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BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeal of)	
CITIZENS FOR LIVABILITY IN BALLARD,)	Hearing Examiner File:
)	W-16-003
From a decision by the Director, Office of)	
Planning and Community Development, regarding)	MOTION TO DISMISS
the adequacy of a Final Environmental Impact)	
Statement.)	

I. INTRODUCTION

Respondent City of Seattle, Office of Planning and Community Development (OPCD) hereby moves the Hearing Examiner for an order dismissing the May 20, 2016 SEPA administrative appeal filed by Appellant Citizens for Livability in Ballard (“Citizens”). As a matter of law, Citizens has waived any objection to the Final Environmental Impact Statement challenged in this appeal by failing to comment on the previous Draft EIS for the underlying proposal. Citizens likewise lacks standing to bring this appeal because it has failed to allege the type of injury-in-fact necessary to challenge a SEPA determination. Several of the issues raised in Citizens’ appeal statement are also beyond the Hearing Examiner’s review authority and

1 should be dismissed on jurisdictional grounds. The Examiner is accordingly requested to enter a
2 dispositive order terminating this appeal.

3 **II. STATEMENT OF RELEVANT FACTS**

4 **2.1 The Seattle 2035 Comprehensive Plan Update.**

5 The instant appeal arises out of the SEPA review conducted for the City of Seattle's
6 pending Comprehensive Plan update. The underlying proposal, "Seattle 2035", involves
7 substantial amendments to various elements of the City's Comprehensive Plan. The fundamental
8 purpose of Seattle 2035 is to establish the policies to distribute the City's anticipated population
9 and job growth through 2035. While some of the proposals contained in Seattle 2035 reference
10 particular neighborhoods within the City, the plan update itself is comprised primarily of area-
11 wide map and text amendments that apply broadly within the City's planning jurisdiction.
12 Clowers Dec. ¶4, Exhibit 1 & Exhibit 3 ("The area represented in this EIS is the entire City of
13 Seattle.") The proposed amendments do not rezone any property, approve any project permits or
14 authorize any physical construction, alteration or improvements. Clowers Dec. ¶5. The policy
15 focus of Seattle 2035 is to continue the City's "Urban Village Strategy", under which new
16 growth and infrastructure investment would continue to be guided toward numerous pedestrian-
17 oriented, mixed use population centers. Clowers Dec. ¶4, Exhibit 1. The Seattle City Council is
18 anticipated to take final legislative action approving the update in fall 2016. Clowers Dec. ¶4.

19 **2.2 The City's SEPA Process.**

20 Under Chapter 43.21C RCW and Chapter 197-11 WAC, the City, as Lead Agency,
21 Clowers Dec., Exhibit 3, performed a lengthy, thorough and deliberate review of the anticipated
22 environmental impacts related to Seattle 2035. The SEPA process was initiated with the
23 Responsible Official's issuance of a combined Determination of Significance/Scoping Notice for
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1 the proposal on October 17, 2013. Clowers Dec. ¶9. The City solicited public comment during
2 the expanded EIS scoping period (October 17, 2013 through April 21, 2014), and held a public
3 EIS scoping meeting on March 25, 2014. Clowers Dec. ¶9. The City retained a team of
4 professional consultants to assist City staff in preparing a Draft Environmental Impact Statement
5 (DEIS), which was issued on May 4, 2015. Clowers Dec. ¶10. The DEIS environmental
6 analysis centered on four policy alternatives for accommodating and guiding the City's future
7 growth; the proposed amendments in the Seattle 2035 update were designated as the "preferred"
8 alternative. Clowers Dec. ¶9-11, Exhibit 1, Exhibit 3.

9
10 The City solicited community input on the DEIS in several ways. The City followed its
11 locally adopted SEPA notification procedures through mailings, postings and other notices. *See*
12 SMC 25.05.455; SMC 25.05.502; SMC 25.05.510; Clowers Dec. ¶12, Exhibit 3. Governmental
13 agencies, tribes, organizations and individuals were invited to submit formal comments in person
14 at Seattle City Hall, by email, by U.S. Mail, and through an online "open house" on the City's
15 website. Clowers Dec. ¶12, Exhibit 3. Complete paper copies of the DEIS were available for
16 public inspection and copying at City Hall and at 13 public libraries throughout the City, and
17 could also be downloaded from the internet. Clowers Dec. ¶12, Exhibit 3. And although not
18 required by state law, *see* WAC 197-11-502; WAC 197-11-535, the City also voluntarily held a
19 duly-noticed public hearing on the DEIS on May 27, 2015. Clowers Dec. ¶13. The City's public
20 notices, as well as the DEIS itself, clearly identified the public comment period for the DEIS as
21 May 4, 2015 through June 17, 2015. Clowers Dec. ¶14.

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24 The City's Final EIS was issued on May 5, 2016. Clowers Dec. ¶19, Exhibit 3.
25 Under WAC 197-11-560(2), the FEIS contains a list and content summary of all comments
26 received during the DEIS comment period, with the City's responses. Clowers Dec. ¶15, Exhibit

1 4. A total of 438 public comments are referenced in this summary. *Id.* Revisions to the DEIS,
2 many of which resulted directly from public input, are set forth in strike-through/underline
3 format in the FEIS. Clowers Dec., Exhibit 1.

4 Despite the numerous and well-publicized opportunities to provide input regarding the
5 DEIS, Citizens submitted no comments to the City.¹ Clowers Dec. ¶16, Exhibit 4.

7 **2.3 Citizens' SEPA Appeal.**

8 Citizens initiated the above-captioned action by filing a Land Use/SEPA Decision Appeal
9 Form ("Appeal Statement") with the City on May 20, 2016. Joseph E. Wert is designated on
10 Citizens' appeal form as the organization's authorized representative. Appeal Statement at 1.
11 The appeal purports to challenge the adequacy of both the DEIS and FEIS for the Seattle 2035
12 update on various grounds. Appeal Statement, Attachment at 1-16. The specific relief sought by
13 Citizens is a Hearing Examiner order directing the City to prepare a new DEIS and FEIS to
14 address the alleged inadequacies in both documents, and for the Examiner to "retain jurisdiction
15 until after the City submits a new scope and detailed methodology and provides public input and
16 is approved by the Hearing Examiner." Appeal Statement, Attachment at 1-16.

18 **III. ISSUES PRESENTED**

19 The instant motion presents the following issues for the Hearing Examiner's disposition:

- 20 ■ Is dismissal of Citizens' appeal of the adequacy of the City's FEIS required as a
21 matter of law where Citizens never commented on the DEIS? [Yes]
- 22 ■ Is dismissal of Citizens' appeal warranted where Citizens have failed to allege the
23 injury-in-fact necessary to establish SEPA standing? [Yes]
- 24 ■ Is dismissal of various issues raised in Citizen's appeal required where such issues
25 are beyond the Hearing Examiner's subject matter jurisdiction? [Yes]

26 ¹ The City is likewise unaware of any person submitting written comment on Citizens' behalf during the previous 2013-14 EIS scoping period, or testifying on Citizens' behalf during the March 25, 2014 EIS Scoping meeting. Clowers Dec. ¶16.

1 **IV. EVIDENCE RELIED UPON**

2 To support this motion, the City relies upon the Declaration of Gordon Clowers with all
3 Exhibits thereto, and the pleadings and other materials on file with the Hearing Examiner.

4 **V. ARGUMENT AND LEGAL AUTHORITY**

5 Citizens' entire appeal should be dismissed as a matter of law under two fundamental and
6 longstanding SEPA principles. First, a party's failure to formally comment on the DEIS for a
7 particular proposal categorically bars that party from subsequently challenging the FEIS issued
8 for the same proposal. Second, to establish standing, SEPA appellants must allege and identify a
9 specific and concrete injury-in-fact that would result from the challenged government action.
10 Citizens' SEPA appeal collapses under these well-established standards, as the group never
11 commented on the DEIS for Seattle 2035 and it alleges only generalized, abstract harm in its
12 Appeal Statement. Dismissal is required under these circumstances.

13 **5.1 Timeliness and Authority for Motion.**

14 The instant motion is brought under Sections 2.16 and 3.02 of the Hearing Examiner
15 Rules of Practice and Procedure, which collectively authorize parties to seek dismissal by motion
16 of all or any part of an administrative appeal. This motion is also timely under the Pre-Hearing
17 Order issued for this matter, under which the deadline for filing dispositive motions is July 7,
18 2016. Pre-Hearing Order at 1.

19 **5.2 Citizens Has Waived any Objection to the Seattle 2035 FEIS by Failing to**
20 **Comment on the Previous DEIS.**

21 A critical aspect of the SEPA review process is the solicitation and consideration of
22 public comment regarding the underlying government proposal. The lead agency must establish
23 a public comment period whenever it issues a DEIS, and must invite interested parties—
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1 including members of the public and other agencies—to provide input on the draft. WAC 197-
2 11-455; WAC 197-11-502. Comments received in response to this invitation must be considered
3 by the lead agency, physically appended to the FEIS, and substantively responded to in the final
4 environmental document. WAC 197-11-560. The Seattle 2035 FEIS follows this mandate to
5 the letter. Clowers Dec. ¶15, Exhibit 4.

7 The SEPA Rules also define the legal consequence of a party's failure to formally
8 comment during DEIS process, unambiguously providing that subsequent challenges to the
9 agency's environmental analysis are barred under such circumstances:

10
11 **Effect of no comment.**

12 (1) **Consulted agencies.** If a consulted agency does not
13 respond with written comments within the time periods for
14 commenting on environmental documents, the lead agency may
15 assume that the consulted agency has no information relating to the
16 potential impact of the proposal as it relates to the consulted
17 agency's jurisdiction or special expertise. Any consulted agency
18 that fails to submit substantive information to the lead agency in
19 response to a draft EIS is thereafter barred from alleging any
20 defects in the lead agency's compliance with Part Four of these
21 rules.

18 (2) **Other agencies and the public.** Lack of comment by other
19 agencies or members of the public on environmental documents,
20 within the time periods specified by these rules, shall be construed
21 as lack of objection to the environmental analysis, if the
22 requirements of WAC 197-11-510 are met.

21 WAC 197-11-545 (emphasis added). The City's local SEPA regulations mirror this requirement.

22 SMC 25.05.545.

24 The purpose of WAC 197-11-545 is to enable the lead agency to meaningfully consider
25 and respond to public comment on a Draft EIS within the procedural framework and timelines
26 established by SEPA, and to prevent the agency from being unfairly surprised by challenges not

1 properly raised during the appropriate stages of environmental review—when the agency can
2 respond and, if needed, modify the proposal:

3 The SEPA guidelines were structured in a way as to require. . .
4 [parties] to participate in the SEPA process at a time when their
5 participation is meaningful and contributes to the environmental
6 assessment at the earliest possible opportunity. Where the
7 objection to an EIS is saved until the parties’ receive an
8 unfavorable decision, the purposes of SEPA are frustrated.

9 *Kitsap County v. Dept. of Natural Resources*, 99 Wn.2d 386, 391, 662 P.2d 381 (1983).

10 WAC 197-11-545 has been widely recognized as an adjunct to, and supplemented by,
11 “common law principles of waiver and exhaustion of administrative remedies” within the
12 specific context of SEPA review. See Richard L. Settle, *The Washington State Environmental*
13 *Policy Act: A Legal and Policy Analysis*, §14.01[10], at 14-92/93 (2015). Washington courts
14 and adjudicative tribunals² have consistently recognized that appeals of an agency’s FEIS are
15 barred where the appellant failed to timely comment on the DEIS. See, e.g., *Kitsap County*, 99
16 Wn.2d at 391-92; *Blair v. City of Monroe*, CPSGMHB Case No. 14-3-0006c, Order on City’s
17 Dispositive Motion and Petitioners’ Motions to Supplement (May 23, 2014); *Tooley v. Gregoire*,
18 CPSGMHB Case No. 11-3-0008, Order on Dispositive Motions, (November 8, 2011); *City of*
19 *Shoreline III and IV v. Snohomish County*, CPSGMHB Coordinated Case Nos. 09-3-0013c and
20 10-3-0011c, Order on Dispositive Motions (January 18, 2010). Cf. *Spokane Rock Products, Inc.*

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25 ² Because the Growth Management Hearings Board has exclusive appellate jurisdiction over
26 appeals of the City’s Comprehensive Plan amendments and the SEPA determination prepared in conjunction with
 such proposals, see RCW 36.70A.280(1), decisions of the GMHB are particularly relevant—if not outright
 controlling—here.

1 v. *Spokane County Air Pollution Control Authority*, PCHB No. 05-127, Order Granting Motion
2 for Summary Judgment (February 13, 2006).³

3 It is equally well-established that waiver under WAC 197-11-545 occurs unless
4 comments on the DEIS were timely submitted specifically on behalf of the party seeking to
5 challenge the subsequent FEIS. An organization relinquishes its right to object to and appeal an
6 FEIS unless one or more of its members previously submitted comments in their capacity as
7 representatives of the organization. See, e.g., *City of Shoreline III and IV v. Snohomish County*,
8 CPSGMHB Coordinated Case Nos. 09-3-0013c and 10-3-0011c, Order on Dispositive Motions
9 (January 18, 2010) (dismissing organization's SEPA appeal where none of its purported
10 members or representatives submitted comment during the relevant comment period on
11 organization's behalf).
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14 Collectively, these principles are fatal to Citizens' SEPA appeal. Citizens failed to
15 submit any formal input on the Seattle 2035 DEIS during the well-publicized comment period
16 for that document. See Clowers Dec. ¶16, Exhibit 4. Under WAC 197-11-545, the
17 organization's failure to comment is construed as a lack of any objection to the City's SEPA
18 analysis and bars the instant challenge to the adequacy of the Seattle 2035 FEIS.⁴ See, e.g., *City*
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21 ³ This organizational principle has been repeatedly upheld in decisions involving participation
22 standing under the Growth Management Act. See, e.g., *Friends of the Law v. King*, CPSGPHB Case No. 94-3-003,
23 Order on Dispositive Motions (April 22, 1994) (for an organization or association to obtain standing under the
24 GMA, a member of the organization must appear and indicate that he or she represents the organization); *Friends of*
25 *Fennel Creek v. Pierce County*, CPSGMHB Case No. 97-3-0005, Order on the Motions (April 22, 1997); *Montlake*
26 *Community Club v. City of Seattle*, CPSGMHB Case No. 99-3-002, Order on Dispositive Motions (April 23, 1999).

27 ⁴ Steven Cohn, one of the individuals now identifying as a member of Citizens, submitted a written
28 comment on or about June 15, 2015. See Clowers Dec. ¶17, Exhibit 5. Critically, however, Mr. Cohn did not
29 reference Citizens for Livability in Ballard in his letter or otherwise purport to speak on the organization's behalf.
30 Subsequent communications submitted by Mr. Cohn during the City's legislative process for Seattle 2035
31 emphasized that he was commenting "as an individual" and not on behalf of any organization. See Clowers Dec.
32 ¶18, Exhibit 6. Mr. Cohn's comments are legally inadequate to confer standing upon Citizens under WAC 197-11-

1 of *Shoreline III and IV v. Snohomish County*, CPSGMHB Coordinated Case Nos. 09-3-0013c
2 and 10-3-0011c, Order on Dispositive Motions (January 18, 2010).

3 The waiver mandate of WAC 197-11-545 is unequivocal and categorical: “Lack of
4 comment. . . . shall be construed as lack of objection to the environmental analysis, if the
5 requirements of WAC 197-11-510 are met.” (Emphasis added.) Citizens’ does not contend that
6 the City’s notice and comment procedures violated WAC 197-11-510 in any manner. Appeal
7 Statement, Attachment at 1-15. The undisputed record demonstrates the City’s compliance with
8 that rule, and that all interested parties enjoyed ample time and opportunity to comment on the
9 DEIS. Clowers Dec. ¶12. Citizens’ failure to submit comments on the Seattle 2035 DEIS during
10 the designated comment period for that document now precludes the organization from
11 challenging the City’s FEIS as a matter of law. Dismissal of the organization’s SEPA appeal is
12 required accordingly.
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15 **5.3 Citizens Lacks SEPA Standing Because It Has Failed to Identify an Injury-**
16 **in-Fact.**

17 Separate from its failure to comment under WAC 197-11-545, Citizens’ appeal should be
18 dismissed for an equally fundamental reason: The organization’s inability to allege any specific,
19 perceptible harm resulting from the City’s adoption of the Seattle 2035 amendments. Without
20 this mandatory prerequisite to SEPA standing, Citizens lacks the legal basis to challenge the
21 City’s FEIS.
22

23 To appeal a SEPA determination concerning a non-project action, a party must have
24 commented and objected during the environmental review period and must satisfy a two-part
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26 545. See, e.g., *City of Shoreline III and IV v. Snohomish County*, CPSGMHB Coordinated Case Nos. 09-3-0013c
and 10-3-0011c, Order on Dispositive Motions (January 18, 2010).

1 standing test. *City of Shoreline v. Snohomish County*, CPSGMHB Case No. 09-3-0013c and 10-
2 3-0011c, Order on Dispositive Motions (January 18, 2011). The test requires the appellant to
3 establish that: (1) he or she is “within the zone of interests to be protected or regulated by the
4 statute...in question”, and (2) he or she has identified a specific “injury in fact.” *Trepanier v.*
5 *City of Everett*, 64 Wn. App. 380, 382, 824 P.2d 524 (1992).

7 Regarding the first element, Washington courts have held that economic concerns are not
8 within the zone of interests protected by SEPA. *See, e.g., Harris v. Pierce County*, 84 Wn. App.
9 222, 231, 928 P.2d 1111 (1996); *Snohomish County Property Rights Alliance v. Snohomish*
10 *County*, 76 Wn. App. 44, 52, 882 P.2d 807 (1994) (finding individual property rights, property
11 values, property taxes, and restrictions on use of property affecting property value are not within
12 the zone of interests protected by SEPA).

14 Establishing an “injury-in-fact” sufficient to satisfy the second criterion of SEPA
15 standing requires an appellant to demonstrate that he/she will be “‘specifically and perceptibly’
16 harmed by the proposed action.” *Trepanier*, 64 Wn. App. at 382 (citation omitted).
17 Additionally, where—as here—the appellant “alleges a threatened injury as opposed to an
18 existing injury, he or she must show an immediate, concrete, and specific injury to him or
19 herself. . . . If the injury is merely conjectural or hypothetical, there can be no standing.” *Id.* at
20 383 (emphasis added); *Harris*, 84 Wn. App. at 231. This requirement ensures that litigants
21 demonstrate a “direct stake in the controversy”; otherwise, the SEPA “appeal process will
22 become no more than a vehicle for the vindication of value interests of concerned bystanders.”
23 *West Seattle Defense Fund v. City of Seattle*, CPSGMHB Case No. 94-3-0016, Order Granting
24 Seattle’s Motion to Dismiss SEPA Claim, at 6 (December 30, 1994). Allegations premised upon
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1 “unsupported assumption[s]” or “merely speculative” harm are insufficient to satisfy the injury-
2 in-fact criterion. *Trepanier*, 64 Wn. App. at 383-84.

3 Citizens’ standing in the present appeal is incurably undermined by this standard, and its
4 appeal should be dismissed accordingly. The City’s Land Use/SEPA Decision Appeal Form
5 specifically directs administrative appellants to identify their interest in the challenged decision
6 and to “state how [they] are affected by it.” *See* Appeal Statement at 1. In response to this
7 question, Citizens offered only vague, generic allegations of aggrievement stemming from its
8 members’ status as Seattle residents:
9

10 The Appellants have standing as an aggrieved party because the
11 appellants are residents of Seattle and adversely affected by
12 changes to the Comprehensive Plan and inadequate analysis in the
EIS.

13 Appeal Statement, Attachment at 1.

14 On its face, Citizens’ purported interest in the underlying Seattle 2035 proposal falls well
15 short of the “immediate, concrete, and specific injury” required to establish SEPA standing.
16 *Trepanier*, 64 Wn. App. at 383. Far from identifying any “direct stake” in the outcome of the
17 City’s Comprehensive Plan update, Citizens alludes only to unspecified, abstract impacts that
18 will allegedly result from the proposed amendments. These allegations are insufficient to
19 demonstrate SEPA standing as a matter of law. *Id.* Likewise, to the extent Citizens relies upon
20 the residency status of its members in order to establish standing, Washington courts have flatly
21 rejected this argument. *See, e.g., Snohomish County Property Rights Alliance*, 76 Wn. App. at
22 52.
23

24 Citizens’ inability to identify any cognizable injury-in-fact under these circumstances
25 simply reflects the practical and legal difficulties of establishing SEPA standing in the context of
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1 nonproject environmental review. The GMHB has repeatedly acknowledged that appellants can
2 rarely satisfy the *Trepanier* standing test when challenging nonproject legislative enactments
3 such as comprehensive plan amendments; this recognition has not, however, prevented the Board
4 from consistently dismissing such appeals for lack of standing. *See, e.g., Everett Shorelines*
5 *Coalition v. City of Everett*, CPSGMHB Case No. 02-3-0009c, Order on Motions for Amicus and
6 Intervention, Order on Dispositive Motions, and Order Amending Final Schedule, at 22 (October
7 1, 2002); *Pilchuck v. Snohomish County* CPSGMHB Case No. 95-3-0047, Order Granting
8 Snohomish County’s Dispositive Motion to Dismiss SEPA Claims, at 4 (August 17, 1995);
9 *Robison v. City of Bainbridge*, CPSGMHB Case No. 94-3-0025, Order on Dispositive Motions
10 (February 16, 1995) (rejecting allegation that FEIS allowing “harmful, unreasonable,
11 unworkable” comprehensive plan established the injury element of standing); *Master Builders*
12 *Ass’n of Pierce County. v. Pierce County*, CPSGMHB Case No. 02-3-0010, Order on Motion to
13 Dismiss SEPA Claims (October 21, 2002). Washington courts have likewise flatly rejected
14 standing premised merely upon the “anticipated future effects” of area-wide planning proposals.
15 *Snohomish County Property Rights Alliance*, 76 Wn. App. at 52.

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18 Citizens’ appeal suffers from the same fatal defect, as the organization does not—and
19 cannot—identify any actual harm to itself or its members that would result from the City’s
20 adoption of the Seattle 2035 amendments. The organization’s vague allusion to some indefinite
21 “adverse effects” accruing from its members’ Seattle residency is facially inadequate under
22 SEPA’s injury-in-fact standing criterion. The Examiner should dismiss Citizen’s appeal
23 accordingly.
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1 **5.4 The Hearing Examiner Lacks Jurisdiction Over Citizen’s Due Process**
2 **Arguments, GMA Claims, Previously Enacted Standards, and Challenges to the Adequacy**
3 **of the Seattle 2035 DEIS.**

4 The waiver and standing issues identified *supra* are dispositive of this appeal, which
5 should accordingly be dismissed in its entirety. Notwithstanding, Citizens’ appeal is further
6 defective because it asserts legal arguments beyond the Hearing Examiner’s review authority.
7 Specifically, Citizens’ due process challenges, its objections to the City’s Level of Service
8 standards, and its references to the Seattle 2035 DEIS exceed the permissible scope of this appeal
9 proceeding and should be rejected on jurisdictional grounds.

11 **5.4.1 Due Process and GMA Claims.** Issue “E” of Citizens’ Appeal Statement
12 contends that the challenged “EIS analysis as presented deprives the appellant, and the general
13 public, of due process, substantive due process and the rights recognized in [RCW]
14 43.21.C.020.” Appeal Statement, Attachment at 2, 15. Citizens’ argument cites the public
15 participation requirements of the Growth Management Act (GMA), RCW 36.70A.070, and
16 asserts that “[t]he provision of inaccurate or incomplete information in the Draft and Final EIS
17 for this Comprehensive Plan proposal abrogates the applicant’s [sic] and the public’s right to
18 participation.” Appeal Statement, Attachment at 15.

19 These issues are beyond the Hearing Examiner’s subject matter jurisdiction and should be
20 dismissed. As officials of an administrative agency created by the Seattle City Council, *see*
21 SMC 3.02.110 -.130, “hearing examiners have only the authority delegated to them by the
22 Council.” *Woodinville Water Dist. v. King County*, 105 Wn. App. 897, 906, 21 P.3d 309 (2001).
23 Nowhere does the Seattle Municipal Code purport to vest the Hearing Examiner with authority to
24 consider and rule upon legal issues implicating federal and/or constitutional law. *See* SMC
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1 3.02.110 -.130; SMC 25.05.680. Due process claims are outside the scope of the Hearing
2 Examiner's delegated jurisdiction. *See, e.g., Chaussee v. Snohomish County Council*, 38 Wn.
3 App. 630, 638, 689 P.2d 1084 (1984) (equitable issues and other purely legal arguments fall
4 beyond hearing examiner's jurisdiction).

5
6 The Examiner likewise lacks authority to review Citizen's arguments concerning public
7 participation under the GMA. The public participation mandate of RCW 36.70A.070 is not an
8 "element of the environment" pursuant to WAC 197-11-444 or otherwise a relevant SEPA
9 consideration in determining the adequacy of an EIS. *See* Chapter 43.21C RCW; Chapter 197-
10 11 WAC; Chapter 25.05 SMC. Citizens' claims to this effect are inappropriate here and should
11 be dismissed without consideration.⁵

12
13 **5.4.2 DEIS Challenges.** Citizens' Appeal Statement also purports to challenge
14 the adequacy of both the DEIS and FEIS for the Seattle 2035 plan amendments. Appeal
15 Statement, Attachment at 1, 6-7, 9, 11-13, 15. The Hearing Examiner's appellate jurisdiction,
16 however, extends only to the FEIS; neither state law nor the City's local SEPA regulations
17 authorize administrative appeals of a DEIS. *See* WAC 197-11-680(3)(a)(iii); SMC 25.05.680.
18 Citizens' challenge to the City's DEIS should be categorically rejected on this basis.

19
20 **5.4.3 Challenges to Previously Adopted LOS Standards.** Finally, Issue "D"
21 of Citizens' Appeal Statement objects to using the City's longstanding screenline measurement
22 methodology for purposes of analyzing traffic level of service (LOS) impacts under the FEIS.
23 Appeal Statement, Attachment at 11-12. If Citizens' argument essentially attempts to challenge

24 ⁵ Citizens' arguments also contend that the Seattle 2035 EIS deprives "the general public" of its alleged due
25 process and participation rights. Appeal Statement at 15. Citizens lacks the ability to assert these claims, as basic
26 principles of standing "prohibit a litigant from raising another's legal rights." *Habberman v. Washington Public
Power Supply*, 109 Wn.2d 107, 138, 744 P.2d 1032 (1987).

1 these previously adopted standards, it is time-barred from doing so now. The screenline methods
2 have been a longstanding component of the City's LOS measurement methodology and have
3 been codified in the Transportation Element and Appendix of the Seattle Comprehensive Plan
4 for approximately two decades. Any challenge to these provisions is untimely. *See* RCW
5 36.70A.290(2).⁶

6 VI. CONCLUSION

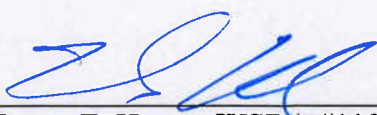
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8 Under WAC 197-11-545, Citizens' failure to formally comment on the Seattle 2035
9 DEIS bars the organization's attempt to challenge the adequacy of the FEIS for that proposal.
10 The instant SEPA appeal should be dismissed on that ground as a matter of law. Separately,
11 Citizens cannot maintain this appeal because of its failure and inability to identify the injury-in-
12 fact necessary to establish SEPA standing under well-established Washington precedent.
13 Finally, several of Citizens' appeal arguments are beyond the Hearing Examiner's subject matter
14 jurisdiction. The Examiner is accordingly requested to enter a dispositive order dismissing this
15 appeal.
16

17 DATED this 7th day of July, 2016.

18 OGDEN MURPHY WALLACE, P.L.L.C.
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21 ⁶ Separately, it bears emphasis that while Citizens challenges the use of the City's screenline methodology in
22 objecting to the impact analysis in the FEIS, it simultaneously accepts the same methodology for purposes of its
23 concurrency argument. Appeal Statement at 11-15. Citizens cannot have its cake and eat it too on this important
24 point. Citizens' analysis is meritless, as is its false-equivalency comparison to intersection-based analysis for
25 development project-level SEPA reviews. In fact, SEPA gives the lead agency "more flexibility in preparing EISs
26 on non-project proposals because there is normally less detailed information available on their environmental
impacts and on any subsequent project proposals" and states 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." WAC 197-11-442(1) and (2). The Examiner should summarily reject Citizen's untenable assertion
that citywide intersection-level transportation analysis is required for comparison of citywide Comprehensive Plan
alternatives in a non-project EIS.

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By 

James E. Haney, WSBA #11058
J. Zachary Lell, WSBA #28744
Attorneys for City of Seattle
OGDEN MURPHY WALLACE, PLLC
901 5th AVE, Suite 3500
Seattle, WA 98164-2008
(206) 447-7000

1 **DECLARATION OF SERVICE**

2 I, Gloria Zak, an employee of Ogden Murphy Wallace, PLLC, and certify that on the date
3 below, I provided this document via messenger to the Hearing Examiner, and via email and
4 regular mail to Steven Cohn and Joseph Wert:
5

6 **Office of the Hearing Examiner**

7 Anne Watanabe, Deputy Hearing Examiner
8 Office of Hearing Examiner
9 700 Fifth Avenue, Suite 4000
10 Seattle WA 98124

11 **Representative for Citizens for Livability in Ballard**

12 Joseph Wert — joewert53@gmail.com
13 8714 - 23rd Avenue NW
14 Seattle WA 98117

15 with additional copy to

16 Steven Cohn — smcohn@speakeasy.net

17 I declare under penalty of perjury under the laws of the State of Washington that the
18 foregoing is true and correct.
19

20 Executed at Seattle, Washington this 7th day of July, 2016.
21

22 
23 _____
24 Gloria Zak, Legal Assistant
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BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeal of)	
CITIZENS FOR LIVABILITY IN BALLARD,)	Hearing Examiner File:
)	W-16-003
From a decision by the Director, Office of)	
Planning and Community Development, regarding)	DECLARATION OF GORDON S. CLOWERS
the adequacy of a Final Environmental Impact)	
Statement.)	

GORDON S. CLOWERS declares as follows:

1. I am over 18 years of age, and am competent to testify in this action. I make this declaration based on my personal knowledge of the facts set forth below, in support of Respondent City of Seattle Office of Planning and Community Development's Motion to Dismiss the administrative appeal filed by Citizens for Livability in Ballard in the above-captioned matter.

2. I am a Senior Urban Planner with the City of Seattle Department of Construction and Inspection. I have been employed with the City of Seattle since 1998, and have held my current position with the City since 2002.

1 3. One of my primary job responsibilities since 2013 has been to assist with the
2 preparation, review and issuance of the Draft Environmental Impact Statement (DEIS) and Final
3 Environmental Impact Statement (FEIS) that were prepared in conjunction with the pending
4 update of the City's Comprehensive Plan ("Seattle 2035"). I coordinated with the City's SEPA
5 Responsible Official and the City staff members and professional consultants who performed work
6 on this project. I also served as the City's primary review official and contact person for all sections
7 of both the DEIS and the FEIS.
8

9 4. Seattle 2035 involves substantial amendments to various elements of the City's
10 Comprehensive Plan. The fundamental purpose of Seattle 2035 is to establish the policies to
11 distribute the City's anticipated population and job growth through 2035. While some of the
12 proposals contained in Seattle 2035 reference particular neighborhoods within the City, the plan
13 update itself is comprised primarily of area-wide map and text amendments that apply broadly
14 within the City's planning jurisdiction. The policy focus of Seattle 2035 is to continue the City's
15 "Urban Village Strategy", under which new growth and infrastructure investment would continue
16 to be guided toward numerous pedestrian-oriented, mixed use population centers. The Seattle City
17 Council is anticipated to take final legislative action approving the update in fall 2016.
18

19 5. The proposed Seattle 2035 amendments do not rezone any property, approve any
20 project permits or authorize any physical construction, alteration or improvements.
21

22 6. Attached as Exhibit 1 to this Declaration is a true and correct copy of Chapter 1.0
23 (Summary) of the Seattle 2035 FEIS.

24 7. Attached as Exhibit 2 to this Declaration is a true and correct copy of the May 5,
25 2016 letter signed by City of Seattle Department of Construction and Inspections Director Nathan
26 Torgelson that introduces and prefaces the Seattle 2035 FEIS.

1 8. Attached as Exhibit 3 to this Declaration is a true and correct copy of the Fact Sheet
2 from the Seattle 2035 FEIS.

3 9. The City's SEPA Responsible Official issued a combined Determination of
4 Significance/Scoping Notice for the plan update on October 17, 2013. Public comment was
5 solicited during the expanded EIS scoping period, which commenced on October 17, 2013 and
6 extended through April 21, 2014. The City held a public EIS scoping meeting on March 25, 2014.
7

8 10. A team of professional consultant firms was retained to assist City staff in preparing
9 the DEIS and FEIS for Seattle 2035. These firms included 3 Square Blocks LLP, BERK, ESA,
10 Fehr & Peers, SvR and Weinman Consulting.

11 11. The City issued the DEIS for Seattle 2035 on May 4, 2015. The City's DEIS
12 environmental analysis centered on four policy alternatives for accommodating and guiding the
13 City's future growth through 2035. Subsequently, a new fifth alternative was added and analyzed
14 in the FEIS for the Seattle 2035 update, which was designated as the "preferred" alternative.
15

16 12. In soliciting public comment on the DEIS, the City followed applicable SEPA
17 notification procedures through mailings, postings and other notices in accordance with the
18 provisions of SMC 25.05.455, SMC 25.05.502 and SMC 25.05.510. Governmental agencies,
19 tribes, organizations and individuals were invited to submit formal comments in person at Seattle
20 City Hall, by email, by U.S. Mail and through an online "open house" on the City's website.
21 Complete paper copies of the DEIS were available for public inspection and copying at City Hall
22 and at 13 public libraries located throughout the City, and could also be downloaded from the
23 internet.
24

25 13. The City held a duly-noticed public hearing on the DEIS on May 27, 2015. I
26 personally attended the hearing.

1 14. The City's public notices, as well as the DEIS itself, identified the public comment
2 period for the DEIS as May 4, 2015 through June 17, 2015.

3 15. The City received 438 comments during the designated DEIS public comment
4 period. Pursuant to WAC 197-11-560 and SMC 25.05.560, Chapter 4.0 of the FEIS contains a
5 list and content summary of all comments that were received during the DEIS comment period,
6 copies of the written comments themselves, a transcript of the May 27, 2015 public hearing, and
7 the City's responses to each comment. Table 4-1 of the FEIS contains a list of the public
8 comments, the name of the person or entity that submitted them, and the date each comment was
9 received. A true and correct copy of Table 4-1 is attached to this Declaration as Exhibit 4.
10

11 16. The City never received any written comment from or on behalf of Citizens for
12 Livability in Ballard during the DEIS public comment period or the expanded EIS scoping period.
13 No person testified for or on behalf of Citizens for Livability in Ballard during the May 27, 2015
14 public hearing on the DEIS, or during the March 25, 2014 EIS scoping meeting.
15

16 17. On or about June 15, 2015, the City received a comment letter from Steven Cohn
17 regarding the DEIS. Mr. Cohn's letter was signed in his capacity as a representative of Seaview
18 Pacific Consulting and did not reference Citizens for Livability in Ballard in any manner. A true
19 and correct copy of Mr. Cohn's June 15, 2015 comment letter is attached to this Declaration as
20 Exhibit 5.
21

22 18. The City received additional written correspondence from Steven Cohn regarding
23 the Seattle 2035 plan amendments on November 6, 2015 and November 20, 2015, respectively.
24 In this correspondence, Mr. Cohn emphasized that he was submitting his comments in his
25 individual capacity and not on behalf of the Ballard District Council organization, which was the
26 only organization he cited in that correspondence. True and correct copies of Mr. Cohn's

1 November 6, 2015 and November 20, 2015 correspondence are attached to this Declaration as
2 Exhibit 6.

3 19. The City's FEIS for Seattle 2035 was issued on May 5, 2016.

4 I declare under penalty of perjury under the laws of the State of Washington that the
5 foregoing is true and correct to the best of my knowledge and belief.

6 Executed at Seattle, Washington this 7th, day of July, 2016.

7
8 
9 Gordon S. Clowers
10

1.0 Summary

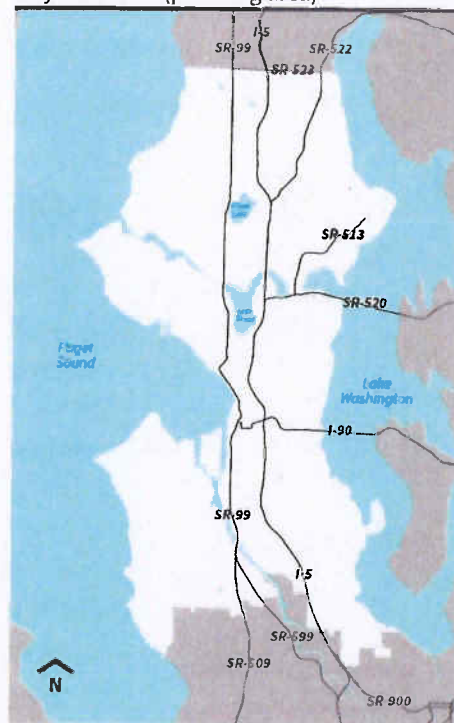
This chapter summarizes the findings of this Environmental Impact Statement (EIS) with respect to environmental impacts, mitigation strategies and significant unavoidable adverse impacts for the ~~four~~ Seattle Comprehensive Plan alternatives. Revisions to this summary section prepared since issuance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

1.1 Proposal

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

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

Figure 1-1
City of Seattle (planning area)



- City of Seattle
- Surrounding Area

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

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

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

The proposal applies to the entire City of Seattle.

1.2 Objectives of the Proposal

The City's objectives for this proposal include:

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

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



1.3 Alternatives

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

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

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

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

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

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

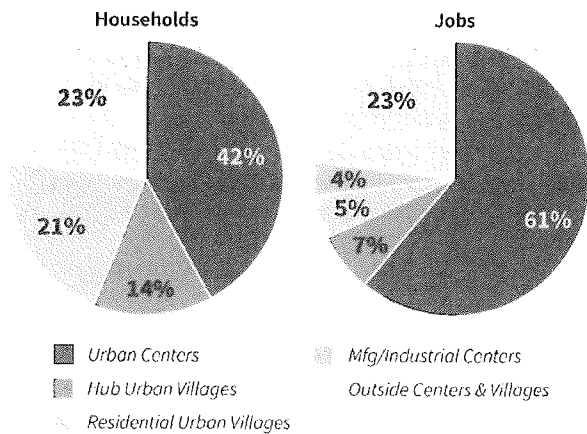
Additional description of each alternative and supporting maps are provided on the following pages.

Figure 1-2 Summary of alternatives

Alternative 1

Continue Current Trends (No Action)

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

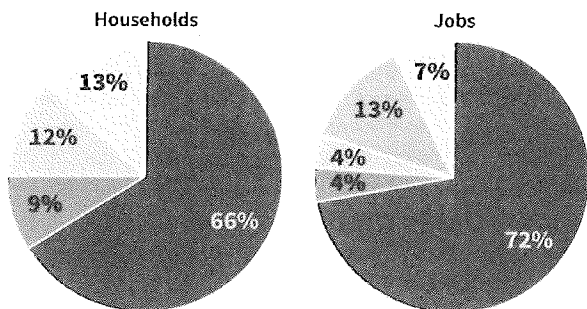


- No change in the number, designation or size of urban villages.
- Greater residential growth emphasis in hub urban villages, in selected residential urban villages and more growth outside of urban villages.
 - Hub urban village emphases: Ballard, Bitter Lake, Lake City and West Seattle Junction.
 -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

Alternative 2

Guide Growth to Urban Centers

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

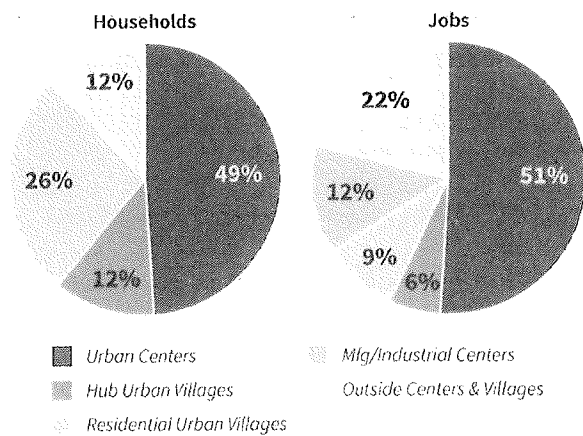


- No change in the number, designation or size of urban villages.
- More growth in urban centers, especially in Downtown, First/ Capitol Hill and Northgate and South Lake Union.
- Less growth outside urban centers, including the least emphasis on hub urban village growth.
- More mid- and high-rise housing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

Figure 1-2 Summary of alternatives (cont.)

Alternative 3
Guide Growth to Urban Villages near Light Rail

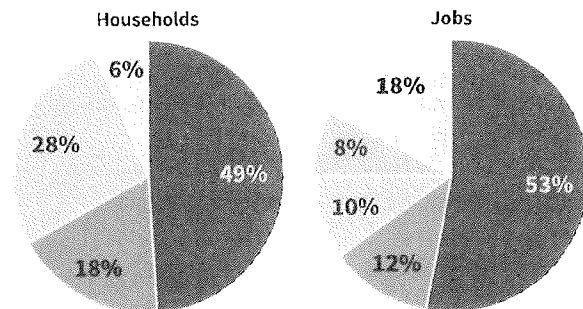
An emphasis on growth in urban centers, but also in urban villages near the light rail stations. Would include boundary adjustments to urban villages with light rail stations to encompass a 10-minute walk to the station. A new village could be designated at 130th St/I-5 and possible reconfiguration of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



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

Alternative 4
Guide Growth to Urban Villages near Transit

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

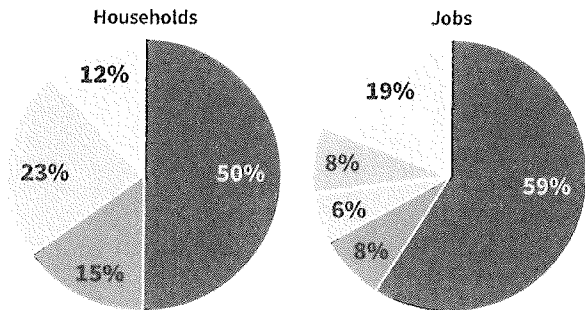


- Includes the higher-growth assumptions and expanded urban village boundaries of Alternative 3 (to capture 10-minute walksheds), and the addition of other selected areas that have very good bus service. These include areas located in the western half of the city (Ballard, Fremont, West Seattle Junction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

Figure 1-2 Summary of alternatives (cont.)

Alternative 5, Preferred Alternative
Guide Growth to Urban Villages near Transit

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



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

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

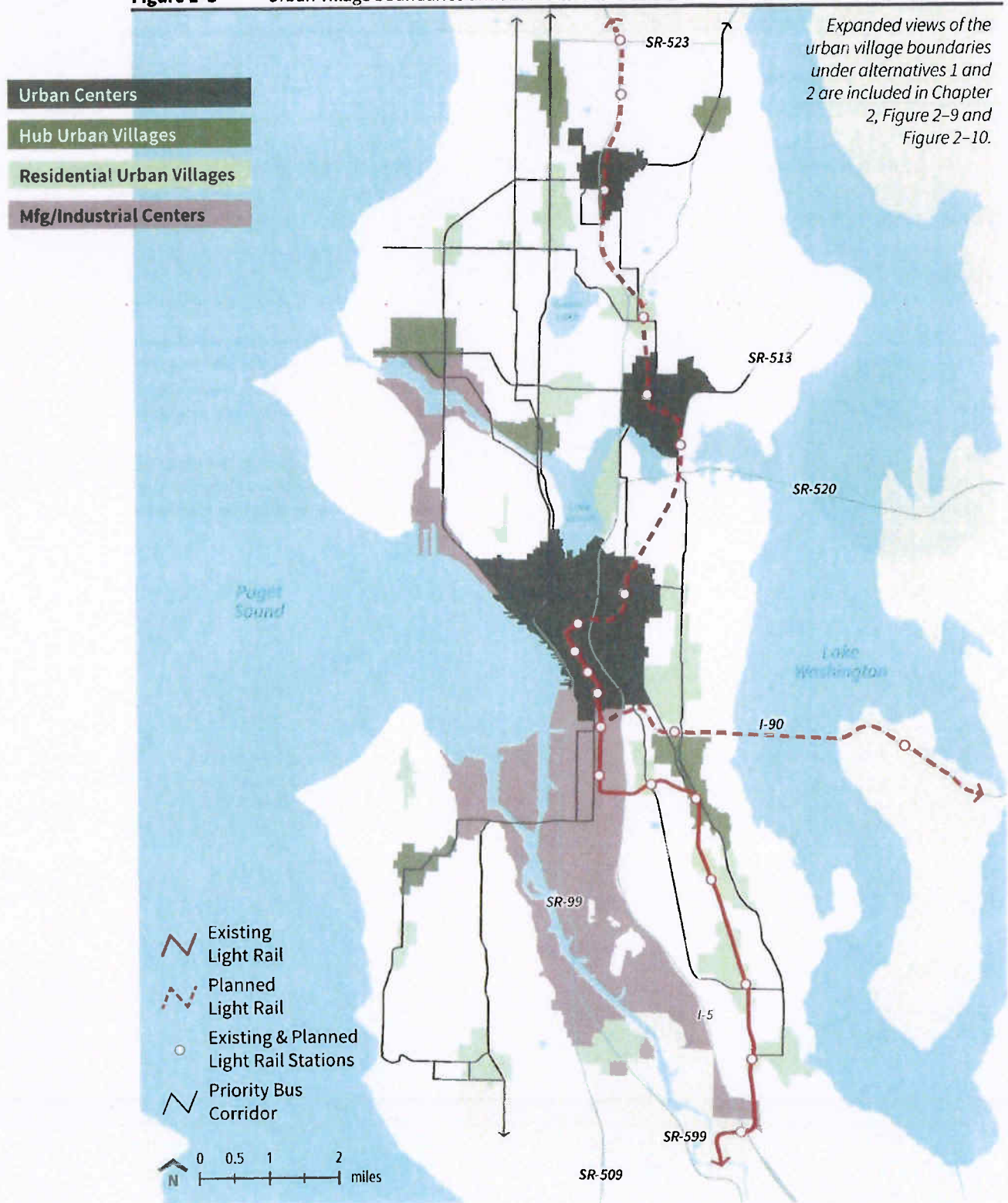


Figure 1-4 Urban village boundaries under Alternative 3

Expanded views of the urban village boundaries under Alternative 3 are included in Chapter 2, Figure 2-12 and Figure 2-13.

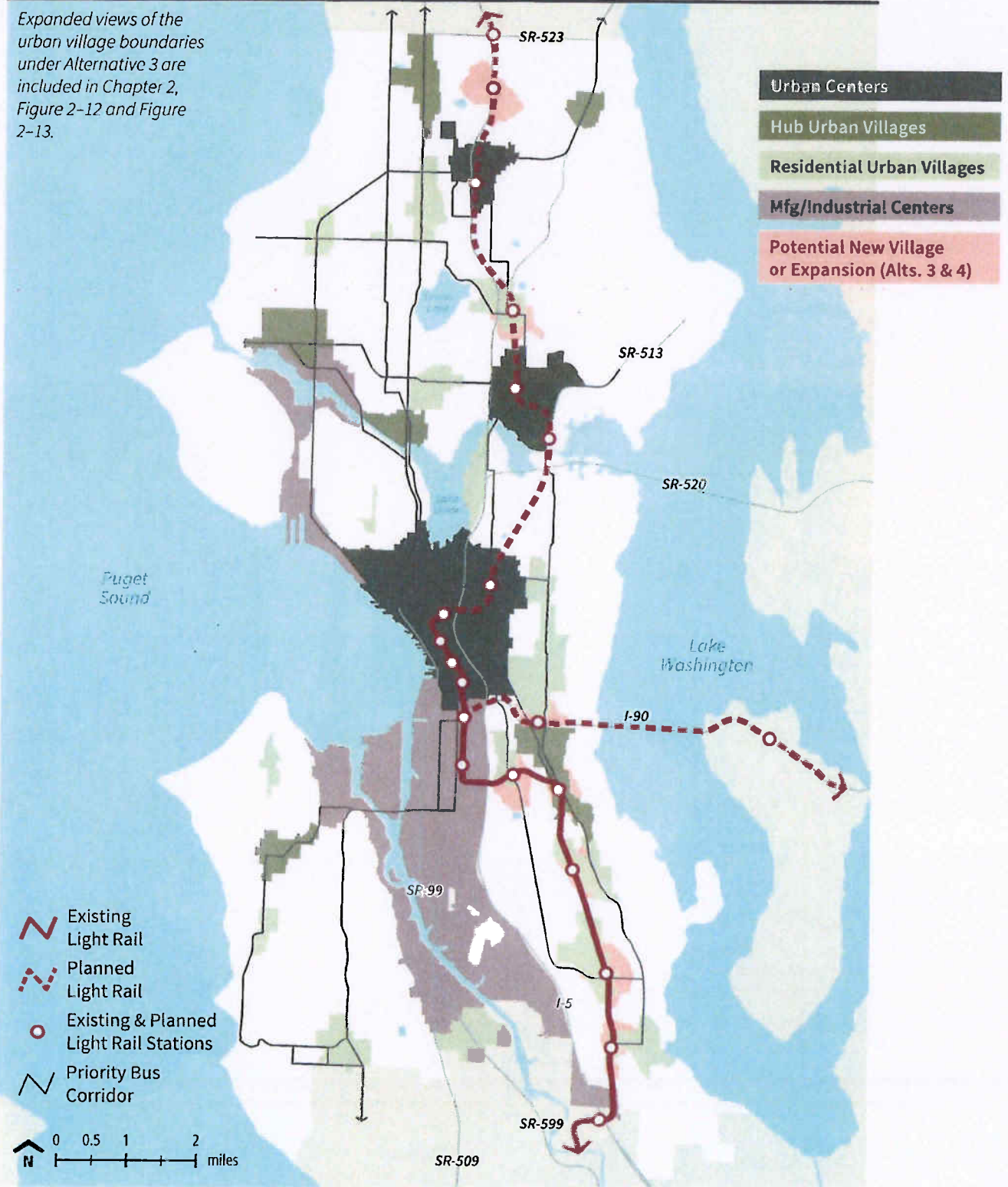
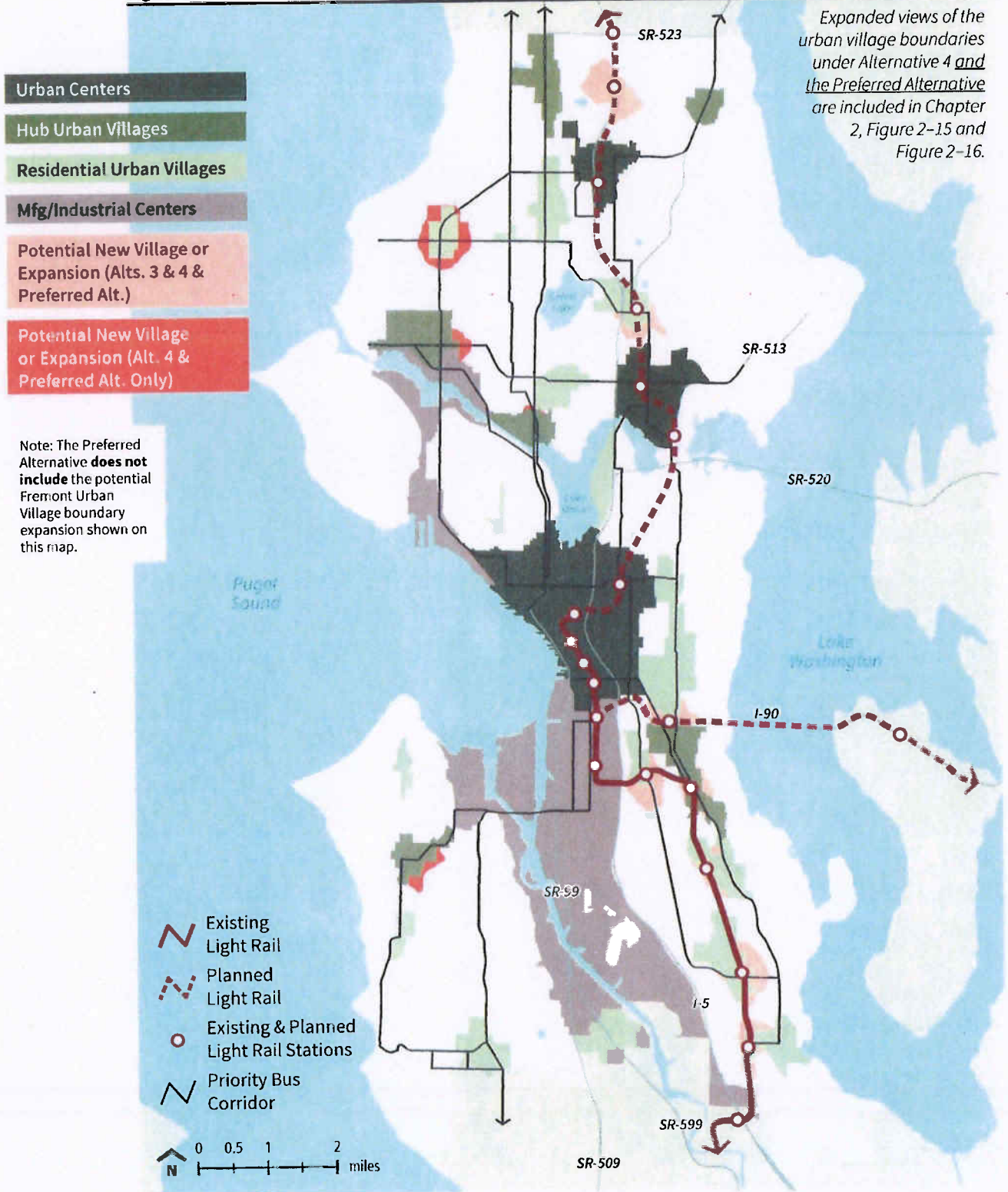


Figure 1-5 Urban village boundaries under Alternative 4 and Alternative 5, Preferred Alternative



1.4 Environmental Review

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

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

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

Key environmental issues and options facing decision-makers include:

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

1.6 **Summary of Impacts and Mitigation Strategies**

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

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

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

Earth and Water Quality

IMPACTS COMMON TO ALL ALTERNATIVES

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

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

ALTERNATIVES 1-4 AND PREFERRED ALTERNATIVE

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

Alternative 1: Continue Current Trends (No Action)

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

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

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

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

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

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



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

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

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

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

Preferred Alternative

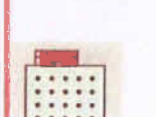
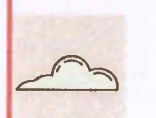
The Preferred Alternative would guide growth throughout the City in a pattern similar to alternatives 3 and 4 and would be expected to result in earth and water quality impacts similar to alternatives 3 and 4 in most areas. Compared to Alternative 4, the Preferred Alternative would guide relatively less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

MITIGATION STRATEGIES

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

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

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



Air Quality and Greenhouse Gas Emissions

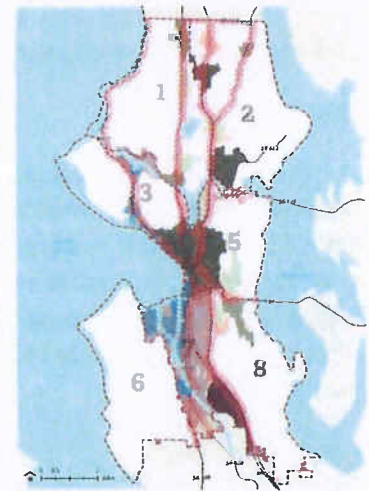
CONSTRUCTION-RELATED EMISSIONS

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

LAND USE COMPATIBILITY AND PUBLIC HEALTH CONSIDERATION

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

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



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

CONSTRUCTION-RELATED GREENHOUSE GAS EMISSIONS

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

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

OPERATION-RELATED GREENHOUSE GAS EMISSIONS

Operational GHG emissions associated with development under all alternatives would change due to a number of factors. Under all alternatives, projected improvements in fuel economy ~~outweigh~~ would be slightly outweighed by the projected increase in vehicle miles traveled. ~~For this reason, a~~ All of the alternatives are expected to generate ~~lower~~ slightly higher GHG emissions than current emissions in 2015 and all would generate roughly the same annual ~~increases in~~ GHG emissions, ranging between ~~2,160,000~~ 111,303 to ~~2,169,000~~ 124,518 MTCO₂e annually. ~~As a result, n~~ No significant adverse impacts are identified with respect to GHG emissions.

MITIGATION STRATEGIES

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

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS.

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



Noise

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

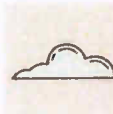
From a regional perspective, temporary construction noise and vibration within these infill development areas would occur in urban areas where ambient noise and vibration levels are already affected by roadway traffic and other transportation sources and would therefore be less noticeable to receivers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

CONSTRUCTION NOISE AND VIBRATION IMPACTS

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

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

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



LAND USE COMPATIBILITY AND NOISE

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

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

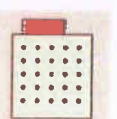
MITIGATION STRATEGIES

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

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

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to noise are anticipated.



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

IMPACTS COMMON TO ALL ALTERNATIVES

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

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

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

Alternative 1: Continue Current Trends (No Action)

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

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

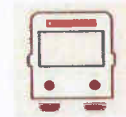
Alternative 2: Guide Growth to Urban Centers

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

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

Alternative 3: Guide Growth to Urban Villages near Light Rail

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



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

Alternative 4: Guide Growth to Urban Villages near Transit

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

Preferred Alternative

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

MITIGATION STRATEGIES

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

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

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

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

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

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



Relationship to Plans, Policies and Regulations

GROWTH MANAGEMENT ACT

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

VISION 2040

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

KING COUNTY COUNTYWIDE PLANNING POLICIES

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

SEATTLE COMPREHENSIVE PLAN

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

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

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

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

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

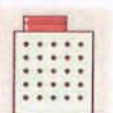
Given its resemblance in many respects to Alternative 4, the Preferred Alternative’s relationship to plans, policies and regulations is most closely similar to Alternative 4, except in its different growth distributions that seek in part to support equitable growth patterns as the city grows over the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

MITIGATION STRATEGIES

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

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts are anticipated.



Population, Employment and Housing

IMPACTS COMMON TO ALL ALTERNATIVES

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

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

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

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

Alternative 1: Continue Current Trends (No Action)

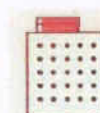
Alternative 1 would result in a more distributed growth pattern compared to the other alternatives and would likely result in patterns of development relatively consistent with the current development pattern. Projected growth under Alternative 1 (No Action) would generate moderate potential for displacement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

Alternative 2: Guide Growth to Urban Centers

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

Alternative 3: Guide Growth to Urban Villages near Light Rail

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



Alternative 4: Guide Growth to Urban Villages near Transit

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

Preferred Alternative

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

MITIGATION STRATEGIES

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

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

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

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

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



Transportation

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

IMPACTS COMMON TO ALL ALTERNATIVES



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

Auto and Transit. The City uses “screenlines” to evaluate auto (including freight) and transit operations. A screenline is an imaginary line across which the number of passing vehicles is counted. Each of those screenlines has a level of service (LOS) standard in the form of a volume-to-capacity (v/c) ratio: *the number of vehicles crossing the screenline compared to the designated capacity of the roadways crossing the screenline.* All of the screenlines are projected to meet the LOS standard for the PM peak hour under all alternatives. Therefore, no auto, freight² or transit impacts are expected under any of the alternatives, including the Preferred Alternative.

Pedestrian and Bicycle Network. The City has identified plans to improve the pedestrian and bicycle network through its *Move Seattle, Pedestrian Master Plan, Bicycle Master Plan* and other planning efforts. These plans are being implemented and are expected to continue to

be implemented under all alternatives, including the Preferred Alternative. No significant impacts are expected to the pedestrian and bicycle system.

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

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

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

MITIGATION STRATEGIES

The recommended mitigation strategy focuses on five main themes:

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

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

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

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

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

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

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

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



Public Services

IMPACTS ON POLICE SERVICES

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

IMPACTS ON FIRE AND EMERGENCY MEDICAL SERVICES (EMS)

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

IMPACTS TO PARKS AND RECREATION

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

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

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



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

IMPACTS TO SEATTLE PUBLIC SCHOOLS

The latest Seattle Public Schools capital program, BEX IV, ensures adequate capacity to meet enrollment projections for the 2020~~1~~/21 school year, 143 years short of the comprehensive plan update planning horizon of 2035 (Wolf 2014). Student enrollment would likely continue to grow as population increases in Seattle, affecting school capacity in the long run.

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

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

MITIGATION STRATEGIES

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

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

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts to public services are anticipated.



Utilities

IMPACTS COMMON TO ALL ALTERNATIVES

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

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

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

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

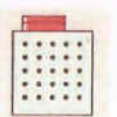


MITIGATION STRATEGIES

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

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

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



FACT SHEET

- 1. SUMMARY
 - 2. ALTERNATIVES
 - 3. ANALYSIS
 - 4. COMMENTS
- APPENDICES

Seattle Comprehensive Plan Update **Final EIS** May 5, 2016

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City of Seattle

Edward B. Murray, Mayor

Department of Construction and Inspections

Nathan Torgelson, Director

May 5, 2016

Dear Affected Agencies, Organizations, and Interested Parties:

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

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

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

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

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

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

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

Thank you for your interest in this document.

Sincerely,

Nathan Torgelson
Director



City of Seattle, Department of Construction and Inspections
700 Fifth Avenue, Suite 2000
P.O. Box 34019, Seattle, WA 98124-4019

An equal employment opportunity, affirmative action employer. Accommodations for people with disabilities provided upon request.

FINAL ENVIRONMENTAL IMPACT STATEMENT

for the

SEATTLE COMPREHENSIVE PLAN

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

Date of Final EIS Issuance:

May 5, 2016

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

Fact Sheet

Name of Proposal

Seattle Comprehensive Plan Update

Proponent

The proponent is the City of Seattle

Location

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

Proposed Action

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

Proposed Alternatives

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

ALTERNATIVE 1: CONTINUE CURRENT TRENDS (NO ACTION)

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

FACT SHEET

1. SUMMARY
 2. ALTERNATIVES
 3. ANALYSIS
 4. COMMENTS
- APPENDICES

ALTERNATIVE 2: GUIDE GROWTH TO URBAN CENTERS

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

ALTERNATIVE 3: GUIDE GROWTH TO URBAN VILLAGES NEAR LIGHT RAIL

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

ALTERNATIVE 4: GUIDE GROWTH TO URBAN VILLAGES NEAR TRANSIT

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

ALTERNATIVE 5: PREFERRED ALTERNATIVE

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

Lead Agency

City of Seattle Department of Construction and Inspections

SEPA Responsible Official

Nathan Torgelson, Director
City of Seattle Department of Construction and Inspections
700 Fifth Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019

EIS Contact Person

Gordon Clowers, Senior Planner
City of Seattle Department of Construction and Inspections
700 Fifth Ave., Suite 1900 Telephone: 206-684-8375
P.O. Box 34019 E-mail: Gordon.Clowers@seattle.gov
Seattle, WA 98124-4019

Final Action

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

Required Approvals and/or Permits

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

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

Authors and Principal Contributors to this EIS

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

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

Location of Background Data

CITY OF SEATTLE, DEPARTMENT OF CONSTRUCTION AND INSPECTIONS

Attn: Gordon Clowers Telephone: 206-684-8375
700 Fifth Ave, Suite 1900
P.O. Box 34019
Seattle, WA 98124-4019

Date of Issuance of this Final EIS

May 5, 2016

Date of Issuance of the Draft EIS

May 4, 2015

Date Draft EIS Comments Were Due

June 17, 2015

Availability of this Final EIS

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

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

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

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

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

4.0 Comments and Responses

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

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

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

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

4.1 Public Comments

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

Table 4-1 Public comments received during the comment period

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

4.1 Public Comments

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

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

4.1 Public Comments

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

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

4.1 Public Comments

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

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

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

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

4.1 Public Comments

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

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

4.1 Public Comments**Table 4-1** Public comments received during the comment period (cont.)

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

4.1 Public Comments

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

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

4.1 Public Comments

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

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

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

4.1 Public Comments

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

No.	Name/Handle	Source	Agency/Organization	Received
376.3	Gary Theo Schultz (1)	Facebook		05/07/2015
376.4	Jeff Nissen (1)	Facebook		05/07/2015
376.5	Hugo Hamerlinck	Facebook		05/07/2015
376.6	Gary Theo Schultz (2)	Facebook		05/07/2015
377	David Sucher	Facebook		05/08/2015
378	@bruteforceblog (1)	Twitter		05/08/2015
379	@bruteforceblog (2)	Twitter		05/08/2015
380	@MaishaBarnett	Twitter		05/09/2015
381	John Paul DeGennaro	Facebook		05/11/2015
382	Up and Coming	Blog		05/13/2015
383	Kyrtin	Blog		05/13/2015
384	MF1986	Blog		05/13/2015
385	bif	Blog		05/13/2015
386	Wallingfordian	Blog		05/13/2015
387	Maple Leafer	Blog		05/13/2015
388	Greenwood neighbor	Blog		05/13/2015
389	How Much Is Enough	Blog		05/13/2015
390	UR	Blog		05/13/2015
391	malinda lewis	Blog		05/13/2015
392	Mileg67	Blog		05/13/2015
393	Cass Turnbull	Blog		05/13/2015
394	@jgould13	Twitter		05/13/2015
395	@HERNANDOSTax	Twitter		05/13/2015
396	@SHJ_Kamishibai	Twitter		05/13/2015
397	Allison Agostinelli	Blog		05/14/2015
398	John Bannion	Blog		05/14/2015
399	prudentequity	Blog		05/15/2015
400	@bruteforceblog (3)	Twitter		05/15/2015
401	Don Perera	Blog		05/18/2015
402	John Barber	Blog		05/19/2015
403	Sovann Nem	Facebook		05/21/2015
404	Ken Thomas	Facebook		05/21/2015
405	@WillSeattle (1)	Twitter		05/21/2015
406	@WillSeattle (2)	Twitter		05/21/2015
407	Lisa Connolley	Facebook		05/25/2015
408	Jeff Nissen (2)	Facebook		05/25/2015
409.1	@SNGreenways (1)	Twitter	Seattle Greenways	05/25/2015
409.2	@SNGreenways (2)	Twitter	Seattle Greenways	05/25/2015
409.3	@GlenBikes	Twitter		05/25/2015
410	@bruteforceblog (4)	Twitter		05/25/2015
411	@Nick_Etheredge (1)	Twitter		05/25/2015
412	@Nick_Etheredge (2)	Twitter		05/25/2015
413	@Nick_Etheredge (3)	Twitter		05/25/2015
414	@NEGreenways	Twitter	NE Seattle Greenways	05/25/2015

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

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

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Understanding this is a non-project EIS, I still think that it is important for the public and decision makers to have a good understanding of the change that is being proposed and I believe that the DEIS falls short on a couple of levels.

1 | My focus is on Alternative 4 which would expand the boundaries of several Urban Villages. My specific interest is the Crown Hill/Ballard Urban Village, though I expect that my comments/concerns are applicable to other Urban Villages as well.

Alternative 4 proposes to expand the Urban Village boundaries to include properties within a 10-minute walking distance from a nearby bus stop. There is a lack of detail about the changes that boundary shifts would entail.

Detailed concerns

2 | Specifically, I am interested in:

- a) The increase in housing unit capacity that would occur after the boundary change and follow-up rezone,
- b) The visual impact that would result from development that would be allowed by the change, and
- c) The impact on infrastructure, especially the bus service, in the area affected by the change and the extent of the downstream effects of the new riders.

My major concerns are addressed below:

3 | 1) What is change in capacity if the boundaries are expanded, both in new housing units and jobs? The DEIS suggests that that the boundary change could be accompanied by rezones in the newly expanded portion of the urban village. In order to reasonably comment on the impacts of the proposed change, it is important to have an idea of the magnitude of the contemplated change. In terms of area, what is the proposed increase? In the Ballard Urban Village, it looks like the proposed increase is very small, but in the Crown Hill area, it looks to significantly increase the acreage of the urban village. How would this translate as increased capacity?

4 | 2) What is the likely visual impact of the new development that will be allowed as a result of rezones that will occur to implement the boundary change? In Crown Hill for example, are the new units likely to be 3-story townhouses or 5 to 6 story apartments/condos with retail or office on the ground floor? Specifically, on pages 3.4-32-33, the proposed expansion areas in Ballard and Crown Hill are zoned for single-family development. Would the boundary area change result in new zoning designations and/or height and density limits?

5 | 3) What would be the impact of new residents on the infrastructure of the area? For example, in Crown Hill, for example, the assumed Household growth difference between Alt 1 and Alt. 4 is 1100 units.

How would this impact bus service? Assuming each unit has 1.5 working adults and 20% of them take the bus, this would result in 330 new trips during morning and evening commute times or

5 cont.

about 165 new riders per hour. Assuming 40 riders per bus, this would require 4 new busses during each hour of the morning and evening commute.

There would undoubtedly be impacts on other infrastructure as well.

Proposed Mitigation in terms of additional policy in the Plan

6

I suggest that if alternative 4 is reflected in the final proposal, that a policy be added to the Plan that would tie the increased capacity allowed by the Urban Village expansion to city funding of the affected infrastructure. For example, if the boundary change will add 20% additional housing capacity to an area, the city would commit to funding (as part of the general fund) some additional bus hours to serve the area. Additional funding for neighborhood parks would also be appropriate, since they would be directly tied to population increase.

I hope to see a policy like this in the proposed Comprehensive Plan update to make it more likely that neighborhoods needs are met. While the actions of one Council cannot bind another Council, such a commitment would help the Council be more accountable to the residents of the city who vote for them.

Thank you for the opportunity to comment on the DEIS.

Steven Cohn
Seaview Pacific Consulting
seaviewpacific@gmail.com

Date: 11/06/2015

Name: Steve Cohn

Draft Plan Element:

Comment:

Tom,

It was good to talk with you last night. I'll send some of my comments in writing to you prior to the comment deadline.

Though I couldn't stay for the presentations, I thought that the open house went very well. It looked to me that there was enough staff to respond to questions, and I thought that the boards did a good job of explaining the issues.

I hope that you received the attendance and feedback you were looking for.

As I mentioned, we have a group of Ballard residents reviewing the proposed Plan; I hope that you're open to coming (or have one of your staff come) to join us in one of our future meetings.

Congrats again on a good job!

Steve C

Date: 11/20/2015

Name: Steve Cohn

Draft Plan Element: Capital Facilities, Growth Strategy, Housing

Comment:

My comments are attached.

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Comment on Seattle 2035 Comprehensive Plan Proposal

My name is Steven Cohn and I am a member of the Ballard District Council's Comprehensive Plan Review Team. I am writing this as an individual and my comments do not represent those of the Review Team.

I like many things in the proposed plan; however I have some concerns which I hope you will address prior to the development of the Mayor's proposed Plan:

A. Changing the Hub Residential Village Boundaries in areas without fixed rail rapid transit.

I have a number of thoughts about the proposal to modify Urban Village boundaries to reflect a 15-minute walkshed, particularly as it applies to the Ballard Urban Village and the Crown Hill Urban Residential Village. Some of my comments may be applicable to other Urban Villages as well; though I am not familiar with the specifics of other Urban Villages.

1. The residential and job targets can be met through current capacity under the current zoning. (Actually, under the terms of the "grand bargain", residential capacity is increased by 10-15%. So there is even more capacity than the Comprehensive Plan assumed when the staff proposal was released).
2. Until ST-3 is passed, there is no assurance about where the new lines will go, where they will stop, and when they will be operational. Unless there is funding and a plan, improved and reliable transit service to a particular station is not assured. Until then, Seattle is relying on the largess of Metro to provide bus service, and as we've seen in Ballard time and time again, Metro has its own metrics for deciding where to expand, reduce, or eliminate routes or bus stops.
3. The GMA requires concurrency to mitigate the impacts of growth. Until the plan and funding is in place, concurrency cannot be guaranteed. Currently the Central Puget Sound Growth Management hearings board has a case before them that includes related issues (See "Shoreline Preservation Society

v. City of Shoreline” case). The Hearings Board decision on this case may have implications about whether the proposed expansion requires immediate implementation and whether a full environmental review of the implantation action is required prior to adoption of either action.

4. In addition to the general question of concurrency and whether or not further environmental review is necessary, the question of implementation of this change is important to discuss. How would this change be implemented? Would rezones be initiated by the city or by the property owners? What timeframe is expected? Would new transitional zoning be developed that would protect the adjacent single family neighborhoods? The boundary change should not occur until these questions are answered.

In summary, I suggest that there is no immediate reason to change the Urban Village boundaries. This decision can be put off until the next Comprehensive Plan Update, which will occur probably 8-10 years prior to the implementation of ST-3 in Ballard.

B. School District Capital Facilities Plan is not in the spirit of the GMA mandate for a 20 year plan. The School District’s Capital Facilities Plan only goes out to the year 2021. Considering that the Comprehensive Plan won’t be adopted until 2016 at the earliest, this is only a 5-year plan. GMA requires a longer view than this.

Having done demographic analysis myself, and being a long-time participant in the PSRC’s regional forecasting group, I know that long-term small area forecasting is hard. But that doesn’t mean that it shouldn’t be attempted (with the appropriate caveats) to respond to the spirit of the GMA.

The School District has a demographer, as does the City of Seattle. The PSRC has long range demographic forecasts based on national models. It seems it would be worthwhile to work with the School District to develop an extended forecast, at least going out 10-12 years, if only to offer Seattle residents a glimpse of how things might change—since the change will directly affect us. For example, if a new middle school or high school is contemplated to serve downtown Seattle and immediate environs to take some pressure off the Northend schools, where are likely areas where that school might be located? Are we in danger of losing some park space or other publicly owned space for one of these schools? In the suburbs, a middle school historically requires 20 acres of property, and a high school twice that. I assume in the city the school district could get by with less property, but even so, property acquisition is something that needs to be considered.

C. Development Impact Fees

GMA requires that land use regulation has basis in adopted policy. Since the city is suggesting that Affordable Housing Fees are impact fees and since the community is beginning to discuss impact fees for schools and transportation, there should be a policy basis for this. Addition of policy support in the Mayor’s Draft Plan will assure robust discussion of this concept (both pro and con) prior to a Council decision as to whether other impact fees should be imposed.

D. Encouraging more of a Jobs/Housing Balance in the Urban Villages

Transportation congestion is difficult to deal with, and it is probably only going to get worse in the future as the number of jobs in the City, Eastside and North County grow. One way to provide some mitigation is by encouraging more job growth in the Urban Villages throughout the city so that some people can live close to jobs (not just close to a transit stop). The Comprehensive Plan should include more policies about encouraging family wage jobs in the Urban Villages so that regulations can be developed which provide incentives for family wage jobs to locate close to some of the new development.

Thank you again for the opportunity to comment.

Steve Cohn

SeaviewPacific@gmail.com