100'-200'
IDR 200'
IDR 200'
South Washington St.
South Main St.
South Jackson St.
IDM 75'-150'
IDM 75'-125'
Maynard Ave. S.
7th Ave. S.
8th Ave. S.
South King St.
South Weller St.
South Lane St.
South Dearborn St.
Interstate 5
14th Ave. S.
ID LSM 65'-85'
(Building Setback)
ID LSM 65'
ID LSM 65'-150'
SDM 180'-240'
Airport Way South
I-90 Express Lanes
IDM - International District Mixed
IDM SS - International District Mixed Special Setbacks
IDR - International District Residential
IDR SS - International District Residential Special Setbacks
ID LSM - International District Little Saigon Mixed I
ID LSM - International District Little Saigon Mixed II
SDM - South Downtown Mixed

Inter•Im
Community Development Association

December 17, 2007

Diane Sugimura
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City of Seattle, DPD
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124-4019

RE: Draft Environmental Impact Statement
Livable South Downtown Planning Study, November 2007
InterIm Community Development Association Comments

Dear Diane,

The following are InterIm's comments regarding the Livable South Downtown Planning Study's Draft Environmental Impact Statement (DEIS). We previously sent you the ID neighborhood's "2030 Vision", which is a document completed by a number of ID community stakeholders that was facilitated by us. The following are additional comments that specifically address various aspects of the DEIS.

Again, to reiterate from the "Vision 2030" letter, we strongly support a holistic planning approach that will capture public benefits in exchange for development that occurs as a result of increased zoning capacity and density. This holistic planning approach was the foundation for our Vision 2030 goals of balanced development and supporting our existing small business climate. In our Vision 2030 document, we stated that certain financial and regulatory tools and programs will need to be implemented concurrent with land use/zoning changes. In essence, we do not believe our neighborhood vision, or a Livable South Downtown Plan that achieves our common goals, is attainable through land use/zoning changes alone. Consequently, any substantive land use change, if not accompanied concurrently by implementable financial and legislative tools, demonstrating the City's ability and commitment to achieve these identified outcomes, would need to be re-evaluated by InterIm, and we expect, by the ID community as well. 1

Similarly, from the beginning of this planning process, we have requested more specific goals and targets in order to determine which zoning options will result in the desired development outcomes. Without this, the analysis becomes a hypothetical urban design exercise, without an understanding of how the limited tools of City zoning will actually play out in the real world of real estate development. Representatives of the ID have worked on a Vision 2030 proposal with the following goals, which we support, designed to build upon and retain the character of the ID.

- We believe the DEIS lacks identifiable goals and targets by which to evaluate the Alternatives to desired development outcomes. Existing City plans and policies, including the Comprehensive Plan, are not adequately used as a framework to establish specific goals and targets by which to evaluate anticipated outcomes of the Alternatives.

The following are specific comments to the DEIS:

Population and Employment

Page 3-97 Headers on Residential and Employment Growth Targets section, I believe, need to be switched; 2

Page 3-99 Alternative 1 residential growth is lower than other alternatives but at the same time has higher heights – is this correct? 3

Page 1-21. "No significant adverse impacts are identified". We disagree with this conclusion. Unless there are significant resources and strategies to both preserve existing low income housing, as well as develop additional new units of low income housing, the area is likely to result in current residents not being able to afford staying in the community. The potential loss of the affordable housing units, and the demographic evaluation of who these low income residents are is lacking in the DEIS. Anticipated gentrification would result in fewer lower income elderly residents, and minority residents, and adversely impact the City's goals of maintaining population diversity. 4

Public View Protection

Please provide for the Final EIS, a hypothetical building envelope bulk massing, viewed from Kobe Park & Danny Woo Community Garden, both protected by Seattle's view ordinance, especially westward views and the PacMed building. 5

Page 1-19. "In views west from **Kobe Park and** Danny Woo Garden, future development could block most of a view toward mountains and Puget Sound." Both are designated areas for view protection.

Parks and Recreation

On page 3-96, it states that we have 1880 households and therefore an open space deficit of .3 acres. However, on page 3-77 it states that we have 2526 units of housing, which is – at %8 vacancy –2324 households. If we would to take the second household count, we would have to make up .8 acres. 6

Besides its location on a hill, attenuation of noise is an important issue for Kobe Terrace Park. Noise studies were done at Yesler and 6th avenue (78 Ldn), which is probably similar for the Kobe Terrace Park, however a study should be done for the park. If the noise is deemed loud, sound mitigation should be looked into for this Kobe Terrace. 7

Transportation

The city has identified a source of significant income that can help support streetscape and open space improvement. Like our need for additional affordable housing resources, we believe that new programs need to be created to help support our community livability strategies. 8

Land Use: Zoning, Land Use and Development Patterns

Page A-14 of the Appendix – Document states that "rezone to IDM may be a less preferable choice for properties abutting the west side of 6th Avenue South, because of steep topography". 9

- We would agree with this statement, however in our 2030 document we did point out the need to extend the IDM zone on Main Street up to 6th Avenue. In our 2030 Vision group discussions we stated our desire to help revitalize the Japantown community, which we believe could gain traction on Main Street, as well as other streets. Consequently, we extended the IDM zone to 6th Avenue, recognizing that although the grade was steep, many retail storefronts already exists in this area and receives many patrons.

*Inter*Im Community Development Association*
310 Maynard Ave. So. Seattle, WA 98104 | 206.624.1802 | 206.624.5859 fax | www.interimcda.org

P 2-21. & Figures 2-5.

1. East of Rainier Av. South. We support the Nikkei Heritage Association of Washington's request to extend the NC 3-65' zone for the entire block from Rainier Ave South to 16th Av. So., between King & Weller Streets. This would remove a split zone condition and help NHAW develop the proposed Japanese Cultural and Community Center at the historic, landmark site of the Seattle Japanese Language School, which is in disrepair. 10

Land Use: Height, Bulk, Scale and Compatibility

Page 3-42 - "Adverse shadowing impacts could potentially occur on a segment of Danny Woo Gardens under any alternative if future development occurs..."

- Considering that the Danny Woo is a 356 day working garden for the elders in our neighborhood, our primary concern for the garden revolves around shadow impacts. Although, in our 2030 document we proposed raising the heights in the IDR zone, we also wanted to have strict bulk controls and setbacks put in place to help prevent new shadows from impacting the working parts of our garden. A study of solar patterns should be done to help us understand the implications of increasing heights in this area. This issue is much more important than view protection for the garden. 11

Page 3-35 "Alternative's 2 extension of a 125-foot height limit to this particular block could result in significant adverse height/bulk/scale impacts with future development, depending on the design and siting of new buildings. Mitigation strategies to further influence the height, bulk and scale of future development should be implemented to protect against such impacts." 12

- We would agree with the need to enforce regulations that would help mitigate possible impacts to the historical core (page 110) if heights were to increase in this area. The mitigation tools may involve required setbacks and/or looking at variable height limits (page 3-19, 3-20, 3-110). Variable height limits would need to be discussed in our neighborhood, however, before we could fully support such an idea.

Land Use: Business and Economic Impacts

Page 49-61 The section reflects the work completed by consultants hired by the City. The study is a comprehensive look at the existing business conditions of the neighborhood, real estate market conditions, economic trends, future plans of current owners, impact analysis of potential land use changes and the Dearborn project to the Little Saigon neighborhood, and mitigation strategies to help small businesses deal with these zoning changes and development impacts. The study was very informative and provided good information regarding the strategies to help our small business community.

The study illuminated several problems that the Dearborn project will create for the neighborhood, such as parking and congestion (page 3-54), uncertainty of consumer behavior of potential new customers from this project due to parking (parking for a second time) issues (page 3-55), and increasing property values making it difficult for existing business owners to purchase properties (page 39 appendix) and increasing the possibility – though low (stated by the consultants, but not us) – of some business displacement due to redevelopment (page 3-53). The analysis provided by the consultants primarily revolved around the issue of displacement of the current businesses in the community. We concur with much of the analysis, though we also believe that the severity of the Dearborn project will be more negative than the study concludes, especially the issue of property values increasing and the ensuing development opportunities that will occur that, we believe, will create retail displacement. 13

We believe the DEIS inadequately addresses the confluence of the Dearborn Center project, plus the proposed zoning changes and height increases in the adjacent Little Saigon area, and the cumulative impact this would

have on changing the development pattern of this near-downtown area, convenient to major transit hubs. We believe that this area is highly vulnerable to site assembly and changes in development patterns that would involve the redevelopment of the many underbuilt, and marginal structures in Little Saigon, which would inevitably lead to existing small businesses (who mostly lease their spaces) needing to relocate to other areas. Many of these business owners are Vietnamese, and Vietnamese businesses have already been significantly adversely impacted by the Sound Transit construction. The FEIS should closely evaluate the likely development outcomes by the Alternatives for this area, and the impact on existing small businesses, along with effective mitigation strategies. 13

Further, we would like to know if the values and character of the community was embodied in the City's proposed zoning alternatives, which is essentially, a more important and central issue/question not asked by the consultants and City in this whole planning process. This, we believe, is the most fundamental question in making zoning changes, especially in regards to a community like the International District, whose most identifying characteristic is seen through the type of retail businesses that embodies its neighborhood.

In the 1970's, the community went through a planning process to help discern what type of community we wanted to preserve and enhance. As stated in the DEIS, one of the goals and objectives of the International District Mixed Use Zone was "to protect, preserve and promote small retail and commercial business." (page 3-105) InterIm supports this particular value to be encompassed throughout the ID community. We believe that much of the Little Saigon community would also embrace this value and would support this value to be codified in any land use change. 14

Consequently, we believe that the current land use recommendation of all three alternatives do not support our desires to help sustain and enhance the community's small business retail environment.

- Page 3-12. "...While these trends can be interpreted as adversely affecting the long-term availability of the existing commercial retail structure for small businesses that have emerged along the Jackson Street retail corridor. ***However, these are not considered to be significant adverse land use impacts...".*** We disagree that there will not be significant adverse impacts to the existing small businesses. Many of these businesses are in under-developed and marginal structures, subject to sale with significant increases in zoning and development rights. We believe the continued existence of this area as "Little Saigon" is at risk.

- *Page 3-12 (Under Land Use – Zoning, Land Use and Development Patterns) "Under Alternatives 1 and 3, different combinations of zones in Little Saigon (a majority of which would be Neighborhood Commercial zones ---- to be specific NC3 ----).... Under Alternative 2, proposed zones include Downtown Mixed Commercial (DMC) zones...."*

We believe that by allowing NC3 or DMC, the City is creating the conditions that allows for a mall development to happen, such as the one being proposed for the Dearborn and Rainier intersection. We think that any big box development is not congruent to the retail characteristics desired by the neighborhood, and consequently, we cannot support this underlying zone. The following Vision 2030 goal reflects our neighborhood's values: 15

- The neighborhood is the vital, dynamic economic and cultural center of the Asian-American community. Maintaining and enhancing small business and other cultural elements of the neighborhood (museum, the arts, family associations) are vital in sustaining the integrity of the cultural character of the community.

We would, consequently, like to have the city examine the possibility of implementing a zone that would limit the square footage of the type of retail that can be situated in this neighborhood, such as NC2 or IDM. The zone that we support is the one recommended in our Vision 2030 document, which embodies the following values and goals:

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- *Maintain and protect the International Little Saigon core as an Asian cultural, retail and residential center. (IDM 23.66.304 A)*
- *To protect, preserve and promote small retail and commercial businesses (IDM 23.66.304 C)*
- *To encourage development of housing above street level (IDM 23.66.304 D)*
- *Street-level uses shall not exceed fifty feet of street frontage per use when located within the interior portion of a block, or one hundred forty-five feet of street frontage per use when located on a corner (IDM 23.66.326 Section D).*
- *Transparency required for 60% of a street-facing façade (it's 50% in the IDM) and have a minimum height of 13' (10' for the IDM). (NC2 zoning)*
- *25,000 sf is the maximum amount of square feet for most uses, except for multi-purpose retail sales facilities which can go up to 50,000 sf. (NC2 zoning)*
- *Housing above the street level is highly preferred. Other uses are allowed but are not limited to community facilities, community centers, cultural centers, extension of a retail business from the street level, offices, medical services, educational services, entertainment venues such as a movie theater (reinterpretation of IDM 23.66.328).*
- *Street-level uses: Preferences shall be given to pedestrian-oriented retail shopping and service businesses that are highly visible or prominently display merchandise in a manner that contributes color and activity to the streetscape. (IDM 23.66.326).*
- *In addition, we wish to develop an additional process for **formula businesses** that wish to locate in this neighborhood to examine if that business is congruent to the character of this neighborhood (DEIS p 3-59).*
  - *Formula retail use is hereby defined as a type of retail sales activity or retail sales establishment which, along with eleven or more other retail sales establishments located in the United States, maintains two or more of the following features: a standardized array of merchandise, a standardized facade, a standardized decor and color scheme, a uniform apparel, standardized signage, a trademark or a servicemark. (San Francisco Formula Business Ordinance)*

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In addition, we support the following strategies recommended in the DEIS and request the City engage in planning for the implementation of these strategies and outline them in the FEIS:

- Community Development Financing Tools – TIF (or a growth related fund),
- community renewal designations (which can possibly deal with the problem of low Vietnamese ownership of properties – 10-15% page 12-13, appendix);
- interagency initiative (page 18, appendix);
- impact fees (page 13-14, appendix) which may help deal with the needed physical improvements we need in Little Saigon (page 23-24, appendix)

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These strategies should be further refined and developed for implementation in the Final EIS.

Housing

The housing study in the DEIS is very comprehensive. However, we have raised several questions regarding some of the assumptions, but more importantly the study does not have any quantifiable goals, such those outlined in the ID's Vision 2030 document. Goals are critical to assess the level of subsidies that are needed to be created in the next 23 years. If baseline goals and targets are identified, one can also assess if current housing programs are sufficient or not in helping reach these goals. If it is determined that the goal is not sufficient, then new programs and/or financial subsidies must be created. We believe that the proposed programs in the DEIS are not sufficient to produce the number of affordable housing units we believe should be our public policy goals and which are consistent with neighborhood calls for balanced and equitable development of housing to provide community diversity.

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At the very basic level, we believe that the Comprehensive Plan housing related goals must be addressed and met at a minimum by this Livable South Downtown Plan (P. 3-80-81). These goals include:

C-1 Encouraging Housing Affordable to Low-Income Households
Policies:

H30 Address the city's share of low-income housing needs resulting from expected countywide household growth, consistent with the countywide affordable housing policies, by planning for:
- a. At least 20% of expected household growth to be affordable to households earning up to 50% of median income (estimated 9,400 affordable units).
- b. At least 17% of expected household growth to be affordable to households earning between 51% and 80% of median income (estimated 7,990 affordable units).

Both new housing and existing housing that is acquired, rehabilitated or preserved for long-term low-income occupancy county as meeting this policy.

H34 Encourage affordable housing citywide.
- a. Plan for at least ¼ (25%) of the housing stock in the city to be affordable to households with incomes up to 50% of area median income, regardless of whether this housing is publicly assisted or available in the private market.
- c. Encourage the production of housing affordable to households **of all incomes**, with particular emphasis on households with incomes up to 50% of the area median income in centers and villages with high land values and/or relatively little existing rental housing affordable to households in that income range.

We note that the impetus for increased density in the Downtown is for purposes of growth management, for which the Comprehensive Plan is the primary policy framework. The goals identified in the Comp Plan should be the minimum threshold for establishing housing affordability goals. We also support the additional housing goals and policies identified on P. E-2. (Policies H3, HG4, and H16) 17

However, after significant discussion and analysis within the ID community about the type of residents that now live, and have lived historically in the ID, along with the interest to move forward with additional housing diversity, we support the following Vision 2030 housing goals developed by the community and request these goals be incorporated into the Livable South Downtown Plan:

1. Healthy Balanced Equitable Development, Increased Density, and Diversity of Housing Choices
   - a. Develop financial tools that will encourage a diversity of income levels. By 2030, 1/3 of the housing stock should be targeted for 50% or below median income, 1/3 for 50%-100% median income, and 1/3 for 100% and above.
     - i. In the area east of the freeway (Little Saigon) and south of Dearborn street, 20% of the housing stock should be targeted for 50% of below median income, 17% for 50-80% median income, 13% for 80-100% median income, and 50% for 100% median income and above.
   - b. Encourage family housing
     - i. By 2030, family housing should account for 20% of the neighborhood's housing stock.
   - c. Maintain community stability through limiting residential displacement.
     - i. By 2030, the number of housing units at 50% or below median income should not fall below the number of low-income units we currently have in the neighborhood.
2. Rehabilitate Substandard Housing and Vacant Buildings
   - a. Develop financial tools and legislative programs to encourage the rehabilitation of substandard and vacant buildings.

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Assumptions for the Projected Growth Through 2030:

1. What is the basis for determining the Growth Projections to year 2030? The EIS should make explicit the assumptions and basis for the projections. Examining data provided from Tables E-9 and E-10, the following appears to be the assumptions: 18

	Table E-10	Table E-9	
Alternative #	Residential Capacity New Housing Units	Projected Growth through 2030 New Housing Units	
1	7,142	5,726	80.2%
2	8,319	6,014	72.3%
3	6,640	6,063	91.3%
4	4,414	3,395	76.9%

Current number of units and affordability 19

The ID has approximately 2,526 units of housing (E-3, appendix). On page 3-77 (table 3-11), the DEIS states that 1,695 units are subsidized. We do not believe this is correct. We believe, according to our review of the Office of Housing's Downtown Inventory for the ID, the correct number subsidized rentals (as opposed to "affordable" at 80% median income) in the ID is 1,326, not the 1,695 stated. We can work with DPD and OH to verify the correct unit totals for the ID; also, "the detailed inventory of existing units" is **not** included at the end of the appendix, as stated. Please include in the FEIS. (page E-3, appendix)

According to the DEIS, 1,102 units in the ID are at medium to high risk of losing their subsidy, because they do not have regulatory agreement for more than 20 years. It also states that 819 units are classified as low risk due to their regulatory agreements. (page 3-85) However, according to our analysis of the Seattle Office of Housing 2006 South Downtown Inventory, we noted that only 11 buildings, with only 683 units (including 2 SHA senior projects), will have regulatory agreements ensuring low income housing affordability in the year 2030.

Note: 20

- We would additionally like to note that the properties utilizing the Multi- Family Property Tax Exemption program are not subsidized, (there is no public subsidy) but are regulated for up to 10 years. We do not believe these units should be identified as "subsidized", but can be categorized as "affordable". It should be also noted that this program is not a permanent housing affordability solution. None of the units currently in the MFTE program would be expected to remain affordable with this program in 2030. Similarly, the eligible income levels continue to increase programmatically and do not serve very low income households.

- HUD definitions of "Affordability" are defined as units at 80% median income or below (see p. E-8). We believe this well established standard should be used. As such, Table E-8 should only include the units up to 80% of median income. Please revise these Tables to correctly identify the "affordable" housing units. For the ID, the totals would be 1,913 units, not 2,526 as stated in Table E-8.

- P. 3-88. Table 3-19. We believe that the Metropolitan Park or Ticino should not be considered affordable housing projects.

Growth and consequences to our affordable housing stock:

With the exception of the 4th alternative, we understand that approximately 6,000 new units of housing will be created in the South Downtown neighborhood (page 3-82).

The # of units projected to be built under the proposed Alternatives will substantially alter the local housing market, ranging from 109%, a doubling, to 172%.

P. 3-75 Table 3-25

Alternative #	Existing Housing Units (ID only)	Projected Growth through 2030 (ID only) (a) New Housing Units	% increase over existing ID units
1	2,526	3,847	152.3%
2	2,526	4,352	172.3%
3	2,526	2,768	109.6%
4	2,526	4,414	

(a) includes So of Dearborn area

Regarding housing affordability targets, which we include preservation of the existing affordable housing units, and a % of new affordable housing units, at a minimum, meeting Comprehensive Plan housing affordability targets. Assuming the Table E-9 projections for new housing units, the following is our analysis of housing affordability, assuming Comp Plan housing affordability targets for new units, and adding in the number of currently affordable housing units at-risk of loss of affordability by 2030. The following table, produced by InterIm, displays the amount of affordable housing units that will be needed to be produced in the next twenty-five years.

	Table E-9	Comp Plan 2030 Affordable New Hsng Targets		Preservation			
Alternative #	Projected Growth through 2030 Only ID	@ 50% median income	@ 51% - 80% median income	Plus Existing affordable hsng at-risk not inc. PS (a)	Total # of affordable units in 2030 needed	Proposed SDT commercial & residential bonus programs for afford. hsng	Affordable Housing Deficit only including bonus programs (2030)
	New Housing Units	20%	17%	(ID =1,102) (PS =178)			
1	5,726	1,145	973	1,280	3,399	(224)	3,175
2	6,014	1,203	1,022	1,280	3,505	(234)	3,271
3	6,063	1,213	1,031	1,280	3,523	(217)	3,306
4	3,395	679	577	1,280	2,536		2,536

Even if we were to include the 107 – 135 affordable units from an incentive program and the 230 or so units from the TDR program, the City would fall far short of the needed subsidies to reach the City's comprehensive planning goals and even further short of our 2030 vision goals. We recognize that traditional direct funding will help us develop additional affordable housing units, however we have concerns with the ability of that specific program,

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which we discuss later, in supporting all of our affordable housing needs. Other programs will need to be created to help us achieve our goals. 21

Existing Programs & Trends That Will Continue to Support Affordable Housing Development (P. 3-88-93):

1). **Direct funding** for affordable housing construction and rehabilitation – We do not believe "... it is reasonable to assume that 2,800 units of affordable South Downtown housing could be funded over the coming 25 years through leveraging traditional housing funding sources..." for the following reasons: 22

   a. Upzoning from this process will increase property values and make it more difficult to secure site control for affordable, low income, or even workforce housing, if competing with mid-rise and high rise developers. Even if sites were able to be tied up, the land costs would be significantly higher, resulting in the need for more and deeper subsidies. "Zone changes would likely increase property values, affecting the ability to realize new affordable housing construction by non-profit developers." P 3-83.
   b. There is no reason to assume that the City's main low income housing funding source – the Housing Levy – will continue to be funded at adequate levels for the next 25 years to ensure the continue low income production rate identified in the DEIS. Voters are already reaching property tax fatigue. The City needs to develop alternate financing sources for low income/affordable housing in addition to the Housing Levy.
   c. The most affordable construction is Type V, allowing 5 stories of wood framing above a Type I concrete base. Any zoning heights in excess of heights required for this type of project, trigger higher construction costs, making affordable housing less likely to be included, and required subsidies for affordability greater.

2) Proposed SDT **commercial and residential bonus programs** could generate approximately 89 units and 125 units of affordable housing respectively. 23
   a. The number of workforce housing production anticipated under the Residential Bonus Program does not identify the percentage median income level of affordability. Workforce housing can be described as ranging up to 120+%. These projections should be correlated to median income levels. (Table 3-20)

3) **Transfer of Development Rights** (P. 3-91, Table 3-21) 24
   a. We seek to have the TDR program applicable to the all of the ID, and to include a 3rd category - the ability to sell TDRs from vacant land, including for new construction, when developed for affordable housing. This may be one way of being able to use the value of the higher zoning for new construction of affordable housing, if underbuilding for affordable housing. Without this, there will be no way to compete with the private market for sites for new construction for affordable housing. The ID used to have this, but was taken away recently.
   b. We also believe that by excluding any zoning increases for buildings within the historic core, it precludes existing vacant and substandard buildings from securing resources from Transfer of Development Right proceeds, which we strongly advocate, provided that these funds can only be used for renovation of these buildings for low income housing or for renovating historic buildings. We believe that increases in zoning for these buildings in the historic core, provided any in-fill development is compatible with the existing historic fabric, and provided that TDRs are limited, can facilitate the preservation or development of vacant buildings for affordable housing.

4) **Existing Housing Supply becoming affordable over time** (page 3-89). While this may be true, it is not a strategy for housing affordability, and it is unlikely that the rents will decrease significantly from market to serving low income residents. The discussion of the "unregulated units" in the ID totaling 580 units may be misleading. Many of these units are in substandard buildings, including SROs that have 25

never undergone substantial renovation. Many of these buildings have long time owners who have not attempted, or may not be capable of undertaking, the complex and costly renovation of 80-90 year old buildings to current codes. In addition, this assumes that private owners of buildings like the Metropolitan will not rehabilitate their apartments over time, which is not the case for many properties, including the Metropolitan which just completed an extensive renovation. 25

5) The City should implement a progressive **incentive zoning program (page 3-90)**, which includes construction of affordable units on-site, or through participation in payment-in-lieu. The levels of affordability must comply with those prioritized in RCW 36.79A.540 – rental housing at 80% median income, and preferably below that. The Housing Development Consortium has been actively working on an incentive housing proposal which would help address the potential of this new tool. In upzoning, we believe the City should capture the public benefit it is granting through its police powers of zoning – a principle that DPD has stated since the beginning of this process. We do not believe basing an incentive zoning program on the Downtown Residential Bonus Program will result in much low income housing production. The City's projections of between 107 – 135 affordable units over then next 20+ years, as a tool is insignificant. The City should implement an inclusionary housing program that includes providing a significant percentage of affordable units in the base, not just on the increased bonus height. The pricing of the in-lieu portions of the ordinance should reflect the difference between the market value of the unit and the specified affordability level, rather than an undervalued $/sf, and additionally, the commitment for affordability of these units should be in perpetuity. 26

Capture of Public Benefit: Affordable Housing Production

The 2 zoning related programs, TDRs and the Residential Bonus Program, provides an insignificant amount of affordability, particularly given the substantial entitlement possible under the proposed zoning options. While allowing additional housing production of up from 40.7% additional units in Alternative 1, the number of affordable units generated is only 9.6% of the bonus units, and only 3.9% of all the units. Similar percentages apply to Options 2 & 3. Clearly, by granting 40.7% to 44.0% more development capacity, while only capturing 8.1% to 9.6% as affordable units, falls far short of meeting any Comprehensive Plan Housing targets – which are based on all new units, not just "bonus units", and does not follow the principle of capturing public benefit from additional granted zoning entitlements.

The following table illustrates the additional development capacity in terms of numbers of units vs. the number of affordable housing units produced by zoning actions (upzoning vs. TDRs and Bonus) alone: 27

AFFORDABLE HOUSING PRODUCTION WITH IDENTIFIED ZONING MITIGATION TOOLS

	Table E-10	Table E-9			Table 3-20	Table 3-21			
Alternative #	Residential Capacity	Projected Growth through 2030	Additinal Hsng Units over Existing Zoning	% increase over existing	Proposed SDT comm. & resid. bonus programs for afford. Hsng	Proposed SDT comm. & resid. bonus programs for afford. Hsng	Total Bonus + TDR affordable hsng units		
	New Housing Units	New Housing Units			Affordable hsng units	Affordable hsng units		% of bonus units affordable	% affordable of all units
1	7,142	5,726	2,331	40.7%	89	135	224	9.6%	3.9%
2	8,319	6,014	2,619	43.5%	114	120	234	8.9%	3.9%
3	6,640	6,063	2,668	44.0%	110	107	217	8.1%	3.6%
4	4,414	3,395							

Generally, in conclusion, the list of potential programs and strategies for affordable housing development does not demonstrate how affordable housing will be preserved or developed to our stated 2030 goals, or even Comprehensive Plan goals. Absent more quantifiable methods of achieving identifiable proposed housing affordability targets, we can only conclude that the proposed upzoning will result in the overwhelmingly vast majority of new units being built at market rents, not affordable housing rents. The higher zoning heights, do not contribute to any affordability in new housing development, and works against affordability, as zoning exceeding Type V wood frame construction result in higher building code requirements, higher construction costs and higher land values.

This imbalanced development mix will add substantial gentrification pressures to the existing threatened low income housing stock. No credible resources or tools have been identified in the DEIS to either preserve the existing low income housing, nor to develop additional new low income housing commensurate to affordable housing goals and targets. We believe that unless further mitigation programs and resources are developed and implemented, concurrently with the proposed rezone, demonstrating that low income housing can be preserved and developed, with quantifiable targets, we can only conclude that the various Alternatives will have an adverse impact on the ID community and low income housing. The Final EIS should address how this would not be the case.

- P. 3-93. "No significant unavoidable adverse housing impacts of the EIS are identified." ***We disagree with this conclusion.*** We do not believe the DEIS has demonstrated that there are mitigation tools to avoid an adverse impact – therefore we believe affordable, low income housing will be adversely impacted.

It may be prudent to delay implementation of any upzoning in this Livable South Downtown Plan until these issues are substantively addressed. To prematurely pass the LSDT rezoning increases, without these other tools concurrently in place, is a strategy that we believe would adversely impact the ID.

We realize that DPD and OH staff have working to understand the issues, and to help develop the tools necessary to address issues we have identified. We believe that this is a City-wide issue that should involve other City Departments in helping address and develop a more comprehensive approach to community development in the context of the City's desire to accommodate regional growth in the urban Downtown core. The Vision 2030 proposals actually proposed some zoning heights higher than the LSDT Alternatives in order to capture additional public benefits. 28

We have identified additional strategies we would like the City to develop (some of which have been discussed in part above) in the ID's Vision 2030 proposal, which is included in Attachment A. In short, our recommendations to achieve these goals, include:

Financial tools:

1. Growth Related Fund
2. Incentive Zoning
3. Transfer of Development Rights

Legislative tools:

1. Formula Business Ordinance
2. Retail Size Cap
3. Code Violation enforcement
4. Liberal Parking Rules
5. Zoning Designations that Support Community Goals

We look forward to working with the City to develop a Livable South Downtown Plan that will create a diverse and dynamic part of the City.

Sincerely,

Elaine Ko Executive Director	Tom Im Community Planner	Ken Katahira Development Director

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ATTACHMENT A
(EXCERPTS FROM VISION 2030 PROPOSAL)

Resources

Many goals were identified by our community stakeholder group. The goals of creating balanced development, rehabilitating derelict buildings, improving our public spaces, and supporting our small business will all need financial support.

In our 2030 document, our neighborhood wishes to achieve a 1/3, 1/3, 1/3 split between low-income housing, moderate income housing and market rate units. To achieve this goal, we believe that current financial resources will not be sufficient in building the amount of low-income and moderate units stated in our goals. We conclude that the increase in land values due to development pressures will make it more difficult to acquire properties for affordable housing purposes. In addition, we fear that existing affordable housing funds will remain competitive and relatively static, making it more imperative to develop additional financial tools to help build affordable housing in this progressively expensive and competitive market.

Of the four goals aforementioned, two of the goals – creating balanced development and rehabilitating derelict buildings – will require vast amounts of financial subsidy or greater participation by the private market. In addition, improving our streetscapes and open spaces, as well as supporting our small business environment will also need financial support. We believe that the City should establish the following financial tools that will help leverage the resources needed to support our various goals. Consequently, zoning changes should not be implemented until the following financial programs are enacted.

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- Reestablishing a **growth related fund** can produce significant financial resources on an ongoing basis to help the neighborhood achieve its housing goals, especially considering the growth that is expected in this distressed community. As we understand, the City can currently establish a growth related fund, funded from the General Fund, which will enable a specifically designated area to access a percentage of the increment of increased property taxes in a given area from a current tax, and to utilize these funds for a designated purpose. We recommend:
    - The South Downtown Livable Community study area should be designated by the City for its own targeted growth related fund.
    - 70% derived from this program be designated for affordable housing purposes.
    - 30% percentage of funds should be designated for acquiring and/or improving public open space, enhancing streetscapes, a technical or financial assistance fund for small businesses, and cultural and community facilities.
    - We request the City commence doing an existing tax base and revenue analysis of the Livable South Downtown planning area.
- Utilize **incentive zoning** to leverage resources from development projects throughout the South Downtown planning area to produce affordable housing within the South Downtown community. Residential and mixed-use developments may build these units on-site, or off-site by the payment in lieu of funds. We recommend that these affordable housing units remain permanently affordable.
    - Affordable housing requirement through incentive zoning or upzoning should contribute to addressing the housing production goals advocated in this 2030 plan.
    - Developments may pay into an affordable housing fund in lieu of building the units on-site, however these units must be built with the South Downtown Livable Community planning area.
    - 15% of funds should be designated for acquiring and/or improving public open space, enhancing streetscapes, a technical assistance fund for small businesses, cultural and community facilities. 85% should be designated to affordable housing purposes.
- Utilize existing **Transfer of Development Right program** to support affordable housing goals.

- We are recommending that TDR's can include vacant properties, as well as Historical buildings.
- Increase heights in the Chinatown-International District historical core, enabling property owners to capture additional resources to rehabilitate historical buildings. However, this proposal will need to be vetted through legal channels to determine if it is legal to increase heights in an historical area with buildings that cannot be demolished due to its historical significance. In addition, it must be determined if our designation as a historical district is in any way threatened with the change of zoning that would allow an increase in heights.

Legislative tools

In addition to leveraging financial resources to support our goals, we are seeking certain legislative tools to help facilitate the rehabilitation of derelict buildings and help preserve the small business environment our community has fostered over the last century. The City should investigate the following legislative tools that can help support the four aforementioned goals.

- Besides creating incentive programs, the City should examine more effective code **enforcement of** current building codes, specifically health and safety codes. This strategy will help encourage current owners of derelict buildings to redevelop their buildings, or to provide disincentives for continued inaction. The City is currently looking at a city-wide program that would increase fines for such buildings.
- In supporting the character of our small business community, we would like to examine the zoning code changes which can provide **limitations on the size of retail businesses** that could enter our community, which would help encourage small family operated businesses typical of the community to be built and maintained in the neighborhood. 29
- We can develop an additional process beyond the Review Board for **formula businesses** that wish to locate in this neighborhood to examine if that business is congruent to the character of this neighborhood.
- The city needs to initiate a dialogue with Little Saigon's business and property owners on possibly developing a different **design review process**, which is currently, in part, housed in the Southeast Design Review Board. In addition, the current IDSRD review guidelines and process should be reviewed, which may include expanding into areas South of Dearborn Street and east of 12th Avenue.
- Allow flexibility of parking uses (shared uses) at all off-street parking lots.
  - Ensure there is sufficient parking necessary for the continued residential and commercial vitality of the District, given the anticipated loss of surface parking lots due to development.
  - Also, look into supporting efforts of developing a community parking structure.
- Expand the Free Ride Zone to Rainier Avenue.
- Expand the neighborhood's green streets to include Washington Street from Kobe Terrace to 4th Avenue South, King Street from 5th Avenue to Rainier, Weller Street from 5th Avenue to I-5.

Additional City Assistance

In addition to the Legislative and Financial Tools aforementioned, the City can dedicate a full time staff person for the neighborhood to look at existing and new programs that can help the community attain its stated 2030 Vision Group goals. The staff person can work on helping to rehabilitate substandard housing in the neighborhood, through providing current property owners with needed technical assistance. In addition, the City staff person can work on issues such as the new Community Preservation District created by the state and other new programs that we are recommending the City incorporate into their South Downtown Livable Community study.

*Inter*Im Community Development Association*
310 Maynard Ave. So. Seattle, WA 98104 | 206.624.1802 | 206.624.5859 fax | www.interimcda.org

JAPANESE CULTURAL & COMMUNITY CENTER of WASHINGTON

December 17, 2007

Gordon Clowers
City of Seattle Dept. of Planning & Development
700 Fifth Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124-4019
(206)684-8375

RE: Draft Environmental Impact Statement
Livable South Downtown Planning Study, November 2007

Dear Gordon,

These comments are provided in response to the above referenced DEIS. I am writing on behalf of Nikkei Heritage Association of Washington, a recently established community-based, non-profit corporation that is developing a Japanese Cultural and Community Center at 1414 So. Weller, Seattle, WA 98144. The cultural center is being developed at the site of the Seattle Japanese Language School, the oldest, continuously operating Japanese Language School in the US. The site, with its 3 existing wood-frame buildings, was designated on the National Register of Historic Places in 1982, and as a Seattle Landmark in 2006. The site is across from the proposed Dearborn Center project at the Goodwill site.

The planning study boundaries identified in the LSDPS for South Downtown include the existing boundaries of the International District and also incorporates, on the eastern boundary, the east side of Rainier Av. So. to cover both sides of Rainier Av. This boundary cuts through the middle of the Japanese Language School site.

The DEIS alternatives propose the eastern side of Rainier Av. So. be rezoned from IC-65' to NC-3 65'.

NHAW requests that the boundaries for the LSDSP be altered to incorporate this same NC-3 65'zoning for our entire site. This would extend this zoning for the entire block on which the JLS buildings now sit – from Rainier Av. So. to 16th Av. So between King St. and Weller St.

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Our project involves preservation of the historic, landmark buildings, along with new construction of additional buildings to house the proposed Cultural Center programs and activities, including some possible commercial development on Rainier to help sustain the cultural center. However, currently this site has split zoning – IC 65' on Rainier, and L2 – RC on the eastern portion of the block up to 16th Av. So. This split zone, along with the current IC-65' zone, are incompatible with our developing the site as a unified parcel, as the IC zone does not allow a community center use, and the split zone requires set-backs that make the site hard to develop and integrate the whole site as a single project.

We have discussed our interest in seeking this rezone designation with DPD's Land Use Division, and believe the proposed NC3-65' for the entire block is a reasonable adjustment to the LSDPS boundaries, and is a zone that would be compatible with our proposed cultural center uses. Given that 2 of the existing historic structures are two stories, and the third is a one-story structure, and all are located on the eastern portion of the site that abuts more residential zoning, they would provide a transitional buffer on our site, with lower heights than the proposed NC3-65' zone would allow.

Further, the LSDPS indicates the desire to preserve the cultural characteristics of the International District. The area just to the east of the ID, across Rainier Av. So. and 14th Av. So., have historically been a center of

JAPANESE CULTURAL & COMMUNITY CENTER of WASHINGTON

the Japanese community institutions, including the Seattle Japanese Language School, the Seattle Buddhist Church, and a number of other churches, dojos, etc. in the immediate area.

With the zoning to help facilitate the development of the Japanese Cultural and Community Center project, the preservation of the both the historic structures and the continuation of the Seattle Japanese Language School programs themselves will be assured. The physical condition of these 70-80 year old structures has made it difficult for the Seattle Japanese Language School to continue to cover the costs of the deferred maintenance in buildings that are not up to current building codes. The development of the cultural center will help preserve this community institution and help preserve and reinvigorate the Japanese communities' ties to the area and community.

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We would be happy to meet with you to discuss this recommendation further. Please feel free to contact Barbara Mizoguchi, our new Executive Director, and Ken Katahira at Interim Community Development Association for additional information.

Thanks for your consideration.

Sincerely,

Ron Mamiya

Nikkei Heritage Association of Washington

Letter #15

SCIDpda

Seattle Chinatown International District Preservation and Development Authority

December 17, 2007

City of Seattle
Department of Planning and Development
P.O. Box 34019
700 Fifth Avenue, Suite 200
Seattle, WA 98124-4019

Attention: Gordon Clowers

RE: Comment Letter on Livable South Downtown Planning Study/Draft Environmental Impact Statement (DEIS)

Dear Mr. Clowers:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) Livable South Downtown Planning study (Study). As a major property owner, developer and manager in the Chinatown International District (CID) for over 30 years, the Seattle Chinatown International District Preservation and Development Authority (SCIDpda) has significant interest in the planning, development and preservation of this unique and vital neighborhood. SCIDpda has been an active participant in the development of the community's Vision 2030 document. The document reflects our vision of a diverse, safe, residential and commercially viable CID. In order to realize this vision we need some additional tools and zoning changes.

We are concerned that the alternatives analyzed in the DEIS do not include any increase in height/density for the historic core of the CID. Currently the core has a number of buildings that are substandard and/or vacant above street level. Everyone's vision includes fully rehabilitated and occupied buildings in a vibrant historic Chinatown core. However, the alternatives analyzed do not provide tools or incentives to bring this vision to fruition. 1

We know from experience that the current zoning and tools are not providing adequate incentive to property owners to rehabilitate vacant and substandard buildings; we must take a new tact. The SCIDpda proposes an increase in height and density in the core of the CID in conjunction with a new Historic Transfer of Development Rights program in order to spur revitalization. We would like to work with the City in the development of this new tool. We also recommend that the Low Income Housing TDR program work with the new Historic TDR program.

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F 206.467.[illegible]
409 Maynard Ave S
Suite 200
Seattle, WA 98104

P.O. Box 3302
Seattle, WA 98114

www.SCIDpda.org

Having a strong and vibrant CID is critical to the health of the south downtown area and the city as a whole. We believe additional height and density along with a Historic TDR program would increase vitality in the CID. 1

Thank you for your time. If you have any questions or concerns please contact me at suet@scidpda.org or at 206.838.8233.

Sincerely,

Sue Taoka
Executive Director
SCIDpda

cc: SCIDpda board
InterIm
CIDBIA
Uwajimaya
IDHA
Nitze-Stagen
Ted Choi

December 17, 2007

To: Susan McLain
City of Seattle, Department of Planning and Development
susan.mclain@seattle.gov

Gordon Clowers
City of Seattle, Department of Planning and Development
gordon.clowers@seattle.gov

From: Jackson Place Community Council
Jill Moe, Co-Chair
moe_jill@hotmail.com
206-322-4983

RE: Livable South Downtown Draft EIS

I am writing in regards to the Livable South Downtown Draft EIS and in particular to address potential impacts to the Jackson Place Community (JPC). As you know, a portion of JPC (the east side of Rainier Ave. S. corridor) is included in the planning area.

We submitted comments on preliminary land use recommendations in April 2006 and on the scope of the EIS in June 2006 and received no response to either letter; we did request a specific response. At a minimum, a general response to public comment topics would help us understand City positions and would show that the City, in fact, is considering our concerns. Along these lines, the public information on the Livable South Downtown web page is out of date (showing Final EIS to be completed in Spring 2007, etc.) making it difficult for the public to follow and meaningfully participate in the EIS and broader planning process.

In light of the above, we ask that you please consider the following comments and expand the EIS analysis before recommending an alternative. 1

As we stated in previous letters, the geographic area of analysis in the EIS should include adjacent neighborhoods that would experience impacts associated with proposed zoning changes in the South Downtown study area. Our letter of April 13, 2006 discusses the reasoning behind this comment in detail. Seattle's SEPA code (25.05) requires that indirect, direct and cumulative impacts be analyzed.

The draft transportation analysis is inadequate at this time, as follows.

- The transportation analyses should consider the major current and planned development on S. Jackson St., Hiawatha Ave. S. and other areas immediately adjacent to the study area (Appendix G does not consider developments outside of the planning area). As stated in previous letters, these projects – in addition to the action alternatives evaluated

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in the Draft EIS – will contribute cumulatively to transportation impacts. As such, the transportation analysis underestimates 2030 impacts. 1

- Level of Service F traffic conditions on Dearborn, Rainier and Jackson cannot be mitigated by the possible strategies identified, as is confirmed in the summary of unavoidable adverse impacts. Associated cut-through traffic and parking issues in adjacent residential neighborhoods must be addressed in the Draft EIS, mitigated and otherwise recognized in the summary of unavoidable adverse impacts. 2, 3
- Where non-City agencies are expected to be responsible for fulfilling mitigation measures/strategies (such as King County Metro for 'local bus frequency and span of service'), we do not see a discussion of how the City plans to seek commitments or agreements related to such requirements. Our previous letters address this issue. 4

The discussion of air quality mitigation measures should be reconsidered and expanded. The current discussion only addresses the exposure of new residents to air pollutants. The analysis should also consider how higher density developments and increased traffic in South Downtown may contribute to air pollution and what requirements should be in place to reduce such impacts, such as green roofs/tree planting, transportation mitigation measures (associated with air pollution specifically), and energy efficiency (as related to air pollution). 5

Cumulative impacts do not appear to be evaluated in the Draft EIS. In general, the impacts discussion seems to be undertaken in a vacuum – without consideration of current development or development activity in adjacent areas. Cumulative impact analysis within and adjacent to the South Downtown planning area should be a high priority in the EIS as there is no other mechanism (outside of the SEPA process) in which cumulative impacts are analyzed. Without an analysis of cumulative impacts, it is inappropriate to allow individual projects to rely on the Livable South Downtown programmatic EIS to meet transportation SEPA requirements, in particular, in the future. 6

Thank you for your consideration of noise, fire/police protection, and parks/recreation as part of the Draft EIS. We also appreciate your consideration of height, bulk and scale issues associated with potential height changes in Little Saigon and the western edge of Jackson Place. We are still concerned about shadows, light and glare associated with the potential height increases; please let us know how these issues will be addressed. 7

On another note, JPC is a member of the Dearborn Street Coalition for Livable Neighborhoods. We are concerned about the current proposal for redevelopment of the Goodwill site and suspect that the proposal (a regional shopping mall) is inconsistent with the zoning that is evaluated under all action alternatives in the EIS. Please see http://dearbornstreetcoalition.org for more information about our concerns. As stated in previous letters, the developer's proposed rezone for the Goodwill site should be specifically evaluated as part of the South Downtown planning process, considering the potential significant effects within the planning area and in residential neighborhoods adjacent to the planning area. 8

Thanks again for your attention to this important area of the City. We hope you will consider our concerns. We would appreciate a response or a discussion with you.

Letter #17

From: kelly Lawrence <kl@speakeasy.net>
To: <Gordon.Clowers@Seattle.Gov>
Date: 12/5/2007 4:57 PM
Subject: P-square

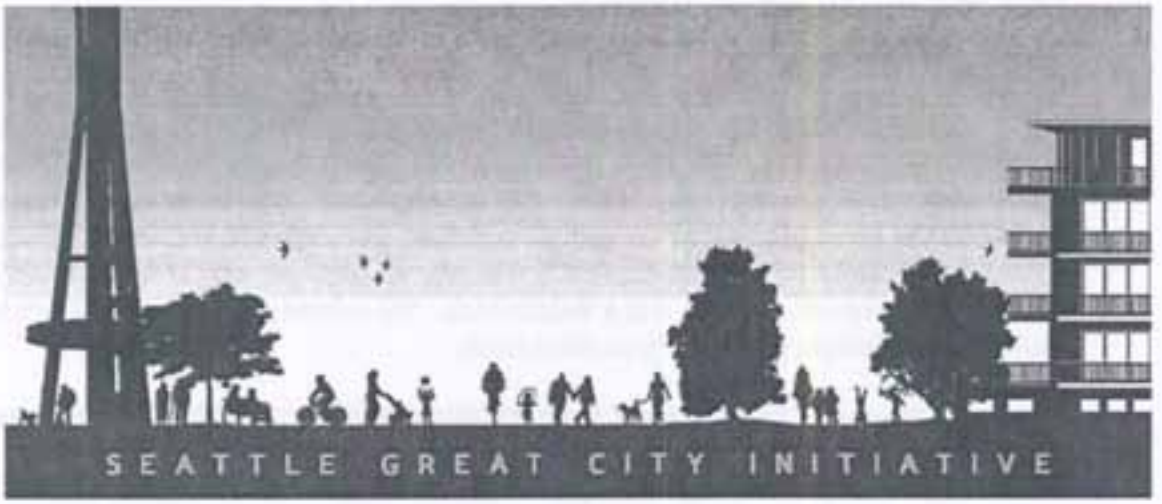
Hi Gordon:

I've been a resident of Seattle since 1992 and have had a small office in the Pioneer Building since shortly after moving here. I'm not quite certain what the zoning meeting is about tonight, but I'd like to suggest to someone in government that the Viaduct be reduced to a street level road much like San Francisco's Embarcadero.

If there was no double decker bridge spewing grit and noise on pedestrians, the waterfront could see a revival for pedestrians: tourists, residents and business folk alike-- and traffic, though perhaps moving at a slower pace, could still be managed effectively give the parking under the road could be converted into many lanes to handle traffic. San Francisco's Embarcadero is 6 lanes (three in each direction) and is a perfect example of what could be here in Seattle. 1

It's seems so sad to me that in the 15 years I've worked in the neighborhood I have never been able to enjoy lunch on Elliot Bay's waterfront. What a pitiful oversight for such an "environmentally correct" town.

Kelly Lawrence
News Broadcast Network
600 1st Avenue
Seattle WA 98104



800 Fifth Avenue, Suite 4000, www.greatcity.org

December 17, 2007

The Seattle Great City Initiative appreciates the opportunity to present comments on the Draft Environmental Impact Statement for South Downtown.

We support the city's efforts to provide jobs and housing in South Downtown as part of a comprehensive strategy to improve neighborhood vitality while respecting and enhancing the unique cultural and historic assets of South Downtown. New housing and jobs in South Downtown are consistent with our region's environmental and health objectives. In-city housing has dramatically positive effects on reducing greenhouse gas emissions, air and water pollution, resource consumption and destructive sprawl. Furthermore, it supports local businesses, encourages walking, biking and transit, enhances human health, and reduces the cost of providing government services. For these reasons, we believe that the South Downtown planning efforts hold great promise.

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Our specific comments to the EIS follow:

Positive Environmental Effects

As we pointed out in our letter regarding the scope of environmental review, we believe it is appropriate for an EIS to address not merely negative effects of governmental action, but also the positive environmental effects. For example, it is well documented that residents of neighborhoods with a diverse mix of uses that are well served by transit have dramatically lower emissions of global warming pollution than residents of sprawling auto-dependent communities. To put it another way, the "no action" alternative carries with it adverse environmental impacts. The failure to accommodate growth in well-designed urban centers means it is likely we will see more sprawl, more pollution, and

increased greenhouse gas emissions. Incorporating this analysis into the Draft EIS would provide useful information to elected leaders and the pubic as they consider the zoning and land use changes contemplated in South Downtown. 1

Height and Housing

Given the value of urban housing, we support consideration of greater heights than was contemplated in the EIS. We agree that new development within the historic districts should fit in with the existing scale. However, we believe that the city could consider taller buildings than contemplated in the EIS for areas adjacent to the historic districts. For example, the Smith Tower, immediately adjacent to Pioneer Square district, is 475 feet tall, yet does not appear to have had any adverse impact upon Pioneer Square. Indeed, it is a Seattle icon. We submit that the issue of height is secondary to the issue of good design, particularly at street level. 2

Additional height will make more housing available in South Downtown, and make it possible for greater private investment in affordable housing, as well local amenities (parks, streetscapes, plazas, community facilities) and regional objectives (transfers of rural development rights). Furthermore, as acknowledged in the Draft EIS, increasing housing supply is a key strategy to maintaining housing affordability. This is particularly importation in South Downtown, where competition for scarce urban housing threatens to drive up prices (see effects of the "No Action" alternative on supply of affordable housing).

Transportation

South Downtown may be one of the most walkable and transit friendly neighborhoods in Washington State. In addition to bus service, it also has Amtrak and commuter rail service, and will soon have Link light rail. Its street grid with pleasing historic buildings encourages walking. South Downtown also has attributes to support bicycling. Much of the area is flat, and auto speeds are compatible with bicycling on streets in the historic districts. Areas within South Downtown undergoing redevelopment should build upon these incredible assets by promoting walking, biking and transit throughout South Downtown, and linking South Downtown to the adjoining neighborhoods. 3

At the same time, we should recognize it may not be desirable or feasible to maintain high levels of service for single occupancy vehicles. In many instances this can conflict with goals to improve walking, bicycling and transit. Streets and intersections should not be designed to maximize automobile flow, but should be designed to meet the needs of all users.

Parks, Streets, Plazas and Green Spaces

We also encourage the city to immediately begin planning parks, green streets and open spaces for South Downtown as part of a "green infrastructure" plan (see below). This must be completed as soon as possible, so that new development can help meet plan objectives, e.g, through the provision of public plazas, streetscape improvements, pedestrian walkways or other amenities. By doing so, the city can maximize the effectiveness of the resources available for parks and green space improvements. 4

Sustainability 5

We appreciate that the city wants to achieve high standards of energy efficiency, and is exploring various strategies to reduce stormwater runoff. We recommend that these and other sustainability objectives become a high priority for the city. The text of the Draft EIS suggests that further planning is needed to realize these goals. As with parks and open space planning, early identification of desirable public and private investments in sustainability will lead to the most effective use of resources. 5

Green Infrastructure

Planning for parks, transportation and sustainability objectives should be integrated into a single "green infrastructure" plan. For example, a street could incorporate intensive vegetation and natural drainage for the purpose of controlling stormwater, to create a street with park-like attributes, and to encourage walking. A green infrastructure plan for South Downtown could identify opportunities to maximize investments from different city agencies, as well as leverage private investment, in ways that could enhance livability and meet high sustainability objectives. 6

Again, we appreciate this opportunity to comment

Sincerely

Michael McGinn

Director, Seattle Great City Initiative.

RealSolutions Capital LLC

12/17/2007

City of Seattle
Department of Planning and Development
700 Fifth Avenue, Suite 2000
Seattle, Washington 98124-4019
Attn: Gordon Clowers

Dear Mr. Clowers:

This letter is to comment on the draft EIS for the Livable South Downtown Planning Study during the public review period.

The goals of the planning study are all in the right direction:

- Increase the density of jobs, housing, services and entertainment in the urban core, where the infrastructure is already in place.
- Put incentives in place for under-utilized properties, especially surface parking lots, to be turned into compelling, well-designed mixed-use buildings.

This works toward so many important objectives:

- Helps maintain the integrity of the growth management line and rural lands and wildlife preservation.
- Plays a key roll in reducing greenhouse gas emissions and combating global warming.
- Allows the city to continue becoming more invigorating, enriching and healthy to live in.
- Puts in place needed ingredients for continued good economic health of the city and in turn the region and the state.

In short it's good urban planning and the right urban planning at the right time.

If anything the DEIS and hence the planning study itself hold back too much. The DEIS examines whether to put growth on the west or on the east or in the middle. If the objectives above matter, why not put incentives in place for growth to happen throughout South Downtown? It's wanted, needed and ready to happen.

The DEIS ironically doesn't touch on a central environmental impact: The negative impact to the environment of not concentrating the growth in close where the infrastructure and jobs already are. Studies show that the per capita carbon footprint is dramatically lower for urban dwellers compared to suburban dwellers.

Thank you for this opportunity to make these comments.

Joe Nabbefeld
Principal, RealSolutions Capital

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DANIELS DEVELOPMENT

December 17, 2007

City of Seattle
Department of Planning and Development
PO Box 34019
700 Fifth Avenue, Suite 200
Seattle, WA 98124-4019

Attention: Gordon Clowers

Re: Livable South Downtown Planning Study/Draft Environmental Impact Statement (DEIS)—Over Tracks Properties

Dear Mr. Clowers:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Livable South Downtown Planning ("LSD") study. Our sister company, Nitze-Stagen, has participated in the multi-year, LSD planning process conducted by the Seattle Department of Planning and Development ("DPD"). As a major stakeholder in the planning area, we are pleased that this long-awaited study has taken this important step forward. This letter sets forth the background explaining our stakeholder interest in the process as it pertains to the Over Tracks properties, and then provides comments on the alternatives and impact analysis of the DEIS.

I. BACKGROUND

By separate comment letter, we have explained our interest in the LSD planning study pertaining to the former Kingdome parking lot, referred to in the DEIS as the North Lot. We are also interested in the area referred to in the DEIS as the "Over-Tracks" properties. We have been working with BNSF Railway Company on the King Street Station and their surrounding ownership since 1994. We have felt that the opportunities to create a true regional transit hub in the area are too compelling to stand on the sidelines and not have this potential realized. In the past few years we have worked with BNSF and the City of Seattle to have the station transferred into public hands as a first step in the creation of a transit oriented development just to the south of the station referred to as Over Tracks properties. Those efforts are nearing fruition after many years of effort by numerous parties.

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As a result of the station transfer, we have partnered with BNSF to create the concept for building over the tracks south of Weller Street and creating a similar development as we did at Union Station across Fourth Avenue. With the transfer of the station and market conditions favoring development near transit, we are poised to commence that development process in 2008.

2401 Utah Avenue South, Suite 305 Seattle, WA 98134
Office: (206) 382-4600 Fax: (206) [illegible] www.danielsdevelopmentco.com

II. COMMENTS ON DEIS

A. NEW ALTERNATIVE

We have carefully reviewed all the alternatives presented in the draft EIS. While each alternative may have certain elements that are helpful, we are most interested in further study of Alternative 3, with a height limit of 180 feet and zoning reflecting the new South Downtown Mixed (SDM). We note that Alternatives 2 also proposes a height limit of 180'; however, Alternative 2 would retain the PSM zone, which reflects the need for market rate residential housing and would not allow the height for the office campus development we have envisioned. We also would encourage the creation of development regulations that allow additional height up to 200' if certain requirements are met to reflect the high costs involved in creating this "land" and allow for taller structures with less mass. We therefore support advancing Alternative 3 for further study. The rationale for higher height limits in this area includes the following:

- Location. The site is currently zoned PSM and IC. Rather, the site represents a hole in the neighborhood fabric that is really part of a no-man's land, located between the traditional Pioneer Square District, the International District and the Stadium District. Its unique location thus presents the perfect opportunity to literally bridge the gap and create a new zone that would more appropriately fit its location and opportunities presented at the site. The new SDM zone or something similar would present the best match for this location.

- Challenges. Bridging over active railroad tracks presents significant challenges, to say the least. Design, engineering and construction costs will be significantly higher that a flat piece of ground. In order to achieve the vision of reconnecting the Districts, development will need to be incentivized through development regulations that ensure the site capacity can be fully utilized.

- Transportation Hub. The site is unique, in that it is served by every mode of transportation. Commuter rail and interstate (AMTRAK) rail access is available at the King Street station. The site is served by KC Metro transit and regional bus service. The streetcar trolley is near the site. The ferry terminal is within walking distance. Bicyclists and pedestrians can access the site, as well. Bus tunnel and future light rail are available at Union Station.

- Zone Purpose. The purpose of the SDM zone is not fully explained in the DEIS; however, it appears that it is intended to be a zone that would support a mix of uses, increased height and density, and would allow residential use through a special review process. SDM seems to put an emphasis on design, public open space and amenities, sidewalks, outdoor areas, and a pedestrian friendly environment. The site is uniquely situated to provide these characteristics on site.

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- Height. The SDM zone appears to allow for increased height, with perceived impacts to be addressed through bulk controls. We believe that the Over Tracks properties are well situated for a minimum height of 180 feet or more. Existing uses in the area include the stadia: QWEST Field's height is 260 feet and SAFECO Field is 247 feet; the Smith Tower is over 500 feet. Heights of buildings at Union Station exceed 150 in height and begin nearly 25' above the surface of the land. The North Lot property is proposed under one alternative for a 180-240' zone. The Over Tracks property at 180' SDM or more would also provide an opportunity to transition the mass and scale from north to south (from the downtown core to the stadium district), and from east to west (Pioneer Square and the International District). Moreover, we encourage the EIS to study the full envelope below 180 feet. Pioneer Square Preservation Board design review is the most effective way to address bulk impacts than artificial setbacks without design parameters and neighborhood input. 1

In summary, we encourage you to further study the 180' SDM zone for the Over Tracks properties.

B. IMPACT ANALYSIS

At several points in the analysis of impacts, the DEIS appears to speculate that increased height will produce "adverse" impacts. No real explanation or rationale is given. As recently seen in the downtown height and density EIS, height in and of itself is not an adverse impact. Height can be a benefit, when properly planned around transit, open space, and housing needs. As set forth below, the Over Tracks site is an area that can accommodate increased height and take full advantage of the public investment in transit options located immediately below the property.

- Increased height can accomplish a lot of positive changes, including the ability to fund bridging the historical gap between the two neighborhoods. 2
- Increased height can allow for better design and massing by providing taller, more slender towers instead of short, squat buildings. This can allow for better transitions between the surrounding neighborhoods and stadia, and better sight lines.
- Increased height can allow for more office users that can utilize transit options or walk from the proposed new residential units in the North Lot area.
- Increased height will allow for more private investment into the neighborhoods creating additional economic development, which in turn could result in more public funding for additional transit improvements at King Street Station.

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Thank you for the opportunity to comment. We look forward to working with DPD as it proceeds on the final EIS. If you have any questions, please do not hesitate to call.

Very truly yours,

Kevin Daniels
President

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Office: (206) 382-4600 Fax: (206) 382-4601 www.danielsdevelopmentco.com

Letter #21

NITZE-STAGEN & CO., INC.
STARBUCKS CENTER
2401 Utah Avenue South, Suite 305
Seattle, Washington 98134

December 17, 2007

City of Seattle
Department of Planning and Development
PO Box 34019
700 Fifth Avenue, Suite 200
Seattle, WA 98124-4019

Attention: Gordon Clowers

Re: Comment Letter on Livable South Downtown Planning Study/Draft Environmental Impact Statement (DEIS)

Dear Mr. Clowers:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Livable South Downtown Planning ("LSD") study. Nitze-Stagen has participated in the multi-year, LSD planning process conducted by the Seattle Department of Planning and Development ("DPD"). As a major stakeholder in the planning area, Nitze-Stagen is pleased that this long-awaited study has taken this important step forward. This letter sets forth the background explaining our stakeholder interest in the process, and then provides comments on the alternatives and impact analysis of the DEIS.

I. BACKGROUND

Our primary interest in the LSD planning study pertains to the former Kingdome parking lot, referred to in the DEIS as the North Lot. The North Lot area is currently owned by King County. When the County built the Kingdome, the north lot was paved for surface parking with the idea that some day it would be redeveloped to a more productive use. After the demolition of the Kingdome and development of QWEST field, the County renewed its efforts to redevelop the North Lot in a manner that would best serve the community interest.

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In June of 2006, King County solicited requests for proposals from the development community. The RFP allowed for a mixed-use development, but set forth certain minimum requirements. The RFP specified that development must include 350,000 gross square feet of housing and provide a minimum of 400 housing units. At least 50 percent of all the housing units in the development must be "for ownership" and 30 percent of those ownership units must be affordable housing.

Nitze-Stagen teamed with Opus NW to respond to the RFP, and our team was selected. We have since entered into a Purchase and Sale Agreement with King County. Our team is excited about the prospect of developing this site, as it presents an opportunity to achieve the City's objectives for Livable South Downtown by creating a place where people can live, work and play all at the same location. The City, County, surrounding communities and our team all have an opportunity to work together to create something truly special. The Livable South Downtown alternatives and accompanying DEIS are important steps in the process. We encourage you to consider our comments below so that the final EIS can be shaped to optimize this opportunity.

II. COMMENTS ON DEIS

A. NEW ALTERNATIVE

We have carefully reviewed all the alternatives presented in the draft EIS. While each alternative may have certain elements that are helpful, there is no one alternative that appears to optimize the characteristics and opportunities present at the North Lot site. We therefore encourage you to study a new alternative in the Final EIS. The new alternative should consider the North Lot site for a new Pioneer Square Mixed (PSM) zone with a 200-foot high limit. The rationale for this includes the following:

- Location. The site is currently zoned PSM, yet it does not contain any historic structures nor the historic attributes that are the primary characteristics of the Pioneer Square district. Rather, the site is currently a no-man's land, located between the historic Pioneer Square District, the International District and the Stadium District. Its unique location thus presents the perfect opportunity to create a new adaptation of the PSM zone that would more appropriately fit the location and the opportunities presented at the site. The new PSM zone would present the best match for this location while acknowledging the site remains an important transition area from Pioneer Square.

- Transportation Hub. The site is unique, in that it is served by every mode of transportation. Commuter rail and intrastate (AMTRAK) rail access is available at the King Street station. The site is served extensively by KC Metro transit, as well as various regional bus routes. The streetcar trolley is near the site. The ferry terminal is within easy walking distance. Bicyclists and pedestrians can access the site, as well. Bus transit in the downtown tunnel and future light rail are available at Union Station next door. This is the only true regional transit hub where all forms of public transit are readily available.

- Zone Purpose. The purpose of the PSM zone is to encourage additional residential use in Pioneer Square.; however, the height and use restrictions would not support the mix of uses we have planned based upon current development regulations. A mix of uses and increased height and density are needed for any project on the North Lot to be successful financially. The new

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SDM zone seems to put an emphasis on design, public open space and amenities, sidewalks, outdoor areas, and a pedestrian friendly environment, and the North Lot is uniquely situated to provide these characteristics on site. So we would suggest that the current development standards for the new PSM zone reflect the SDM zone and give more flexibility on how to accommodate the desired residential use by eliminating the requirement for 75% housing to achieve the maximum height. The north lot project already has covenants created by King County that require a minimum of 400 housing units, so additional development regulations to encourage housing are not necessary as they are in other parts of the district.

- Height. The new PSM zone could allow for increased height, with perceived impacts to be addressed through bulk controls. We believe that the North Lot is well situated for a height of 200 feet. Existing surrounding uses include the stadia: QWEST Field's height is 263 feet and SAFECO Field is 247 feet; the Smith Tower is over 500 feet. Heights at Union Station are over 150 feet. The "Over the Tracks" property is proposed under one alternative for the SDM 180 zone. The North Lot if developed at 200 feet would provide for a mixed use, mixed income, master planned development with the housing component required by the County. It would also provide an opportunity to transition the mass and scale from north to south (from the downtown core to the stadium district), and from east to west (Pioneer Square and the International District). Moreover, we encourage the EIS to study the full envelope below 200 feet rather than focus on setbacks. Pioneer Square Preservation's Board design review is a better way to address bulk impacts than artificial setbacks at this location given the specific land covenants encumbering the site for view corridor protections and the ability to protect specific public view corridors. 1

In summary, we encourage you to incorporate an additional alternative in the final EIS that will consider a mixed used proposal on the North Lot site under the PSM/200 zone. We also encourage you to include an alternative that could allow development for the full envelope below the 200 foot height limit, at least for purposes of the EIS study.

B. IMPACT ANALYSIS

We have carefully reviewed the DEIS impact analysis. Our transportation consultant, Heffron Transportation, has provided comments on the transportation assumptions (attached). 2

In addition, we have included other comments for your consideration. Of particular note are the comments on the land use section. At several points in the analysis of impacts, the DEIS appears to speculate that increased height will produce "adverse" impacts. No real explanation or rationale is given. As recently seen in the downtown height and density EIS, height in and of itself is not an adverse impact. Height can be a 3

benefit when properly planned around transit, open space, and housing needs. As set forth below, the North Lot is an area that can accommodate increased height.

- Increased height can accomplish a lot of positive changes, including the ability to preserve open space corridors for public use, such as the Second Avenue extension.
- Increased height can allow for better design and massing by providing taller, more slender towers instead of short, squat and bulky buildings. This can allow for better transitions between the surrounding districts and stadia, and preserve more public views from various locations throughout the Pioneer Square neighborhood.
- Increased height can allow for more housing units. In a neighborhood that has accommodated more than its fair share of low income housing (almost 75% of the total housing stock), taller buildings can help provide market rate and above market rate units and bring much needed economic activity, as well as housing, to the neighborhoods.
- For these reasons, we urge you to re-evaluate the stated assumption that all height increases are cause adverse impacts.

3

SUMMARY

Thank you for the opportunity to comment. We look forward to working with DPD as it proceeds on the final EIS. If you have any questions, please do not hesitate to call.

Very truly yours,

Kevin Daniels
President

heffron transportation, inc.

MEMORANDUM

Date: December 17, 2007

To: Kevin Daniels, Nitze-Stagen
Alan Cornell, Nitze-Stagen

From: Linda Cuadra, Senior Transportation Planner
Marni C. Heffron, P.E., P.T.O.E.

Subject: Livable South Downtown EIS
Comments on Transportation Analysis

Heffron Transportation has reviewed the *Draft Environmental Impact Study for Livable South Downtown Planning* (City of Seattle Department of Planning and Development, November 2007), and specifically the *Livable South Downtown Transportation Discipline Report* (The Transpo Group, September 2007). A summary of the analysis as it relates to the North Lot Development is presented in a separate memorandum. The following presents our specific comments that should be addressed by the City as part of the Final EIS.

Comments about Transportation Analysis

1. The Livable South Downtown Draft EIS evaluated three Action alternatives and one No Action alternative. All four alternatives assumed that 956 residential units would be constructed on the North Lot. This does not match the current planning for the site, which proposed approximately 600 housing units and 300,000 sq. ft. of office use, plus complimentary neighborhood retail. The Final EIS should address the current proposal for the North Lot as part of its preferred alternative. 4

2. The EIS notes no significant change in mode split or trips internal to the area between the alternatives. We question both findings. As congestion increases, the percentage of trips that can be made by automobile should decrease. In addition, an increase in both employment and residents in the area should increase the number of trips that are made internal to the area on foot. New modeling methods are being tested by the City as part of its Urban Mobility Plan, and when it is ready, that model could be used to test the mode of travel and internal trip assumptions. 5

3. Transit service is one element where improvements should be focused. The analysis determined that passenger loads on all of the north-south routes through the area are now overcapacity, and severe overcapacity conditions would occur in the future with any of the alternatives, including the No Action alternative. A sensitivity analysis should be performed 6

to determine what level of transit service might be needed in this area to affect the mode shift desired for the area. Such transit improvements could reduce both the traffic congestion and parking demand in the area. 6

4. The Draft EIS discusses that up to 1,190 off-street parking spaces could be lost in the future; the loss of on-street parking is not tallied in the EIS, and only limited information is provided. The off-street spaces could be lost through redevelopment, but replacement stalls would probably be part of any new development. However, there is no specific information about where these spaces are located, other than a general summary by neighborhood. The DEIS should consider that redevelopment of the North Lot includes a contract provision to replace the lost surface spaces totaling 491 for event use. 7

5. Mitigation strategies for all alternatives are based on demand reduction strategies. No capacity increases, beyond those already planned for the area, are suggested. Strategies to reduce SOV trips, increase transportation demand management, promote alternative modes, promote telecommuting, and instituting Transportation Impact Fees, are suggested. The effect of these mitigation measures are not measured in the EIS. Given that no transit improvements are proposed and most transit routes are expected to be over capacity in the future, a sensitivity analysis should be performed for the Final EIS to determine the extent of transit improvements needed to achieve the mode shift desired. 8

urban visions

Department of Planning & Development
City of Seattle
P.O. Box 34019
700 Fifth Avenue, Suite 2000
Seattle, Washington 98104
Attn: Gordon Clowers

Re: Comments on Livable South Downtown Draft EIS

Dear Mr. Clowers:

We are writing to provide comments on the draft environmental impact statement ("DEIS") for the City of Seattle's Livable South Downtown Planning Study. Urban Visions is the owner of several properties within the study area and has a keen interest in the planning and review process undertaken by the City.

"South of Dearborn" Area

Density: The 6 FAR maximum development intensity suggested for Alternative 3 is in the range that is appropriate for the area, but should not be conditioned upon "mixed-use development". It is likely that a mix of uses will develop in the broader South Downtown area, so using development regulations to force such development on single sites is unnecessary. 6 FAR should be in the range of allowable FAR for single-use developments in this area. The South of Dearborn area is proximate to the regional multi-modal opportunities at King Street Station; so density should be promoted in this area (regardless of the mix of uses) as a way to capitalize on these transit opportunities. To penalize single-use projects with a lower FAR will only exacerbate local and regional transportation issues. Therefore, we recommend a base FAR of 5 and a maximum FAR of 7 for this area be considered in the Final EIS for this study area. 1

Height: The Final EIS should consider heights for this area in excess of 160 feet. The Vision 2030 project (undertaken by stakeholders in the International District) has identified heights of up to 240 feet as possibly appropriate in this area. Once again, the regionally unique opportunity offered by King Street Station for transit-oriented development (TOD) argues for the consideration of greater heights and densities for this area. We suggest that the Final EIS for this study area consider heights of up to 240 feet for this area.

leading the way

Permit Process: The suggestion in the DEIS that a "public meeting and negotiation process" must accompany all permits is ill-considered. The new zoning provided under the Livable South Downtown planning study should allow for the same level of regulatory predictability as the rest of Seattle enjoys. The public meeting and negotiation process is inconsistent with Seattle's land use permitting process and will only discourage capital investment in the area. The City's existing Code processes – with SEPA and the MUP process – are adequate to address any development-related issues that may arise. 2

Stadium Area

Density: For the reasons noted above, the Final EIS should consider greater densities for this area, in order to provide a better opportunity to take advantage of the unique rail, transit and light-rail opportunities offered at King Street Station. 3

Height: For the reasons noted above, the Final EIS should consider greater heights for this area, in order to provide a better opportunity to take advantage of the unique rail, transit and light-rail opportunities offered at King Street Station.

Residential Use: The suggestion in the DEIS (at page 3-14) that residential uses might be prohibited on portions of the "WOSCA" site is inappropriate. The DEIS does not include analysis to support such a condition, and in fact, there exist a host of installations and technologies that can adequate mitigate the noise that may arise in the interface between industrial and residential uses. 4

Permit Process: As noted above, the "public meeting and negotiation process" cited in the DEIS is outside the bounds of Seattle's land use process and should not be adopted. 5

We appreciate the opportunity to provide comments to the DEIS. Please feel free to contact us if you have any questions about these issues.

Sincerely,

Gregory B. Smith

December 5, 2007

UWAJIMAYA INC.
Corporate Administration
4601 Sixth Avenue South
Seattle, Washington 98108
Tel (206) 624-3215 Fax (206) 624-0377

Tomio Moriguchi's Statement
At
Public Comment Meeting of Draft EIS for South Downtown

For the record, my name is Tomio Moriguchi; I am Chairman of Uwajimaya Inc. Uwajimaya owns three contiguous blocks in Seattle's International District.

Thank you for undertaking this once-in-several decades' effort to update South Downtown zoning.

Uwajimaya has continuously operated its flagship market in the neighborhood since 1945. I have been involved with the betterment of the District since the Model Cities program of the late 1960's.

From our small, 3,000 square feet Main Street store we moved to our 24,000 square feet 6th & King store in 1970. Then, one evening in late November, 2000, we moved our 50,000 square feet Seattle Uwajimaya Market across Weller Street to the new Uwajimaya Village. Three months later Bruce Lorig Associates opened Uwajimaya Village Apartments above our Uwajimaya Market.

We believed in our neighborhood's future; we wanted to make a positive contribution. Uwajimaya and several family members put everything we owned on-the-line and risked millions of dollars on a 70,000 square foot mixed use complex anchored by Uwajimaya Market and a 176 unit, market rate apartment. Uwajimaya Village

1

1

was the first of its kind for downtown Seattle; we hoped this mixed use development would be a prototype for the future.

I am glad our development partner Bruce Lorig was able to convince the Bank of America that Uwajimaya Village was a good business decision. Today, Uwajimaya Village thrives and we believe it has been an economic catalyst for the Chinatown-ID and has contributed to South Downtown's economic base.

But, there is so much more to dream about and so much more to do.

The Vision 2030 Group composed of participants from Little Saigon and Chinatown-ID has presented the City with a vision for a vibrant, denser neighborhood with a balanced mix of housing, businesses, cultural destinations, community services and even a hotel.

1

A place imbued with Asian character and history. A place for family, a place for professional singles or childless couples. A place with a sense of community and culture. A place convenient and accessible.

By 2010, light rail operations and continued bus services; plus I-5 and I-90 access improvements will make the District a transportation nexus providing significant opportunities to further State growth management goals and help the City create denser, mixed use South Downtown neighborhoods.

What's needed now; for South Downtown's future, is zoning that encourages Transit Oriented, Sustainable Development that will bring the Vision 2030 to life. The District needs heights and densities to take advantage of the transportation hub.

Also, the District needs tools such as transfer of development rights to support fixing up buildings that are worthy of a new life. We need a bonus program that helps to fund public benefits and does not jeopardize the feasibility of new development.

I encourage the City to provide the heights, densities and tools that will make Vision 2030 a reality; support state growth management goals and encourage sustainable, transit-oriented development. 1

In closing, given the zoning and tools, I pledge that Uwajimaya and the Moriguchi family will continue to make significant investments in Seattle's International District.

Thank you.

VAEDA
Vietnamese American Economic Development Association
1032 South Jackson Street • Suite 203 • Seattle, WA 98104 • Tel (206) 709-4804

Diane Sugimura, Director **December 17, 2007**
Attn: Gordon Clowers, Susan McLain
Dept of Planning and Development
700 Fifth Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124-4019

Re: VAEDA comments on Livable South Downtown DEIS

Dear Ms. Sugimura,

Since the beginning of this process, VAEDA has been a strong supporter of healthy growth for the South Downtown area in general and Little Saigon in particular. We understand that the pressure to develop in our neighborhood is becoming greater and greater each year. Our objective is not to stop these forces but rather to channel them to ensure healthy, responsible, and compatible development. To this end, we support growth that adheres to the following guiding principles:

- Grow and sustain the small business districts of Little Saigon and Chinatown/ID.
- Preserve and develop the unique cultural characters of Little Saigon/CID and Pioneer Square.
- Encourage the production of a balanced mix of low-income, workforce, and market-rate housing for the neighborhoods.
- Prevent the encroachment of retailers that are out of scale and character with the neighborhoods.

1

We ask that DPD give its strongest consideration to these principles as it goes about making its final recommendations.

We Support Vision 2030
We support Vision 2030 because of its balanced approach to growth in CID/Little Saigon. Rezoning should occur if and only if the recommended tools and resources are in place to help preserve and sustain the unique character of this area.

2

The CID/Little Saigon neighborhoods should be preserved and grown as a small business district. The NC3 recommendation is unacceptable to us; it runs counter to the community's wishes. The City should adopt Vision 2030's recommendation of a

modified zoning designation for Little Saigon. This zoning designation would allow for more density while preserving the small business nature of the neighborhood. 2

Dearborn Street Project Must be Part of LSD

The Dearborn St project must be brought into the Livable South Downtown process. We find it unacceptable that such a large project be allowed to develop outside the parameters of this process. Considering that this project is located only two blocks from Little Saigon, it makes imminent sense to ensure that it gets developed in a way that is compatible with our neighborhood. Currently, this project is incompatible with 3 of the 4 guiding principles we have laid out above. 3

Economic Impact Study Is Inadequate

The economic impact study commissioned by DPD for Livable South Downtown was a good start. However, it is inadequate to support some of the conclusions expounded by the consultants for the following reasons: 4

- None of the case studies had significant retail development, much less a 635,000 sq ft shopping mall located within the impacted neighborhood.
- Oklahoma City case study not relevant:
  - Most developments were situated at least 1/2 mile from the Vietnamese business district. The Dearborn project is just 2 blocks away.
  - None of the Oklahoma City revitalization projects had significant retail component.
  - The biggest project was a $63 million convention center. How is this similar to a 635,000 sq ft national chain mall?
- San Jose case study not relevant:
  - No real impact analysis done. Evidence anecdotal and vague.
  - No data of how many businesses were displaced over time.
  - No mention of some possible factor of displacement
  - No large-scale mass-market mall near the business districts.
- Rincon Hill case study is a good example of what ought to be done to create a livable urban neighborhood but what is the relevance of this example in helping to determine the probability of impact of the Dearborn project on Little Saigon?
- Dorchester, Boston: the lessons learned from this example do not inform our understanding of how a mass-market mall would impact an ethnic small business district.
- **Little Saigon High Probability Impact #2** states that there would be "modest" increase in potential value of development in the remainder of Little Saigon due to increase heights but it doesn't look specifically at the impact that the Dearborn development will have on potential property value in the neighborhood. Why wasn't there an analysis of property values and development potential from other large-scale retail developments regionally or nationally? 5
- **Little Saigon High Probability Impact #3** states that there would be increased exposure of existing Little Saigon businesses to mass market customers from the Dearborn project. This conclusion is pretty obvious. The relevant question that is not asked is "what is the likelihood of those customers shopping or eating in Little Saigon after they complete their shopping at Target, Best Buy, Petco, etc?" The way this conclusion is framed is misleading. 6

- The study addresses the above question in a manner that diminishes its importance. The consultants conclude that in order for those customers to shop in Little Saigon after they shop at a mass-market mall like the Dearborn project, they'd have to park twice. This is "considered challenging in the retail industry." In other words, they're not likely to frequent Little Saigon businesses after shopping at the mall. 6
- It is strange that this finding is given much less prominence even though it is much more relevant. Why wasn't there more digging on this?

- The definition of "Low probability impact" is problematic. Pg. 38. *Additional potential impacts that the consultant team either cannot say with certainty will occur, or the outcome of the impact is difficult to predict. These are assessed with lower probability than those discussed previously and are designated as speculative.*
  - If something is "difficult to predict," it does not follow that it has a "lower probability" of occurring. Predicting something as having "high" or "low" probability of occurring entails that there is an adequate sampling of relevant occurrences to base the prediction on. In this context, it seems that the consultants just did not have enough information or relevant case studies to make a determination or prediction. This situation seems best characterized as "inconclusive." 7
  - The popular notion of the term "speculative" gives the findings under this label a negative connotation. This will be misinterpreted by the general public as to mean that these findings have little validity when in fact these are "inconclusive" because the consultants just did not have enough information. Again this supports our view that this study is inadequate.

Conclusion

We want to express our sincere appreciation to the Livable South Downtown staff; particularly to Susan McLain and Gordon Clowers who have the unenviable task of pulling the multitude of inputs from this process together into a coherent whole. 8

We look forward to continuing our work with DPD to arrive at recommendations that strengthen our neighborhoods and add value to our City. We strongly encourage the Mayor and DPD to respect neighborhood plans and goals.

Sincerely,

Quang H. Nguyen,
Executive Director
Vietnamese American Economic Development Association

Responses to Comments

Letter 1
Washington State Department of Transportation, Aviation Division

1. Your comments with respect to future building development and its relationship to airspace for the Harborview helipad and King County International/Boeing Field are noted. DPD anticipates that design review, permitting and environmental review processes can help future development avoid airspace conflicts even with the maximum recommended zoned height of 240 feet in the Yesler Way vicinity.

Letter 2
Puget Sound Clean Air Agency

1. Your comments on air quality, public health and climate protection are noted. The suggested edit to the "area of most concern" for air pollution has been made in this Final EIS. However, per further conversation with Mr. Carr in February 2008, the edits provide additional clarification with respect to the 200-meter distance for measuring the "area of most concern." Because the height of Interstate 90 ramps varies from roughly 10 to 50 feet in elevation, the area most affected by vehicle-generated airborne particulates would vary between 100 and 200 meters (approximately 320 to 650 feet) with the high end of this range expected from higher portions of the ramps.

Letter 3
Port of Seattle

1. Your overview comments about the EIS analysis, potential conflicts with Port operations, and your advice on zoning and freight mobility planning strategies, are noted. The Port's long-term land use goals and its interests in good transportation connections and round-the-clock activities are acknowledged. Please review this Final EIS for edits made to improve clarity and provide additional information on pertinent impact topics. The lead agency concludes that the EIS adequately analyzes the likely adverse cumulative noise, light, glare and similar land use-related impacts (that you describe as "gentrification impacts"), particularly with the edits made in this Final EIS. Also, see the responses to other comments in this letter for further discussion of your concerns.

2. Your comments indicating that likely impacts of "gentrification" on nearby industrial uses were not examined in sufficient detail, or not at all, are noted. However, the lead agency disagrees with several premises in this comment about the purported lack of cumulative impact analysis, the use of the term "gentrification impacts," and purported "deficiencies." The lead agency asserts that the EIS already provides cumulative impact analysis in sufficient detail that meets and exceeds the requirements of SEPA for this programmatic EIS.
   - It is incorrect to state that "the analysis does not include the western side" [of the study area] because the Stadium Area is explicitly analyzed for the environmental elements most applicable to it, not only in the main volume of the EIS but the appendices as well. This includes land use, height/bulk/scale, light/glare, noise, hazardous substances, transportation, and relationship to plans and policies sections, as well as describing what the EIS alternatives represent in the Chapter 2 project description. The reader may also review the analyses in Appendix A and other appendices for more information.
   - The comment's use of the term "gentrification" obscures the intended meaning of the Port's comments, although it may be interpreted as relating to the compatibility between the Port's

land uses and other nearby land uses. More specifically, the comment attaches this term only to the residential uses proposed for the WOSCA property under Alternatives 1 and 3. The Port's apparent concerns relate to topics such as residential land use compatibility, noise, light/glare, traffic interactions and similar operational compatibility concerns. The EIS already materially addresses and discloses a range of impacts and mitigation, when necessary, for these elements of the environment in a manner that meets and exceeds requirements of SEPA for a programmatic EIS.

3. Your comments requesting that the WOSCA property not be rezoned due to inconsistency with the existing Manufacturing and Industrial Center Plan, and describing that property's role as a buffer for industrial uses, are noted. This programmatic EIS does include land use impact analyses related to this topic, as indicated in the response to comment #2 above. The EIS does consider the role of this vicinity (including the Stadium Transition Area Overlay) "in the context of the future of the neighborhood." See all of the land use-related sections, including the Relationship to Plans and Policies sections in Chapter 3 of this FEIS for edits that provide expanded discussion relevant to this comment.

4. Your comments indicating higher probable future noise levels than measured for the EIS, due to future increases in Port operations and measurements taken during off-peak times, are noted. The Draft EIS noise study found that under existing conditions noise from traffic on SR 99 is the dominant noise source on the WOSCA property. Because it is adjacent to the WOSCA property, noise from traffic on SR99 is loud. As shown in Table 3-30 (Draft EIS page 3-140), noise measurements at the WOSCA site recorded the highest 24-hour average noise of the locations sampled. Potential increased activity at Terminal 46 likely would have minimal effects on future noise measurements at the WOSCA property because the WOSCA property is on the other side of the SR 99 Alaskan Way Viaduct. Given this current configuration of SR 99, the noise from SR 99 traffic effectively masks most of the noise from Terminal 46. If a viaduct would continue to be present in the future condition, traffic noise from SR 99 would similarly continue to mask increases in noise from Terminal 46. Depending upon the future highway or street configuration, however, noise conditions and the degree of masking could change (ESA, 2008).

   The Draft EIS found that existing noise sources in Livable South Downtown would necessitate additional sound insulation if residential uses were located in the most affected locations. As indicated on Draft EIS page 3-145, these sound insulation measures could be implemented through future Master Use Permit reviews on a case-by-case basis. For the WOSCA property, such reviews would be able to consider the long-term configurations of SR99 and its resulting noise levels, and the probable effects of additional noise contributed by Terminal 46 activities. For perspective, the EIS reader should also review pages 1 through 7 of Appendix F and particularly page 4, which describes how multiple noise sources are physically perceived by the human ear. As is noted there, two identical noise sources that produce noise levels of 50 dBA, for example, would together be experienced as a combined sound level of 53 dBA rather than as a sum total of the two noise sources.

5. Your comments, disagreeing with the conclusions of the noise, light and glare impact analyses and the effectiveness of suggested mitigation strategies, are noted. However, the lead agency disagrees with your conclusions. The first paragraph of this comment fails to acknowledge that conclusions of adverse light/glare impacts are provided on DEIS page 3-46, a fact that is only indirectly acknowledged in the second paragraph of the comment. Contrary to this comment, the EIS text (see in particular the "compatibility" discussion in the Land Use section of this Final EIS) properly identifies the potential for such light/glare impacts and properly identifies possible mitigation strategies to shield and reduce the potential severity of a light/glare impact on potential

residential uses. "Quantification" of light/glare impacts is not necessary to provide in this programmatic EIS, in part because the EIS Scope specifies qualitative-level requirements for the analysis.

Your comments about the ineffectiveness of suggested light/glare and noise mitigation strategies are noted. However, the lead agency concludes that these are possible effective noise-reduction strategies (e.g., to reduce interior noise levels to 45 dBA). This conclusion remains accurate even if potential Port-related noise is somewhat higher in the future. Also, see the response to comment 4 in this letter.

6. Your opinions about the potential future uses of the WOSCA property in light of SR 99 highway plans are noted. The lead agency disagrees with the comment's premise that the property cannot be rezoned to accommodate a mix of non-residential and residential uses at this time. However, the Preferred Alternative does not propose a zone that would allow for residential uses on that property.

7. Your comments that interpret the findings of the transportation analysis are noted. The S. Atlantic Street corridor is expected to degrade in arterial operations between the years 2007 and 2030, as shown in Tables 5-7 and 5-9 of Appendix G. This is due to the general increase of traffic, including truck traffic, which is expected to occur in the area. The improvements expected from the implementation of the SR 519 Phase 2 project would limit the level of increased delays along the S. Atlantic Street Corridor especially during the earlier years of its initial service, but operations are still expected to degrade in later years of the study period if the projected amounts of growth assumed in this EIS and Puget Sound Regional Council forecasts occur. The Action Alternatives studied in the programmatic EIS do not significantly contribute to further reduction in arterial operations along S. Atlantic Street, as is documented by the corridor operations and travel speed conclusions shown for S. Atlantic Street in Tables 3-47 and 3-49 for AM and PM peak hour conditions. These conclusions show no difference between the No Action Alternative and the Action Alternatives in either arterial level of service or travel speeds, even with the full amount of assumed growth to year 2030.

   Your comments endorsing various possible freight mobility mitigation strategies mentioned in the EIS are noted.

8. Your preference for a more comprehensive approach to determining and implementing freight mobility for the Duwamish MIC is noted. It is not necessary for this programmatic EIS to "show conclusively" that potential conflicts between freight mobility and transit-aiding mitigation strategies can be "adequately mitigated." The continuing planning and decisionmaking efforts of the Seattle Department of Transportation and other agencies will further evaluate and determine future improvements and strategies to undertake. Also, the analysis did not identify any significant impacts as a result of the implementation of the Action Alternatives. Instead, the No Action and Action Alternatives perform much the same with regard to freight mobility.

   The transportation analysis assumed completion of concept 10C as part of the Alaskan Way Viaduct Replacement project because this was considered the most likely option when the transportation analysis was conducted. Since then, the alternative known as Option 6 has emerged as the most likely option, as you pointed out. There are changes in travel patterns associated with this change in the transportation system. Most importantly, Option 6 would result in less through traffic along S. Atlantic Street and more traffic using 1st Avenue South to connect with SR 99. However, these changes in travel patterns would likely not contribute to significantly greater adverse effects on operations along S. Atlantic Street, because the intersection of S. Atlantic

Street and 1st Avenue South would be configured differently and signal timings would also be modified. This means that larger amounts of 1st Avenue S. traffic could pass through this intersection without increasing the incidence of further adverse impacts on S. Atlantic Street operations. Therefore, no new findings about additional adverse impacts on S. Atlantic Street need to be included in the findings of this EIS traffic study, with respect to differences between the 10C and Option 6 concepts.

9. Your comments indicating needed corrections to selected facts in the transportation analysis are noted. Edits to the Final EIS provide these corrections.

10. Your comments with regards to truck distribution are noted. Figure 5-8 in Appendix G has been updated to clarify the intent of the information presented. The purpose of the figure was to identify at a broad level the origin and destination of study area truck trips, including delivery trucks. The arrows on the figure show the general direction of truck distributions and not the actual route the truck may navigate. The three percent figure along the western edge of the study area in the DEIS Appendix G graphic was meant to represent that some trucks have an origin and destination to areas west of the study area, including West Seattle and Kitsap County. The arrow does not represent truck trips heading to and from Terminal 46.

11. Your comment about the SR 99 south-end alternative that was assumed as part of the traffic analysis is noted. Please see the response to comment 8 in this letter.

12. Your comments regarding truck traffic from T-46 and T-30 are noted. The analysis focused on truck travel at a broad programmatic level, while accounting for known increases in truck trips assumed as part of the Port of Seattle Container Terminal Access Study (Year 2003 Update, October 2003, Heffron Transportation). These increases in truck trips were manually entered into the volume forecasts for the AM and PM peak hour periods based on information contained in that report. S. Atlantic Street is assumed to continue to serve the highest amount of truck traffic in the future due to the probable closure of S. Holgate Street and relocation of the SR 519 westbound ramp.

13. Your comment clarifying the definition of a tail track has been noted. The corrections have been incorporated into the Final EIS.

14. Your comment regarding the designation of Colorado Avenue S. is noted (refer to Figure 4-4 in Appendix G). This corridor will be discussed and considered as a Major Truck Street during the next Transportation Strategic Plan update.

15. Your comment regarding the ability of trucks to use S. Atlantic Street when S. Royal Brougham Way is blocked by a train is noted. The text in Section 6.6.3 of Appendix G has been updated to reflect this situation.

16. Your comment regarding the differences in the AM peak hour westbound travel speeds listed in Table 5-15 as compared to Tables 5-6 and 5-7 is noted. However, the tables present information using different corridor extents. Table 5-15 summarizes travel speeds for S. Atlantic Street between 1st Avenue S. and 4th Avenue S. Tables 5-6 and 5-7 summarize travel speeds between Alaskan Way S. and 4th Avenue S. The corridor travel speeds highlighted in Tables 5-6 and 5-7 are lower than those in Table 5-15 because they take into account the delays expected at the intersections of S. Atlantic Street with the assumed SR 99 “frontage road” and Alaskan Way South.

Letter 4
Washington State Public Stadium Authority (PSA)

1. Your comments are noted. Please see the responses to comments #1 and #2 in Letter 7 (Seattle Mariners).

2. Your comments are noted, but the lead agency disagrees with several premises within the comments.
   - The EIS transportation, parking and utility analyses evaluate the impacts to these elements of the environment, within the context of a programmatic EIS. This comment does not identify specific shortcomings of the analyses.
   - Adoption of zoning changes will not "become determinative of the availability and adequacy of public facilities for all future development." Nor will the City "be left without a key tool to require future development to mitigate its adverse impacts on the community, neighborhoods, and on public and private infrastructure." The SEPA concept of phased review is applicable, meaning future project-level reviews can specify other impacts applicable to projects, and can specify mitigation measures if significant adverse impacts are identified. The content of the cited analyses accommodates the potential for further phased review. Zoning changes are not "determinative" in relation to public facilities as suggested.

3. Your comments are noted, but the lead agency disagrees with several premises within the comments.
   - The EIS acknowledges and analyzes impacts with respect to the stadia/event centers and the balance of the study area in which they reside, per the needs of a programmatic EIS. In general, a programmatic EIS does not analyze potential impacts to specific lots, businesses or individuals within the planning area. See edits made within this Final EIS.
   - It is disagreed that "at a minimum" the identified topics need to be further analyzed in this EIS. See edits made within this Final EIS.
   - The alternatives' relationships to the Comprehensive Plan and zoning have been analyzed in this EIS, particularly when considering edits made within the Final EIS.

4. Your comments are noted. Please see the response to comment #71 in Letter 7.

5. Your opinion about the adequacy of the mitigation strategies discussed in this EIS is noted. Edits made within this Final EIS clarify the mitigation discussions so that existing transportation management plan responsibilities of the stadia are not described as mitigation strategies for the rezones evaluated in this EIS.

6. Your comments are noted. Please see the response to comment #3 in this letter.

7. As also referenced in the response to comment #2 in Letter 7, neither the planning study nor the EIS is inconsistent with the growth targets. The EIS does not "generally ignore" applicable overlay districts. See the Land Use and Relationships to Plans and Policies sections in Chapter 3 of this Final EIS for edits that improve clarity and further discuss the Stadium Transition Area Overlay District.

8. Please see the response to comment #2 in Letter 7.

9. Your comment on maps identifying the stadia/event center facilities is noted. These facilities were identified on the most applicable identification map which is Figure 2-3. Nearly all of the EIS graphics would not have included these facilities due to their subject matter.

10. Your comments are noted.

11. Your opinions on building bulk are noted.

12. The lead agency's scoping for the EIS, and subsequent planning work, did not identify business/ economic impacts on the business operations of Qwest Field and Event Center as a topic for analysis in this programmatic EIS, nor does SEPA require such an analysis.

13. Please see the "Major Conclusions" section in Chapter 1 of this Final EIS to see any edits to the text.

14. By definition, this SEPA analysis pertains to proposed legislation, not legislation that has been adopted.

15. This comment requests expression of summary information on corridor traffic speeds in terms of percentage declines. The lead agency reviewed this request, and concludes that the information presented is correct and further edits do not need to be made to this summary table. Please see Table 1-1 in Chapter 1 of this Final EIS.

16. With respect to the significance of the transit operating speed impacts, the EIS transportation analysis does not necessarily conclude that these impacts are significant adverse impacts, particularly as a blanket conclusion. The identified differences in speed, per average travel speed in 2030 as a percentage of posted speed limits, range from a 0% to a 4% difference, comparing between the No Action and Action Alternatives. Overall transit performance should be interpreted according to the multiple criteria of frequency, span of service, travel speed, and passenger loading as was presented in Section 5.5.3 of Appendix G. Please see Table 1-1 in Chapter 1 of this Final EIS for edits.

17. Please see the response to comment #9 in this letter.

18. This comment requesting representation of these stakeholders' interests as "objectives of the Livable South Downtown planning process" (see Draft EIS page 2-3) is noted.

19. Your comment to update and include the final planning recommendations is noted.

20. The requested edits identifying the "Stadium Transition Area Overlay District" have been made.

21. The requested edit has been made, with the observation that the WAMU Theater is a particular configuration within the Event Center for concert activities, rather than a "property" per se.

22. Please see the response to comments #1, #47, #48 and #53 of this letter.

23. Regarding Figure 2-6, your comment is noted and that figure has been corrected to note the proposed change to an 85-foot maximum height limit in the Qwest Field and Event Center vicinity. Regarding the other figures, your comment with respect to the 85'/120' zone (labeled with a "120'") is incorrect. Alternatives 1, 2, 3 and 4's zoning for the cited zone primarily addressing properties on the east side of 1st Avenue S. is a retention of the existing PSM 85'/120'

zone designation (as was depicted on Figure 2-7 in the Draft EIS). Please see Figures 2-4, 2-5, 2-6 and 2-7 in this Final EIS for any edits to graphics and notations. As suggested by the notes on these graphics, the labeled heights in these EIS figures indicate maximum height limits of zoning.

24. Your comment on the SDM zone is noted, with the observation that "impacts of the change" were evaluated in the Draft EIS and are evaluated in the Final EIS.

25. Please see the response to comments #1, #47, #48 and #53 of this letter.

26. Your comment noting a possible benefit of reserving action related to SR99 and the WOSCA property is acknowledged.

27. No errors or inconsistencies are identified with respect to the content of this comment. In fact, a word search of several sections of the EIS including Chapter 1, Chapter 2 and relevant portions of Chapter 3 indicate no instances of "PSM 150'/240'" in the text. Figure 2-5 of Alternative 2 correctly depicts the zoning category of PSM and correctly labels the 150-foot and 240-foot maximum heights for the correct portions of the north lot vicinity, per the graphic's intent and labeling format. The Table 2-1 headings (see DEIS page 2-19) for this area indicate the relevant area as having a PSM 85'/240' zone designation, which would in fact be accurate for the entire affected property under Alternative 2 even if the northern portion were limited to a maximum height of 150 feet. As noted on page 2-17 where Table 2-1 is introduced, "*Table 2-1 summarizes details of Alternatives 1, 2 and 3*," which is self-explanatory.

28. This comment incorrectly interprets the discussion on page 3-3 of the Draft EIS. The Draft EIS does not refer to "stadium events" as "intermittent." The word "intermittently" is used twice, both referring to intermittent effects on traffic conditions in the 1st Avenue S., 4th Avenue S., S. Royal Brougham Way and Occidental Avenue S. corridors. This characterization is accurate, as the range of small and large events do not constantly affect traffic congestion but tend to generate more effects at some times than others. As already acknowledged in the paragraph on page 3-3, stadium and event center activities include "*80+ baseball games a year, 10 football games a year, and <u>numerous</u> other regularly scheduled soccer, <u>tradeshow and concert activities</u>*." (emphasis added) By phrasing in this manner, the Draft EIS acknowledges the regularity and diversity of activities occurring at the two stadia and the event center. Also see Chapter 3 of this Final EIS for additional edits to the Transportation section with regard to the description of event traffic management.

29. See Chapter 3 of this Final EIS for additional edits with regard to the Stadium Transition Area Overlay District.

30. Please see the responses to comments #1 and #2 in Letter 7.

31. It is disagreed that "squaring off" the current curved zoning boundary would constitute a change that would require amendments to the Comprehensive Plan for this area.

32. The lead agency disagrees with the premises in this comment.
    - The cited height-related impact is separately addressed in the Land Use—Height, Bulk, Scale and Compatibility section (see page 3-23 of the Draft EIS), with a sufficiently detailed characterization of the potential significant adverse impacts. Therefore, this impact does not need to be discussed in the cited section on page 3-10 of the Draft EIS, and the text already cross-references the height/bulk/scale section.

- This comment's dismissal of the value of height/bulk/scale controls is noted, but as indicated in the Draft EIS text such controls would be possible. See Chapter 2 of the Final EIS for further information on proposed controls.

33. Your comment requesting that the inconsistency of the Stadium Area Overlay District with the "proposed changes in Stadium area zoning" be acknowledged in the EIS is noted. However, this comment does not substantiate why such changes would be inconsistent with the Stadium Transition Area Overlay District. See edits to the Chapter 3 Land Use—Zoning, Land Use and Development Patterns and Relationship to Plans and Policies sections for further information provided about the relationship to the Stadium Area Overlay District zoning. Also, please see response to comment #1 in Letter 7.

34. Your comment regarding a mitigation strategy applicable to the Stadium Area is noted.

35. Your comments doubting the appropriate analysis and disclosure of impacts along 4th Avenue S., and the "ability of this corridor to accommodate this level of development without significantly impairing freight and general traffic" are noted. However, the lead agency disagrees with the conclusions of this comment, which does not provide any specifics about why such analyses in the EIS are not appropriate. See the responses to comments # 2, 4, 16, 32, 37, 39-43, 47, 49, 57, 58, 60, 62 and 63 in this letter for further discussion.

36. Your comments on construction staging uses of properties for SR 99 construction are noted.

37. Attendance numbers have been corrected in the Final EIS. Draft EIS page 3-21 clearly describes Qwest Field and Safeco Field as part of the existing uses in the Stadium Area. The lead agency disagrees with the premise that Alternative 2's zoning to 240 feet would be incompatible with the "edges of Qwest Field." The relevant comparison is to the stadium's overall height, bulk and scale, not merely the edges of the stadium concourse. Also, the 300+ foot distance between the potential development site and the stadium is relevant to interpreting potential adverse height/bulk/scale impacts. Further, the cited text describes existing conditions, not the future condition, so no text edits are warranted.

38. Please see the relevant Final EIS sections for any edits that have been made, including the impacts discussion for "compatibility", which begins on page 3-42 in the Draft EIS. This comment refers only to the Affected Environment discussion. Also, see the response to comment #6 in this letter and the response to comment #1 in Letter 7. It is noted that neither this comment nor past comments substantiate an actual probable significant adverse shadow impact on Qwest Field that warrants discussion in this programmatic EIS.

39. Your comments are noted. Your characterization of a "doubling or nearly tripling of existing allowed heights" (emphasis added) is not accurate because the existing maximum allowed heights in the zone at the north lot location reach 120 feet. It is acknowledged that only under Alternative 2, the maximum height limit in a portion of the North Lot property would represent a "doubling" of "allowing heights" but "tripling" is inaccurate. The significance of the identified potential impacts has already been noted in the EIS text. See Chapter 2 of this Final EIS for more information about possible height/bulk/scale controls.

40. See Chapter 2 of this Final EIS for more information about possible height/bulk/scale controls, as are described for the Preferred Alternative. Please note that the level of specificity of the mitigation strategies is consistent with the level required for a programmatic EIS.

41. Your comment is noted but the lead agency disagrees with several premises in this comment. Draft EIS Figures 3-3 and 3-4 reflect existing limitations of proposed easements cited in this comment, and do not understate the potential impacts. This comment incorrectly interprets the depicted hypothetical buildings on Figures 3-3 and 3-4 as portraying height limit envelopes. The easement and height limits are shown in revisions to these figures in the Final EIS using the "dotted-line" approach. See Chapter 2 of this Final EIS for more information about proposed height/bulk/scale controls for the Preferred Alternative.

42. Your comments about the significance of height/bulk/scale impacts in the Stadium Area are noted, although the lead agency disagrees with the comment's linkage of the impacts "to and from public facilities." The level of detail describing potential mitigation is appropriate for a programmatic EIS.

43. As also referenced in the response to comment #41 in this letter, your comment incorrectly assumes that the buildings depicted in comments 3-18 and 3-19 are "building envelopes." The buildings (referenced as such in the figures' footnotes) illustrate the number and hypothetical shape of buildings included in the EIS growth scenario for 2030 under the alternatives. As such, the figures were accurate as shown in the Draft EIS. All possible building envelopes do not need to be portrayed. Review the figures in Chapter 3 of this Final EIS for graphic updates that have been made.

44. Your comment on shadow impacts is noted. Please see the response to comment #38 in this letter.

45. Your comment on land use controls and development regulations is noted. Please see Chapters 2 and 3 of this Final EIS for any edits that may provide new information or improved clarity.

46. Please see the response to comment 12 in this letter.

47. See the response to comments #1, #48 and #53 in this letter. The cited section does not need to "acknowledge that the proposed South Downtown Plan is fundamentally inconsistent with the basic growth assumptions made for this area in the City's Comprehensive Plan" because that is an incorrect statement. This EIS does not "set out on its own and establish a household growth target of 6,000." Rather, it conducts an impact analysis on a growth scenario for year 2030 that aligns with projections of the Puget Sound Regional Council. This was described in multiple locations in the EIS text, including pages 1-1, 2-9, 3-82 and 3-98. The growth targets indicated in the city's Comprehensive Plan express minimum levels of desired growth and are not actual growth forecasts of future growth to year 2030, and they are not identical to the growth projections provided by the Puget Sound Regional Council's econometric modeling. That modeling provides 2030 growth projections of future conditions in subareas that are used for transportation trip forecasting and are therefore preferable to use for a consistent set of growth-related impact analyses.

48. See the response to comments #1, #47 and #53 in this letter. It is noted that the No Action Alternative in the EIS already defines a less aggressive growth scenario. However, for the reasons cited in response to these other comments, other "less aggressive growth assumptions" are not necessary to further study in this EIS.

49. See additional discussion about the Stadium Transition Area Overlay district in the cited section of Chapter 3 in this Final EIS. Also, see the response to comment #33 in this letter, and the response to comment #1 in Letter 7.

50. Your disagreement with the conclusion of adverse but not significant adverse impacts for the 150-foot maximum height limit under Alternative 3 is noted.

51. Please see the referenced discussion items in Chapter 3 of this Final EIS for edits that respond to this comment.

52. Your comment supporting increased density in South Downtown in the form of new residential and commercial development in the area is noted.

53. This comment incorrectly relates the Comprehensive Plan's "growth target of 2,000 new households" to the "projected growth of 6,000 additional dwelling units by 2030" that is evaluated in the EIS impact analysis growth scenarios. The capacity discussion provided on page 3-82 of the Draft EIS does not need to be amended as suggested. Growth target information is already described in the Population and Employment section (see DEIS pages 3-95 and 3-97). Also see the responses to comments #1, #47 and #48 in this letter.

54. The cited growth distribution represents residential growth projected to occur under the EIS growth scenarios for impact analysis purposes. Such growth is by definition a hypothetical projection to year 2030 for the given area, for the purposes of the programmatic environmental review.

55. The requested development capacity information is accounted for in the Pioneer Square numbers in Table 3-27.

56. Your comment on 180-foot zoning is noted. Regarding the North Lot, since it is separated from the PSM 100' zone by the 100-foot wide S. King Street right-of-way, its "border" is different from the "railroad gap" area's closer proximity to adjacent property that is within the same block, across a 16-foot alley.

57. Your comments on views are noted, but the lead agency disagrees with the premises in the comments. It is further noted that this comment's supposition of proposed changes to the PSM 85'/120' zone south of S. King Street is incorrect. See the responses to comments #4 and #23 in this letter.

58. Please see the response to comment #71 in Letter 7.

59. This comment on noise is noted, but the lead agency disagrees with the purported significance of such impacts.
    - During EIS scoping, the potential for such noise impacts was considered and judged to not have probable significant impact potential.
    - The lead agency disagrees with the characterization of a "box canyon" as a result of future development.
    - This comment does not substantiate a probable significant adverse noise impact.
    - The stadium's event-related generation of noise by attendees is a known phenomenon, but the relative infrequency of such large-attendance high-noise-generating events in the stadium bowl, the distance of nearby uses from the stadium, and the intervention of the stadium structure itself when considering "east and west" directions are appreciable elements that limit adverse impact potential.
    - Commercial buildings would maintain lesser noise sensitivity than residential uses.

- Noise reflection, while possible, also is not substantiated in this comment with factual information that would justify a finding of a probable significant adverse impact. Although noise does reflect off buildings, rarely does this result in noise impacts, because the reflected sound energy is diffused when reflected and sound energy is also absorbed by buildings (ESA, 2008).

60. Your concern about the impact analyses for public services and utilities is noted, but the lead agency disagrees with the suggestion that the City will be foreclosed from mitigating the effects of future growth unless additional detail is included in this EIS.

61. These venues are functionally equivalent to private entertainment facilities (requiring paid admission), and an analysis of the potential impacts of the proposal on such facilities is not required in a programmatic EIS.

62. The event-day information provided in this comment is noted. See the Transportation section in Chapter 3 of this Final EIS for any edits that may pertain to this topic. Such edits provide additional information about the relationship of event traffic conditions to the traffic conditions evaluated in this EIS.

The Draft EIS text on "event management strategies" in the Mitigation Strategies discussion (page 3-236) is acknowledged as incorrectly suggesting that adaptation of the stadia transportation mitigation plans (TMPs) would be a "mitigation strategy" for the impacts of the EIS alternatives. Future changes to the TMPs prepared each year for the stadia are not "mitigation" for impacts discussed in this EIS. The Final EIS text reflects changes to correct this error.

63. This comment refers to the phrasing of the "Significant Unavoidable Adverse Impacts" item in the Transportation section. The Transportation section does clearly disclose the significant adverse impacts to decisionmakers, and does not suggest an absence of impacts. The first underlined word "accommodate" is not relevant to transportation impacts but merely indicates that under the zoning alternatives additional development would be accommodated. The other underlined phrases describe the anticipated reductions in efficiency and performance of the transportation system. What this comment does not recognize is that the analytic results represent modeling of the worst-case unmitigated traffic conditions. With implementation of a range of possible mitigation strategies, transportation conditions by 2030 could avoid at least some of the reported worst-case traffic conditions. Future traffic conditions would furthermore depend on several choices made between now and 2030 that would influence the dimensions and capacity of the transportation network. In light of information provided in the Transportation study itself and this response, the characterization of the Significant Unavoidable Adverse Impacts in the Draft and Final EISs is accurate. Please see Chapter 3 of this Final EIS for edits made to the Transportation analysis.

64. Your comments on parking impacts are noted. The Chapter 3 Parking section analyzes potential parking impacts at a suitable level of detail for this programmatic EIS. Impacts related to displaced parking and the parking losses associated with the SR99 project are indicated in the section. The EIS is not obligated to analyze "how or where" such parking will be replaced, but it does discuss a range of possible mitigation strategies.

Letter 5
First & Goal, Inc.

1. Your comments on Qwest Field operations and relationships to existing and future uses are noted. Many of these comments, particularly those relating to staging/move-in and move-out activities, are addressed by an agreement between the City and First & Goal, entitled "Event Traffic Management Plan, Plan Years 2008-2010," prepared May 2007. This is an example of the proactive approach you request that has already been accomplished in planning and city actions to date.

   The EIS transportation analysis focuses more attention on the high-attendance baseball and football events because they are the type most likely to overlap with peak hour traffic (such for a weekday afternoon baseball game or a weeknight early evening football game) and have a bearing on worst-case traffic conditions. These are also the most common high-attendance event scenarios that require police postings, even though postings may also frequently occur for other events such as concerts and tradeshows. See the Final EIS Chapter 3 Transportation section for any edits to the event-traffic sections that improve the acknowledgement of other events and relevant transportation matters.

   The EIS informs decisionmakers by evaluating land use, compatibility and other impacts across several environmental elements. For example, see in particular the "Qwest Field north parking lot" discussion on pages 3-10 and 3-11 of the Draft EIS.

2. Please see the discussion of impacts related to event management on pages 3-228 through 2-230 of the Draft EIS. Also, see the Final EIS Chapter 3 Transportation section for edits to the event-traffic sections that improve the acknowledgement of other events and relevant transportation matters. As indicated in the response to comment #1 of this letter, topics relating to staging move-in and move-out activities are addressed by an agreement between the City and First & Goal, entitled "Event Traffic Management Plan, Plan Years 2008-2010," prepared May 2007. Contrary to this comment, a wide variety of possible mitigation strategies for significant adverse transportation impacts are described in the Chapter 3 Transportation section. Further discussion of overall transportation mitigation strategies is either not necessary for this programmatic EIS or has already been documented in the "Event Traffic Management Plan, Years 2008-2010 signed by the City and First & Goal.

   The Draft EIS text on "event management strategies" in the Mitigation Strategies discussion (page 3-236) is acknowledged as incorrectly suggesting that adaptation of the stadia transportation mitigation plans (TMPs) would be a mitigation strategy for the impacts of the EIS alternatives. Future changes to the TMPs prepared each year for the stadia are not "mitigation" for impacts discussed in this EIS. The Final EIS text reflects changes to correct this error.

3. Your comments on noise and lighting impacts are noted. Regarding noise impacts, see the response to comment #59 in Letter 4, and note that study area noise sources were cited as including "athletic facility events and associated activities" on page 3-139 in the DEIS. An edit also has been made to the first paragraph of the noise compatibility impact discussion (see DEIS page 3-145) to acknowledge this in the list of noise sources.

   Regarding event lighting for nighttime events in relation to possible residential buildings, such lighting is acknowledged as an occasional occurrence, but is not identified as a significant adverse impact. See the Land Use—Height, Bulk, Scale and Compatibility section of Chapter 3 in this Final EIS for edits that address this matter (under the Compatibility—Light, Glare and

Shadows—Pioneer Square heading). Future site-specific project review processes would provide opportunities to further pursue additional environmental review and design review guidance that could help minimize adverse consequences with future development.

4. Your comments on views are noted. Please see the response to comment #71 in Letter 7.

5. Please see the response to comment #1 in this letter.

6. Your comments on shadow impacts are noted, but the lead agency disagrees with several premises in the comments. This includes the suppositions about the EIS analysis, the purported imperative to study such impacts and the purported significance of such impacts. This comment does not provide information that substantiates the degree of such impacts or their significance. Please see the response to comment #38 in Letter 4.

Letter 6
Washington State Major League Baseball Stadium Public Facilities District (PFD)

1. Your comments expressing support for appropriate redevelopment in South Downtown, and your concern about increased height and densities to the west of Safeco Field, are noted. Please see the response to comments #4 and #58 in Letter 4, and the response to comment #71 in Letter 7, for more discussion about views.

2. These comments on traffic evaluation inadequacies, including for event traffic, are noted. These comments do not specify why traffic impacts are underestimated or why the event traffic analysis was not objective. See the Transportation section in Chapter 3 of this Final EIS for edits to the event-traffic sections that may improve the acknowledgement of other events and relevant transportation matters. Also, see the responses to comments #28 and #62 in Letter 4, the responses to comments #1 and #2 in Letter 5, and the responses to comments #44, #45, #46 and #47 in this letter.

3. Your comment about the scarcity of information on the Stadium Transition Area Overlay District is noted. Please see the Land Use—Zoning, Land Use and Development Patterns and Relationship to Plans and Policies sections in Chapter 3 of this Final EIS for edits that provide more information about the Overlay District. Please see the response to comment #1 in Letter 7.

4. Your comments about significant impacts of the alternatives are noted. Regarding the study of an alternative with less density and lower heights, the EIS already includes three different action alternatives with varying heights and densities. This comment also refers to topics addressed in the responses to comments #29 and #38 in this letter. Also see the response to comment #1 in Letter 4, and the response to comment #4 in Letter 7.

5. Please see the response to comment #1 in this letter.

6. Your comments on inadequacies of mitigation measures are noted. Please see Chapter 2 of this Final EIS for more information on recommended height/bulk controls, design controls, special review processes and other measures, described in this programmatic EIS.

7. While one graphic notation of 85 feet at Qwest Field on Draft EIS Figure 2-6 was not properly underlined as a change, other actual graphic errors, omissions or inconsistencies are not identified. The commenter may confuse the hypothetical buildings depicted on height/bulk/scale

graphics as depicting height limits or building "envelopes." See the responses to comments #23, #27, #41 and #43 in Letter 4, and review graphics in Chapter 3 for any edits or updates.

8. Your comment indicating the need to update the Chapter 1 summary is noted.

9. Your comment on graphically depicting the Stadium Transition Area Overlay District, Safeco Field and associated parking garage on Figure 1-1 are noted. However, these updates are instead depicted on an edited Figure 2-3 in this Final EIS.

10. Your comment disagreeing with major conclusions and level of detail of mitigation strategies is noted.

11. Your skepticism about the effectiveness of bonus and transfer of development rights programs is noted.

12. Your request to study business and economic impacts on Safeco Field is noted. However, see the response to comments #12 and #46 in Letter 4.

13. Your comment noting few differences in transportation impacts is noted, but the lead agency disagrees with the premises in the comment. The evaluation of comparable growth assumptions across the action alternatives is preferable for the EIS impact analysis, in order to properly compare and distinguish differences in impacts among the alternatives. Such distinctions were in fact identified. Differing distributions of growth among the studied subareas in the action alternatives also aided the impact analysis. Differences between the No Action Alternative (Alternative 4) and the other Alternatives provide perspective about impacts under differing growth assumptions.

14. Your comment on the need to update the impact summary table is noted. However, the lead agency disagrees with the need for update of the cited topics of views and business/economic impacts on Safeco Field.

15. Your disagreement with a part of the Alternative 1 and 2 conclusions on height/bulk/scale impacts in the impact summary table is noted. See Chapter 2 of this Final EIS for more information about special review processes within proposed South Downtown Mixed zones.

16. Your comment on the vagueness of Chapter 2 descriptions is noted, but the lead agency disagrees with this characterization. Such information is properly acknowledged in Chapter 2. Please see Figure 2-2 on page 2-6, and references to residential uses in the Alternative 1 "overview of planning concept" and "increased residential development capacity at edges of core neighborhoods" paragraphs on page 2-10 in the Draft EIS.

17. This comment requesting representation of these stakeholders' interests as "objectives of the Livable South Downtown planning process" (see Draft EIS page 2-3) is noted. The extent to which the special interests of any particular business, landowner or citizen are to be promoted as part of the public planning process is a policy and political issue for elected officials, and does not affect the adequacy of the FEIS.

18. The cited transaction approximately halving the "WOSCA Property" is acknowledged, and Figure 2-3 has been updated.

19. The requested clarification in Table 2-1 has been made in this Final EIS.

20. The cited inconsistencies in the Table 2-1 summary of zone changes for "other properties south of S. Royal Brougham Way to S. Holgate" are acknowledged and corrections have been made in this Final EIS. The distinctions relate to the zoning of the Safeco Field property, and a failure to specifically note the rezone from IG2 U/85' in a portion of the "Pyramid Brewery block."

21. Your perspectives on the purpose of the Stadium Transition Area Overlay District are noted. See the cited section and the Relationship to Plans and Policies section for any edits made to improve clarity about this Overlay District. Also, see edits to Figure 2-3 to show the Overlay District, rather than the requested Figure 2-1.

22. Your comment requesting more specificity on the proposed South Downtown Mixed zone is noted. Please see Chapter 2 of this Final EIS for further information.

23. Your comment perceiving the significance of land use impacts at the "WOSCA property" is noted. Conclusions are already noted in the Table 1-1 Summary of Impacts table. See the response to comment #51 in Letter 7 for related discussion.

24. Your request for acknowledgement on DEIS page 3-14 of changes in the WOSCA property due to SR 99 related property acquisition is noted. See the cited section in this Final EIS for any edits made to improve clarity. This comment's perspectives on construction timing and resulting lack of need for a rezone are noted.

25. Your disagreement with two sentences that make impact conclusions about the 1st Avenue S. corridor is noted. One of these sentences in the paragraph addressing lodging uses under Alternative 3 (DEIS page 3-14) has been deleted in this Final EIS because it does not relate well to the remaining text. However, the other sentence addressing the Pyramid Brewery block is retained.

26. Your opposition to any increase in the height limit for the "Pyramid Brewery block" west of Safeco Field is noted.

27. Please see the response to comment #12 in Letter 4.

28. Your comments on heights and development economics are noted. However, due to differences in typical property size, likely future uses, and various details of the zoning scenarios, the cited development feasibility conclusions on pages 3-54 and 3-58 are inapplicable to the 1st Avenue S. corridor in the Stadium Area, particularly for the 160-foot height scenario in Alternative 1.

29. Your comments on growth targets are noted. However, the lead agency disagrees with the premises of this comment. See the response to comments #1, #47, #48 and #53 in Letter 4.

30. Your comments disagreeing with the "relatively limited" phrasing of a statement at the end of page 3-63 in the Draft EIS are noted. See the cited text in Chapter 3 of this Final EIS for any edits that clarify or revise this statement. However, please note that the lead agency disagrees with this comment's rationales for suggesting such edits.

31. Your comment disagreeing with the first statement on "economy" on page 3-64 of the Draft EIS is noted. See the cited text in Chapter 3 of this Final EIS for any edits that clarify or revise this statement. Please see the response to comment #12 in Letter 4.

32. Your comment requesting more information on potential localized improvements is noted. The DEIS text was accurate as written but a few edits have been made in this Final EIS. It is not possible at this time to identify where such improvements may be needed. That will depend on the nature of future project-specific development proposals. Therefore, there is no need to identify such information and additional specificity is not necessary for this programmatic EIS. An EIS is not required to identify mitigation measures that will avoid or mitigate all potential impacts, or guarantee that mitigation will be successful. The nature and amount of mitigation that is proposed in response to this proposal is a policy decision for the City Council.

33. Your comments questioning "more efficient" growth are noted. However, no edits to the EIS are needed. Within the regional growth-management-related context of the comment, the increased density of infill growth encouraged by the action alternatives' zoning by definition would be "more efficient" in use of land than potential growth under existing zoning.

34. Your comments about the Stadium Transition Area Overlay District are noted. See the Chapter 3 "Relationship to Plans and Policies" section in this FEIS for additional text describing this Overlay District and relationships to the alternatives.

35. See the response to comment #34 in this letter.

36. See the response to comment #25 in this letter. This comment incorrectly attributes "purposefully limited heights and densities" to the Overlay District regulations "…in order to maintain these physical and visual connections between the ballpark and Pioneer Square, First Avenue, and the waterfront and downtown areas farther north." This comment mis-characterizes the content of the Overlay District regulations (see the Chapter 3 Relationship to Plans and Policies section in this FEIS for more discussion).

37. Please see the Chapter 3 Relationship to Plans and Policies section in this FEIS for additional text describing this Overlay District and relationships to the alternatives, and the description of related zoning topics in the Preferred Alternative in Chapter 2 of this Final EIS.

38. See the response to comment #29 in this letter and the other cross-referenced responses to comments in Letter 4.

39. Your comment noting an error in table headings is acknowledged. This error has been fixed in Chapter 3 of this Final EIS.

40. Please see the response to comment #71 in Letter 7.

41. Please see the response to comment #71 in Letter 7.

42. This comment may confuse the estimated *development capacity* under the alternatives' zoning, as shown on page 3-82 in the Draft EIS, with the EIS growth scenario assumptions summarized in the second column of Table 3-33 on page 3-158 in the Draft EIS. If the comment seeks to relate page 3-82's reference to "approximately 6,000 dwelling units" for Alternatives 1, 2 and 3 to the "approx. 5,700 – 6,100" in the second column of Table 3-33 on page 3-158, there is no inconsistency. The reader should examine the structure and relationship between the three columns of Table 3-33 to understand its conclusions. No inconsistency is identified and no corrections need to be made to the parks analysis on this basis.

43. Please see the responses to comment #61 in Letter 4 and to comment #1 in Letter 7.

44. Your comments on event traffic management are noted. However, the lead agency disagrees with several premises in this comment.
    - While the comment notes the conclusions presented in the Draft EIS summary chapter's Table 1-1, it is disagreed that these are the only conclusions related to transportation and the stadia. See the entire content of information related to this topic in the Transportation section of the Draft EIS and Final EIS.
    - The content on pages 3-195 to 3-196 is description of the Affected Environment. This comment either fails to recognize the related impact analysis on pages 3-228 through 3-330 of the Draft EIS or inaccurately characterizes it as "short" and "subjective" and consisting only of "observations" or "some suggestions." Rather, it provides a variety of pertinent analysis on vehicle and pedestrian traffic.
    - The lead agency's opinion is that the event traffic management impact analysis in the Draft EIS was neither inadequate nor unacceptable. See the Transportation section in Chapter 3 of this Final EIS for edits that provide additional information describing this topic.

45. Your comments on the number and range of events at Safeco Field are noted. See the response to comment #44 in this letter, and the Transportation section in Chapter 3 of this Final EIS for any edits that provide additional information describing this topic. Also, please see the response to comment #12 in Letter 4.

46. The Draft EIS text on "event management strategies in the Mitigation Strategies discussion (page 3-236) is acknowledged as incorrectly suggesting that adaptation of the stadia transportation mitigation plans (TMPs) would be a "mitigation strategy" for the impacts of the EIS alternatives. Future changes to the TMPs prepared each year for the stadia are not "mitigation" for impacts discussed in this EIS. The Final EIS text reflects changes to correct this error.

47. Your comments are noted.

Letter 7
Seattle Mariners

1. Your summarized concerns in this comment are noted. By definition, the proposal entails changes to existing City policies and regulations. The potential environmental impacts of that proposal are described in this programmatic EIS. As a programmatic document, this EIS generally does not describe potential impacts to specific lots within the planning area.

2. The content of Chapter 2 in the Draft and Final EISs describes the planning process in detail. It includes reference to a March 2006 preliminary recommendations document, an "overall vision," goals and specific objectives for the planning process, other key issues that planning recommendations should address, and "geographic themes" of the planning effort's consideration of future uses (see pages 2-1 through 2-9). With regard to this comment's reference to 6,000 new dwelling units, this is described in the EIS and in FEIS responses to other comments as an EIS growth scenario, aligned with projections of the Puget Sound Regional Council, which is used to study growth-related impacts to year 2030. The growth targets in the Comprehensive Plan represent the minimum level of desired growth, rather than a ceiling on growth.

3. Your comments are noted. However, the lead agency disagrees with the premises of this comment. It is not necessary for this EIS to elaborate on the statement about city leaders or provide other information requested in this comment.

4. Your comments are noted. The EIS presents a range of zoning alternatives that will help achieve the policy goal of increased housing and job growth in the planning area. It does not consider alternatives to the goal itself because such alternatives would not, by definition, meet the policy objective of increased housing and job growth.

5. Your comment is noted, and the "elements of the environment" list on pages xi and xii has been updated in this Final EIS.

6. This is a programmatic EIS that generally does not describe potential impacts to specific lots or buildings within the planning area. The potential for changes to views designated as protected by SEPA, and any other discussion of view-related impacts, is described in the FEIS Chapter 3 Public View Protection section.

7. Your comment is noted. Please see response to comment #1 in this letter with respect to the issue of consistency with plans, and response to comment #2 in this letter with respect to the nature of the growth projections considered in the proposal.

8. Your comment is noted. Even though the Draft EIS text at the cited location on page 1-1 is not in error, an edit has been made in this Final EIS to address this comment.

9. Your comment incorrectly identifies the "DEIS" as the subject of the statement. Actually, the cited sentence ascribes the intended analysis to "South Downtown planning." The EIS provides a body of information that is available to be used in decisions about whether a change of direction is warranted. See edits made to the cited section in this Final EIS, which amend the quoted text.

10. See the response to comment #3 in this letter.

11. Your comments are noted. Please see response to comment #1 in this letter.

12. The cited statement is written in a generalized manner applicable to the entire study area, and refers to the notion that existing regulations could be changed to better achieve the proposal's objectives.

13. See the response to comment #17 in Letter 6.

14. Your comment disagreeing with the generality of the objectives is noted. It is not necessary for the planning process objectives to be made less general. However, please review Chapter 3 of the Final EIS (including the Relationship to Plans and Policies section) for edits that improve clarity with respect to the relationship to the Duwamish Plan.

15. Please see the response to comment #1 in this letter.

16. The planning recommendations are contained in the Livable South Downtown recommendations report that is issued with this FEIS.

17. With regard to the "overall vision" text expressed on pages 2-4 and 2-5, the presence of the ballpark and event venues is mentioned in the second sentence of the first paragraph as the "largest sport entertainment venues." Please also see the response to comment #17 in Letter 6.

18. Your comment is noted. However, the lead agency disagrees with the premises of this comment. The cited sentence beginning at the bottom of page 2-4 indicates the element of consistency as being that the planning process "envisions neighborhoods that are complemented by new developments that incorporate appropriate mixes of uses and are compatible with their surroundings due to high-quality and sensitive architectural design." As this is accurate, no revision is necessary. The planning recommendations do not address a departure from the "population goals and allocations of the Comprehensive Plan." The fact that residential uses are evaluated in EIS alternatives for locations currently within the Greater Duwamish Manufacturing and Industrial Center is acknowledged here and is also discussed in the Draft EIS, such as at pages 3-70 and 3-71, and in the FEIS. Please see response to comment #1 in this letter.

19. Clarifying edits have been made to the graphic and text information on pages 2-6 and 2-7 that refer to the preliminary recommendations' depiction of a land use concept map with the term "emerging areas." Please see the response to comments #1 and #3 in this letter.

20. The WOSCA property is located within the "Stadium Area" evaluated in this EIS. The separate listing and description of these individual geographic descriptive terms is correct as written.

21. As this comment notes, page 3-40 of the Draft EIS refers to the cited change in the west half of the WOSCA property. The relevance of this property condition has already been factored in as an assumed future condition. This includes, but is not limited to, the topics of land use, environmental health and transportation and the adjacency of the highway right-of-way to the WOSCA property. See other edits in Chapter 3 of this Final EIS that describe the status of the WOSCA property.

22. Edits in this Final EIS provide additional information describing the Stadium Transition Area Overlay District, including the cited text and in the Chapter 3 Relationship to Plans and Policies section.

23. None of the action alternatives (Alternatives 1, 2 and 3) evaluated in the Draft EIS are a preferred alternative. When compared to each other, each of the action alternatives could feasibly attain or approximate the planning process objectives. The differing nature of the alternatives, including but not limited to differences in geographic distribution and magnitude of zoning changes, allow for comparisons of the relative magnitude of environmental costs among them. This also applies to the Preferred Alternative included in this Final EIS (see Chapter 2 for more information). Please see the response to comment #4 in this letter.

24. Your comments about clarity of description of the alternatives in text and graphics are noted. See Chapter 2 of this Final EIS for any edits that may have been made to assist in clarifying the alternatives. However, the lead agency disagrees with the suggested method of expanding the text to further discuss how each alternative would change existing "plans and zoning." The suggested method would become too unwieldy in its length and description, given the detailed nature of the changes and affected locations. Rather, the comment's purpose is fulfilled by reading the text, comparing amongst the alternatives' graphics (Figures 2-4 through 2-7) and reviewing the content of Table 2-1. Also beneficial is the fact that the Figure 2-7 "No Action/Existing Zones" graphic is located adjacent to Table 2-1, allowing for comparisons to be made.

25. Your comment on clarity of the alternatives' zoning graphics is noted. See Chapter 2 of this Final EIS for any edits that may assist in clarifying the graphic depictions. It should be noted that these graphics' use of a system of underlining where new zones are proposed already addresses this

comment's concern. Also, the use of letters (IDM, IC, SDM) with a legend to identify the zones is already a satisfactory manner of identifying zones.

26. This programmatic EIS is prepared to fulfill SEPA requirements. The extent to which the proposal entails changes to the City's Comprehensive Plan, including neighborhood plans included in the Comprehensive Plan, is described in Chapter 2 of this FEIS in the text cited in this comment. It is also indicated in the FEIS Chapter 3 Land Use—Zoning, Land Use and Development Patterns and the Chapter 3 Relationship to Plans and Policies sections where the discussion indicates Comprehensive Plan changes and relationship to the Greater Duwamish Manufacturing and Industrial Center Plan. See these Chapters and sections of the FEIS for any edits that update and improve the clarity of information on this topic.

27. Your comment on graphically depicting the Stadium Transition Area Overlay District is noted. See edits to Figures 2-7 and 3-1 in this Final EIS which depict existing zoning, and also review Figures 2-4, 2-5 and 2-6 for any changes that may have been made to clarify the alternatives' relationship to that Overlay District.

28. Your comment seeking increased clarity in identifying residential use capabilities under Alternative 1 is noted. However, the lead agency disagrees with the comment "this can only be determined by reviewing other sections later in the DEIS" because the intent is described by the last paragraph's heading and content, including the text excerpt at the bottom of page 2-10 and top of page 2-12. See Chapter 2 of the Final EIS for any edits that may have been made to improve clarity.

29. As an alternative zoning concept, the zone boundaries shown for Alternative 1 are approximate boundaries that would contribute to fulfilling the purposes indicated in Chapter 2 of this FEIS, which include "increased residential development capacity at edges [inside or just outside] of core neighborhoods" for the "approximate northern third" of the property between S. Royal Brougham Way and S. Railroad Way.

30. As a prospective statement of probable benefits of residential use adjacent to the Pioneer Square neighborhood, and as part of the "overview of planning concept," the statement does not require elaboration.

    This comment inaccurately interprets the EIS text in the last paragraph on page 2-10 of the Draft EIS. The referenced zone changes and related residential presence "at the edges of the neighborhood cores" are described as contributing to revitalizing the established neighborhoods. To clarify this text, an edit is made in the Final EIS for this to read "…at the edges <u>(inside or just outside)</u> of the neighborhood cores…" This statement does broadly correspond with at least the northern third of the WOSCA property.

31. Your comment is noted. The change to the Comprehensive Plan designation is not treated as an after-thought, but, as this comment notes, is already discussed in the description of the alternative. See Chapter 2 of the Final EIS for any edits that may have been made to improve clarity.

32. Your comment is noted. See Chapter 2 of the Final EIS for any edits that may have been made to improve clarity and provide additional information about South Downtown Mixed zoning.

33. Your comment is noted. However, the lead agency disagrees with the premises of this comment. As the cited text represents a concept-level description of the intended benefits of the South

Downtown Mixed zone, it is an appropriate description of general zoning intent. The DEIS does not assume that good urban design can be achieved only if building heights are raised.

34. Your concern about Alternative 1's proposal for increased height limit to 85 feet is noted. A possible increase in height limit without an increase in density limit affords possible increased flexibility in siting buildings and arranging their bulk, in ways that might allow better accommodation of parking uses as well as optimized bulk arrangements.

35. Your comment requesting specific characterizations of Alternative 2 in relation to the 1st Avenue S. corridor is noted. However, it is noted that text on DEIS pages 2-12 and 2-14 already convey similar information, so no edits are necessary.

36. Please see the response to comment #29 in this letter.

37. Your comments about Alternative 3's description in Chapter 2 are noted. See Chapter 2 of this Final EIS for any edits that may improve clarity. Also, see the response to comment #34 in this letter.

38. The lodging (hotel) use is included in Alternative 3 in order to include it as a possible use change in this environmental review, to evaluate its potential impacts in the balance of the EIS.

39. Your comments about residential use on the WOSCA property and relationship to the Comprehensive Plan designations are noted. See the response to comment #1 in this letter.

40. Your comment requesting the basis for height increases, and theoretical public benefits and public concerns of the same on the WOSCA property, is noted. Please see the response to comments #1 and #3 in this letter.

41. Please see the response to comment #29 in this letter.

42. As described in the response to comment #2 in this letter, the action alternatives do not "involve revisions to the population and employment growth targets established in the Comprehensive Plan."

43. It is acknowledged that, as written in the Draft EIS, the cited "disadvantage of reserving implementation" refers to the Downtown Urban Center neighborhoods.

44. The lead agency disagrees with the premises of this comment on affordable housing. The DEIS does not "acknowledge that the development spurred by the zoning changes will result in the loss of hundreds of existing affordable housing units." See the Draft EIS analysis on pages 3-85 to 3-88 and updated analysis in the FEIS for an accurate description of the cited potential impacts. The balance of this comment is noted, but the lead agency disagrees with its content.

45. Your comment about a potential "benefit of reserving implementation" with respect to SR 99 and use of the adjacent WOSCA property is noted. Uncertainty of long-term status of properties' uses is a phenomenon generally applicable to almost all properties in the study area. Also, the first bulleted point under "benefits of reserving implementation" sufficiently addresses this comment's concern.

46. This comment's request to acknowledge a "benefit of reserving implementation" of potentially "preserving" the ballpark's views rather than their "being lost forever" is noted as the commenter's perspective. Please see the response to comment #1 in this letter.

47. Your comment requesting expansion of the "Summary of Alternative Zoning Details" table, Table 2-1, is noted. See the response to comment #24 in this letter. This table contains detail that allows for comparing and understanding differences among the alternatives. Other edits to headings or additional details could become unwieldy and more difficult to understand. See Chapter 2 of this Final EIS for any edits made to improve clarity.

48. Figures 2-7 and 3-1 have been amended to depict the boundary of the Stadium Transition Area Overlay District. See text on page 3-6 and the Relationship to Plans and Policies section in this Final EIS for edits made to improve clarity and expand description of the Stadium Transition Area Overlay District. This comment's documentation of past history in zoning decisions on height limits is acknowledged. Please see the response to comment #1 in this letter.

49. This comment's interest in the Greater Duwamish Manufacturing and Industrial Plan receiving equal treatment or "status" is noted. Also, the comment's observations about land use and zoning considerations within the Stadium Area are noted. The extent to which the special interests of any particular business, such as the Seattle Mariners, are to be promoted as part of the public planning process is a policy and political issue for elected officials, and does not affect the adequacy of the FEIS. Information about zoning around stadia in other cities is not required to be included in this programmatic EIS.

50. See the Chapter 3 Land Use—Height, Bulk, Scale and Compatibility section in this Final EIS for text revisions that provide more information about hypothetical potential for light/glare impacts on Safeco Field. These arise from potential future development on a certain segment of the "over-tracks" property, if a building was to be built approximately at or south of where the current Interstate 90 off-ramp intersects with 4th Avenue S. Similar to the response to comments about Qwest Field wind impacts, it is noted that the lead agency considered comments about possible wind impacts during EIS scoping but concluded there was not a probable significant adverse wind impact on Safeco Field that warranted discussion.

51. This comment correctly cites the Draft EIS text on page 3-13 as indicating the "significant shift in the City's land use policy" conclusion, which refers to a shift in the Comprehensive Plan's preferred land use pattern from "Manufacturing & Industrial Center" to "Downtown Urban Center." However, this comment incorrectly characterizes this as a "significant impact." Because of the nature of the referenced action, it is not characterized as a "significant impact." While the change is already identified in Chapter 2 as part of Alternatives 1 and 3 regarding the 1st Avenue S. corridor, it is not necessary for Chapter 2 or the Chapter 1 Summary to identify it as a "significant impact." This is particularly so for Chapter 2 because it describes the alternatives rather than including impact analysis. Also, please see the response to comment #1 in this letter.

52. Your comment, indicating uncertainty as to whether incompatibilities of residential use could be mitigated by constraining the location and orientation to shield residential uses, is noted. Despite your uncertainty, this is a valid possible mitigation strategy that could be implemented even with the current narrowed shape of the WOSCA property.

53. See the response to comment #25 in Letter 6. One of the cited sentences with impact conclusions on DEIS page 3-14 has been deleted because it does not relate well to the text, but another similar sentence relating to the Pyramid Brewery block has been retained. With respect to possible

effects of development near Safeco Field on the level of enjoyment experienced by the Mariners' customers, their enjoyment is not an element of the environment that must be analyzed in an EIS. However, the Mariners may provide that information to the City Council as part of the general public comment opportunities that will be provided for the proposal. Also, please see the response to comment #1 in this letter.

54. Your comments about PSM 85'/120' zoning are noted. The Draft EIS discussion as written identified the residential use criterion and suggested that vacant parcels are the probable location of future development. The Draft EIS noted the possibility of future development to 120 feet, not that it "will likely" occur. It is not necessary for this EIS to provide further evaluation of which buildings are landmarks or landmark-eligible, because the cited text is adequately descriptive. See the cited text in Chapter 3 of this Final EIS for any edits that may have been made for clarity.

55. It is not necessary for the lead agency to revise the cited text at Draft EIS page 3-21 to explain why the 65-foot height limit was established. As indicated by the section headings, the cited text is about existing conditions and is meant to describe "compatibility among existing uses" and "land use patterns and height transitions." See the Impacts discussion in the Land Use—Height, Bulk, Scale and Compatibility section in Chapter 3 of this Final EIS and the Relationship to Plans and Policies section for any edits that may have been made to clarify or expand the discussion of such impacts. Please see the response to comment #1 in this letter.

56. The specific kinds of open space outside Downtown that are listed in the cited SEPA Policy (SMC 25.05.675.Q.2.a) are "publicly owned parks, public schoolyards, private schools which allow public use of school yards during non-school hours, and publicly owned street ends in shoreline areas." For the portions of the study area that are outside the existing Downtown Urban Center, the only location that would appear to meet any of these criteria is the public school yard at Bailey Gatzert School, which is near Little Saigon north of Boren Avenue S. near Main Street. Safeco Field is not a publicly owned park as that term is used here, instead it is functionally equivalent to a private entertainment facility. Please see the response to comment #1 in this letter.

57. The conclusions on page 3-46 with respect to future possible development on the WOSCA property and its relationship to light/glare from the Port of Seattle are not technically affected by sale of part of the WOSCA property. It would, of course, preclude a potential residentially developable area in the western portion of the original WOSCA property. An edit has been made to this section in the Final EIS to denote that buildings "or other uses within the same building" might be able to provide shielding, to cover a scenario where residential uses and non-residential uses might be present in the same building.

58. These comments relating to the City's growth strategies are noted. Please see the responses to comments #1 and #2 in this letter.

59. See the cited text in Chapter 3 of this Final EIS for text revisions made to improve clarity. Also, see the responses to comments #1 and #53 in this letter.

60. Your comments requesting that the EIS include more discussion of the Duwamish Plan, height limits and uses, are noted. The cited text already mentions the relationship of the Stadium Transition Area Overlay District to the MIC Plan, and mentions the inconsistency of zone proposals under Alternatives 1 and 3. See the cited text in Chapter 3 of this Final EIS (equivalent to DEIS pages 3-70 through 3-74) for any edits made to provide additional information and improve clarity. Under Alternatives 1 and 3, the amount of industrially-zoned property area in the MIC that would be rezoned to non-industrial zone categories would be approximately 14

gross acres under Alternative 1 and approximately 55 gross acres under Alternative 3 (this calculation includes land in rights-of-way). For the same area, there would be no change under Alternatives 2, 4 or the Preferred Alternative.

61. See the Relationship to Plans and Policies section in Chapter 3 of this FEIS for edits that address this comment and provide other related expanded discussion. Also, see the response to comment #1 in this letter.

62. See the responses to comment #2 in this letter and comment #47 in Letter 4. It is inaccurate to state that "no explanation is provided of this planning assumption," because it was described in multiple locations in the EIS text, including pages 1-1, 2-9, 3-82 and 3-98. See Chapters 2 and 3 of this Final EIS for any additional edits made for clarity.

63. This comment incorrectly characterizes the EIS analysis by suggesting it assumes "demand would be taken from traditionally preferred areas." Rather, the EIS growth scenario for impact analysis aligns with the PSRC's 2030 growth projections relating to the study area.

64. See the responses to comment #2 in this letter and #47 in Letter 4.

65. Please see the response to comment #1 in this letter, and the Livable South Downtown recommendations report issued with this EIS.

66. See the responses to comments #62 and 63 in this letter.

67. The EIS growth scenarios for the alternatives assume few instances of building demolitions because the projected growth can be accommodated largely within parcels without existing buildings. Information in the Chapter 3 Parking section responds to your comment about parking lots and spaces.

68. As written, the Draft EIS text at pages 3-83 to 3-84 used explicitly-cited factors to estimate total housing demand generated by new South Downtown employment and the subset of that demand that might be attracted to the Downtown Urban Center. On page 3-84, the DEIS text suggested that some of those employees would likely be among those seeking affordable housing in South Downtown. See the Housing section in Chapter 3 of this Final EIS for edits that amend the findings.

69. Your comments critiquing the housing impact analysis are noted. However, the comments incorrectly characterize the content of the cited analysis, and the lead agency disagrees with your conclusion of understated impacts. Data from the City's Office of Housing (OH) inform the counts of currently subsidized affordable housing units at-risk and the unsubsidized rental units that are shown in Tables 3-17 and 3-18. According to the best available data, the amounts (which were reviewed and updated in this Final EIS) represent the number of housing units that are at risk of future rent level changes. The text in the first paragraph of Draft EIS page 3-87 indicates a conclusion of a lack of direct impact potential for these units, but it also explicitly notes that a "potential indirect adverse impact of increases in rent levels could be anticipated in some cases." This discloses the potential for indirect housing impacts.

The second paragraph on page 3-87 documents those properties with affordable units that would be directly affected by possible zoning changes, with a corresponding potential for direct impacts (also summarized on Table 3-19). In order to incur the total impact implied by Table 3-19, all of the cited buildings would need to be redeveloped, converted or experience rent increases.

70. Your comments relating to the "incentive" or inclusionary zoning requirements for affordable housing, and their potential low value as mitigation for housing impacts, are noted. Calculations shown on Draft EIS pages 3-90 and 3-91 are based for each alternative on the growth scenarios used for impact analysis purposes, through year 2030. For this programmatic EIS, the 75% of projects estimated to take advantage was an analytic assumption of the level of participation by future development applicants, and a basis for the calculations in Table 3-21, although those calculations have been revised. The findings are identified as "estimates" in the table's title. See the cited section in this Final EIS for edits made that clarify and revise the findings.

It is not reasonably possible to pinpoint a single probable outcome with respect to affordable housing supply dynamics through 2030. However, the EIS reader may compare the potential impacts described in Tables 3-17, 3-18 and 3-19 with the potential positive influences on affordable housing supply described in Tables 3-20, 3-21 and the accompanying text.

An EIS is not required to identify mitigation measures that will avoid or mitigate all potential impacts, or guarantee that mitigation will be successful. The nature and amount of mitigation that is proposed in response to this proposal is a policy decision for the City Council.

71. The extent to which views from Safeco Field might be changed by future development in the surrounding area is information that can be provided to decisionmakers in a variety a ways. For example, and as noted in the comment, the City's rezone criteria (SMC 23.34.009) provide that changes to views are a factor to be considered in determining whether to approve rezoning, and information regarding views would typically be presented in DPD's Director's Report analyzing proposed rezoning. Additionally, the Mariners can present such information to the City Council in the course of public comment opportunities provided in connection with this proposal. In the context of a programmatic EIS, however, analysis of potential changes to views from specific, individual buildings or lots is not generally required. Such analysis could occur in a project level EIS, where the impacts of a specific, proposed development upon views from nearby buildings might be described.

72. The lead agency disagrees with premises in this comment, and notes contradictory elements in this comment. The comment's first paragraph acknowledges that the existing development context is shown in the cited graphics, but then asserts "there is nothing depicting the existing condition." Note that the EIS does describe existing conditions (for example, see all lighter-shaded buildings in the graphic depictions of height, bulk and scale) and also provides some graphics in a photographic montage manner. For this programmatic EIS, there does not need to be more information on the building models, nor additional types of views. However, please see Chapters 2 and/or 3 of this Final EIS for edits that include additional graphic portrayals related to the Preferred Alternative.

73. Your comments about the graphics' viewpoints are noted. The reader may note that all graphics provided in the Chapter 3 "Public View Protection" section are from eye-level. The viewpoints of the height/bulk/scale graphics were selected to portray and compare the relative effects of the proposed building heights and densities.

74. See the response to comment #59 in Letter 4. A programmatic EIS generally does not analyze the potential adverse impacts of the proposal upon specific lots or parcels.

75. Technically, the DEIS does not conclude that "there would be significant adverse noise impacts on residential uses on the WOSCA property." Rather, on DEIS page 3-145 it notes that future

residential development in locales within roughly one block of the SR 99 Viaduct would face the "greatest adverse exposure to high noise levels" and in the next paragraph describes these as "significant adverse noise conditions." This portrays the high levels of noise at the subject property but does not technically identify the finding as a significant adverse impact of the rezone per se.

Your comments on noise impacts and SEPA policies are noted. The lead agency disagrees with the comment's implication that the City lacks authority to mitigate for potential noisy conditions at a noise-receiving property.

76. Your comments on fire/emergency impacts, mitigation strategies and growth targets are noted. However, the lead agency disagrees with several premises in this comment.
- Technically, the DEIS notes on page 3-152, "*Explore methods to address cost impacts to SFD of providing additional staffing and equipment to serve cumulative future growth in the study area. Consider defining impact fees or similar strategies that would be proportional to the level of impact anticipated with individual developments*." This might occur via legislation occurring either in the short-term or the long-term. Potential mitigation measures need not be fully developed or discussed in a programmatic EIS.
- As noted elsewhere in this chapter, this comment's premise of a "three-fold increase in the population targets for this area of the City" is incorrect.

77. See the Police Protection section in Chapter 3 of the Final EIS for any edits made to generally acknowledge the event traffic control function provided by police. This section does not need to further address event traffic control at the ballpark, which is addressed in the Transportation section and associated transportation discipline report in Appendix G. The lead agency disagrees with the comment's premise that residential traffic might cause police staffing to not be available for event traffic control.

78. See the response to comment #42 in Letter 6. No actual mismatches or differences are identified in this comment.

79. While it might be possible for the City to consider parks/open-space-related impact fees, the DEIS did not identify the cited impacts as significant adverse impacts. Between now and 2030, such park/open space needs might be satisfied via numerous actions such as public agency provision of such facilities and/or provision of on-site open space through future private development projects.

80. Your comment seeking more quantification of future open space outcomes is noted. However, it is reasonable to conclude that the provision of private open space will mitigate the need for additional open space as a result of future growth. Additionally, the requested analysis fails to consider the extent to which the demand for open space may be met by future possible public agency provision of park/open space (which is not reasonably possible to predict at this time).

81. The lead agency disagrees with several premises of the critique of the event traffic analysis in this comment. However, the reader should review the Chapter 3 Transportation section in this Final EIS for additional analysis that fulfills the EIS scope on this topic.

The Draft EIS text on "event management strategies" in the Mitigation Strategies discussion (page 3-236) is acknowledged as incorrectly suggesting that adaptation of the stadia transportation mitigation plans (TMPs) would be a "mitigation strategy" for the impacts of the EIS alternatives. Future changes to the TMPs prepared each year for the stadia are not

"mitigation" for impacts discussed in this EIS. The Final EIS text reflects changes to correct this error.

Your comment with respect to the number of police postings addressed in the ballpark's Transportation Management Plan is noted.

Letter 8
Joint letter: PSA, First & Goal Inc., PFD, Seattle Mariners

1. Your comments noting the public investment in the stadium and event center facilities, the need to disclose impacts on those facilities, and the need to further acknowledge the Stadium Transition Area Overlay District, are noted. See edits made in the Land Use and Relationship to Plans and Policies sections in Chapter 3 of this Final EIS for additional information about the Overlay District. The lead agency disagrees with how this comment characterizes the analysis to date and the degree to which further analysis is needed in this programmatic EIS. Your support for increased housing and density in "certain areas" is noted.

2. Your comments indicating a perceived understating of traffic impacts and other shortcomings in the event-related traffic analysis, and a need for proactive mitigation strategies for transportation impacts, are noted. While the Draft EIS incorrectly noted that the stadia's transportation mitigation plans (TMPs) would be "mitigation strategies" for impacts identified within this EIS, that text has been revised in this Final EIS. A wide variety of other possible transportation mitigation strategies are included in the Transportation section in Chapter 3 of this EIS for the range of identified significant adverse traffic impacts. Therefore, the lead agency disagrees with this comment's characterization that the EIS "leaves the problem to be solved in future stadium Transportation Management Plans." The lead agency acknowledges the agencies' comments about the perceived severity of adverse impacts, but does not agree that negative impacts on the stadia will cause "the quality of life and economic vitality for all area residents and businesses [to] be highly compromised." See the Transportation section in Chapter 3 of this Final EIS for edits made to improve clarity about event-related traffic and event traffic management.

3. Your comments on view-related topics are noted. The lead agency disagrees with the characterization that condos or offices would "wall in the ballpark and football stadium" and the number of affected individuals. See the response to comments #4 and #58 in Letter 4.

Letter 9
Seattle Steam Company

1. Your comments favoring district energy concepts and integrated energy planning for this study area are noted. See the Final EIS Chapter 3 Energy section for edits that update and expand information provided about proposed energy strategies.

2. Your comments on thermal energy demands are noted. See the Final EIS Chapter 3 Energy section for edits that describe proposed energy strategies, including policy or regulatory actions that encourage hydronic strategies and discourage reliance on electrical methods of serving thermal loads.

3. Your comments on low carbon technologies are noted. See the Final EIS Chapter 3 Energy section for edits that describe proposed energy strategies relating to carbon emissions and any additional analysis provided on carbon and greenhouse gas emissions.

4. See the response to comment #3 in this letter. Your comment describes potential economic and environmental implications, at the macroscopic level, of energy choices. Interpreting the precise degree to which these implications relate to Seattle City Light operations is beyond the scope of this EIS discussion. However, see the Final EIS Chapter 3 Energy section for any additional information that further describes the alternatives, the City's proposal to date, and their implications.

5. The Washington State Governor's Executive Order on Climate Change includes actions related to the construction of buildings and reducing greenhouse emissions. Taking steps to implement these will move Washington State to at least 60% of the 2020 goal and grow the clean energy economy. Relevant topics pertain to constructing high performance green buildings, and maintaining the highest levels of efficiency in our state's energy code and regularly updating and enhancing those standards.

   The City's proposal contains provisions for density-bonused and "planned community development (PCD)" projects in South Downtown that would require green building energy performance approximately equivalent to the level of LEED Gold with 8 LEED EA1 credits, and also require energy cost savings of 20% beyond current Seattle Energy Code (SEC) compliance. Further, by City Council Resolution 30280, the City is required to periodically revisit the commercial portion of the SEC to revise it to achieve performance 20% beyond the ASHRAE 90.1 standard currently in effect. Independently and beyond the purview of the EIS, the City is developing a variety of initiatives, proposals and programs to achieve the goals of the Executive Order.

6. Your comments relating to district energy systems, fuel switching, and carbon neutrality, are noted. The City's proposal indicates support for strategies that would reduce natural gas consumption. See the Final EIS Chapter 3 Energy section for additional description of such proposals and their broad implications.

Letter 10
Downtown Seattle Association

1. Your comments preferring increased heights and densities and a historic transfer of development rights program applicable to historic buildings are noted.

2. Your comments in opposition to the No Action Alternative are noted.

Letter 11
Futurewise

1. Your comments supporting infill growth in the Downtown Urban Center (including the study area) on the basis of increased efficiencies in land use, transportation and greenhouse gas emissions are noted.

2. Your comments agreeing with the zoning strategy for historic and culturally significant portions of Pioneer Square and Chinatown/I.D. are noted.

3. Your comments with respect to industrial lands are noted. DPD is undertaking further analysis of industrial lands south of the study area in 2008.

4. Your comments supporting a bolder "hybrid" alternative set of zoning changes is noted. See Chapter 2 of this Final EIS for discussion of the Preferred Alternative that is a hybrid of zoning options studied in the other EIS Alternatives.

5. Your comments with respect to density, incentives for infill development, green building standards, and public investments in pedestrian connections and public spaces, are noted.

Letter 12
International District "Vision 2030" stakeholders group

1. Your comments describing a neighborhood vision, a holistic planning approach that captures public benefits, a requested package of recommendations with financial, regulatory and other tools, and interests in attaining more affordable housing while minimizing gentrification pressures, are noted. DPD planning staff are considering these recommendations and will present this information to decisionmakers for their consideration. See Chapter 2 of this Final EIS for a further description of a Preferred Alternative.

2. Your comments describing the "Vision 2030" and related neighborhood goals for the entire Chinatown/I.D. neighborhood are noted.

3. Your comments on housing, building rehabilitation, balanced development, financial programs including a growth related fund, incentive zoning and transfer of development rights programs, are noted.

4. Your comments advocating for more effective code enforcement of current building, health and safety codes, are noted.

5. Your comments requesting limitations on the size of retail businesses newly locating in the community are noted.

6. Your comments, supporting an additional process beyond the International Special Review District for the purpose of assessing proposed "formula businesses," are noted.

7. Your comments, on a possible different design review process for Little Saigon east of I-5, are noted.

8. Your comments, about shared parking, sufficiency of parking for residential and commercial vitality, and a community parking structure, are noted. These parking topics would be subject to future ongoing planning and decisionmaking by City departments, including but not limited to the Department of Planning and Development and the Seattle Department of Transportation. In general, "community parking structures" are difficult to achieve using public funding. However, it is conceivable that shared off-street parking arrangements can be made in the future, with private developments, which would help provide for the long-term parking needs of the Chinatown/I.D. neighborhood.

9. Your recommendation to expand the Metro free-ride zone to Rainier Avenue S. is noted. Feasibility of this potential action could relate to total costs of making such a change and overall prioritization of transit service to the city as a whole.

10. Your comments, about expanding Green Street designations on S. Washington Street, S. King Street and S. Weller Street, are noted. The Preferred Alternative proposes several extensions of Green Streets, a number of which appear to be the same as these recommendations.

11. Your comments, advocating for one staff person in the City to work on neighborhood objectives, are noted.

12. Your comments, advocating for IDM 100'/200' zoning in the 4th/5th Avenue S. vicinity north of S. Jackson Street, and an IDR 200' zone east of 5th Avenue S., with approximate setback recommendations for avoiding shadow and view impacts, are noted.

13. Your comments, advocating for IDM zoning with 125-foot or 150-foot height limits across the core area of the Chinatown/I.D. neighborhood, with approximate setback recommendations, are noted.

14. Your comments, advocating for a zone similar to IDM and NC2 zones, with 65-foot, 85-foot and 150-foot height limits, street level use and transparency requirements, maximum sizes of use to 25,000 or 50,000 square feet, housing preferred above street level, and an additional review process for formula businesses, are noted.

15. Your comments, advocating for an NC3 style of zoning with 180'/240' height limits (for commercial and residential uses, respectively) in the south-of-Dearborn vicinity and over-tracks vicinity, are noted.

Letter 13
Inter*Im Community Development Association

1. Your preference for a holistic planning approach that will capture public benefits in exchange for development, as described in the Vision 2030 letter, is noted. Your preference for the required use of financial and regulatory tools and programs implemented concurrent with land use/zoning changes is noted.

   The commentary on "goals and targets" is noted, but the lead agency disagrees with some of the premises of this comment.

   - More specific goals and targets of the kind suggested in this comment are not necessary to discuss further in this EIS, which already includes discussion that meets and exceeds the needs for a programmatic environmental impact analysis per SEPA. Comprehensive Plan policies already provide direction that establishes applicable goals.
   - Mathematical assessment of future scenarios and consideration of goals and target concepts can facilitate further discussion of housing policy over time between neighborhood stakeholders and City departments. However, the lead agency disagrees that otherwise the EIS or planning effort is merely a "hypothetical urban design exercise." Similarly, it is not clear that without more specific goals and targets the EIS or planning effort lacks understanding of how scenarios would "play out in the real world of real estate development." The lead agency suggests that establishing more specific goals and targets may involve numerous speculative assumptions about real estate markets and potential

government actions. Such efforts are beyond the scope of this EIS. These are matters better discussed and evaluated through the ongoing policymaking and implementation efforts of the City departments that address housing and development issues.

- The lead agency disagrees with the premises of the stated concept that "existing City plans and policies, including the Comprehensive Plan, are not adequately used as a framework to establish specific goals and targets by which to evaluate anticipated outcomes of the Alternatives." This is contrary to the City's plans and policies including the Comprehensive Plan and other housing-related plans. Also see comment #17 in this letter which "at the very basic level" supports addressing and meeting, at a minimum, the Comprehensive Plan housing related goals.

2. Your comment noting incorrect table headings on DEIS page 3-97 is noted. These table column headings have been corrected.

3. The cited difference on DEIS page 3-99 in residential growth assumption is correctly portrayed. This limited difference in residential growth assumption for Alternative 1 is considered acceptable for impact analysis purposes, and is related to assumptions about how many buildings would be constructed to accommodate the future growth under the alternatives. See Chapter 2 and the cited text in Chapter 3 of this Final EIS for any edits made for clarity, or in relation to the Preferred Alternative.

4. This comment apparently refers to the population and employment impact conclusions at the bottom of Draft EIS page 1-13. Your disagreement with the conclusions on grounds of affordable housing loss and gentrification pressures is noted. However, this EIS does not conclude that such impacts would occur in a significant adverse manner (see analysis in the Chapter 3 Housing section of this Final EIS). This includes discussion of potential loss of affordable housing units. The "demographic evaluation of who these low income residents are" is discussed on DEIS pages 3-94 and 3-95. Therefore, no substantive lack of analysis is demonstrated by this comment.

5. Hypothetical building bulk massing and associated westward view impacts from Danny Woo Garden and an optimal street view near Kobe Terrace Park are already provided in the Draft EIS (see Figures 3-27 and 3-28 on DEIS pages 3-122 and 3-124. No further views or modifications of the hypothetical bulk scenarios presented are necessary to respond to this comment. However, it is agreed that these are designated areas for view protection, so future buildings on relevant properties should be designed and reviewed with an eye toward being consistent with such protections.

6. This comment cites two data points that are indicators of households and housing units derived from different information sources. This response acknowledges there are disparities in these measures, even though there are also differences in what is counted: e.g., individuals or groups of individuals forming a single "household" as compared to numbers of residential units. The comment attempts to further relate these two data points to existing identified "gaps" in open space provision, which are identified from another Seattle Parks Department study. Because the cited data points from three separate sources cannot be reliably linked in a mathematical sense, the quantitative conclusion derived in the comment is not justified. Rather, the EIS reader may rely on the existing "gap" information that is provided at page 3-157 in the DEIS.

7. Undoubtedly, noise from Interstate 5 traffic contributes to elevated noise levels in portions of the Kobe Terrace/Danny Woo Gardens park. It is not necessary in this EIS to conduct a noise study at this location or to propose sound mitigation, because this condition is not an impact of the alternatives studied in the EIS and so no mitigation is required.

8. Your preference for new programs to be created to help support community livability strategies is noted.

9. Your support for extending an IDM 100'/200' zone east to the intersection of 6th Avenue S. and S. Main Street is noted. The lead agency agrees with the rationale expressed in this comment, and clarifies that the observation on DEIS Appendix page A-14 referred primarily to S. Washington Street. Main Street between 5th and 6th Avenue S. has a relatively modest slope where new businesses could be feasible and complementary to the existing setting. It is also noted that one building on the south side of Main Street that would be affected by this zoning concept is located within this neighborhood's National Register historic district.

10. Your support for a rezone to NC3 65' for the block east of Rainier Avenue S. containing the Japanese Language School landmark is noted. See Letter #14 for more details.

11. The lead agency agrees with the objective of limiting shadow impacts and their effect on the Danny Woo Gardens. The City's review of future specific development proposals in locations near the gardens would provide one venue for ensuring building bulk is well-located and conditioned to avoid significant adverse impacts.

    For this programmatic EIS, new sun and shadow analysis was performed to yield more perspective on the potential extent of impact. The analysis confirms there are shadows relating to garden areas, but only at certain times of year, certain times of day, and generated predominantly by hypothetical future development of one property at the southwest corner of the intersection of Main Street and 7th Avenue S. Morning shadows until roughly 11 a.m. in the months of October through mid-March could be generated on the garden area if a 150-foot tall building was built at 7th/Main. However, during other Spring and Summer periods, the shifting position of the sun in the sky negates the possibility of this impact. This is identified as a potential adverse shadow impact, but it is also considered to be of minor magnitude. The judgment of minor magnitude also relates to the modest differences between the existing IDR 150' zone and the proposed amended 150' zone.

12. Your preference for regulations to mitigate possible impacts to the historic core in the Chinatown/I.D. neighborhood is noted. The Preferred Alternative, as discussed in Chapter 2 of this Final EIS, contains proposals for setbacks in the cited vicinity. "Variable height limits" such as currently used in the Pioneer Square PSM 100' zone are not included in the Preferred Alternative, and are not likely relevant to the identified "old Uwajimaya grocery" block because the likely development would occur under one property ownership probably through a single development plan and not in an intermittent and dispersed single-property fashion as has been the case in Pioneer Square.

13. Your comments, which summarize several of the conclusions made in the business/economic impact analysis with respect to Little Saigon (see Appendices C-1, C-2 and C-3) but disagree with the strength of the conclusions about the severity of the identified potential impacts, are noted. While this comment suggests an inadequacy of analysis, the lead agency concludes that there is no inadequacy of the analysis under SEPA requirements, but the commenter simply disagrees with the strength of the findings and conclusions about the probable likelihood of occurrence. The lead agency concludes that the EIS already "closely evaluate[s] the likely development outcomes by the Alternatives for this area, and the impact on existing small businesses, along with effective mitigation strategies."

14. Livable South Downtown planning, including the City's efforts to define and evaluate a range of alternatives in the EIS, have considered the values and character of the community in detail, and the distinctive nature of each part of the Chinatown/I.D. neighborhood. Your comment's disagreement with the nature of one EIS alternative's zoning for Little Saigon and the conclusion of no significant adverse land use/development pattern impacts for Alternative 1 on DEIS page 3-12 are noted. However, the lead agency disagrees with this comment. As is clarified in the detailed land use analysis on EIS Appendix page A-16, this particular conclusion was informed by interpretation of the degree of zoning change. This includes noting that Alternative 1 zone changes north of S. Jackson Street would be from "Commercial" 1 to "Neighborhood Commercial" 3 zones without increases in zoned height limits. Given the characteristics inherent in those zones, such a change may be interpreted as a minor change for that location. Similarly, a rezone from an Industrial Commercial 65' zone to a Neighborhood Commercial 3 85' zone would likely lead to land use patterns that evolve away from heavier commercial and industrial uses as noted in the DEIS, and this can be construed as having negative and positive implications with a reasonable conclusion that does not indicate "significant adverse" impacts. See the Preferred Alternative description in Chapter 2 of this Final EIS as to how it relates to Little Saigon.

15. The perspectives, values and goals included in this comment about development patterns and zoning choices are noted. See the Preferred Alternative description in Chapter 2 of this Final EIS as to how the Preferred Alternative recommendations relate to Little Saigon.

16. Your comments favoring implementation strategies that include community development financing tools, community renewal designations, an interagency initiative and impact fees, are noted. See the Preferred Alternative description in Chapter 2 of this Final EIS as to how the Preferred Alternative recommendations relate to Little Saigon.

17. The perspectives, values and objectives in this comment about the housing study, goals, relationships to the Comprehensive Plan, and future development are noted. It is acknowledged that the cited Comprehensive Plan policies H30 and H34 are relevant to the discussion of housing production objectives. Encouraging family housing, limiting residential displacement, and encouraging rehabilitation of vacant and substandard buildings are noted as preferable objectives.

    The lead agency notes that the EIS study does not need to establish quantifiable goals for future affordable housing production. These are better defined by the Comprehensive Plan, other City housing policies and plans, and related ongoing policymaking and implementation efforts by City departments such as OH. Also see the response to comment #1 of this letter.

18. The numbers as cited in this comment are consistent with the information presented on DEIS pages 3-98 and 3-99. The initial text in the Impacts discussion on page 3-98 explains the basis for the EIS growth scenarios used in the impact analysis, which include their alignment with projections made by the Puget Sound Regional Council. See the cited section in the Final EIS for any edits made to improve clarity and/or update the analysis with respect to the Preferred Alternative.

19. With the assistance of OH, the information presented in Table 3-11 has been reviewed and corrected using the latest housing inventory information, and is now much closer to the number you cite. The corresponding housing unit total is now shown as 2,394 units, and the number of subsidized rental units is shown as 1,347 units. The housing inventory information, as of 2008, is included in Appendix E.1 to this FEIS.

20. OH has clarified that the Multifamily Property Tax Exemption projects are not considered "subsidized," but a number of those units are considered "affordable." According to rent level information available to OH, units in the Metropolitan Park and Ticino buildings are considered "affordable." Regarding an identified disparity about either 683 or 819 dwelling units having regulatory agreements at least to year 2030, the difference of 136 units may be due to the newest completed building known as Washington Terrace at 6th/Yesler. The housing inventory information, as of 2008, is included in Appendix E.1 to this FEIS.

21. The lead agency acknowledges that achieving additional affordable housing growth will entail making effective use of a range of available tools and strategies via public sector and private sector efforts. The information provided in this comment illustrates future needs that can be discussed over time by the City and neighborhood stakeholders. However, a couple of specific details about the information presented warrant further response.

    The estimation of needs in the second table in this comment is an example of a "balance sheet" approach that the lead agency considers to be unreliable for identifying levels of environmental impact, but may be useful in later discussions between stakeholders and City departments. The most pertinent example of an inaccuracy in that table (for impact analysis purposes) is its assumption that "at-risk" housing will be lost and therefore will add to the numbers of affordable housing needed to be replaced in the future. This cannot be assumed as likely to happen merely because zoning would change, in some cases only in minor increments, on the affected properties shown on Table 3-19 (DEIS page 3-88).

    In the first table within the comment, it appears that the "new housing units" totals presented for Alternatives 3 and 4 are not correct. Rather, based on Table 3-25, the projected growth through 2030 of new housing units is 3,837 dwelling units for Alternative 3 in Chinatown/I.D. including the south-of-Dearborn vicinity, and 1,826 dwelling units for Alternative 4 (the No Action Alternative).

22. Your comment disagreeing with the statement about funding 2,800 dwelling units through capital subsidies if trends continue into the future (see DEIS page 3-88), is noted. That sentence has been deleted from the Final EIS because it is too presumptive about future trends.

23. Table 3-20 contains projections relating to the Commercial Bonus Program, which currently is limited to supporting production of units at or below 80% median income.

24. Your comments advocating for particular transfer of development rights concepts and rezones within the historic core of Chinatown/I.D. are noted. See the Livable South Downtown recommendations report, and Chapters 2 and 3 of this Final EIS for edits, which further describe preferred approaches that include transfer of development rights concepts applicable to Chinatown/I.D. The lead agency disagrees with this comment's premise that not rezoning the historic core would "preclude" vacant and substandard buildings from securing resources from transfer of development rights proceeds.

25. The Draft EIS indication on page 3-89 that some existing housing units in privately owned buildings may become more affordable over time describes a possible future trend, reflecting what City staff have observed in other neighborhoods in the City. That doesn't necessarily mean it will happen in South Downtown, and it is not intended to be part of a "strategy for housing affordablility."

26. Your comments, indicating a preference for a progressive incentive zoning program that includes on-site (inclusionary) affordable housing construction or payment-in-lieu, a well-valued in-lieu payment amount, and an in-perpetuity commitment to affordability for the produced units, are noted. The City is pursuing an expansion of the Incentive Zoning Program separate from this EIS process. Your comments on how best to accomplish that program activity also should be provided as input to the Incentive Zoning proposal's decision-making process.

27. Your comments on the low proportion of affordable housing as compared to future projected development are noted. See Chapters 2 and 3 in this Final EIS for any edits that further describe the Preferred Alternative and the housing impacts.

28. Your summarizing comments on housing impacts are noted. See the responses to several other comments in this letter, including comments #1 and #17-27. The EIS Housing section evaluates and discloses a range of possible adverse impacts, but does not conclude that the potential impacts constitute a "significant adverse" or a "significant unavoidable adverse" impact. Your comments and suggestions about other financial and legislative tools that should be implemented to help achieve your preferred outcomes are noted.

29. Your comments in the attachment, which represent the Vision 2030 group's proposal of several strategies to address community concerns about future development's effects, are noted.

Letter 14
Japanese Cultural and Community Center of Washington (Nikkei Heritage Association of Washington)

1. Thank you for your comments requesting Neighborhood Commercial 3 65' zoning on the "Japanese Language School" property located between Rainier Avenue S., 16th Avenue S., S. King Street and S. Weller Street. Refer to Chapter 2 of this Final EIS for details on the Preferred Alternative.

Letter 15
Seattle Chinatown International District Preservation and Development Authority (SCIDPDA)

1. Thank you for your comments requesting additional zoning incentives and strategies to address building rehabilitation objectives in the historic core of Chinatown/I.D. The Preferred Alternative (see Chapter 2 of this Final EIS) addresses this topic by strategies including additional capabilities to use transfer of development rights strategies.

Letter 16
Jackson Place Community Council, Jill Moe

1. Thank you for your comments addressing the public process, the geographic scope of the EIS analysis, and the need to evaluate indirect, direct and cumulative impacts for transportation and other environmental elements.

   With regard to your request for response to your EIS scoping letter, you should be aware that SEPA does not require the lead agency to provide a letter response to comment letter writers on the scope of an EIS. After scoping, DPD planning staff did contact and meet with your group to describe the planning process and answer questions.

The size and extensive nature of the study area means that the impact analysis considered effects of growth across a wide-ranging portion of the city. Based on preliminary assessment during scoping as well as subsequent analysis for the EIS, no further extension of the EIS study area was considered needed by the lead agency for the impact analysis.

The potential for indirect impacts across a broader area was considered as staff prepared the EIS analysis, but few potential indirect impacts relevant to Jackson Place were identified. Examples of EIS discussions relating to a broader area than the study area include the following. 1) The EIS analysis mentions a relative consistency between Livable South Downtown land use alternatives and your vicinity's Central Area Neighborhood Plan. 2) It discusses the limited potential for direct land use and height/bulk/scale impacts of proposed changes as they relate to the eastern edge of the study area which is the Jackson Place vicinity nearest the study area. 3) The EIS includes review for historic landmark character of a few buildings located just outside the study area in the Rainier Avenue S. vicinity. 4) The Transportation section evaluates impacts on some intersections outside the study area (such as at S. Spokane and S. Lander Streets); and 5) also evaluates some transit loading impacts that have indirect effects on other areas served by those routes, including non-study-area neighborhoods east of I-5. Also note the transportation information in the paragraph below.

The EIS analysis as a whole examines a reasonable amount of residential and employment growth that could occur within the study area between the present and 2030, which corresponds to regional growth projections from the Puget Sound Regional Council as they relate to Seattle. The transportation analysis similarly uses growth projections and models that fully account for projected growth not only within the study area but in a widespread area outside the study area as well. For example, all growth in the City and region has been incorporated into the model to account for the expected increase in travel on all modes of transportation caused by development outside the study area. This means that traffic from specific developments now underway on S. Jackson Street and at Hiawatha do not need to be explicitly included in the transportation analysis because they are already accounted for as a part of anticipated future growth in Seattle. Therefore, the transportation analysis already addresses cumulative impacts and does not underestimate transportation impacts as suggested. Only known development projects located within the study area were listed explicitly in Table 5-2 of Appendix G.

2. Your comments regarding LOS F traffic conditions along S. Dearborn Street, Rainier Avenue S., and S. Jackson Street are noted. Arterial operations along these corridors are expected to remain at LOS E and F conditions under each of the alternatives, including the No Action Alternative, as shown in Tables 5-7 and 5-9 in DEIS Appendix G. It is expected that strategies to reduce the dependency on the automobile and advanced traffic management measures, as highlighted in Chapter 6 of Appendix G, can be implemented to help manage traffic conditions on these arterials. This means it would be possible to mitigate and reduce the worst-case significant adverse traffic conditions at the identified locations.

3. The City has already allocated $600,000 for designing and implementing traffic calming improvements in the immediate Jackson Place vicinity just east of the study area. This should be able to sufficiently address the identified cut-through traffic issues with a practical set of traffic calming improvements, such that further improvements would not be likely needed. This EIS has not identified spillover parking impacts in Jackson Place as adverse, significant adverse or significant unavoidable adverse impacts, and therefore no mitigation for this is proposed.

4. It is acknowledged that the EIS discussion of possible mitigation strategies, such as those relating to bus services, does not create an obligation for other agencies such as King County Metro to

provide additional services. Bus service hours are determined according to the availability of those agencies' funding resources and their decisions that allocate and distribute service to their system's routes inside and outside of Seattle. The Seattle Department of Transportation has on their work plan for 2008 a study to continue on with consideration of options such as those described in the Livable South Downtown EIS.

5. Your comments about air quality, traffic, energy efficiency and "green" strategies for addressing air pollutant presence are noted. Increased traffic in South Downtown would likely contribute to additional amounts of air pollutant loading. However, scoping processes for the EIS (including conferring with a representative of the Clean Air Agency) resulted in the lead agency concluding that potential traffic-specific air quality impacts would not rise to the level of probable significant adverse impacts, and thus did not warrant quantitative analysis. The Livable South Downtown planning process endorses the environmental benefits of "green" strategies as they may relate to achieving benefits such as greater energy efficiency, improved drainage performance, greenhouse gas emission reductions, and improved air quality. This topic is acknowledged in various sections within the Draft EIS and in the FEIS Chapter 3 Energy section, and further information is available in the Livable South Downtown recommendations report.

6. Please see the response to comment 1 in this letter.

7. As is noted in the EIS Scope under the Land Use element, light/glare and shadow impacts were to be analyzed as follows: "*Qualitatively describe the adverse impact implications of potential noise, odor, light/glare and shadowing factors to the extent they relate to overall judgments of land use compatibility between types of uses prescribed in the alternatives*." The Draft EIS included discussion of these topics mostly in relation to the Stadium Area and the Kobe Terrace Park/Danny Woo Gardens. The Land Use—Height, Bulk, Scale and Compatibility section in Chapter 3 of this Final EIS now includes an additional sentence characterizing potential for light/glare impacts for the Rainier Avenue S. vicinity under the Preferred Alternative.

8. The impact analysis for this EIS does include evaluation of a shopping center/mixed-use development at the Goodwill property as part of the growth scenario for Alternatives 1, 2 and 3. Alternative 4, which is the No Action Alternative, evaluates a smaller development at that site. Specifically, this includes the land use-related, economic/business and transportation sections of the EIS as well as any other impact analysis that evaluates impacts related to the amount of growth. Such analysis was conducted at a programmatic level suited to the environmental review needs of the Livable South Downtown planning study. The analysis to date has not identified inconsistencies of a commercial/mixed-use development at the Goodwill site with the zoning evaluated in the EIS alternatives. The site-specific environmental impact statement completed for the Goodwill site proposal prior to this EIS also includes extensive impact analysis addressing most of the elements of the environment. Please see the Preferred Alternative's zoning recommendations described in Chapter 2 of this Final EIS.

Letter 17
Kelly Lawrence

1. Your comments recommending a street-level solution and removal of the Alaskan Way Viaduct are noted.

Letter 18
Seattle Great City Initiative, Michael McGinn

1. Your comments supporting infill growth in South Downtown on the basis of land use, transportation, and environmental health efficiencies and associated positive effects on greenhouse gas emissions, resource consumption, sprawl, and natural environment pollution are noted. The positive implications were already acknowledged in the EIS impact analysis, but your point that the No Action Alternative also leads to adverse impacts has been acknowledged in edits to the Environmental Health section.

2. Your comments in favor of considering higher height limits for the purpose of generating additional housing, amenities and achieving other objectives are noted.

3. Your comments describing the transit hub and walkability of the central portion of the study area, and the preference to design streets for all users not just single-occupant vehicles, are noted.

4. Your comments in favor of further planning for enhanced parks, green streets and open spaces so that new development can meet "green infrastructure" objectives is noted.

5. Your comments in favor of sustainability, including in relation to energy efficiency strategies, are noted.

6. Your comments on the benefits of jointly planning for parks, transportation and sustainability objectives to achieve integrated "green infrastructure" results are noted. The recommendations from Livable South Downtown planning include strategies that may assist in making progress toward those objectives.

Letter 19
RealSolutions Capital LLC, Joe Nabbefeld

1. Your comments favoring the goals and objectives of the Livable South Downtown planning study are noted. To clarify a point made at the end of this comment, the different geographic allocations of growth studied in the EIS alternatives were defined for impact analysis purposes, and are not meant to endorse growth only in one portion of the study area or another.

2. Your comment noting the "carbon footprint" benefits of concentrating growth in the Downtown urban center, and the associated adverse impacts of <u>not</u> concentrating such growth (implied by the "no action" alternative), are noted.

Letter 20
Daniels Development, Kevin Daniels

1. Your comments describing the "Over-Tracks" property and its development, and your zoning preferences, are noted.

2. The conceptual benefits of increased height in zoning regulations are acknowledged. The City's SEPA policies on height, bulk and scale describe the potential for impacts in relation to possible incongruities or incompatibilities (SMC 25.05.675 G). They also indicate a preference for land use regulation to provide for smooth transitions between areas in different use.

The programmatic-level impact analyses on this topic in this EIS consider the potential for impacts under a "worst-case" scenario describing what theoretically might occur if height and bulk controls were absent or insufficiently defined in zoning regulations. This not only satisfies SEPA impact analysis purposes but can inform and influence the lead agency's development of final zoning recommendations and decision-makers' decisions.

Letter 21
Nitze-Stagen & Co., Inc., Kevin Daniels

1. Your comments describing the "North Lot" property and its development, and your preferences for analyzing a new PSM 200' zone at this location, are noted. See Chapter 2 of this Final EIS for further information on the Preferred Alternative.

2. Please see the response to comments 4 through 8 in this letter.

3. The conceptual benefits of increased height in zoning regulations are acknowledged. With regard to the last bullet point in this comment, it is inaccurate to conclude that in this EIS there is a "stated assumption that all height increases…cause adverse impacts."

   The City's SEPA policies on height, bulk and scale describe the potential for impacts in relation to possible incongruities or incompatibilities (SMC 25.05.675 G). They also indicate a preference for land use regulation to provide for smooth transitions between areas in different use.

   The programmatic-level impact analyses on this topic in this EIS typically consider the potential for impacts under a "worst-case" scenario describing what theoretically might occur if height and bulk controls were absent or insufficiently defined in zoning regulations. This not only satisfies SEPA impact analysis purposes but may inform and influence the lead agency's development of final zoning recommendations. Additional information included within Chapter 2 of this Final EIS provides more details about preferred height and bulk controls that would help avoid the worst-case impacts.

4. Your comments regarding the differences in land use assumptions specific to the "North Lot" are noted. The transportation analysis was conducted at a non-project-specific level, looking more broadly at the land use scenarios that could occur in each neighborhood under the proposed zoning. While individual development project assumptions might vary, the goal of the EIS transportation analysis was to identify approximate types and amounts of land use growth that might occur in the neighborhood. To begin this process, land use was estimated based on many sources of data, including preliminary development discussions. Prospective future development information was then summarized within the City's travel demand model's Transportation Analysis Zones (TAZs). Review Section 5.3 of DEIS Appendix G for a description of how the travel forecasts were prepared. This provides a reasonable estimation of future development to year 2030 in each particular neighborhood under each alternative. The transportation analysis is flexible enough and conservative in its growth assumptions such that it "covers" impact analysis for a number of different possibilities for future development at specific locations. Future project-specific reviews and analysis for specific development proposals could help further clarify project-related traffic impacts in the area, as is intended by SEPA policies.

5. Your comments regarding mode split and internal trips are noted. Tables 5-4 and 5-5 in DEIS Appendix G indicate a minimum 1% shift to non-passenger-car vehicles is likely to occur under the alternatives when compared to the No Action Alternative. Only 29% of the trips are expected

by single-occupancy vehicle. The City's travel demand model provides the best indication for future travel behavior based upon a series of assumptions including type of land use, vehicle delays, parking costs, transit network, etc. All these systems work together to define the population's particular transportation choices. No other tools are available to further model travel behavior for a geographic area as complex as this study area. Although it is recognized that additional shift to other modes might take place in the future, the City's travel demand model is the best available tool. In addition, the current analysis is a conservative estimate of possible impacts and therefore is preferable with respect to the disclosure purposes of this EIS.

6. Your comments regarding the need for additional transit improvements are noted. The mitigation strategies described in Chapter 6 of DEIS Appendix G highlight several types of strategies and improvements that could be made to the transit system to facilitate and improve this mode of travel. The transportation analysis indicates that new service alone would not be enough to address the deficiencies shown for each of the alternatives, including the No Action Alternative. New transit-only facilities (such as transit traffic lanes) are likely needed to improve transit speed and reliability through the study area. Transit improvements are being studied by the City as part of the Urban Mobility Plan, and such efforts will consider the strategies and issues raised by this transportation analysis.

7. Your comments regarding the loss of off-street parking spaces are noted. A comment about the contract provision to replace the lost surface spaces in the "North Lot" has been included in the Final EIS. The transportation analysis evaluated the likely number of surface parking stalls that could be lost to redevelopment opportunities, by neighborhood, as shown in Chapter 5.7 of Appendix G. It is likely any parking stalls created as part of new development would be prioritized first for the businesses or residents using that development. The City has a maximum limit on the amount of new parking stalls that can be built as part of new developments. This limits the amount of parking, including for general public use, that could be replaced when surface lots are redeveloped.

8. Your comments regarding the need for specific transit improvements and a transit-service-related sensitivity analysis are noted. The Transportation section of this EIS discloses adverse impacts and identifies potential improvements and strategies to mitigate them. Several types of transit improvements have been identified in Chapter 6.5 of DEIS Appendix G, including items such as bus or HOV lanes, transit signal priority, and increased bus service. These items are being evaluated as part of the City's Urban Mobility Plan that is taking a broader look at what can be done in the study area. Improvements in transit service are believed to be needed to address the future predicted mode split which anticipates larger volumes of transit ridership. An even greater shift to transit would require an even more significant additional investment in transit. These transit investments need to be evaluated over time and prioritized against other improvement needs and balanced against all system users.

Letter 22
Urban Visions, Gregory B. Smith

1. Your preference for a 6 FAR density for the south-of-Dearborn vicinity that is not conditioned on the presence of mixed-use development is noted. Your preference for the study of higher height limits up to 240 feet in this area is noted.

2. Your comments describing the sufficiency of SEPA and MUP processes, and a preference to avoid "public meeting and negotiation processes" in development approval processes, are noted.

3. Your comments describing a preference for the EIS to study greater heights and densities in the Stadium Area are noted.

4. Your comment opposing a zoning choice that would prohibit residential uses on the WOSCA property is noted. However, such a choice would continue to be an option. Your comment about the potential for effective noise mitigation strategies is acknowledged.

5. Your comments noting a preference to avoid "public meeting and negotiation processes" in development approval processes are noted.

Letter 23
Uwajimaya, Inc., Tomio Moriguchi

1. Your comments in support of the recommendations of the Vision 2030 group of stakeholders, and support for tools and zoning to realize the favored improvements in South Downtown, is noted.

Letter 24
Vietnamese American Economic Development Association, Quang Nguyen

1. Your comments in support of guiding principles that would favor small business districts, cultural character, balanced income-mix in housing production, and discourage encroachment of out-of-scale retailers in the study area neighborhoods, are noted.

2. Your comments in support of the recommendations of the Vision 2030 group of stakeholders, and opposition to NC3 zoning in Little Saigon, are noted.

3. Your comments preferring inclusion of the Dearborn Street (Goodwill site) project within the Livable South Downtown process are noted.

4. Your comments on the inadequacies of the case study examples in the "Phase II" business and economic study (Appendix C-2), and their irrelevance to assessing a large shopping center's impacts in Little Saigon, are noted. These case studies allowed the consultants to reach a variety of "lessons learned" conclusions that predominantly relate to neighborhood-based community development strategies. This is a body of information that is complementary to the purposes of understanding the existing situation of the Little Saigon and Chinatown/I.D. neighborhoods, and other information in the Phase II study also assists in characterizing the sensitivity of existing business districts and the degree of overlap between existing retail uses and those proposed in the Dearborn Street project. The other Phase I and III studies also contribute to a meaningful body of information.

5. Due to the availability of pro-forma real estate development analyses comparing existing zoning and alternative zoning scenarios, the lead agency was able to make conclusions about the degree to which potential value of development would shift. Under the 85-foot height limit alternatives, the difference in profitability is predicted to be 1-7%, while the 125-foot height limit alternative is predicted to result in reduced profitability due to higher construction costs. These figures and the other analysis of the consultant inform a conclusion of a "modest" increase in potential value of development. See pages 3-53 and 3-54 in the Draft EIS, and pages 30 and 31 of Appendix C-2.

6. Your objections to the description of mass-market customer exposure effects on Little Saigon are noted. See pages 3-54 to 3-55 in the Draft EIS, and pages 33-35 of Appendix C-2. A straightforward reading of the impact discussion shows that it does clearly identify a range of positive and negative possible effects of a new large shopping center at the Goodwill site. It does not diminish the importance of the points cited in this comment. First, it highlights the importance and sensitivity of parking resources available for the existing range of Little Saigon businesses. Second, it acknowledges that customer behavior, locational and topographic factors may discourage most shopping center customers from walking to other Little Saigon businesses outside the shopping center unless they re-park their vehicle elsewhere. Third, the study comments on the capacity and potential interest of Little Saigon businesses in responding to this customer base.

   To clarify one point made in your comment, the consultant does not describe the situation as one where "in order for those customers to shop in Little Saigon…" they would "have to park twice" (emphasis added). Rather, the consultant indicates that parking twice would be one possibility that is "considered to be a challenge by the retail industry."

7. Your comments with respect to the terms "low probability," "speculative," and "difficult to predict" are acknowledged. While the terms "low probability" and "speculative" can be construed in a neutral sense that together may convey a sense of their likelihood, it may be preferable to use another term such as "less probable impacts" to avoid possible negative or dismissive connotations. Edits to these terms have been made in the Land Use—Business and Economic Impacts section of Chapter 3 in this Final EIS. The analytic discussion on these points has otherwise been retained.

8. Your comments favoring respect of neighborhood plans and goals and neighborhood-strengthening actions, are noted.

PUBLIC HEARING TO ACCEPT VERBAL COMMENTS ON THE
LIVABLE SOUTH DOWNTOWN PLANNING STUDY
DRAFT ENVIRONMENTAL IMPACT STATEMENT

December 5, 2007

6:30 p.m.

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MS. SUGIMURA: Good evening. I think we'll go ahead and get started now. Thank you very much for coming tonight. Hopefully you're all here because of the Livable South Downtown work and to comment on the draft EIS, correct?

Thanks very much. I'm Diane Sugimura. I'm the director of the Department of Planning and Development. And I'll just do a few brief introductory remarks. We'll have a brief explanation of the four alternatives that were in the EIS. But the purpose of tonight's meeting is primarily to hear from you. And so that's what we want the majority of the time tonight to be, an opportunity for you to speak. So you probably want to talk about the planning work in general. But more specifically, to comment on the EIS. That's the main purpose of tonight's meeting.

As many of you know -- and you have been involved in this for quite a while, and we appreciate your participation -- some of the key objectives in this planning area have been livability, neighborhood improvement, and economic vitality. These are the things we heard from neighborhood folks.

These are extremely important historic and culturally special, very special neighborhoods for the City of Seattle. And we're looking at funds for the greatest housing growth and making sure these remain and get to become even more vital communities than they are. We're looking at urban design improvements. And all through that, it's very important to reinforce and protect the unique quality of these neighborhoods. A number of the

locations in the south downtown area will also provide us with an opportunity for employment growth, not just housing but opportunities for employment growth as well.

And then another interest that has been key from both the community side as well as the neighborhood side is looking at how we can make this a truly sustainable neighborhood, looking at how we can have more green elements in our community developments, our physical development projects, as well as the neighborhood as a whole.

We appreciate all the participation from all of you over-- it's been quite a while now that we have been working on this. You have been a great and very insightful group to work with. We have had fourteen advisory group meetings, and those meetings were probably attended by twice as many people as were on the advisory committee. We have had a couple of public open houses. We had an EIS scoping meeting as well. And staff have met a number of times with the neighborhood review boards.

Staff has been trying to look at the issues very broadly as we look at the broader South Downtown area. South Downtown includes Pioneer Square, the International District, Little Saigon, the stadium area. We have looked at -- we have hired consultants to help us with our environmental impact analysis. And we hired consultants to look at real estate business and economic impacts, transportation impacts, and noise issues. All of this information is included in the draft EIS.

This DEIS process, as we call it, is a very important step in the whole process to look at the zoning and land use issues and other issues in South Downtown. It's also a required part of the legislative rezone process and provides the public an opportunity to provide us with comments on what -- on the issues we are looking at, let us know what you're thinking, and it will help the decision makers, the mayor and the city council when the zoning changes are made and the other changes are made to the-- in the district.

The DEIS was published November 1st. The comment period ends December 17th. And if you have written comments, we would love to have written comments as well as your verbal comments tonight because that way we can make sure that we have got all your points correctly.

We have a court reporter tonight, so we believe that we'll probably have as accurate a record of the comments as we have ever had. Those comments will be included in the final EIS as well. So we should have a good record of your comments.

Tonight, I think we had about nine or so people on the sign-up list. We still would ask you to keep your comments as succinct as possible and as specific as possible to help us. But maybe three to five minutes a person, and then we'll see. There might be other people who want to speak afterwards who haven't signed up. But we would like to keep things moving so that everybody can speak tonight.

We have interpreters for Chinese and Vietnamese in the back. Raise your hand. So if you know people who would like to use the interpreter service, please probably, I guess, just go up to them and let them know. So hopefully that will help people who would like to use that service.

And one other little bit of directions, in the interest of helping to save the environment, we no longer provide you with bottled water. It's one of the new rules in the city hall. And the cups are compostable. So we really appreciate it if you would put them in the compost bins, the brown bins at the back door by the window there. We're trying to make an effort here.

The other thing, I am going to have to leave fairly soon because I have got another meeting in Lake City. It's not that I'm not interested in what you have to say, but I got double booked tonight, so don't be offended. Gordon, do you want to briefly talk about the alternatives?

MR. CLOWERS: I just wanted to point out there are copies of the EIS available in disk form or paper form if you would like to pick one up. We did run the scoping period for this EIS mid-last year. And we did add a few topics as a result of folks' comments. So we are covering the majority of topics that are possible to study in SEPA.

We've produced a programmatic EIS. The [alternatives] are portrayed here. We have three action alternatives, one no-action alternative. The alternatives represent different combinations of possible zone changes that we could make. We

don't have to choose them in any one set or another. We can mix or match.

In general, we've themed the alternatives to represent a kind of a geographic spread of options for level of change. Alternative One tends to concentrate more of the change along the western portion of the study area. Alternative Two tends to focus more change along the central eastern part of the study area. And Alternative Three is a bit more balanced set of changes across the whole study area.

What the alternatives do is really provide us the full range of zoning choices that we want to consider for each particular subarea, whether it's south of the Dearborn area, Chinatown, Little Saigon, Japantown, Pioneer Square, or the stadium areas.

So we look forward to hearing your comments tonight. And you can submit written comments through December 17th. And following that time, we'll get to work on the final environmental impact statement, which will include your written and spoken comments, and also continue working on the next steps in making our final recommendations which are shown on the board to the left there.

So without further ado, we'll move into the comment stage. First up is Jose Gaitan.

MR. GAITAN: Good evening. Thank you for the opportunity to address you this evening regarding the Draft EIS for the Livable South Downtown planning study. As you have stated, my

name is Jose Gaitan, G-A-I-T-A-N. I'm here this evening in my capacity as chair of the Public Facilities District.

My colleagues and I who serve on the board of directors of the Public Facilities District, i.e. Safeco Field, take our responsibilities very seriously. Our responsibilities are to site, design, build, and operate an excellent and attractive baseball park that is an asset to the community and to this region.

To put it succinctly, we are charged with protecting the public's investment in this publicly owned facility to assure that its value is retained not just today, but through future generations.

Unfortunately, each of the action alternatives studied in the DEIS we believe jeopardize the public's investment by threatening the qualities of the ballpark that make it a wonderful and unique destination, the destination that it is today. 1

We are disturbed that despite our repeated calls to the South Downtown advisory group, and through the South Downtown advisory group, and in our meetings with planning staff, and in our EIS scoping letter where we have talked about the impact of the views from the ballpark, that these were not adequately studied in the DEIS. Likewise, we are concerned that the traffic evaluations underestimate the impacts of the greatly increased density on the operation of Safeco Field. And they fail to 2

adequately study the impact of event traffic for Qwest and Safeco.

These events are not-- these events are not merely a special occasion. Between Qwest Field and the events center and Safeco Field, our facilities are hosting at least one event almost every day of the year. 2

While special zoning areas in Pioneer Square, the International District, and the greater Duwamish manufacturing and industrial area are recognized repeatedly in this draft EIS, the existing stadium overlay district that currently governs development adjacent to the ballpark is virtually invisible. Indeed, in reading the Draft EIS, it is as if Safeco Field and its companion venue, Qwest Field, are barely acknowledged as existing conditions, facilities whose needs are important to accommodate and facilities whose needs are important to study in relation to any major change in the development of that area. 3

We will be submitting a DEIS comment letter more fully detailing our many concerns with oversights and inaccuracies that we find in this draft document. Let me close by reminding you of the important history of Safeco Field.

The PFD chose to site Safeco Field in 1995 for a number of reasons -- chose the site of Safeco Field in 1995 for a number of reasons. While the site was easily reachable from downtown, it was intentionally not located in the center of a neighborhood with a high level of residential and retail density. 4

Public input from the Pioneer Square neighborhood in particular strongly discouraged the siting of the ballpark any closer to competing demands of residences and businesses, claiming that traffic and pedestrian flows were incompatible with those uses in close proximity. Additionally, the site that we eventually decided on offered the opportunity, an opportunity to take advantage of the spectacular and signature views of Elliott Bay, the Olympic Mountains, the sweep of the downtown skyline, and not from the high price seats that exist at Safeco Field, but from the over concourse and outflow seats that are the preferred destination for families and youth and community groups.

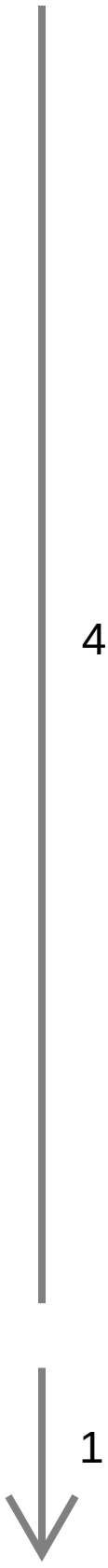
This proposal suggests that access to the spectacular views enjoyed by over three million people each year will get transferred to the wealthy few who can afford the high priced condos in the building that will wall the ballpark in the event that the current rezone proposal remains unchanged.

While we support the city's interest in increasing housing and density in this area, we think it should be done in a more measured fashion, through a plan that will add to, and not detract from, the public's investment in this very important publicly owned facility.

Thank you.

MR. MORIGUCHI: Thank you. For the record, my name is Tomio Moriguchi. I'm the chairman of Uwajimaya, Inc.

Uwajimaya owns three contiguous blocks of the Seattle International District. And I wanted to thank the committee for



undertaking this once in a several decades effort to update the South Downtown zoning.

Uwajimaya has continuously operated its flagship store in the neighborhood since 1946. I have been involved with the betterment of the International District since the Model Cities Program of the late 1960s.

From our small 3,000 square feet Main Street store in 1946, when we moved to our 24,000 square feet at Sixth and King Street in 1970. And one evening in late November of 2000, we moved our 50,000 square feet Seattle Uwajimaya store across the street from Weller Street to our new Uwajimaya Village. Three months later, Bruce Lorig Associates Uwajimaya opened Village Apartments over our Uwajimaya Market.

We believed in our neighborhood's future. We wanted to make a positive contribution. Uwajimaya and several family members put everything we had on the line and risked millions of dollars on this new 70,000 square feet mixed use complex anchored by Uwajimaya Market and 176 unit market rate housing above us. Uwajimaya Village was the first of this kind for the downtown Seattle area. And we hope this mixed use development would be a prototype for future developments in our neighborhood.

Consequently, the zoning is necessary. I am glad our development partner, Bruce Lorig, was able to convince Bank of America that the Uwajimaya Village was a good business decision. Today, Uwajimaya Village thrives. And we believe it has been an

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economic catalyst for the International District, which has contributed to the South Downtown economic base.

But there is much more to dream about and so much more to do. The Vision 2030 group composed of participants from Little Saigon and Chinatown ID area has presented to the city, and I hope it will be part of the record, the vision of this organization for a vibrant, denser neighborhood with a balanced mix of housing, businesses, cultural destinations, community services, and even a hotel.

A place imbued with Asian character and history, a place for family, a place for professional singles or childless couples, a place with a sense of community and culture, a place convenient and accessible.

By 2010, light rail operations and continued bus services, plus I-5 and I-90 access improvements will make the district a transportation nexus providing significant opportunities to further state growth management goals and help the city create denser, mixed use South Downtown neighborhoods. 1

What's needed now for South Downtown's future is zoning that encourages transit oriented sustainable development that will bring the Vision 2030 to life. The district needs heights and densities to take advantage of the transportation hub.

Also the district needs tools such as transfer of development rights to support fixing up buildings that are worthy of a new life. We need a bonus program that helps to fund public benefits that does not jeopardize the feasibility of new

development. I encourage the city to provide the heights, densities, and tools that will make Vision 2030 a reality, a reality that will support state growth management goals and encourage sustainable transit oriented development.

In closing, given the zoning and tools, I pledge that Uwajimaya and the Moriguchi family will continue to make significant investments in Seattle's International District.

Thank you.

MR. CLOWERS: David Young followed by Fred Mendoza.

And Susan wanted me to remind you, if you have written testimony, you can submit it to us, and we'll give it to the court reporter.

MR. YOUNG: Hello. I'm David Young. I'm the assistant general manager for Qwest Field and Events Center.

First and Goal is proud of the fact that we're delivering on the promises made when the public invested three hundred million dollars in Qwest Field and Events Center by bringing hundreds of events every year to our facility to make it a vibrant part of the South Downtown area. We're not only home of the Seattle Seahawks. But in 2009, we will be home to the new major league soccer franchise. Also we host college football, the annual supercross event, and large concerts such as the Rolling Stones and Kenny Chesney. Also we have the attached events center which is the home to the region's four largest consumer shows.

In addition to that, we host hundreds of other events, from nearly thirty shows and events in our new WAMU theatre, to corporate meetings, trade shows, and graduations, and other social events.

This means we are busy just about every day of the year. In fact in 2006, just at Qwest Field and Events Center alone, we hosted 274 individual events which accounted for 531 event days. Knowing that some events are more than one day and overlap, and you could have more than 365 event days in a year. We also coordinated load in and load out activity on 122 days in 2006.

All of this activity drew over 1.1 million visitors to the South Downtown area in 2006. And we're on track for very similar numbers for 2007. And we project in the future for that number to grow. 1

As our neighbors agree, it's not always easy to have a stadium and events center in our neighborhood. But we have built relationships with the neighborhood organizations in Pioneer Square, SODO, Chinatown, and the International District. We support the goals of the Livable South Downtown. We support increased density and mixed use development in the area. For example, we are on record in support of the development or proposed development in the north half of our north parking lot. While this development will make things more complicated for us, we do recognize the benefit to the neighborhood.

However, we are concerned that the Draft EIS does not adequately analyze the impacts of the existing condition, which

is the facility operations and events in conjunction with the expected new development contemplated by the proposed zoning changes. This is essentially in the area of transportation.

Our concerns are not new. In June of 2006, we outlined this in our scoping letter for this EIS. And our concerns are not limited to transportation and parking, but for tonight in the interest of time, that's where I will focus.

The DEIS does not adequately consider the annual volume of events at Qwest Field and Events Center. Indeed, in browsing through the DEIS statement of impacts, statement in general, the stadium is barely mentioned. The DEIS does not adequately quantify the expected impacts of new development, nor does it propose strategies to mitigate those impacts. The strategies must not only deal with the event traffic, pedestrians and parking conditions on weekends as well as weeknights, but also the traffic and congestion that arises while the events are moving in out and out of the complex. This activity, which often involves hundreds of semis and large vehicles may happen around the clock, weekdays, weeknights, and on weekends.

This activity is very easy to overlook because it occurs outside of when the normal -- the public event is open. As I noted before, this activity occurred on 122 days of the past calendar year. That's about a third of the entire year. And generally this activity is the most impactful to traffic in the South Downtown area.

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We're very concerned about the impacts on our operations, of course on the businesses, and residents also existing in the area. But more importantly, the inadequacies of the DEIS severely limit the city's ability to create a positive environment for new businesses and residences. The existing transportation infrastructure is already overburdened. Leaving the problem to be solved in the stadium transportation management program is not a solution.

Without a proactive series of measures to address the increased event related parking and transit related demands, the quality of life will be highly compromised. Thank you.

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MR. CLOWERS: Fred Mendoza followed by Kevin Daniels.

MR. MENDOZA: Thank you very much. My name is Fred Mendoza. I'm the vice chair of the Washington State Public Stadium Authority, or the PSA. The Public Stadium Authority is the owner of Qwest Field and Events Center, a facility that was built with 300 million dollars of public money. And that money not only came from the citizens of Seattle and King County, but the citizens of the entire state of Washington.

Interestingly, that public investment has already returned to the state of Washington, aside from the economic impacts, positive economic impact on the community, over a million dollars in cash that has been returned to the state common school fund from the events that Mr. Young has just described.

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The PSA will take the opportunity to provide written comments by the deadline. And my comments are intended simply to summarize some of the initial views that we have taken.

First of all, let me say that the Public Stadium Authority supports the city's goal for increased density in the South Downtown neighborhood and welcomes the new residential and commercial development in that area. We have been on record since the beginning supporting that, and we still do.

As stewards of the public investment at Qwest Field and Events Center, the PSA's sole mission is to oversee the operation and maintenance of these facilities, to maintain the value of these facilities, and insure that the quality experience of the tenants and the millions of people who attend the events is protected. 1

We're very concerned that the Draft EIS understates the impacts of the proposed rezone of South Downtown area under all but the no action alternatives and does not appropriately acknowledge the importance and the value of the stadium and events center or the stadium transition area zoning overlay district.

All of the action alternatives in the DEIS achieve growth targets that materially exceed the area wide growth targets established by the city's current comprehensive plan. That's interesting. 2

Without considering lower growth targets with some alternatives, the impacts of less intense development are not

studied. And if they are not studied, then in our view, the EIS is not adequate. 2

The DEIS also does not adequately analyze the environmental impacts and impacts on the land use, the land use changes resulting from the rezone, the proposed rezone. These include significant impacts on the transportation system and on the area and on parking.

As noted in the draft, if the build-out occurs at the levels that are planned, significant area of surface parking [would] be lost. I should point out here that Mr. Young didn't mention that each year since the events center has been open, and the stadium has been open, attendance and demands on that facility have increased. So even in the no action alternative, the demands for parking are going to increase, and the transportation issues are going to continue. 3

The DEIS does not recognize the value of public views that will be lost to and from the stadium. The environment in which the publicly owned facility was sited and constructed showcases Seattle's dramatic views. Just watch Monday Night Football, and you will know that. The stadium has become an icon. 4

You remember twenty, thirty years ago, the Space Needle was the city's icon. Now there are two icons in the city, or three including Safeco Field. And removing those views is a significant impact that should at least be addressed in this process.

Finally, the proposed mitigation measures, we believe, are inadequate. For example, Qwest Field should not be responsible for mitigating the transportation impacts caused by the future development through our annual transportation management plan. 5

As I said, usage continues to grow every year. And the transportation plan and its management become more challenging every year.

We believe that new alternatives need to be studied and that all of the significant impacts on Qwest Field and Events Center as well as Safeco Field need to be disclosed in order for the EIS to be an adequate document and an adequate study under state law. 6

We look forward to working with the city during that process. And finally I would like to reiterate what I said at the beginning, that PSA supports the city's goals and the rezoning efforts. However the city's goals should not be achieved at the expense of, or with the undue burden upon, one billion dollars in public investments in stadiums. Thank you.

MR. CLOWERS: Kevin Daniels followed by Tom Im.

MR. DANIELS: Good evening. My name is Kevin Daniels. I'm the president of Nitze-Stagen. We have been actively involved in Pioneer Square and the stadium neighborhoods for well over a decade and have made numerous investments in the community.

We are also currently partners with Opus Northwest on what is known as in the EIS as the Union Station Development and have been working with Burlington Northern Santa Fe on the over-the-tracks development.

I would like to take a few minutes and start by thanking the staff for the inclusive approach during the last few years with respect to how many meetings there were and how important it was given the possible changes in the zoning for the neighborhood. And then I'd like to speak on just two direct points. And we'll do the rest of mine in written comments.

When we developed the Union Station project, it was our hope that it would serve as a catalyst, as a regional hub. That is one of the key reasons we, as well as Paul Allen, donated the station building to Sound Transit for headquarters. We are clearly not there yet. But we still hold out the hope that with the upcoming transfer of the King Street Station to the city's control, that we have more possibilities and opportunities ahead of us. 1

We encourage the city to take advantage of the transportation options at the King Street Station and increase density within the neighborhood in a smart but sustainable way. It has seemed odd to me for a number of years that the area in the central city with the highest concentration of transit options are located also has the lowest allowed density. And maybe we need to reflect on that.

We support the current Livable South Downtown concepts that increase the possible density in the area. We disagree with one statement made in the DEIS, that increased height and density will have severe negative impacts, as if those are as a fact. We don't necessarily think they need to be. As we look at our future development projects in the Pioneer Square neighborhood, we see a great opportunity to address the neighborhood's stated goals in the last twenty years and create a true transit oriented development. But in order to accomplish that goal, we'll need increased density and heights in the area around the station. 2

We also have a number of responsibilities under a contractual acquisition agreement with the county that we will provide subsidized affordable housing, as well as work force housing, as well as the necessary parking for the stadium that we are building over. These requirements cannot be done financially under the no action alternative by anyone. And we want to make that statement known. 3

Putting on another hat, as one of more passion than a business investment, as the newest trustee for the National Trust of Historic Property and the vice chair of the National Preservation Committee, I want to take the opportunity to emphasize the importance of protecting the unique collection of historic assets within both neighborhoods as well as the truly irreplaceable cultural heritage that's present down there. It's quite unique to have two historic districts side by side. 4

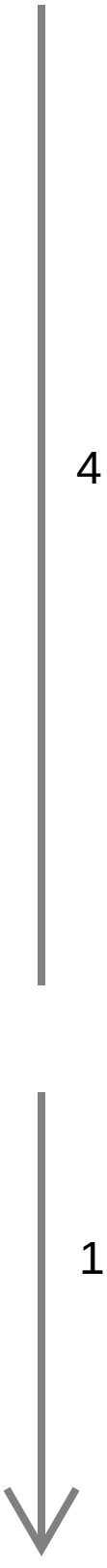
I would also encourage the city to continue to work on preserving these assets within the new planning effort, but understand the long term viability of any historic neighborhood requires investments and more density in the long run to successfully protect historic assets. That's a lesson that the Trust has learned. Creating a living and thriving neighborhood is the best way to preserve our current historic assets that we all treasure. And it does appear to be [that] in the past we have missed this lesson. Neither district should be looked upon as a museum piece that needs to be protected behind a glass wall for somebody in the future to look through it, but rather as a collection of historic assets and community memories that shelter both those who live and work daily within our community.

So please bring a balanced approach to preservation goals by recognizing the importance of community development and revitalization within these neighborhoods. Thank you.

MR. CLOWERS: Tom Im, followed by David West.

MR. IM: Hi. My name is Tom Im. I'm representing the group called the 2030 Vision Group, which is a number of stakeholders in the International District. And ultimately we went through like, I would say, a year and a half process, meeting about 40, 50 times to complete a business statement for the community, what we want to see in the year 2030.

And it has a number of goals in this document. It talks about what type of housing goals, what type of business retail



community we want to see in the year 2030. It also states the type of public spaces that we want to see in the community.

This document was formed because we felt that we needed to respond to the city's initial query into the South Downtown community study. So in essence, we came up with some land use recommendations. We printed a little map here. This is in color. And we also wanted to encapsulate the type of legislative as well as financial goals -- I mean tools, that need to be -- that needs to accompany these, the land use references that we have stated in this map as well as the document. 1

And we said this has to be a holistic process. So after reading the DEIS, which I'll make some further written comments, I just wanted to touch on two topics.

One is on the issue of retail businesses, the section called business and economic impacts. And I just want to make reference to the International Special Review District, the small businesses in our community. It was created in the 1970s. If you read through the ordinances as well as the guidelines, you'll notice there's a lot of values encapsulated in the document talking about maintaining small businesses and the main core of our community. 2

And that's something that's right now in question in our community, maybe not in the Chinatown community, but east of the freeway. And there's a large development that's being planned. And that's something that we think we need to look at, not just in the Chinatown core, but in the Little Saigon neighborhood.

And these are the values. I think the Little Saigon community also has high values in their community.

One of the things that was looked-- that was not looked at, that I hope will be looked at in further review is that the zoning that was in the three alternatives looked at, NC3, I think DMC, and -- it didn't look at zoning that would limit the square footage of retail stores, such as NC2. That's one of the recommendations we have in our document. We have this zone called ID-- we didn't know what to call it -- ID-Little Saigon Mixed. And that's a hybrid between NC2 and also the IDM [zone's] values. So those are the type of values we want to see in the Little Saigon community.

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The second subject I would like to talk about is about housing. Housing is really an important issue. We're a 501(c)(3) that builds affordable housing. So we took a little bit of a lead when it came to creating the 2030 vision. And I think the document, the DEIS is very comprehensive when it looks at housing. It looks at the number of housing units that will be created, the number of units they might produce, the at-risk housing units that are out there, 350 units, how time might dilapidate some buildings to migrate to more affordable.

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I think the one thing that's missing: it doesn't really have a stated goal, a baseline, that is how many units of affordable housing that needs to be produced. And I think that's an important element to have within this document. And that might be okay in some circles. But in our vision, when we say we

want to see at least 33 percent of units in our community at 50 percent below median income, we want to see a balanced community. That's why we stated that's our goal.

If we're going to produce -- if we have 2,500 units in our neighborhood, and we're going to increase it by another 6,000, that's the math we have to get to. And that's the number that we should target when it comes to subsidies. And right now what I see, I don't see the programs that are out there that will sufficiently catch those numbers. I only see 2,500 units and the present programs that we have. They might get to the numbers. So I think there's other programs that need to be created.

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And that leads me to these other issues of street space improvements and open space improvements. In the DEIS, it doesn't talk about what are the strategies to get more open space and better open spaces for our neighborhood. And that's basically what we're trying to create in our community. We're trying to create the legislative tools, such as NC2 zoning as well as financial tools, that will enable our community to actualize this vision that we have created. Thank you.

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MR. WEST: Good evening. My name is David West. I'm the executive director of Puget Sound SAGE, a new organization which is a community labor partnership in King County. Our members include the Church Council of Greater Seattle and four major unions.

We're here tonight to generally support the recommendations that Tom Im just discussed from the Vision 2030

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group. We're in full support of that. And in particular, to make sure the zoning they talked about for the area east of the freeway, their recommendations be applied, you know, to that -- to that area in your final reports.

Our concern is that this proposed development at Dearborn is the elephant in the room that we're looking at, the east side of the freeway. It's referenced to in the zoning maps through the zoning, but it's not fully discussed or analyzed in the draft.

Where the economic analysis is particularly lacking is in the real impact of a large shopping development like that on the surrounding neighborhoods, on traffic, on transit, and on parking. What the analysis did not do, but what needs to be done is to look at-- what you're looking at is if you drop Northgate Mall or University Village into that space. And the economic analysis didn't do anything on that scale, not to mention, the follow-on development that inevitably follows these developments that we have seen in the Northgate and University Village area.

As it stands, these alternatives that allow this kind of large retail development makes Little Saigon and those surrounding neighborhoods a “big-box sacrifice zone” for the benefit of other Seattle neighborhoods, for Downtown, Queen Anne, Capitol Hill, and other areas. Based on the interviews that we, our organization and the other neighborhood groups within our coalition have done in the neighborhoods, there's really no support for that kind of development.

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Finally, I would just -- your director mentioned there's going to be a jobs impact of these changes. And so when you're looking at zoning that supports “big–box” retail, the jobs that you are going to get are absolute bottom of the barrel when it comes to living-wage benefit of jobs -- that support the city as a whole, and prevent the necessity of having the city spend large amounts of money on health subsidies through the hospitals and the public health department to support that kind of resource.

MR. NGUYEN: Good evening. My name is Quang Nguyen. I'm the executive director of VAEDA. We represent the interest of small businesses in the Vietnamese American community in the Seattle area.

Little Saigon is around today because of the hard work and sacrifice of hundreds of families over the last twenty years. It is the-- it's a vibrant and vital part of the Vietnamese community.

We're very supportive of the Livable South Downtown's effort to increase density in our neighborhood and also in Chinatown ID. We strongly support a more livable neighborhood that preserves the cultural uniqueness and character of the area, while sustaining and growing the small business component.

That is why we strongly support Vision 2030, created in collaboration with groups in Chinatown ID. However, we find that looking at the EIS, or the DEIS, that the DPD's recommendation of NC3 [zoning] for Little Saigon to be unacceptable. We believe it runs counter to the community's wishes. We believe that a

modified zoning designation for Little Saigon akin to NC2, akin to what Tom has mentioned before, is much more appropriate for this community.

We hope that you incorporate Vision 2030 into your final recommendations in full form. I would also like to make some comments about the economic impact study that was done. I think that it was a good start. However, it's an inadequate study. Unfortunately, the study -- for example, none of the case studies examined any-- in any of the case studies examined, there were no retail developments in any of the cities that were comparable to the Seattle situation. Another example is in the impact analysis of the economic impact study. It says that there would be modest increase in potential value of development in the remainder of the Little Saigon area due to increased heights. But it doesn't look specifically at the impact the Dearborn project will have on potential value in the neighborhood. Why is this? I'm not sure. I think that's a huge, glaring hole there.

Another example is the Little Saigon high impact -- high probability impact #3 that states that there would be increased exposure of existing Little Saigon businesses to mass market customers from the Dearborn project. This conclusion is pretty obvious. If you plunk down 650,000 square feet of retail space, of course you'll get a lot more mass market customers. However, the relevant question here is, what is the likelihood of those customers shopping or eating at Little Saigon after they complete their shopping at Target or Best Buy?

The study gives the answer to this question much less prominence later by saying, in order for those customers to shop in Little Saigon after they shop at the mall, they would have to park twice, which in the industry is considered very challenging. So in other words, they are not likely to frequent little Saigon businesses after shopping at the mall. And it's strange this fact is given much less prominence, even though it's much more relevant.

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Finally, I would like to conclude by saying that I hope that Livable South Downtown incorporates the Dearborn project into its process. And not allow-- I hope the city doesn't allow the Dearborn project to move ahead without the final recommendations of Livable South Downtown in place.

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And I would also like to add that-- to thank Susan and Gordon for their hard work. I think they have been very helpful in our community's effort to understand this process. Thank you.

MR. CLOWERS: Is Melody McCutcheon here?

AUDIENCE MEMBER: My understanding is she was at another meeting and was going to try to be here now. Unfortunately, it appears she was longer than she thought. So we will defer her remarks.

MR. CLOWERS: Is there anyone else who would like to speak? Okay.

MS. MOE: Hello. My name is Jill Moe. I'm a co-chair of the Jackson Place Community Council. The Jackson Place community is directly to the east, the far eastern border of the study

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area. I would like to thank you for your attention to the South Downtown area. It's very important, I think, in the study. And we have been glad to participate in the past working with Susan.

Tonight, I guess, I would like to second the comments that were made by SAGE and VAEDA and also ask in particular, again, that the traffic, transit and parking impacts to adjacent neighborhoods be considered for the next iteration of the EIS. We're already experiencing significant cut-through traffic due to the low levels of service on Rainier and Jackson. And so I think it's important that the City look at those impacts and consider specific mitigation to handle those impacts associated with whatever alternative is pursued. 1

And, again, we'll be submitting a specific comment letter before the end of the comment deadline, but I wanted to highlight that specific issue.

MR. CLOWERS: Thank you. Anyone else like to speak? Not seeing any takers, I will close the meeting and thank you all for your comments. And we appreciate them tremendously.

C E R T I F I C A T E

State of Washington)
) Ss.
County of King)

I, the undersigned Certified Court Reporter and an Officer of the Court under my commission as a Notary Public for the State of Washington, hereby certify that the foregoing meeting was taken before me on December 5, 2007 and transcribed under my direction;

That the transcript of the meeting is a full, true, and correct transcript to the best of my ability.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this date, December 13, 2007:

_____

Yvonne A. Gillette

NOTARY PUBLIC in and for the State of Washington, residing at Renton. Commission expires 6/9/2010.

RESPONSE TO VERBAL COMMENTS MADE AT THE
PUBLIC COMMENT MEETING FOR THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
December 5th, 2007

Jose' Gaitan, Washington State Major League Baseball Stadium Public Facilities District (PFD)

1. Your comments about the inadequacy of the study in the Draft Environmental Impact Statement are noted. See the responses to comments in the PFD's Letter #6 in Chapter 4 of this Final EIS.

2. Your comments are noted. See the responses to comments in the PFD's Letter #6 in Chapter 4 of this Final EIS, including comments #2, and #44 through #47.

3. Your comments are noted. See the responses to all comments in the PFD's Letter #6 in Chapter 4 of this Final EIS.

4. Your comments on impacts to views available from Safeco Field are noted. See the responses to all comments in the PFD's Letter #6 in Chapter 4 of this Final EIS, and responses to other comment letters from stadium area stakeholders addressing this topic.

Tomio Moriguchi, Uwajimaya, Inc.

1. Your comments in support of the neighborhood, zoning changes and the recommendations of the Vision 2030 group are noted. See the responses to comments in your Letter #23 in Chapter 4 of this Final EIS, and responses to all comments in Letters #12-15 and 24.

David Young, Qwest Field and Events Center

1. Your comments describing the event activity at Qwest Field and Events Center and concerns about the proposal's relationship to event-related transportation, parking and event load-in and load-out activities are noted. See edits made to the Final EIS, including updates to event-related discussion and analysis in the Chapter 3 Transportation section of this Final EIS. Comments relating to load-in and load-out activities are already effectively addressed by an agreement between the City and First & Goal, entitled "Event Traffic Management Plan, Plan Years 2008-2010," prepared May 2007.

Fred Mendoza, Washington State Public Stadium Authority (PSA)

1. Your concerns that the EIS understates impacts and does not acknowledge the importance of the stadia or the Stadium Transition Area Overlay District are noted. See edits made to the Final EIS.

2. Your comment that lower growth targets must be studied in some alternatives to address impacts of less-intensive development is noted. The lead agency notes that Alternative 4, the No Action alternative, studies a lesser amount of growth than Alternatives 1, 2 and 3. However, the lead agency disagrees with your comments and conclusions on EIS adequacy.

3. Your comments on land use, transportation and parking impacts are noted. See edits made to the Final EIS that provide for a sufficient programmatic EIS analysis of these topics.

4. Your comments on the value of views lost to and from the stadium are noted. See edits made to Chapter 3 of this Final EIS and additional discussion of this topic in responses to comments in Chapter 4 of this Final EIS.

5. Your comments on the inadequacy of mitigation strategies are noted. See edits made to the Final EIS, including updates to event-related analyses and description of mitigation strategies in the Chapter 3 Transportation section of this Final EIS.

6. Your comments on impacts to the stadia and events center are noted. A new Preferred Alternative is studied in this Final EIS. See edits made to the Final EIS that provide additional pertinent information relating to land use, transportation and impacts in the Stadium Area.

Kevin Daniels, Nitze-Stagen

1. Your comment advocating for increased density in the transit hub vicinity around King Street Station is noted.

2. Your comment disagreeing with significant adverse height, bulk and scale impact conclusions in the Draft EIS is noted. It should also be noted that the EIS identifies the possibility of height, bulk and scale controls that could be implemented to provide for adequate mitigation of such impacts.

3. Your comment noting the infeasibility of developing the north half of the Qwest Field north parking lot without zoning changes is noted.

4. Your comments encouraging a balanced approach to historic preservation of the affected neighborhoods, with a recognition of the value of community development and revitalization, are noted.

Tom Im, 2030 Vision group

1. Your comments, noting the letter from the 2030 Vision group and how it represents the conclusions reached of a long process of community stakeholder dialogue, are noted.

2. Your comments, addressing the importance of the retail business community in Chinatown/I.D., and the potential for retail business impacts including from the pending Dearborn Street development proposal, are noted. Your concept for a zone that would limit size-of-use in Little Saigon is noted. See Chapter 2 of this Final EIS for information on the Preferred Alternative, which includes size-of-use limits in Little Saigon.

3. Your comments noting the importance of housing issues in the Chinatown/I.D. neighborhood, and the need for a stated affordable housing goal, are noted. See the Chapter 3 Housing section for any edits that update the analysis, and responses to comments in Letters #12 and #13 for more discussion of relevant topics.

4. Your comments, seeking more information about strategies for pedestrian and open space improvements, are noted. See Chapter 2 of this Final EIS but also the final recommendations report for the Livable South Downtown planning project for more information.

David West, Puget Sound SAGE

1. Your comment in support of the Vision 2030 group's zoning concepts for Little Saigon are noted. The lead agency disagrees with your conclusion about inadequacy of the economic analysis provided in this EIS. The analysis does provide conclusions about the impacts that are probable on Little Saigon from the Dearborn Street proposal.

2. Your comments in opposition to zoning that would allow "big-box" stores in Little Saigon, are noted.

3. Your comments about the low quality of jobs in "big box" stores and their secondary effects on public health subsidies are noted.

Quang Nguyen, Vietnamese American Economic Development Association

1. Your support for Vision 2030 recommendations and your opposition to the studied NC3 zoning are noted.

2. See the response to comment #4 in Letter #24.

3. See the response to comment #5 in Letter #24.

4. See the response to comment #6 in Letter #24.

5. Your comments, supporting a joint consideration of the Dearborn Street Project with the Livable South Downtown recommendations, are noted.

Jill Moe, Jackson Place Community Council

1. Your comments, supporting recommendations of VAEDA and SAGE, and a request to further consider traffic and parking impacts in Jackson Place, are noted. See the responses to your comments in Letter #16 in Chapter 4 of this Final EIS, which address your specific comments about these topics.