

Seattle Transportation Plan

A Vision for the Future of Transportation in Seattle

Final Environmental Impact Statement

February 2024

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February 29, 2024

Subject: Final Environmental Impact Statement (FEIS), Seattle Transportation Plan

To Affected Tribes, Interested Agencies, and Members of the Public:

The City of Seattle developed the Seattle Transportation Plan (STP) to help envision a transportation future. Cocreated with the community, the STP creates a 20-year roadmap to guide future investments that modernize and maintain our transportation system. It helps identify and prioritize transportation solutions that improve safety, mobility and economic vitality, livability, equity, and sustainability across modes of transportation and geographies in the city.

As part of the STP planning process, the City has prepared a non-project Final Environmental Impact Statement (Final EIS). The Final EIS completes the environmental review process for a range of alternatives analyzed and evaluated in the Draft EIS. These alternatives represent bookends of potential transportation implementation scenarios, representing a spectrum of potential transportation project investment:

- Alternative 1 No Action: It maintains the existing transportation networks and describes a future with no
 additional multimodal or transportation improvements beyond what is funded today. This is a required
 "baseline" alternative under the State Environmental Policy Act (SEPA).
- Alternative 2 Moderate Pace: It envisions a future with moderate growth in additional funding for new multimodal infrastructure. It takes a modest approach to expanding investments in sidewalks, the bike network, transit corridors, and PSPS improvements. It also includes a moderate number of community and mobility hubs.
- Alternative 3 Rapid Progress: It focuses on an expansion of expanded and enhanced multimodal transportation in Seattle's transportation network, with substantial improvements in the pedestrian, bicycle, and transit connections. It includes a broad range of improvements that extensively advance implementation of overarching policies of the STP.

The Final EIS provides responses to comments received during the Draft EIS comment period and identifies adjustments made that reflect public input. The Final EIS does not repeat information in the Draft EIS, which compared the alternatives and provided mitigation measures for identified impacts. It evaluated the following elements required by the State Environmental Policy Act:

- Air Quality
- Water Resources
- Sea-Level Rise
- Transportation

- Noise
- Land Use Patterns
- Utilities (Electrical Power)

The key issues facing decisions makers include:

- Creation of a network concept that meets plan objectives to create an equitable, livable, inclusive and climate resilient community.
- Approval of a Transportation Plan, including a vision, goals, and strategies, that fulfills Seattle's vision and meets state and regional requirements.

Please see the Final EIS Fact Sheet for a summary of the approvals associated with the proposals.

If you have any questions, please contact: Radcliffe Dacanay, Policy and Planning, Principal Transportation Planner City of Seattle Department of Transportation 700 Fifth Ave, Suite 3800 Seattle, WA 98124-4996 Ph: (206) 945-2407 radcliffe.dacanay@seattle.gov

For more information, please see the project website: www.seattle.gov/transportation/seattletransportationplan

Thank you for your interest in the future of Seattle and its Transportation Plan.

Sincerely,

Greg Spotts (Feb 22, 2024 19:16 PST)

Greg Spotts Director, Seattle Department of Transportation

FACT SHEET

Project Title

Environmental Impact Statement (EIS) for the Seattle Transportation Plan

Proposed Action & Alternatives

The Seattle Transportation Plan (STP) is a 20-year vision document developed in coordination with the One Seattle Plan, the City's 20-year growth strategy. The STP will serve as a roadmap to guide actions and investments for transportation solutions that coordinate to improve mobility across geography and modes of transportation in the city. The proposal is informed by recommendations from community input collected in 2022 and 2023.

This Environmental Impact Statement (EIS) studied two action alternatives relative to a No Action Alternative. These alternatives illustrate different potential futures for the city's transportation networks. Studied systems include pedestrian, bike, People Streets and Public Space (PSPS), transit, and freight. These two alternatives evaluated the effects of potential changes to SDOT infrastructure and policy implementation approaches over a 20-year time horizon (to 2044). The "No Action" Alternative is required by SEPA and serves as a baseline for comparison. Alternative 2 and Alternative 3—the bookends of potential implementation scenarios—apply proposed frameworks that are based on community input and are intended to respond to issues, challenges, and opportunities for multimodal mobility in Seattle.

Assumptions considered in each alternative include:

- General: Assumptions related to the funding of existing initiatives and committed projects, such as Sound Transit 3, as well as potential electric vehicle (EV) infrastructure investment.
- **Pedestrian:** Assumptions related to sidewalks throughout the city, including destination streets.
- Bicycle: Assumptions related to all bicycle-related facilities, excluding sharrows, and committed projects.
- PSPS: Assumptions related to Healthy Streets and pedestrian improvements on destination streets, as well as including People Streets in the Seattle Transportation Plan. PSPS refers to People Streets and Public Spaces.
- Transit: Assumptions related to transit lanes, facilities, and corridors.

- Community & Mobility Hubs: Assumptions related to the introduction of community & mobility hubs throughout the city.
- Freight: Assumptions related to the street network for trucks.

Each alternative also considered how the proposed changes implement goals and policies outlined in the STP. To implement the transportation concepts in each of the Action Alternatives the City of Seattle would:

- Engage and co-create with community, boards & commissions, elected officials
- Collaborate with agency partners
- Pursue funding opportunities
- Update policy, processes, and guidelines
- Expand staff capacity and training

Each of the alternatives evaluated in this EIS pose different investment and policy priorities related to the city's pedestrian, bike, PSPS, transit, and freight networks for the purpose of improving the future of mobility in Seattle. The multi-faceted objectives of the proposal are listed in **Section 1.3.1** of this EIS. The following is a summary of the three alternatives:

- Alternative 1 No Action: Alternative 1 No Action is a SEPA-required alternative that would maintain existing transportation networks and approved funding commitments. Roadway operations are optimized at key intersections, limited spot safety improvements are made throughout the network, and very limited slow zones are implemented on key pedestrian spaces.
- Alternative 2 Moderate Pace: Alternative 2 allocates a moderate amount of new funding for multimodal infrastructure. The pedestrian network increases by 127 linear miles of sidewalks, the bicycle network adds 53 miles with facilities, an additional 45 miles of streets receive additional PSPS improvements, and an additional 33 miles are dedicated as transit corridors. This plan includes some restricted areas for general purpose traffic, a network of People Streets, and a moderate number of community and mobility hubs. The existing freight network is unchanged.
- Alternative 3 Rapid Progress: Alternative 3 focuses on the expansion of Seattle's pedestrian, bicycle, and transit connections. The pedestrian network increases by 848 linear miles of sidewalks, the bicycle network adds 385 miles with facilities, an additional 76 miles of streets receive additional PSPS improvements, and an additional 123 miles are dedicated as transit corridors. In this alternative, the City fully implements overarching policies of the Seattle Transportation Plan with a greater expansion of PSPS, electrification infrastructure, a wider range of community & mobility hubs, and mobility management strategies in concert with the region. The existing freight network is expanded to include 19 miles of shared freight- and- bus (FAB) lanes.

This Final EIS responds to comments on the Draft EIS issued in August 2023 and completes the environmental review for the proposal.

Proponent & Lead Agency

Seattle Department of Transportation

Location

The proposal addresses all transportation in the public right of way in the City of Seattle.

Tentative Date of Plan Adoption

Spring 2024

Responsible SEPA Official

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Contact Person

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Required Approvals

The proposal includes the development of legislative proposals for the STP. The proposals will be reviewed by the Seattle City Council Transportation Committee and considered for approval by the City Council.

Principal EIS Authors & Contributors

Under the direction of the Seattle Department of Transportation, the consultant team prepared the EIS as follows:

- BERK Consulting: SEPA documentation, Land Use Patterns, Utilities
- Kimley-Horn: Transportation, Air Quality, Noise, Sea-Level Rise

The following departments provided subject matter expertise to the EIS:

- City of Seattle. <u>Office of Planning and Community Development</u>: Land Use Patterns Affected Environment.
- City of Seattle. Department of Transportation: Transportation
- City of Seattle. Office of Sustainability and Environment: Air Quality
- City of Seattle. City Light: Utilities
- City of Seattle. Department of Construction and Inspections: Noise, Sea-Level Rise

Draft EIS Date of Issuance

August 31, 2023 Comment Period: August 31 to October 16, 2023

Final EIS

February 29, 2024

Date of Final Action: Anticipated Spring 2024

Prior Environmental Review

The study area was reviewed as part of the citywide Comprehensive Plan EIS completed in 2016:

Final Environmental Impact Statement for the Seattle Comprehensive Plan Update, May 5, 2016.

Location of Background Data

You may review the City of Seattle website for more information at <u>STP Website</u>. If you desire clarification or have questions, please see the contact person above.

Purchase/Availability of Final EIS

The final EIS can be downloaded from the City of Seattle website at

https://www.seattle.gov/transportation/projects-and-programs/programs/seattle-transportation-plan.

A hard copy, compact disk, or thumb drive are available for purchase at cost (see the contact person above to arrange).

DISTRIBUTION LIST

The final EIS has been issued with a notice of availability and methods of publication required in SMC 25.05.510 Public Notice.

Federally Recognized Tribes

Confederated Tribes and Bands of the Yakama Nation Muckleshoot Indian Tribe Nisqually Indian Tribe Puyallup Tribe Snoqualmie Tribe Squaxin Island Tribe Stillaguamish Tribe of Indians Suquamish Tribe Swinomish Indian Tribal Community Tulalip Tribes of Washington

Federal Agencies

National Oceanic and Atmospheric Administration Fisheries, National Marine Fisheries Service

- U.S. Army Corps of Engineers
- U.S. Department of Commerce Economic Development Administration
- U.S. Department of Fish & Wildlife Services
- U.S. Department of Housing & Urban Development
- U.S. Environmental Protection Agency
- USDA-Wildlife Services Division

State Agencies

Department of Archaeology & Historic Preservation

Department of Commerce Department of Commerce, Growth Management Services Department of Ecology Department of Fish & Wildlife Department of Fisheries Habitat Department of Health Department of Natural Resources Department of Social & Health Services Department of Transportation

Regional and County Agencies

King County Community and Human Services King County Department of Natural Resources, Parks Division King County Department of Permitting and Environmental Review King County Department of Transportation King County Department of Transportation King County Executive's Office King County Metro Transit King County Metro Transit King County Regional Water Quality Committee King County Wastewater Treatment Division Port of Seattle Puget Sound Clean Air Agency Puget Sound Regional Council Seattle-King County Department of Public Health Sound Transit

Seattle, Adjacent Jurisdictions, Service Providers

See regional providers above and following. City of Shoreline City of Tukwila Seattle City Light Seattle Housing Authority Seattle Public Library, Public Review Documents Seattle Public Utilities Seattle Public Utilities Seattle Public Schools Southwest Suburban Sewer District Seattle City Council Legislative Department Seattle Department of Education and Early Learning Seattle Department of Neighborhoods Seattle, Department of Neighborhoods, Historic Preservation Program Seattle Department of Transportation Seattle Fire Department Seattle Fleet Management Seattle Indian Services Commission Seattle Landmarks Preservation Board Seattle Law Department Seattle Office of Arts and Culture Seattle Office of Economic Development Seattle Office of Emergency Management Seattle Office of Housing Seattle Office of Planning & Community Development Seattle Office of the Mayor Seattle Parks and Recreation Seattle Police Department

Community Organizations & Individuals

Duwamish Tribe Industrial and Maritime Strategy Council Georgetown / South Park Council Ballard Council Interbay Council SODO Council Black Indigenous and Persons of Color (BIPOC) Youth Engagement Partners Persons providing scoping comments (see Chapter 2)

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1.1. Purpose

The Seattle Transportation Plan (STP) is a 20-year plan for the future of our transportation system. It is informed by thousands of people who live, work, and play in Seattle. It represents the first time the City has comprehensively addressed the needs of all people who use our streets on a citywide scale. Altogether, the STP builds upon the foundation of existing plans and initiatives. The STP identifies new ways to accelerate progress on the things that matter most, like safety, equity, and climate action. It identifies important updates to pedestrian, bicycle, transit, and freight networks, priorities related to people streets and public spaces (PSPS), accessing and managing the curb, and the vehicular network. The plan considers a mix of integrated transportation investments to transform how we move and gather, and ways to improve how travel modes work together. This plan works hand-in-hand with the One Seattle Plan to guide City decisions about where we locate housing and jobs, and where and how we invest in transportation, utilities, parks, and other public assets.

This Environmental Impact Statement (EIS) studies three alternatives illustrating different potential futures for the city's transportation network considered in the STP. The three alternatives evaluate the effects of potential changes to the transportation network over a 20-year time horizon (to 2044).

The "No Action" alternative is required by the State Environmental Policy Act (SEPA) and serves as the baseline for comparison. The two Action Alternatives (Alternative 2, and Alternative 3—the bookends of a range of potential implementation pathways—apply different transportation policy concepts that are based on community input and intended to respond to issues, challenges, and opportunities for transportation.

To implement the policy concepts in each of the Action Alternatives, the City of Seattle would:

- Engage with community, boards & commissions, elected officials
- Collaborate with agency partners
- Pursue funding opportunities
- Update policy, processes, and guidelines
- Expand staff capacity and training.

The following is a summary of the three alternatives.

What is an Alternative?

Alternatives are different ways of achieving objectives that allow decisionmakers to compare the effects of different options. The No Action Alternative is based on current plans, policies, and regulations and is a benchmark against which other alternatives can be measured. Action alternatives serve as bookends and can test a range of ideas, implications, and benefits. The Alternatives in the EIS consider the Seattle Transportation Plan policies and different network configurations to achieve the Plan objectives. Alternatives are conceptual, they provide high-level direction, but are not yet project specific.

The three Alternatives presented here are intended to convey **a range** of reasonable options; it is not intended to consider every possible option. The final STP need not be identical to any single alternative but must be within the range of alternatives considered. The STP can mix and match and pull elements from each alternative. Some information, such as a fiscal analysis, will inform and influence STP but is not included in the EIS.

- Alternative 1—"No Action": The No Action Alternative is required by SEPA. It describes the future of Seattle's transportation system where the city implements no additional multi-modal or other transportation improvements beyond what is funded today. This alternative focuses on optimizing existing conditions in the transportation system with no new additional dedicated space for transit, pedestrians or bikes. Roadway operations are optimized at key intersections, limited spot safety improvements are made throughout the network, and very limited slow zones are implemented on key pedestrian spaces.
- Alternative 2— "Moderate Pace": Alternative 2 envisions a future with moderate growth in funding for new multimodal infrastructure in Seattle's transportation system. This alternative takes a modest approach to expanding pedestrian, bicycle and transit connections. Some space for general purpose vehicular traffic in this alternative would be reprioritized as dedicated spaces for priority modes including some improvements to the public and pedestrian realm. In this alternative, the city implements a modest set of the overarching policies of the Seattle Transportation Plan. These include some areas for a network of People Streets and a moderate number of community & mobility hubs.
- Alternative 3—" Rapid Progress": Alternative 3 envisions a future with expanded and enhanced multimodal infrastructure in Seattle's transportation system. This option significantly improves the pedestrian, bicycle, and transit networks. It reprioritizes some general-purpose lanes to dedicated spaces for priority modes—creates more space for all mobility options. This alternative also includes a broad range of improvements to the public and pedestrian realm and additional dedicated space for goods movement through the city. In this alternative, the City fully implements overarching policies of the Seattle Transportation Plan with a wider network of People Streets, electrification infrastructure, a wider range of community & mobility hubs, and deploys mobility management strategies, in concert with the region.

This Final EIS provides responses to comments on the Draft EIS.

1.2. Emerging Factors Affecting Seattle's Transportation Network

The STP addresses the most important factors affecting Seattle's transportation system today and the anticipated needs of the next 20 years. This plan strives to:

- Make the transportation system more equitable.
- Increase safety.
- Foster a clean, sustainable transportation system.
- Strategically link housing and mobility investments.
- Create more low-cost travel options.
- Continue recovery from the COVID-19 pandemic.
- Reflect community priorities in the limited right-of-way.

1.3. Objectives, Proposal, & Alternatives

1.3.1. Objectives ("Goals" in the STP)

SEPA requires a statement of proposal objectives ("Goals" in the STP) and the purpose and need to which the proposal is responding. Alternatives are different means of achieving objectives.

The proposal would update Seattle's 20-year Transportation Plan (STP). The objectives behind this proposal are multi-faceted and seek to address the City's transportation network holistically. The objectives are organized around the six central themes that organize the STP. These themes are: Lead with Transportation Justice; Safety is Central; Climate Action; Connect People and Goods; Streets for People, Places We Love; and Streets that Work, Today and in the Future. See Exhibit 1-1.

Exhibit 1-1. Objectives of the Proposal

	with Transportation Justice: Co-Create with community and implement restorative practices to address portation-related inequities
TJ1.	Center the voices of communities of color and underrepresented groups in our planning and decision-making processes
TJ2.	Address inequities and past harms in our transportation system by prioritizing investments for impacted communities
TJ3.	Ensure everyone can afford to take the trips they need to make
Safet	y is Central: Everyone feels safe traveling in Seattle, and there are no serious injuries or fatal crashes
S1.	Reduce vehicle speeds to increase safety
S2.	Promote safety investments at our most collision-prone locations
S3.	Make it safer for everyone traveling in Seattle, particularly users who are walking, biking, rolling, and accessing transit
S4.	Provide safer routes to schools, parks, transit, community gathering spaces, and other common destinations
Clima	te Action: Respond to climate change with a lens of climate justice to maximize community benefit
CE1.	Improve neighborhood air quality and health outcomes by promoting clean, sustainable travel options
CE2.	Green our streets to better handle our changing climate
CE3.	Foster neighborhood vitality and improved community health
CE4.	Support the transition from fossil fuel to electric vehicles (EVs) for personal, commercial, and delivery trips
CE5.	Advance mobility management strategies to improve air quality and encourage transit, walking, and bicycling
	ect People and Goods: Provide reliable and affordable travel options that help people and goods get where need to go
PG1.	Create seamless travel connections
PG2.	Make walking, biking, and rolling easy and enjoyable travel choices
PG3.	Create world-class access to transit and make service more frequent and reliable

PG4. Support economic vitality by accommodating goods movement and growth in deliveries

PG5. Manage curb space to reflect our values and priorities

Streets for People, Places We Love: Reimagine our streets as inviting places to linger and play

PP1. Prioritize street space for people while preserving access for goods

PP2. Transform transportation hubs into welcoming community places

PP3. Co-create and enhance public spaces for playing and gathering to improve community health

PP4. Activate public spaces to create a welcoming and age-friendly public realm

Streets that Work, Today and in the Future: Improve our transportation infrastructure and ready it for the future

- SW1. Transform our system and extend the life of our assets through optimal timing of maintenance and replacement
- SW2. Reduce neighborhood disparities in the quality of our streets, sidewalks, public spaces, and bridges
- SW3. Ready our streets for new travel options and emerging technologies

Source: Seattle Department of Transportation, Draft Plan, 2023.

1.3.2. Proposal

The proposal considers STP policy amendments that could help meet the objectives defined in **Section 1.3.1**. The EIS includes two multimodal investment alternatives (alternatives 2 and 3) that would make different combinations of multimodal network improvements and degrees of change to existing transportation infrastructure. A "No Action" Alternative is also considered. As the title suggests, it has no changes to existing networks beyond existing commitments and minor spot improvements.

1.3.3. Network Concepts

The multimodal investment alternatives (alternatives 2 and 3) would apply proposed network changes that are based on community input and intended to respond to issues, challenges, and opportunities for Seattle's transportation networks.

Five transportation networks (pedestrian, bike, people streets and public space, transit, and freight) are studied with changes integrated to different degrees in the multimodal investment alternatives. Network assumptions studied in each alternative include:

- General: Assumptions related to the funding of existing initiatives and committed projects, efficiency via signal optimization, and potential electric vehicle (EV) infrastructure investment.
- Pedestrian: Assumptions related to sidewalks throughout the city, including destination streets.
- Bicycle: Assumptions related to all bicycle-related facilities, excluding sharrows, and committed projects.
- **PSPS:** Assumptions related to stay healthy streets and pedestrian improvements on destination streets.
- Transit: Assumptions related to transit lanes, facilities, and corridors.
- Community & Mobility Hubs: Assumptions related to the introduction of community & mobility hubs as outlined in the transit vision network.

• Freight: Assumptions related to the street network for trucks.

A description of concept is provided below and following that a full description of each alternative and how it assimilates the mobility concepts.

General Investments

General assumptions include the funding of existing initiatives and committed projects as well as potential electric vehicle (EV) infrastructure investment. Exhibit 1-2 summarizes the existing plans and initiatives that have already been adopted by Seattle City Council as well as studies, initiatives, and plans developed to guide Seattle's transportation system.

Implementing **signal optimization** improves the efficiency of traffic operations. Each alternative implements some level of efficiency improvements, but the degree to which these are incorporated varies across the 3 alternatives.

EV infrastructure investments include dedicating right-of-way to charging stations, transitioning the City fleet to be zero-emission vehicles, supportive infrastructure for transit agency partners, and policy requirements for EV charging infrastructure with new development.

Year	Plan
2012	Transit Master Plan (Revised 2016)
2013	Bicycle Master Plan
2015	Vision Zero Action Plan
2016	Freight Master Plan
2017	New Mobility Playbook
	Pedestrian Master Plan
2021	Transportation Electrification Blueprint
2022	Transportation Equity Framework
2023	Climate Response Framework
	Vision Zero Top to Bottom Review
	Transportation Asset Management Plan

Exhibit 1-2. Existing Transportation Plans and Initiatives

Source: City of Seattle, 2023.

Pedestrian Investments

Seattle's sidewalk network offers dedicated and safer places for pedestrian traffic across the city. The extent of this network is measured in linear miles, and each alternative offers a different number of sidewalk miles. In addition, crosswalk improvements enhance the safety and comfort of pedestrians when paths cross with vehicular traffic. Each alternative offers a selection of crosswalk improvements, but the extent of these improvements varies across the plans.



Enhanced pedestrian crossing along Linden Avenue. Image source: Seattle Transportation Plan, 2023

Bicycle Facility Investments

The bicycle network is measured in linear miles of corridors with bike facilities, including multi-use trails, protected bicycle lanes, conventional bicycle lanes that meet "all ages and abilities" guidelines, Healthy Streets, and Neighborhood Greenways. Sharrows are not considered in this calculation. The two action alternatives outline plans to add miles to the existing bike network. Improvements to the bike network can include reallocation of street space for protected bike lanes, enhancing existing bike facilities with additional safety features, and additional accommodations for bike parking.



Protected bike lanes at Green Lake. Image source: Seattle Transportation Plan, 2023

People Streets and Public Space (PSPS) Investments

People Streets are corridors that provide enhanced, safe, and comfortable walking and rolling environments and access to public spaces, climate-resilient landscapes, transit, and mobility choices. Public Spaces are community-prioritized places in the public realm that invite people to gather, play, and connect with each other and support local businesses (e.g., transit stations, community & mobility hubs). The goals of PSPS investments are to make access to the public right of way more equitable and to encourage the activation of shared spaces. One example of PSPS investments is the network of healthy streets across the city. During the onset of the COVID-19 pandemic in 2020, pedestrian thoroughfares were carved into the existing neighborhood street grid by designating "healthy streets" where nonmotorized users are given the right-ofway and vehicle traffic is prohibited or restricted to local traffic only. The popularity of this program has led to a movement to make these temporary interventions more permanent and expand their presence across Seattle neighborhoods. Each alternative maintains existing and committed PSPS investments. The two action alternatives further expand the street space dedicated to these uses.



Street space reclaimed for public use at Westlake. Image source: Seattle Transportation Plan, 2023

Transit Investments

Mass public transportation in Seattle is provided by a collection of local and regional service providers that offer light and heavy rail, bus, and streetcar service. Investments include adding bus-only lanes, improvements to make it easier to walk or bike to transit, and upgrades to improve the experience waiting for transit. Each alternative studied in the EIS maintains existing and committed investments to support light rail, bus, and streetcar service improvements. The two action alternatives add to the mileage of dedicated transit corridors, offer bus service expansions, and introduce community & mobility hubs to support transit service (see description below).

Community & Mobility Hubs

A community & mobility hub is a place where transportation connections, travel information, and community amenities are collocated and coordinated to allow easy transfers between mobility services. Community & mobility hubs also connect with pedestrian and bike networks and incorporate businesses and/or services

that promote vitality and placemaking. Seattle does not currently have intentional community & mobility hubs, and they are not included as part of the No Action Alternative. The two action alternatives, however, integrate community & mobility hubs across Seattle. Alternative 3 also integrates EV charging infrastructure.

Freight Investments

The freight network highlights the streets well-suited to truck traffic and the movement of goods throughout the city. Alternatives 1 and 2 maintain this network, while Alternative 3 adds 19 miles of dedicated freight and bus lanes.

1.3.4. Regulatory Concepts

Mobility Management Strategies

Mobility management strategies can employ pricing mechanisms that influence travel choices. They can take a number of different forms such as tolls, per-mile charges, parking pricing, parking taxes, and other charges that help manage travel demand. These types of strategies may be pursued in concert with the region.

Implementation of Alternatives

To implement the transportation concepts in each of the Action Alternatives, the City of Seattle would:

- Engage with community, boards & commissions, elected officials
- Collaborate with agency partners
- Pursue funding opportunities
- Update policy, processes, and guidelines
- Expand staff capacity and training

A project list that implements the Preferred Alternative will be generated as part of the STP process and will inform the replacement to the Levy Move Seattle, which expires at the end of 2024.

1.3.5. Alternative 1—No Action

The No Action Alternative is required by SEPA. This proposal explores the future of Seattle's transportation system where the City implements no additional multi-modal or other transportation improvements beyond what is funded today. This alternative focuses on optimizing existing conditions in the transportation system with no new additional dedicated space for transit, pedestrians, or bikes. Roadway operations are optimized at key intersections, limited spot safety improvements are made throughout the network, and very limited slow zones are implemented on key pedestrian spaces.

The table below in Exhibit 1-3 summarizes network, policy, and program changes that would be integrated under Alternative 1 – No Action.

Alternative 1: No Action			
Summary of Changes to Network by Mode			
Pedestrian	2,277 linear miles		
linear miles of sidewalk			
Bike	161 linear miles		
linear miles of corridors with bike facilities			
PSPS	29 linear miles		
streets with additional pedestrian improvements			
Transit	38 linear miles of dedicated transit corridors, 31		
miles of dedicated transit corridor	LRT stations, and 75 linear miles of RapidRide		
	corridors.		
Freight	218 linear miles of truck streets		
linear miles of truck streets and corridors with			
dedicated lanes			
Multimodal Improvements			
Transit System Improvements	Limited increases in frequencies for bus routes		
making connections to light rail, serving non-	connecting to light rails (limited additional bus		
commute trips, serving underserved communities	service hours).		
Network of People Streets	No additional People Streets or Public Spaces		
creating space for other modes on city streets and	beyond the planned 29 linear miles of stay healthy		
discouraging general purpose traffic on certain	streets.		
corridors			
Complete Streets	No repurposed parking or limited general purpose		
reprioritizing street space for bikes, transit,	(GP) traffic outside of existing and funded		
sidewalk cafes	improvement:		
	161 linear miles of bike facilities.		
	29 linear miles of PSPS streets.		
	38 miles of dedicated transit corridors.		

Exhibit 1-3. Summary of Policy Concepts for Alternative 1

Alternative 1: No Action			
Crosswalk Improvements	Limited crosswalk improvements focused on the		
prioritize safe crossings for people at arterials,	safety and comfort of pedestrians at key		
highways, and water	intersections.		
Community & Mobility Hubs	0 community & mobility hubs, with no associated		
	improvements		
Add mobility zones	Traffic calmed zones at designated areas.		
slow traffic in designated areas for emerging			
micromobility devices			
Improvements at Transit Stops	Limited safety improvements for transit stops in		
improve comfort and safety at transit stops,	and around downtown.		
especially for riders waiting at night			
Traffic Operations			
Traffic operations to increase efficiency	Signal optimization for transit and GP traffic at key		
optimize operations	intersections.		
Electrification			
Support electric vehicle adoption	No new EV charging requirements for new		
encourage electric vehicle charging infrastructure in	development and limited EV infrastructure in public		
public streets and new private development	streets (assumed best-fit trendline for EV		
	adoption).		
Programs			
Mobility management strategies	No additional mobility management strategies.		
implement additional mobility management			
strategies, in concert with the region			

1.3.6. Alternative 2—Moderate Pace

Alternative 2: Moderate Pace envisions a future for Seattle's transportation system with moderate growth in in and funding for new multimodal infrastructure in Seattle's transportation system. This alternative takes a moderated approach to expanding pedestrian, bicycle, and transit connections. Some space for general purpose vehicular traffic in this alternative would be reprioritized as dedicated spaces for priority modes including some improvements to the public and pedestrian realm. In this alternative, the City implements many of the overarching policies of the Seattle Transportation plan including some restricted areas for a network of People Streets and a moderate number of community & mobility hubs.

The table below in Exhibit 1-4 summarizes network, policy, and program changes that would be integrated under Alternative 2.

Exhibit 1-4. Summary of Policy Concepts for Alternative 2

Alternative 2: Moderate Pace			
Summary of Changes to Network by Mode			
Pedestrian	2,400 linear miles		
linear miles of sidewalk			
Bike	214 linear miles		
linear miles of corridors with bike facilities			
PSPS	376 linear miles		
streets with additional pedestrian improvements			
Transit	71 linear miles of dedicated transit corridors, 31 LRT		
miles of dedicated transit corridor	stations, and 75 linear miles of RapidRide corridors.		
Freight	218 linear miles of truck streets		
linear miles of truck streets and corridors with			
dedicated lanes			
Multimodal Improvements			
Transit System Improvements	Somewhat more frequent bus service connecting to		
making connections to light rail, serving non- light rail connections and increased off-peak			
commute trips, serving underserved communities	frequency (some additional bus service hours).		
Network of People Streets	29 linear miles of stay healthy streets (limited		
creating space for other modes on city streets and	traffic)		
discouraging general purpose traffic on certain	46 linear miles of destination streets		
corridors			
Complete Streets	Some additional repurposed parking areas and GP		
reprioritizing street space for bikes, transit, sidewalk	traffic lanes as part of:		
cafes	214 linear miles of bike facilities.		
	74 linear miles of PSPS streets.		
	71 miles of dedicated transit corridors.		
Crosswalk Improvements	Crosswalk improvements focused on the safety and		
prioritize safe crossings for people at arterials,	comfort of pedestrians along major arterial		
highways, and water	roadways including principal and county arterials.		
Community & Mobility Hubs	52 community & mobility hubs with multimodal		
	improvements.		
Add mobility zones	Traffic calmed zones at designated areas around 69		
Slow traffic in designated areas for emerging community & mobility hubs in the city of s			
micromobility devices			
Improvements at Transit Stops	Moderate safety improvements for transit stops		
improve comfort and safety at transit stops,	near light rail stations and along RapidRide lines.		
especially for riders waiting at night			

Alternative 2: Moderate Pace			
Traffic Operations			
Traffic operations to increase efficiency	Signal optimization for GP traffic and transit on all		
optimize operations	major arterials and improvements to reduce		
	congestion at key intersections.		
Electrification			
Support electric vehicle adoption	No new EV charging requirements for new		
encourage electric vehicle charging infrastructure in	development and limited EV infrastructure in public		
public streets and new private development	streets (assumed best-fit trendline for EV adoption).		
Programs			
Mobility management strategies	No additional mobility management strategies.		
implement additional mobility management			
strategies, in concert with the region			

1.3.7. Alternative 3—Rapid Progress

Alternative 3—Rapid Progress envisions a future for Seattle's transportation system with strong growth in and funding for new multimodal infrastructure in Seattle's transportation system. The focus of this alternative is expanding pedestrian, bicycle and transit connections. This alternative also includes a broad range of improvements to the public and pedestrian realm and additional dedicated space for goods movement through the city. In this alternative, the city fully implements overarching policies of the Seattle Transportation plan with car-free streets, electrification infrastructure, a wider range of community & mobility hubs, and imposes mobility management strategies, in concert with the region.

The table below in Exhibit 1-5 summarizes network, policy, and program changes that would be integrated under Alternative 3.

Alternative 3: Rapid Progress			
Summary of Changes to Network by Mode			
Pedestrian	3,125 linear miles		
linear miles of sidewalk			
Bike	546 linear miles		
linear miles of corridors with bike facilities			
PSPS	1,384 linear miles		
streets with additional pedestrian improvements			
Transit	161 linear miles of dedicated transit corridors, 31		
miles of dedicated transit corridor	LRT stations, and 75 linear miles of RapidRide		
	corridors.		

Exhibit 1-5. Summary of Policy Concepts for Alternative 3

Alternative 3: Rapid Progress		
Freight	218 linear miles of truck streets of which	
linear miles of truck streets and corridors with	19 miles are shared freight- and bus lanes	
dedicated lanes		
Multimodal Improvements		
Transit System Improvements	Much more frequent bus service connecting to light	
making connections to light rail, serving non-	rail and increased off-peak service (more additional	
commute trips, serving underserved communities	bus service hours).	
Network of People Streets	29 linear miles of stay healthy streets (limited traffic)	
creating space for other modes on city streets and	46 linear miles of destination streets	
discouraging general purpose traffic on certain	29 linear miles of strolling streets	
corridors	2 linear miles of event streets	
Complete Streets	More additional repurposed parking area and GP	
reprioritizing street space for bikes, transit, sidewalk	traffic lanes as part of:	
cafes	546 linear miles of bike facilities.	
	105 linear miles of PSPS streets.	
	161 miles of dedicated transit corridors.	
Crosswalk Improvements	Crosswalk improvements focused on the safety and	
prioritize safe crossings for people at arterials,	sings for people at arterials, comfort of pedestrians along all classified roadway	
highways, and water	including minor and collector arterials.	
Community & Mobility Hubs105 community & mobility hubs with EV		
	infrastructure and multimodal improvements.	
Add mobility zones	Traffic calmed zones at designated areas around 105	
slow traffic in designated areas for emerging community & mobility hubs in the city of Seatt		
micromobility devices		
Improvements at Transit Stops	More safety improvements for transit stops along	
improve comfort and safety at transit stops,	the entire transit system, particularly on high-	
especially for riders waiting at night	ridership bus lines.	
Traffic Operations		
Traffic operations to increase efficiency	Signal optimization for GP traffic and transit on all	
optimize operations	classified roadways, and improvements to reduce	
	congestion at key intersections.	
Electrification		
Support electric vehicle adoption	More EV charging infrastructure required in new	
encourage electric vehicle charging infrastructure in	development and additional EV infrastructure at 105	
public streets and new private development	community & mobility hubs (assumed best-fit	
	trendline for EV adoption +15%).	
Programs		
Mobility management strategies	Introduce additional mobility management	
implement additional mobility management	strategies, in concert with the region.	
strategies, in concert with the region		

1.3.8. Comparison of Alternatives

Exhibit 1-6 below summarizes the three alternatives studied in this EIS. Network changes are visualized in Exhibit 1-7. In summary, the alternatives are arranged with an increasing degree of investment in multimodal transportation modes, with Alternative 3 having the greatest degree of change. A legislative proposal will be developed once the EIS process is complete which will likely be a hybrid of the alternatives described below.

	Alternative 1:	Alternative 2:	Alternative 3:		
	No Action	Moderate Pace	Rapid Progress		
Summary of Changes	Summary of Changes to Network by Mode				
Pedestrian	2,277 linear miles	2,400 linear miles	3,125 linear miles		
linear miles of sidewalk					
Bike	161 linear miles	214 linear miles	546 linear miles		
linear miles of corridors					
with bike facilities					
PSPS	29 linear miles	376 linear miles	1,384 linear miles		
streets with additional					
pedestrian improvements					
Transit	38 linear miles of	71 linear miles of	161 linear miles of		
miles of dedicated transit	dedicated transit	dedicated transit	dedicated transit		
corridor	corridors, 31 LRT	corridors, 31 LRT	corridors, 31 LRT		
	stations, and 75 linear	stations, and 75 linear	stations, and 75 linear		
	miles of RapidRide	miles of RapidRide	miles of RapidRide		
	corridors.	corridors.	corridors.		
Freight	218 linear miles of truck	218 linear miles of truck	218 linear miles of truck		
linear miles of truck	streets	streets	streets of which		
streets and corridors with			19 miles are shared		
dedicated lanes			freight- and- bus lanes		
Multimodal Improver	ments				
Transit System	Limited increases in	Somewhat more	Much more frequent		
Improvements	frequencies for bus	frequent bus service	bus service connecting		
making connections to	routes connecting to	connecting to light rail	to light rail and		
light rail, serving non-	light rails (limited	connections and	increased off-peak		
commute trips, serving	additional bus service	increase off-peak bus	service (more additional		
underserved communities	hours).	frequency (some	bus service hours).		
		additional bus service			
		hours).			

Exhibit 1-6. Summary of STP Alternatives

	Alternative 1:	Alternative 2:	Alternative 3:
	No Action	Moderate Pace	Rapid Progress
Network of People	No additional People	29 linear miles of stay	29 linear miles of stay
Streets	Streets or Public Spaces	healthy streets (limited	healthy streets (limited
creating space for other	on 29 linear miles of stay	traffic).	traffic).
modes on city streets and	healthy streets.	46 linear miles of	46 linear miles of
discouraging general		destination streets	destination streets
purpose traffic on certain			29 linear miles of
corridors			strolling streets
			2 linear miles of event
			streets
Complete Streets	No repurposed parking	Some additional	More additional
reprioritizing street space	or limited GP traffic	repurposed parking	repurposed parking area
for bikes, transit, sidewalk	outside of existing and	areas and GP traffic	and GP traffic lanes as
cafes	funded improvement:	lanes for as part of:	part of:
	161 linear miles of bike	214 linear miles of bike	546 linear miles of bike
	facilities.	facilities.	facilities.
	29 linear miles of PSPS	74 linear miles of PSPS	105 linear miles of PSPS
	streets.	streets.	streets.
	38 miles of dedicated	71 miles of dedicated	161 miles of dedicated
	transit corridors.	transit corridors.	transit corridors.
Crosswalk	Limited crosswalk	Crosswalk	Crosswalk
Improvements	improvements focused	improvements focused	improvements focused
prioritize safe crossings for	on the safety and	on the safety and	on the safety and
people at arterials,	comfort of pedestrians	comfort of pedestrians	comfort of pedestrians
highways, and water	at key intersections.	along major arterial	along all classified
		roadways including	roadways, including
		principal and county	minor and collector
		arterials.	arterials.
Community & Mobility	0 community & mobility	52 community &	105 community &
Hubs	hubs, with no associated	mobility hubs with	mobility hubs with EV
	improvements.	multimodal	infrastructure and
		improvements.	multimodal
			improvements
Add mobility zones	Very limited traffic	Some traffic calmed	More traffic calmed
slow traffic in designated	calmed zones at	zones at designated	zones at designated
areas for emerging	designated areas.	areas around 69.	areas around 105.
micromobility devices		Community & mobility	Community & mobility
		hubs in the city of	hubs in the city of
		Seattle.	Seattle.
Improvements at	Limited safety	Moderate safety	More safety
Transit Stops	improvements for	improvements for	improvements for

	Alternative 1:	Alternative 2:	Alternative 3:
improve comfort and safety at transit stops, especially for riders waiting at night	No Action transit stops in and around downtown.	Moderate Pace transit stops near light rail stations and along RapidRide lines.	Rapid Progress transit stops along the entire transit system, particularly on high- ridership bus lines.
Traffic Operations			
Traffic operations to increase efficiency <i>optimize operations</i>	Signal optimization for transit and GP traffic at key intersections.	Signal optimization for GP traffic and transit on all major arterials and improvements to reduce congestion at key intersections.	Signal optimization for GP traffic and transit on all classified roadways, and improvements to reduce congestion at key intersections.
Electrification			
Support electric vehicle adoption encourage electric vehicle charging infrastructure in public streets and new private development	No new EV charging requirements for new development and limited EV infrastructure in public streets (assumed best-fit trendline for EV adoption).	No new EV charging requirements for new development and limited EV infrastructure in public streets (assumed best-fit trendline for EV adoption).	More EV charging infrastructure required in new development and additional EV infrastructure at 105 community & mobility hubs (assumed best-fit trendline for EV adoption +15%).
Programs			
Mobility Management Strategies implement additional mobility management strategies, in concert with the region	No additional mobility management strategies.	No additional mobility management strategies.	Introduce additional mobility management strategies, in concert with the region.

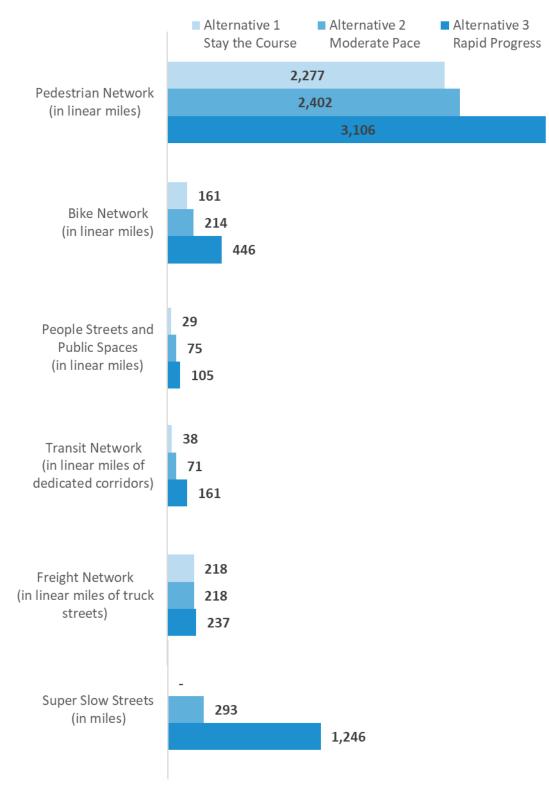


Exhibit 1-7. Summary of Network Changes by Mode for Alternatives

1.4. Alternatives and Draft STP

The Draft STP was published in August 2023. It was developed with extensive community engagement. That input served as the foundation for the Draft STP. And development of alternative scenarios relative to a baseline—No Action (Alternative 1)—scenario. Alternative 2 and Alternative 3 were developed to reflect different investment levels. Alternative 2 allocated a moderate amount of new funding for transportation improvements. Alternative 3 offered the most expansive level of investment for improvements.

The Mayor's Recommended STP is an aspirational, vision-based document. It is organized around 6 major goals—Safety, Equity, Sustainability, Mobility & Economic Vitality, Livability, and Maintenance & Modernization. Key moves under each goal describe strategies to achieve long-term aims of the plan.

The Mayor's Recommended STP includes several long-range and aspirational tools to guide implementation of the Key Moves and actions over the next 20 years. By design, each of these tools is not funding constrained and, as such, includes a slate of actions that will likely exceed the City's ability to deliver everything included within the plan. As described in the Implementation Strategy, SDOT will utilize a prioritization process to select actions from the aspirational tools for implementation.

The first of these tools is the priority investment network maps. These maps are included within the functional elements in Part II. The maps, taken together, guide investment decisions within each corridor. They are also be one of the inputs used to identify where to make implementation improvements. The priority investment maps were shared and reviewed for several rounds of community input throughout the STP planning process. The maps were then revised and updated for inclusion in the Mayor's Recommended STP.

The second tool is the list of programmatic actions. Much of the Department's work is programmatic – both in terms of services SDOT provides and the capital projects SDOT constructs. The programmatic actions guide potential changes to existing programs as well as the potential creation of new programs. Dependent on resourcing, programs then prioritize specific service levels and capital investments in keeping with the STP Implementation Strategy. The programmatic actions were shared and reviewed for community input in the fall of 2023. The slate of actions were then revised and updated for inclusion in the Mayor's Recommended STP. The programmatic actions are highlighted within the Key Moves chapter, and detailed within Part II.

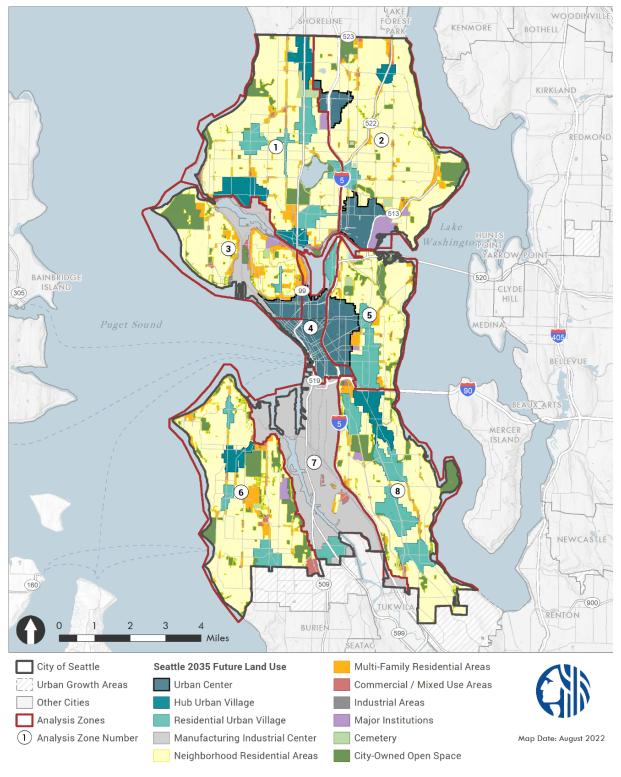
The third tool is the STP Large Capital Project List. The STP unconstrained project list includes a variety of transformational projects (each estimated to cost more than \$10 million) that could be pursued to implement the STP. As with the priority investment networks and the programmatic actions, the list of projects implemented over the 20-year STP planning horizon will likely be a subset of the 81 projects included in the STP. A preliminary project list was released for public review in October 2023. Subsequent community feedback on the preliminary project list was considered in the development of an unconstrained project list. This prioritized list of projects is included in the Mayor's Recommended Seattle Transportation Plan and can be found within the Implementation Strategy Chapter and detailed within Appendix A.

1.5. Study Area

The study area includes the full city limits. The city has been divided into 8 regions based on road and natural features. These 8 regions are delineated in the map below (Exhibit 1-8) and include:

- EIS Analysis Zone 1 Northwest Seattle
- EIS Analysis Zone 2 Northeast Seattle
- EIS Analysis Zone 3 Queen Anne/Magnolia
- EIS Analysis Zone 4 Downtown/Lake Union
- EIS Analysis Zone 5 Capitol Hill/Central District
- EIS Analysis Zone 6 West Seattle
- EIS Analysis Zone 7 Duwamish
- EIS Analysis Zone 8 Southeast Seattle

Exhibit 1-8. Study Area



Sources: City of Seattle, 2022; BERK, 2022.

1.6. Summary of Engagement

Upon publication of the Draft EIS in August 2023, the City held online and in-person comment opportunities. This included a public hearing on September 26, 2023. Comments received during the 45-day comment period, including the hearing, are presented in Chapter 2 and the Appendix of this Final EIS.

1.7. Future Use of SEPA Document

1.7.1. Environmental Review

Process

Under SEPA agencies conduct environmental review of actions that could affect the environment. For actions that have the potential for significant impacts, preparation of an EIS is required. An EIS is a useful tool that provides detailed information to the public, agencies, tribes, and City decision-makers about the environmental effects of a plan or project before a decision is made.

The EIS process involves the following steps: (1) scoping the contents of the EIS with agencies, tribes, and the public; (2) preparing a draft EIS with a comment period; (3) responding to comments and developing a preferred alternative; and (4) developing legislation. With the issuance of the Final EIS, the EIS process is in step 3. See Exhibit 1-9.



Source: BERK, 2023.

Non-Project EIS

This document is a non-project EIS that analyzes the proposals and alternatives broadly across the study area. See Exhibit 1-10 below for features of a non-project EIS. SEPA identifies that a non-project EIS is more flexible and studies a range of alternatives comparatively to support the consideration of plans, policies, or programs. (WAC 197-11-442) A non-project EIS does not provide site-specific detailed analysis. As individual

projects are finalized, and depending on whether they meet certain thresholds for potential environmental impacts under SEPA regulations, they will go through project-level SEPA review. This review will focus on the environmental impacts of the specific proposed project. It will provide a detailed analysis of the potential impacts associated with the construction and operation of the project. Phasing from a broader non-project EIS to future more specific review under SEPA is addressed in WAC 197-11-060(5).

Feature	Project Environmental Review	Non-Project Environmental Review (WAC 197-11-442, -774)
Location	Site-specific	Areawide
Analysis Level of Detail	Detailed	Broad / order-of-magnitude
Alternatives	Specific construction proposals	Conceptual based on vision
Mitigation	Specific, alters project, project proponent responsibility	Broader; changes policies, plans, or code. City or future developer responsibility.
Future Environmental Review	No additional SEPA review	Subject to additional SEPA Review

Exhibit 1-10. Comparison of Project and Non-Project Environmental Review

Source: WAC 197-11-442, BERK, 2023.



2.1. Draft EIS Comments

This section of the Final EIS summarizes the comments received for the Draft EIS from August 31 to October 16, 2023. Approximately 17 comments were received on the Draft EIS; this included comments shared via a public hearing. See the comments received organized by agencies, businesses, and individuals under Exhibit 2-1.

Exhibit 2-1. List of Commenters

Number	Last Name	First Name	Date	Agency/Organization	
STATE/REGI	STATE/REGIONAL/LOCAL AGENCIES				
1	Murdock	Vanessa	10/13/2023	Seattle Planning Commission	
2	Poor	Geri	10/16/2022	Port of Seattle The Northwest Seaport Alliance	
3	Sturges	Susan	10/16/2023	U.S. Environmental Protection Agency (EPA), Region 10	
4	Grodnik-Nagle	Ann	10/23/2023 LATE	Seattle Public Utilities	
SPECIAL INT	EREST ORGANIZAT	IONS/CORPORATIO	ONS		
5	Schaffer Singh Glosecki	Tyler Ranu Dylan	10/13/2023	AIA Seattle Urban Design Forum	
6			10/16/2023	Cascade Bicycle Club, Commute Seattle, Futurewise, Seattle Neighborhood Greenways, The Urbanist, Transportation Choices Coalition	
7	Goodman	Erin	10/16/2022	SODO Seattle BIA	
8	Wasserman	Eugene	10/16/2023	North Seattle Industrial Association	
9	Howard	Lisa	10/31/2023 LATE	Alliance for Pioneer Square	
INDIVIDUAL	S				
10	Horn	Colleen	10/4/2023	Individual	
11	Kruse	Megan	10/13/2023	Individual	
12	Bueche	Tina	10/16/2023	Individual	
13	Anonymous		9/1/2023	Individual	
14	Anonymous		9/2/2023	Individual	
15	Anonymous		10/17/2023	Individual	
DEIS Public	Input Session (Sept	ember 26, 2023)			
16	Cantor	Carla	9/26/2023	Seattle Neighborhood Greenways	
17	Schaffer	Tyler	9/26/2023	LMN Architects	

2.2. Responses to Draft EIS Comments

2.2.1. Responses to Overall Themes

Below is a summary of responses to overall themes found in the comments on the Draft EIS 2023.

Why did the STP EIS not use travel demand modeling?

Travel demand models were traditionally used to forecast future travel patterns and develop long-range regional plans. These models are however relatively insensitive to variables such as street design, distance to transit, and the accessibility of destinations. Many traditional models also focus exclusively on vehicle trips. Bicycling, in particular, is rarely treated as a separate transportation mode. An important outcome of the STP is to encourage travelers to use non-motorized modes of travel, as well as transit, and for transportation to work together with land use. Travel demand modeling has limited potential to evaluate these aspects of the alternatives.

A range of performance measures are considered the standard of practice for evaluating future multimodal transportation networks. These include greenhouse gas emissions from vehicle trips, vehicle miles traveled (VMT, the percent of people walking, biking, or riding transit, households within 10-minute access (via a sidewalk or AAA bikeway) to very frequent transit (10 minutes or less headways). EIS alternatives were evaluated based on these measures.

A full set of performance metrics can be found on Page 1-119 of the STP document.

What is mobility throughput and how is it measured?

Mobility throughput refers to the volume or capacity of people or goods moving through a transportation system within a given period. It is a measure of the efficiency and effectiveness of the transportation network in facilitating the movement of passengers or freight from one point to another.

Increasing mobility throughput often involves optimizing the efficiency of existing infrastructure, implementing traffic management strategies, investing in new transportation projects, or promoting alternative modes of transportation to reduce congestion and improve the flow of people and goods. Action Alternatives 2 and 3 anticipate improving the mobility throughput of people and goods, consistent with the goals of the STP.

Alternatives 2 and 3 would both increase the linear miles of sidewalks and corridors with bus and bike facilities, allowing for the more efficient movement of people. Alternatives 3 would create 19 miles of dedicated freight and bus lanes which would reduce the amount of congestion for freight vehicles by removing general traffic. These lanes would meet King County Metro's desired minimum width for bus lanes (11').

How is freight considered in the STP?

Alternatives 1 and 2 are consistent with the City's freight masterplan and maintain the city's existing freight street designations while Alternative 3 builds on that with additional facilities exclusively for use by freight vehicles and buses. Improvements to freight movement are also anticipated from improvements to traffic operations efficiency and mobility management strategies which would improve the flow of people and goods.

Tier	Projects Along a Truck Routes	Total	Share
1	13	20	65%
2	13	21	62%
3	17	40	43%
Total	43	81	53%

As part of implementation, the STP anticipates investments in freight-supportive projects. The table below shows the proportion of projects in each of the priority tiers of the STP.

A future freight-and-bus lane pilot will provide more insight on how to implement more of them in key segments of the city. Investments in SDOT freight program, including an updated study on the Heavy Haul Network, is expected soon.

Based on community feedback on ROW reallocation, the Mayor's recommended Draft STP manages or scales back its application to avoid impact on freight movement.

How will the STP be implemented?

Full implementation of all STP-identified projects and programs across the city will require more funding than is currently available. Project completion is anticipated to take many years, extending beyond the STP's 20-year horizon.

The Draft STP includes a project list that implements a network that falls between Alternative 2 and Alternative 3 of the EIS. A prioritization framework outlines a method to evaluate transportation projects and programs for their potential to achieve the STP vision. It relies on a combination of quantitative and qualitative data to assess how well potential investments advance plan goals. During public engagement to develop the STP, community input provided information on how much emphasis should be placed on different goals and criteria when evaluating potential project and program investments. Of the 6 goals, 72% of respondents said safety was "more important" to emphasize for prioritization. Over the 20-year life of the plan, it is likely that decisions on how to weight goals will change based on current contexts and emergent issues at the time of prioritization.

Many goals can be addressed concurrently; for example, a project to maintain and modernize an aging bridge can be an opportunity to re-allocate street space to improve safety outcomes and promote climate-friendly

travel options. These complex considerations are central to prioritization, and through regular implementation evaluation and planning updates, SDOT can focus investment on appropriate sets of prioritized projects and programs.

Based on an initial application of a prioritization framework, the STP groups the large capital projects into 3 tiers. These tiered lists, presented on page 1-110 and 1-111 of the STP, reflect how well projects advance the STP goals, as well as how they are positioned to address qualitative considerations. The latter assesses things such as timing to align with forthcoming major regional transit investment, leveraging of related projects (to save time or money), available funding opportunities, and a range of community input. The tiering analysis reflects conditions at the time of STP publication and, moving forward, SDOT will periodically reprioritize projects. It is likely that some projects in lower tiers may be advanced as circumstances change and new needs or opportunities emerge. Funding availability will help determine how many projects can be implemented over the life of the STP.

What is a programmatic EIS?

As described in Chapter 1, Section 1.7.1 Environmental Review, a programmatic or "non-project" Environmental Impact Statement (EIS) evaluates the potential environmental impacts of a program or a series of related actions rather than a specific project (see WAC 197-11-442; WAC 197-11-060(5)). It is typically prepared when a series of similar actions are anticipated within a defined geographic area or time frame, and it would be more efficient and effective to analyze the cumulative impacts of these actions collectively rather than individually. This approach helps ensure that decision-makers and the public understand the potential environmental consequences associated with the program as a whole before individual projects proceed.

A programmatic EIS provides a broad overview of potential environmental impacts, often at a higher level. They are typically prepared early in the planning process, before individual projects under the program are fully defined or proposed. It may identify general mitigation measures and strategies applicable to the entire program but may not provide detailed analysis for each individual project. It helps guide decision-making at a strategic level and may inform subsequent project-level environmental reviews.

As individual projects are finalized, and depending on whether they meet certain thresholds for potential environmental impacts under SEPA regulations, they will go through project-level SEPA review. This review will focus on the environmental impacts of the specific proposed project. It will provide a detailed analysis of the potential impacts associated with the construction and operation of the project. Phasing from broader to more specific review is addressed per WAC 197-11-060(5).

2.2.2. Responses to Comments

Exhibit 2-2 provides a list of responses to the specific comments received. Where comments reflect a preference for an alternative or state an opinion regarding a topic, responses indicate that the comments are noted and forwarded to City decision makers. For topics that include comments or questions about the environmental analysis or alternatives, a response is provided.

Number	Comment Summary	Response
1	Murdock	Seattle Planning Commission
1-1	Appreciate the clarity that no action has consequences for the entire transportation system and its communities. Highlights the needs to increase mobility for people and goods by reprioritizing the right-of-way to meet the goals in the STP and avoid conflicts with the Comp Plan's future growth strategy.	Comment noted.
1-2	Appreciate the inclusion of the detailed Overview of Historical Planning and Transportation Decisions in the Land Use section for context on projects' impacts on racial equity, and hope this context is front of mind during plan implementation.	Comment noted.
1-3	 Overall Recommendation: Include an additional overlay analysis for disproportionately impacted communities within sub-areas based on a race and social equity lens. 1. The sub-area is still too high-level and glosses over impacts on specific communities e.g., sea-level rise impacting South Park, negative air quality impacts to residents in Chinatown International District. 2. The Transportation Equity Framework (TEF) is too forward looking to assess the impacts of the plan. The EIS should look at the current transportation system's impact on people who rely on public transportation, and assess how each alternative responds to existing conditions and issues e.g., how areas of the city with sidewalk gaps coincide with communities of color and a high amount of pedestrian injuries. 3. Add an additional overlay analysis that identifies impacts across each section based on overlapping factors of race, socioeconomic status, and a history of disinvestment and harm perpetuated by planning decisions. Analysis could look to impacts to vulnerable communities or use a financial lens to identify where investments are being made. 	This type of analysis is beyond the scope and requirements of SEPA. The recommendations may be carried out at a later date as part of performance measures monitoring for the Seattle Transportation Plan.
1-4	Study the impact of each alternative on affordability of travel for different modes	Comment noted. This is beyond the scope of the EIS. SEPA does not require an evaluation of economic, cost, or fiscal considerations.

Number	Comment Summary	Response
		(WAC 197-11-448 and 450) Affordability of travel analysis by different modes may be conducted later for planning purposes
1-5	Tie the EIS analysis to network buildout targets in the STP. Set targets for implementation at different intervals and commit to tracking progress through those targets. Analyze the minimum level of system building for each alternative required to meet those targets and avoid significant and unavoidable impacts identified in the DEIS.	Comment noted. This is beyond the scope of a non-project EIS on the STP, a multimodal vision plan. The City will consider a Transportation Element and Capital Facility Plan as part of the Comprehensive Plan that will identify the investments for a 20-year period to meet Growth Management Act requirements.
1-6	Land Use: Conduct additional analysis once a preferred alternative is selected for the Comprehensive Plan to fully align transportation investments with the City's growth strategy. It is difficult to fully evaluate the land use analysis for compatibility with the growth strategy without the draft CP publicly available.	Comment noted. The DEIS analyzed alternatives against the most intense land use scenario (Seattle Comprehensive Plan EIS Alternative 5) to understand the greatest potential for impacts. Comment noted. As described in the One Seattle EIS Scoping Notice in 2022, the One Seattle Comprehensive Plan EIS is intended to evaluate the effect of the Comprehensive Plan land use and growth on the transportation system and identify impacts and mitigation. The Comprehensive Plan DEIS is anticipated in Spring 2024. The Seattle Transportation Plan (STP) process provides a separate EIS to test multimodal transportation system changes. The STP Draft EIS tests the same Alternative 1 and Alternative 5 growth alternatives in relation to the alternative multimodal networks to consider the potential network in relation to a range of growth to identify an optimal network that advances city multimodal goals and objectives. The STP and Comprehensive Plan project teams have worked closely to assemble future transportation improvements that align with administration-supported probable growth scenarios.
1-7	Land Use: Clarify how SDOT will align transportation investments with community- specific displacement mitigation strategies We look forward to how the final EIS will identify impacts related to displacement once the Comprehensive Plan is further defined, and how SDOT and City agencies will respond. We commend and fully support the displacement mitigation strategies and implementation on pg. 3-293.	Comment noted. The STP EIS identifies mitigation strategies that projects considered under the STP can implement. Specific mitigation strategies will be implemented on a project-by-project basis, in coordination with impacted communities, to determine appropriate mitigation based on project-specific impacts.
1-8	Land Use: Conduct additional analysis to identify possible impacts of organizing dense multifamily housing and multimodal transportation next to major arterial streets. The analysis should go further to assess potential impacts to air quality public health, and safety when housing is located on busy arterials, and suggest associated mitigation strategies that are consistent with KCCPP H- 24.	Comment noted. Project-level analysis of environmental impacts, including air quality, would be performed at the time of project planning and design. The Comprehensive Plan EIS due in spring 2024 has scoped an evaluation of air quality and the alternative growth options at a programmatic level.
1-9	Transportation Recommendation	Comment noted. A qualitative discussion of transportation impacts _appropriate for this non-project EIS is included in Section 1.7.6 and

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		Provide additional analysis of the benefits of prioritizing active travel and transit modes in the right-of-way Recommend the EIS study: - What are the impacts of each alternative on travel times for transit, walking, and biking? Consider using a multimodal level of service model such as the one used in the following study: <u>Multimodal Level of Service Analysis for</u> <u>Urban Streets</u> . - What benefits of time and convenience will	matches the objectives of the proposal and provides information supporting the policy-based and conceptual nature of the STP. A study to address these recommendations may be considered in the future during a more detailed phase of planning. We appreciate and will consider the recommendation to use Multimodal Level of Service Analysis for Urban Streets in further exploration of multimodal LOS for our streets.
		 non-car travelers see as a result of each alternative? What are the impacts of each alternative on Vision Zero goals and what are the costs of deaths and injuries from the no action alternative? What impacts and challenges arise from mode prioritization and the redistribution of space when space and/or funding is 	
	1-10	constrained along a particular street. Further explore the impacts of parking on the ability to implement each action alternative. How do current parking policies affect the ability to implement each of the alternatives?	Comment noted. Currently parking policies do not affect the ability to implement a range of alternatives between Alternative 2 and Alternative 3. Our parking policies and pricing may be adjusted over time to continually support the implementation of the STP. Project implementation may include a qualitative discussion of parking impacts required. Note that SEPA no longer identifies parking as an element of the environment in in WAC 197-11-444(2)(c)(iv).
	1-11	Provide additional details of estimated changes in Vehicle Miles Traveled (VMT) for each alternative, with a breakdown of how those numbers are calculated. The estimates provided for Alternatives 2 and 3 are based on Alternative 5 of the CP Update, indicating same VMT for Alts 2 and 3 despite different levels of investment. Both estimates appear to be low.	The VMT estimates in the DEIS are based on the range of the land uses Alternatives 1 and 5 that are under evaluation in the Comprehensive Plan and are based on changes to land use and do not factor in changes to the Alternative 1 No Action transportation system. Each STP alternative's impact on VMT was assessed on a qualitative level. Alternative 2 and 3 each include a more comprehensive transit network, more dedicated transit right-of-way, that is likely to support more compact and transit-oriented development. They include more of a mix of pedestrian and cycling facilities. Alternative 3 includes mobility management strategies as part of regional VMT reduction efforts. Combined, these factors can likely induce more travel non-automobile modes, thereby reducing VMT. See discussion of impacts of Alternative 2 and 3 on pages 3-104 and 3-106.
	1-12	Climate Change Study impacts on transit and active mobility users during extreme heat events and forest fire smoke events e.g., How will an increase in frequency of extreme heat events impact transit users who must wait outside at transit stops?	The DEIS includes STP objectives in Exhibit 2-2. The STP includes goals and policies to address climate change and climate justice such as greening city streets to better handle a changing climate. The STP notes the City's efforts on climate actions for more than 10 years including for the transportation system.

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		The DEIS addresses the effect of the alternatives on greenhouse gases and sea level rise that are related to drivers of climate change and need for adaptation respectively.
		The City has also developed a Climate Resiliency study on infrastructure and people. ¹ The report considers how different assets including transit infrastructure are exposed to climate impacts. Additionally, the City is developing a Climate Element per the Growth Management Act that would address policies to address vulnerable populations and assets including transportation. The Comprehensive Plan DEIS anticipated in spring 2024 identifies a number of climate objectives and metrics identified for study through scoping. ²
		As a result of the STP and Comprehensive Plan, as well as Climate Action Plans and Hazard Mitigation Plans, the City can consider actions and resources addressing a wide range of climate and hazard vulnerability. Future more specific implementation actions could be addressed in regulations and standards such as frontage and street standards. More detailed development regulations would be subject to review through SEPA as appropriate.
1-13	Climate Change	Comment noted. See response to 1-12
	Study the impact of extreme heat events and other environment-related emergencies, such as major earthquakes, on the City's transportation infrastructure.	
	Explore the questions:	
	ls the transportation system prepared to respond to damage or service interruption due to major heat events? Who will be most impacted by such interruptions and what are potential solutions?	
1-14	Climate Change	See Response 1-12. The STP Vehicle Element discusses the
	Discuss emergency preparedness and the system's ability to respond to environment- related events e.g., an earthquake. Recommend the EIS study how each	importance of maintaining our key emergency routes. SDOT continues to partner with the Office of Emergency Management to ensure the city's preparedness for different emergency scenarios.
	alternative supports the transportation system's ability to respond to natural disasters and major climate events.	Additionally, the City regularly prepares an all-hazards mitigation plan.
1-15	Climate Change	See Response 1-12.
	Study the impact of paving materials and other impervious surfaces on urban heat island effect. Identify potential solutions e.g., alternative materials.	
1-16	Air Quality	The DEIS identifies sensitive land uses such as housing and other
	Study impacts to users when active travel modes, community & mobility hubs, and	uses near major roadways. See pages 3-99 and 3-100.

¹ See: <u>https://seattle.gov/documents/departments/opcd/seattleplan/seattleclimatevulnerabilityassessmentjuly2023.pdf</u>. ² See: <u>https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanEquityClimateMetrics.pdf</u>.

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	housing are placed alongside polluting travel modes e.g., What are the air quality impact and related public health risks for users of multipurpose trail that runs alongside a multilane arterial? Identify strategies to reduce impact. Study the impacts of air quality for other uses, such as housing, when located adjacent to high-traffic volume roads.	The potential effects of adding trails near major routes is a type of analysis that is suitable at a project level when the alignments and distance and other factors can be assessed.
1-17	Pursue the most aggressive implementation of the STP to avoid the transportation plan becoming a limiting factor in the growth strategy selected for the Comprehensive Plan, especially given the climate crisis and the City's anticipated growth.	Comment noted.
1-18	Add a glossary or more consistent definitions when conceptual or technical terms (e.g., Super Slow Streets, community & mobility hubs) are used.	A full glossary is contained in the final iteration of the Seattle Transportation Plan.
2	Poor	Port of Seattle The Northwest Seaport Alliance
2-1	We (NW Seaport Alliance and Port of Seattle) cannot comment on the distinctions among the alternatives studied to understand how or whether the STP would have environmental impacts. We believe the analysis does not sufficiently provide into the impact to freight mobility in and around the two Manufacturing & Industrial Areas. We would like to understand the impacts of converting existing traffic lanes to active travel and transit modes, especially in the MICs, as we know that trucks have increased start and stop times and emissions associated with start/stop.	The Draft EIS on pages 3-393 and 3-394 including Exhibit 3-166 identify the corridors and number of miles where general-purpose lanes could be removed for transit or freight priority. The potential for impacts on capacity constrained corridors and future land use served is addressed in Exhibit 3-161. It is anticipated that more roadways are capacity constrained under Alternatives 2 and 3. Careful and measured reprioritization to transit and freight can help increase mobility for people and goods. "In the multimodal street, the capacity of the street is increased by a more balanced allocation of space between the modes." (NACTO) People shifting out of cars and into more space efficient modes of travel can increase capacity on roadways. And enable freight and other vehicles that require use of the lanes to move more reliably through the network. See response to the overall theme regarding mobility throughput. See also response to the overall theme regarding consideration of freight in the STP. Before converting existing general-purpose lanes, especially in the MICs, a detailed analysis would need to be conducted. When the City considers moving forward with a project, emissions related to start/stop could also be assessed. To address start/stop related emissions, measured application of general-purpose lane conversion could be better aligned with more of truck fleets converted to clean energy propulsion. Additionally, as described in response to comment 1-5, exploring potential opportunities for signal timing optimization for commercial trucks could also mitigate start/stop related emissions. The STP EIS is programmatic and does not include a constrained project list with which to perform detailed modeling. Further

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		detailed analysis would also be conducted at the project implementation level in the specific MICs. A forthcoming freight-and-bus lane pilot on Westlake Ave (as part of the Route 40 bus-lane project) will be analyzed for its reliability,
		efficiency, and impacts to both freight and transit. Those findings in addition to ongoing community engagement with stakeholders will help inform future application of FAB lanes.
2-2	Pg.1-9: A Final EIS will be issued in 2024 and will include responses to public comments received during the Draft EIS comment period. Following the EIS process, the City will develop specific policy proposals that will be the subject of public meetings and public hearings by the city council. How did they write the Plan already if they don't have the public feedback on the alternatives?	The Mayor's proposed Seattle Transportation Plan was coordinated with the completion of the Final Environmental Impact Statement. Comments received in the DEIS and to the draft project list (shared with the public in mid-October 2023) were noted and considered in the final version of the plan.
		After the release of the DEIS, additional consultation with the freight community also informed the final version of the plan. The plan now includes a combined "Mobility & Economic Vitality" goal. It also expands on discussions related to freight and its impact on the economy. The public will have an opportunity to review the FEIS after it is
	-	released.
2-3	 Pg.1-16: The freight network highlights the streets well-suited to truck traffic and the movement of goods throughout the city. Alternatives 1 and 2 maintain this network, while Alternative 3 adds 19 miles of dedicated freight and bus lanes. Has it been determined that the existing network meets the needs for freight? Do the 19-mile freight/bus lanes include construction of new streets? If not, how can this be considered an expansion? 	Due to the lack of available land and constrained nature of the City's rights-of-way, new streets are not planned. To address the mobility challenges with this constraint, the STP leans on more efficient use of our right-of-way—becoming more multi-modal—to open up capacity for people and goods movement.
		The DEIS considers implementation of Freight-and-Bus (FAB) lanes where planned transit-only lanes overlap segments of the freight network. The purpose of FAB lanes is to maintain and enhance freight mobility by allowing freight to use excess capacity in the planned transit only lanes.
		The 19 miles of freight-and-bus (FAB) lanes is the upper limit of what could be implemented. The revised STP does not propose 19 mile of freight-and-bus lanes.
		Combined with other multi-modal improvements that support freight, i.e., improvements on Aurora Ave N. (project #23), can increase capacity for freight movement.
		See also response to the overall theme regarding how freight is considered in the STP.
2-4	Pg.1-16: A project list that implements the Preferred Alternative will be generated as part of the STP process and will inform the replacement to the Levy Move Seattle, which expires at the end of 2024. This project list is significant, but not available for comment or environmental review?	The Candidate Project List and Programs was released for review in mid-October 2023.
		The project list has been further refined and included in STP Chapter 5, Implementation Strategy. It is an aspirational list that is a subset of the Alternatives 2 and 3 evaluated in the EIS. See response to the
		overall theme regarding how the STP is implemented.
		The list of aspirational projects is in Chapter 5, page I-110, of the STP.
2-5	Pg.1-20 – 1-21: Traffic operations to increase efficiency. Signal optimization for GP traffic and	SDOT's traffic operations considers many factors in making the signal system run as efficiently and safely as possible. Related to freight, this includes: signal timing improvements on truck corridors,

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	transit on all major arterials and improvements to reduce congestion at key intersections. Signal optimization should also consider trucks and movement of goods throughout the system, not just general and transit.	such as signal priority or adjusting signal timing to facilitate heavy truck movements. In Part II, in the Freight Element, Mobility key move F34 states "Design the street network for safe and predictable movement of trucks" To this end, SDOT may explore additional analysis of potential opportunities for signal optimization for freight.
2-6	Pg. 1-20 (& 1-21): 218 linear miles of truck streets of which, 19 miles are shared freight- and bus lanes.	There are no truck-only or truck-dedicated streets. The freight network overlaps with general purpose traffic and transit. They all share general purpose lanes.
	This appears to be a reduction of truck dedicated streets. Of the 218 miles, 19 of them would have lanes changed to also	To improve reliability and efficiency for freight, large commercial trucks can take advantage of excess capacity in transit-only lanes where they overlap with the major truck routes.
	accommodate transit. How does this impact	See response to comment 2-1.
	freight and vehicle emissions if there's more stopping and starting?	At a broader level, freight and vehicle emissions are expected to be lower by 2044 due to state and federal mandates improving fuel economy and transitions to cleaner fuels. Over time, start/stop- related emissions should also decrease.
		Impacts to air quality from the alternatives were evaluated by looking at the potential changes to VMT from the three alternatives. As shown on pages 3-102-103 of the DEIS, infrastructure such as sidewalks, bike lanes and transit improvements have been shown to decrease VMT. Corridors classified as truck streets by the Freight Master Plan do not indicate planned freight only lanes, but places where freight will be a major priority when considering street improvements. The 19 miles of freight and bus only lanes represent an increase in dedicated to freight and transit.
2-7	pg. 1-24: Support electric vehicle adoption. encourage electric vehicle charging infrastructure in public streets and new private development. Shouldn't the city be open to other clean energy transportation options besides electricity, unless we can demonstrate the future infrastructure and technology needed to power every vehicle, every business, and every household with electricity.	The Draft EIS identifies the state Clean Fuel standard and alternative fuels, factored into the emissions estimates. See pages 3-98 and 99.
		The goal of the Clean Fuel standard is to encourage the use of cleaner, low-carbon, alternative fuels, such as electricity, hydrogen, and biofuels to reduce the overall carbon footprint of transportation in the state.
		The City supports this. SDOT will continue to work with partners on the transition away from fossil fuels to power our economy. And towards any viable clean energy transportation options. The updated the Freight Element, key move F31, addresses this: "Support comprehensive decarbonization strategies that include clean energy fuels and innovative technologies. Collaborate with the Port of Seattle and the Northwest Seaport Alliance on ways to support their goal of phasing out all emissions from seaport activities, including drayage trucks."

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2-8	pg. 1-25: The analysis of potential impacts from the STP is a qualitative assessment based on efficiency indicators and performance metrics such as travel mode, access to transit, access to pedestrian network, access to jobs, and personal vehicle and freight electrification. What is freight electrification & what is a realistic time schedule for implementation? We're not hearing a clear path forward on that and are considering other ways to decarbonize freight movement.	Decarbonization of freight, we agree, will not only be from electrification of the commercial truck fleet, but also transition to other clean-energy options. These may include options from hybrid engines to hydrogen fuel cells. Ultimately, the goal is to reduce fossil-fuel generated emissions. Electrification may get the spotlight, but we acknowledge other clean-energy options will also need to play a role in the decarbonization of the freight. The City's Transportation Electrification Blueprint set a goal of 30 percent of goods delivery is zero emission by 2030. Decarbonization of goods delivery will be both electric and through clean-energy transition. The state's Clean Fuel standard will also play a role in the transition to decarbonize freight.
		See response to comment 2-7.
2-9	 pg. 1-25: Four sites within the City were monitored from 2019 to 2021 to provide baseline data on ambient air quality conditions and to compare criteria pollutant levels to current NAAQS (National Ambient Air Quality Standards)2019 to 2021, in the heart of the pandemic. How did "work from home" during the pandemic impact the AQ sampling results relative to the rest of the non-pandemic time? 	The Draft EIS identifies the reduction in pollutant levels from 2019- 2021, apart from Ozone at Beacon Hill at pages 3-88 and 3-89. For most of the pollutants monitored, 2021 values for are lower than 2019 values. Additionally, from the Puget Sound Clean Air Agency's summary of annual air quality data, in 2021, King County reported 307 "good" air quality days. In 2020, that number was 296; in 2019, 280. During the pandemic, fewer people commuting to work because of work from home policies reduced air pollution.
2-10	Pg. 1-28: Alternatives 2 and 3 include better access to alternative modes of transportation, which result in less vehicle traffic and provides a net benefit to water quality.	Comment noted. See Section 1.7.2 Water Resources and Chapter 3.2 Water Resources in the Draft EIS. This approach under Alternatives 2 and 3 reflects the community's input on the range of transportation investments they would like to see in Seattle over the next 20 years.
2-11	pg. 1-31: With the implementation of minimization and mitigation measures, no significant unavoidable adverse impacts are anticipated with respect to sea-level rise and GHG emissions for all alternatives.	Comment noted. Key words are "implementation of minimization and mitigation measures." This must happen to avoid significant adverse impacts. The City expects to implement many of the interventions with aim to minimize or mitigate adverse impacts from sea-level rise and GHG emissions.
2-12	pg. 1-32: All alternatives include ST3 Sound Transit Link Light Rail Extensions. Light rail train pass-bys, bus access/trips, vehicle parking, and community & mobility hubs at transit stations can result in increased ambient noise levels and a moderate noise impact. Mitigation to reduce this impact is identified below. Rail for freight doesn't seem to be included in this plan. There is no discussion or mitigation proposed for freight rail. Is this not a part of the city's transportation system? I'm confused how Sound Transit traffic are considered but not BNSF/UP freight?	Comment noted. Rail for freight is described in the Freight Element under "Railroads" and "Intermodal" facilities. (Pages F-28 – F-30.) To support rail-based freight, the Freight Element notes SDOT's work to continue working with railroad partners to eliminate maintenance backlog at public at-grade rail crossings (page F-35). Additionally, the element also proposes a rail program to address rail safety and maintenance (page F-46). SDOT's traffic operations division has staff dedicated to freight movement, including an engineer who specializes in railroad-related issues and would carry out this work. See also Chapter 1 of the Final EIS for a description of the updated proposed STP and relationship to the DEIS alternatives. See also responses to overall themes regarding how freight is considered in the STP and how the STP will be implemented.

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2-13	pg. 1-34: All alternatives would include projects that invest in and improve the transportation network, including pedestrian, transit, and bicycle infrastructure improvements. So, no differentiation?	There is differentiation between the alternatives. Alternative 2 and Alternative 3 have varying levels of investment in the transportation network. Page 1-35 notes that each alternative differs in the level of investment in the transportation infrastructure. See Exhibit 2-20 in Draft EIS that identifies miles of pedestrian, transit, and bicycle infrastructure improvements that differ among alternatives. Alternative 1 includes 2,277 linear miles to the pedestrian network, while Alternative 2 includes 2,402 miles and Alternative 3 includes 3,106. Similarly, Alternative 2 includes 161 linear miles of bike network while Alternative 2 includes 214 and Alternative 3 includes 446 miles. Alternative 1 includes 38 linear miles of dedicated corridors for transit, Alternative 2 includes 71 and Alternative 3 includes 161.
2-14	 pg. 1-34: Thresholds of significance used include consistency with goals related to the GMA, regional planning & local policies; compatibility w/ current & future land use; effects on increasing displacement risk; and access to community assets. The solutions to land use impacts focus only on displacement risk. This misses compatibility with future land use (like industrial zones) and access to community assets (like jobs). 	All alternatives are consistent with state, regional, and local plans. Alternative 1 was found to have land use compatibility impacts that could be addressed by some features of the action alternatives as noted on page 1-36. Features of the action alternatives that assist with access to jobs and compatibility with industrial areas are the existing freight network in Alternative 2, the addition of 19 miles of dedicated freight and bus lanes in Alternative 3, and improvements to access to transit and sidewalks in areas where growth in housing and jobs are anticipated in both alternatives.
2-15	Seattle streets are inviting places to linger, gather and play" is not good messaging for safety or freight.	The commenter is referencing STP objective in Exhibit 2-2 regarding streets for people. A sub-objective under that is "PP1. Prioritize street space for people while preserving access for goods." Thus, improvements would balance appropriate locations for gathering as well as ensuring access for goods. This is reflected in the STP key moves related to connecting people and goods, a sub-objective includes "PG4: Enhance economic vitality by supporting freight movement and growth of deliveries."

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3	Sturges	U.S. Environmental Protection Agency, Region 10
3-1	The stormwater elements of the draft STP EIS are mainly geared toward flow control. EPA encourages additional focus on stormwater toxicants, particularly from polluted road runoff.	The Environmental Impact Statement (EIS) addresses the presence of toxic substances in stormwater runoff caused by pollution. The alternatives presented in the EIS indicate that treatment for water quality from polluted road runoff will be necessary unless the project's hard surface area does not exceed 10,000 square feet or if the basin discharges into a public combined sewer system. To mitigate these impacts, the EIS proposes replacing pollution- generating hard surfaces such as roadways with non-polluting alternatives like sidewalks, as well as converting pervious surfaces into landscaped areas that do not generate pollution.
		Another option considered is the use of an approved landscape management plan (LMP) as an alternative to formally treating runoff from pollution-generating pervious surfaces, provided it meets water quality treatment requirements. Further detailing of stormwater toxicants and exploration of different options for water quality treatment is outside the scope of the non-project EIS. Individual projects considered under the STP, when implemented, would undergo an evaluation to determine appropriate stormwater treatment as this analysis is dependent on location and not appropriate for a non-project EIS.
3-2	Encourages the City to include more information on how the City plans to meet the Vision 2050 goals by addressing polluted road runoff.	The 2050 Vision goals related to addressing pollution from road runoff are consistent with alternative requirements under City of Seattle's stormwater code. Mitigation measures to address water quality are discussed in Section 3.2.3. The City adopts stormwater regulations consistent with state and federal requirements, but also considers more specific detailing of stormwater toxicants and exploration of different options for water quality treatment at a project level.
3-3	Encourages the City to develop more specifics for the STP EIS on how it will mitigate polluted road runoff, particularly tire wear particles and 6PPD-quinone in stormwater. 6PPD-quinone is found in vehicle tires and studies have shown it being toxic to coho salmon and sensitive to other fish species.	Researchers demonstrated that four types of permeable pavements can act as giant filters, retaining more than 96% of applied tire particle mass. They also captured several tire-associated chemicals, resulting in a 68% average reduction of 6PPD-quinone, a contaminant shown to kill coho salmon in urban streams (Washington State University, 2024). In Section 3.2.3, we discuss permeable pavement and converted pervious surfaces as mitigation measures for tire pollution. Further delving into the specific design considerations for permeable pavement will require a project-level evaluation, which is beyond the scope of this non-project EIS. See also response to overall theme regarding details on a programmatic EIS.
3-4	Encourages the City to develop as proactive of a plan as possible for treating polluted road runoff to ensure that every drainage has adequate stormwater treatment. Recommend longer-term approaches (e.g., retrofits) and short-term projects to address stormwater pollution.	Comment noted. The City regularly updates its stormwater plans and regulations to meet the requirements of its National Pollutant Discharge Elimination System (NPDES) Phase I Municipal Stormwater Permit and federal and state standards.
3-5	Encourages the City to go above and beyond current stormwater permit requirements, accelerating retrofits, and incentivizing low impact development.	Comment noted.

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3-6	Encourages the City to explore implementing stormwater parks as a multi-benefit approach to stormwater treatment.	Comment noted.
3-7	Continued support of other modes of transportation, such as mass transit, can reduce driving and tire wear, and result in improved water quality.	Comment noted. Supporting the shift from personal vehicles to other modes of transportation, i.e., transit, cycling, or walking, is one of the main tenets of the STP.
4	Grodnik-Nagle	Seattle Public Utilities
4-1	Sustainability Goal By focusing on climate change alone, the STP Sustainability goal misses the mark.	The DEIS scoping process identified a range to topics to explore, including air quality and water resources. "Sustainability" is captured broadly in the assessment of these topics.
	Sustainability should focus on environmental and human health TODAY and it should include water quality and ecosystem health as	The DEIS includes an Air Quality chapter, Section, 3.1, page 3-82. This addresses federal and state air quality standards and greenhouse gases.
	well as air quality and GHG emissions. We strongly encourage SDOT to reconsider the framing of this goal to incorporate a more holistic, more accurate definition of sustainability in this goal.	The DEIS includes a Water Resources chapter, Section 3.2, page 3- 109. The final iteration of the STP includes enhanced references to stormwater treatment and opportunities to improve water quality.
4-2	Water Quality/Stormwater Management The DEIS is missing an element on water quality and the STP is missing an objective related to water quality. Roads are the largest pollutant contributor to our water bodies in the City and this fact is ignored in the current draft. SPU IDs several specific key moves that could be improved by referencing water quality treatment opportunities that would directly contribute to livability and sustainability in Seattle.	The DEIS includes a Water Resources chapter, Section 3.2, page 3- 109. Potential water quality impacts are discussed in Section 3.2.2 of the DEIS. The STP has been updated to include enhanced references to stormwater treatment and opportunities to improve water quality.
4-3	Streets Illustrated and Complete Streets Checklist These implementation tools are really where the principles of the STP become relevant. We need to get water quality to show up here as well, so that SDOT and SPU can work together on projects from the same playbooks, with the same objectives.	Comment noted.
4-4	Solid Waste Collection There are several opportunities to allow for solid waste collection access and reduce delay/ complications for solid waste trucks.	Comment noted.
4-5	 Pg. 1-10 - Climate Action: Response to climate change Addressing drainage and specifically water quality and the adverse impact that roads have on water quality is missing. Water quality treatment could be included in some of the sub-objectives under climate 	Comment noted. The final iteration of the STP includes enhanced references to stormwater treatment and opportunities to improve water quality. See response to 4-2.

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	change. But given the impact of roads and their conveyance of 6PPD to our creeks, which we know kills salmon, this should be its own objective. SDOT should be pro-active at addressing this issue, which currently it is not and generally puts up roadblocks, since they manage the largest pollutant contributor to our water bodies in the City.	
4-6	Pg. 1-28. What are some solutions or mitigations for impacts? This section includes a lot of generalities that are unlikely to occur. The results of this plan will more likely result in negative impacts to water quality as long as SDOT does not make water quality treatment for their roads a clear priority in this plan beyond the bare minimum that it is required by stormwater code, including making it easier for others to mitigate for SDOT roads by coming up with creative solutions to meet multiple goals.	Comment noted. DEIS Chapter 3.2 described current policies and regulations and other mitigation measures beyond the summary in Chapter 1. Some of the mitigation measures describe "The City of Seattle could also provide additional water quality measures by including treatment beyond the requirements of the Washington Department of Ecology" The final iteration of the STP includes enhanced references to stormwater treatment and opportunities to improve water quality.
4-7	Pg. 2-48 – "Foster a clean, sustainable transportation system" This should include options for treating stormwater runoff from roads.	Comment noted. Considered for discussion in the final iteration of the STP. See also Response to 4-6.
5	Schaffer Singh Gloseckhi	AIA Seattle Urban Design Forum
5-1	 We need more mixed-use zones that activate the street and where people can live affordably downtown, we also need people to feel safe while walking downtown. We need protected bike lanes for people to move freely within the city without the need for a car. We need reliable transit. Most importantly, we need to diversify our streets to make them a larger part of urban life where people can enjoy being part of the city. The reach of the STP should also invest in neighborhood commercial zones to improve walkability, bikability, and transit access. People should be able to affordably live and work in the same area and be able to reach their needs within 15-minutes. We ask that SDOT use the following goals developed by AIA Seattle to help develop the Prioritization Framework: Reduce single occupancy vehicle trips throughout our region. Target the negative environmental impacts of our region's transportation 	Comment noted. We will consider these goals to develop the prioritization framework.

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	 systems; emphasize lower-emission transportation options. Promote equitable access to transportation options for our region's diverse peoples and communities, including all ages and 	
	 abilities. 4. Contribute as planners and designers to compact, walkable, transit-oriented communities that will curb sprawl and worsening environmental conditions. 	
	5. Foster connections between communities by building linkages across the city and region.	
	 Promote community wellness and safety through appropriate design solutions for new and existing transportation facilities. 	
	 Maintain currency with the growing spectrum of new mobility devices and systems. Apply this informed understanding along with design skills to assure that emerging technologies solve transportation problems equitably and without creating new ones. 	
	Support the flow of goods and services throughout our region, including the use of alleys in our cities, and the planning and design of networks for these services to maintain the economic vibrancy of our region.	
5-2	Clarify the STP's vision and rank the Key Moves and Goals to help identify a project list that support the vision.	Comment noted. The Vision statement remains the same. The Key Moves and Goals have been updated to reflect comments received on the draft STP. They are not ranked.
5-3	Center people within STP's Vision Statement. The Key Moves and Goals need to support that Vision. Streets need to be prioritized for people, not cars	Comment noted. The Vision statement remains. The Key Moves and Goals support the Vision. The STP emphasizes more multi-modality as part of our transportation future. It includes an increased prioritization for people, especially around safety and equity.
5-4	 Prioritize the Key Moves as follows: 1. Equity - Co-create with community and implement restorative practices to address transportation-related inequities. 	Comment noted. The Key Moves are not prioritized in any particular order. They are taken as a whole with the aim to achieving the broader goals of the plan.
	 Addressing equity is vital to the livelihood of underrepresented communities. Restoring communities through co-creation will help combat the historic disinvestment that has occurred and ensure that all people can thrive. 	

Number Comment Summary

2. Livability - *Reimagine city streets as inviting places to linger and play.*

a. Our city streets need to be livable. Streets need to be enhanced by good design practices to allow for enjoyment of our public spaces. This will inevitably encourage people to walk and bike more.

3. Mobility - Provide reliable and affordable travel options that help people and goods get where they need to go.

a. Streets must be designed to allow for multiple methods of transportation. People walking, biking, and transit need to be prioritized.

4. Safety - Prioritize safety for travelers in Seattle, with no serious injury or fatal crashes.

a. Safety is paramount to meet Vision Zero goals. However, if streets are designed for people, through wider sidewalks, and traffic calming devices, then increased traffic safety will be a result.

5. Sustainability - *Respond to climate change through innovation and a lens of climate justice.*

a. Sustainability strategies are important to meet the city's climate goals. However, if alternative forms of transportation are achieved through the Mobility Key Move, then there will be a reduction of Vehicle Miles Traveled (VMT).

6. Maintenance & Modernization - *Improve city transportation infrastructure and ready it for the future.*

a. Maintenance and modernization are important to ensure that the city's infrastructure functions, but encouraging other modes of transportation can lessen the wear and tear on the city's infrastructure.

⁵⁻⁵ Prioritize each of the Key Move's goals so prioritized projects can be determined. Here is a list of prioritized goals:

1. Equity

- a. TJ2: Address inequities in the transportation system by prioritizing investments for impacted communities
- TJ1: Center the voices of communities of color and underrepresented groups in planning and decision-making processes
- TJ3: Remove cost as a barrier so everyone can take the trips they need to make.

Comment noted. The Key Moves sub-points are not prioritized in any particular order. The prioritization process for the project list takes into account all of these sub-points each Key Move.

Number Comment Summary

2. Livability

- a. **PP1:** Boldly reallocate street space to prioritize people while preserving access for goods delivery and emergency response.
- **b. PP2:** Transform community and mobility hubs into welcoming places.
- c. PP3: Co-create and enhance public spaces for playing and gathering to improve community health.
- PP4: Activate and maintain public spaces to create a welcoming and agefriendly public realm.

3. Mobility

- a. **PG2:** Make walking, biking, and rolling easy and enjoyable travel choices.
- b. **PG3:** Create world-class access to transit and make service more frequent and reliable.
- c. **PG1:** Create seamless travel connections.
- d. **PG5:** Manage curb space to reflect city goals and priorities.
- PG4: Enhance economic vitality by supporting freight movement and growth in deliveries.

4. Safety

- a. 54: Provide safer routes to schools, parks, transit, community gathering spaces, and other common destinations.
- b. **S3:** Make all journeys safer, from departure to destination.
- c. **S2:** Concentrate safety investments at the most collision-prone locations.
- d. **S1:** Reduce vehicle speeds to increase safety.

5. Sustainability

- a. **CA3:** Foster neighborhood vitality and improved community health.
- b. **CA1:** Improve neighborhood air quality and health outcomes by promoting clean, sustainable travel options.
- CA2: Green city streets with landscaping and street trees to better handle changing climate.

Number	Comi	nent Summary	Response
	d.	CA5: Advance mobility management strategies to encourage walking, biking, and transit trips.	
		CA4: Support the transition from fossil fuel to electric vehicles for personal, commercial, and delivery trips.	
	6. M	aintenance & Modernization	
		MM2: Reduce neighborhood disparities in the quality of streets, sidewalks, public spaces, and bridges.	
		MM3: Ready city streets for new travel options and emerging trends and technologies	
	sustai	Transform city streets for safety and nable travel choices through optimal g of asset maintenance and replacement.	
5-6	variou be pri of pro List sh	ative 3 is the far better option. The is investments of Alternative 3 need to oritized to determine an appropriate list jects. The development of the Project would focus on enhancing the right-of- or walking, biking, and transit.	Comment noted. We have considered this feedback as part of the tiered prioritization of the project list.
	made	ments in multimodal hubs need to be for not online efficient transfers but also g them destinations for people to r.	
5-7	to see	will develop a project list. We would like that transportation investments be ted for the following:	Comment noted. We have considered these comments as part of the tiered prioritization of the project list.
	p v	Nobility and community hubs should be prioritized and must be aligned to the ity's One Comprehensive Plan. These vill provide anchors for people within heir neighborhoods. (PP2 goal)	
	e	o meet the SDOT goal of 90% zero missions mobility trips by 2030, bold actions need to occur:	
	a	 Stay Healthy Streets could be the baseline standard for Neighborhood Streets and the project list should reflect those investments (PP1 and S4 goals). 	
	t	 The bike network needs to be drastically expanded and gaps within the network need to be closed (PG1 goal). 	
		i. Redesign bike system signage for green bike routes and	

Number	Comment Summary	Response
	 neighborhood greenways (PG2 goal). C. Congestion pricing to disincentivize car travel to reduce VMT (CA5 goal). Develop slow streets for enhancing public spaces for playing and gathering as well as for providing safer routes and reducing vehicle speeds to increase safety (PP3, S1, and S4 goals). Prioritizing people at street crossings by lessening wait times at street crossings (PG2 goal). Enhancing Premium Transit Corridors with bus transit only lanes, priority signalization, larger bus stops, higher quality pavement (PG2 and PG3 goals). Create better east-west connections. Seattle is north-south oriented which makes it difficult to cross the city (PG1 goal). Utilize alleys more effectively to reduce the transportation of goods and services on streets. This will make it safer for people walking, biking, and rolling (S4 goal). Maintain public spaces to create a welcoming public realm (PP4 goal). For example, the 	
	activation of 3rd Ave to help revitalize downtown.	
5-8	The draft STP consolidates street- or neighborhood-scale transportation plans into one comprehensive transportation plan and uses Key Move Goals to create a weighted scale for prioritization. We also need to understand the larger transportation concepts or ideas that will help define Seattle's public realm and transportation network.	Comment noted and appreciated. The Key Moves in the STP are not ranked. People are a central focus to the plan.
	The Key Move goals define an evaluation framework, but a clearly defined concept will help articulate the vision for the future of the city.	
	We ask that the Key Move Goals be ranked to ensure that people are the central focus of the plan.	
5-9	The DEIS Alternative 3 should be implemented to ensure that our transportation needs are aligned with the One Seattle Comprehensive Plan Alt 5	Comment noted.

Number	Comment Summary	Response
6		Cascade Bicycle Club, Commute Seattle, Futurewise, Seattle Neighborhood Greenways, The Urbanist, Transportation Choices Coalition
6-1	Alternative 3 would create the most significant expansion to Seattle's pedestrian, bike, and transit networks. It provides the highest likelihood of reaching the city's transportation, climate, and equity goals. We support Alternative 3 because it includes the most investment in and bs out the most miles of Seattle's bike, pedestrian, and transit networks. We support Alternative 3 because it best supports the land use pattern that is planned	Comment noted. Alternative 3 is one bookend of the spectrum of possible combinations of transportation investments between Alternatives 2 and Alternative 3.
	for in Comp Plan Alt 5, which allocates the most housing and job growth needed to equitably and sustainably accommodate Seattle's population growth in the next 20 years. The anti-displacement mitigations proposed in this section are critical, regardless of which Alternative is adopted for the STP.	
6-2	Do the VMT assumptions in Alternative 3 put Seattle on target to meet Seattle's Climate Action goal by 2030? Specifically, will Alt 3 definitely result in at least a 20% reduction in VMT and 75% reduction in GHG emissions?	See discussion of air quality impacts in Section 3.1.2. Alternative 3 assumptions may get us closer to achieving Climate Action Plan goals by 2030. In this alternative, mobility management strategies are included as part of a regional VMT reduction approach. And could potentially reduce VMT by roughly 40% over the next 20 years. (See discussion of Alternative 3 impacts on VMT, page 3-106.) Absent these mobility management strategies, reduction in VMT by 20% and reduction in passenger vehicle GHG emissions by 82% by 2030 would be difficult to achieve.
6-3	Since the lifespan of the Seattle Transportation Plan extends beyond 2030, what is the city's VMT reduction goal for 2044?	The performance metric in the STP is to reduce VMT by 37% by 2044 relative to a 2018 baseline. In 2018, VMT was estimated at 6.17 billion. Even as the city grows in population, to meet our GHG reduction commitments, we need VMT to steadily decrease year-over-year to be at about 3.7 billion in 2044.
6-4	Is the VMT reduction target measured per capita or by total sum? If it's per capita, taking into account Seattle's 20-year population growth projections, what policies and procedures does SDOT plan to put in place to ensure achievement of the 20% total VMT reduction called for in the City's climate action plan?	The VMT target is total sum. The City will set VMT reduction goals and policies in the Comprehensive Plan consistent with HB 1181. The DEIS also reports on changes in VMT per capita (see page 3-383).
6-5	Transportation Impacts Alternative 2 and 3 are "unlikely to raise VMT per capita and more likely to reduce VMT per capita citywide." However, it is not clear if these projected VMT reductions are enough to	Alternative 1, the No Action Alternative, and current/existing numbers are essentially the same. The aim is to reduce VMT by 37% by 2044 relative to a 2018 baseline. Alternative 3 level of investments represents a greater likelihood to significantly reduce VMT. See also response 6-2.

		Response			
	actually reach the city's stated VMT and GHG emission goals.				
	Is the projected VMT reduction under STP Alt 3 a reduction from current (2023) numbers, or a reduction from the projected No Action Alt 1 numbers?				
6-6	Transportation Impacts What specific policies is the Dept. of Transportation going to put in place to reduce VMT by 2044?	actions. Alignme Comprehensive induce more wal reducing VMT. An the State and reg	To reduce VMT will require a broad range of integrated policies and actions. Alignment of land use policies in the forthcoming Comprehensive Plan and proposed transportation improvements to induce more walking, cycling, and transit in the STP will play a role in reducing VMT. At a broader levelbeyond the Citycoordination with the State and regional partners on a range of mobility management strategies will also play a role in reducing VMT.		rthcoming ion improvements to STP will play a role in itycoordination with
	Transportation Impacts	, .		all trips will be m	ade by walking,
	What are the city's mode share goals? How will the increase in miles to the bike, ped, and transit networks make it so that these modes are the most convenient way to get around, rather than just making it more possible to walk, roll, bike, or take transit?		s improving th onvenient opt s of these net	ions to the extent	nese modes, to make t feasible. To build ill need to find
6-8		Comment noted			
Describe and quantify the amount of access (network miles by mode type) that each alternative would provide to areas a) within urban centers/villages and frequent transit corridors, and b) outside urban		Villages is detailed g the existing Urb d 3 are using Lan	d in the table below. oan Centers and		
	centers/villages and frequent transit corridors.		Alt. 1	Alt. 2	Alt. 3
		Within Urban (Centers / Villa	iges	
		Pedestrian	631.40	809.90	809.90
		Bicycle	57.70	83.20	167
		People Streets and Public Spaces	11.61	345.95	360.82
		Transit	45.40	99.70	141
		Freight	75	77.8	82.80
		Outsido Urban	Contors (Vil	lagoe	
		Outside Urban Pedestrian	1638.30	1583.4	2303.5
		Bicycle	99.5	124.9	371.5
		People Streets and Public Spaces	16.91	31.06	1018.84
		Transit	35	68.3	126.7
		Freight	138.8	135.1	148.8
6-9	Land Use Impacts How will each alternative affect the financial	Comment noted			not part of the scope 7-11-448 and 450.
	feasibility of developing "middle housing" land uses as it relates to the city's implementation of House Bill 1110?				
6-10	Land Use Impacts	See response to	comment 1-10	Э.	

Number	Comment Summary	Response
	How will each alternative affect the amount of surface parking land use present in the city between now and 2044?	
6-11	Sea Level Rise / Climate Change	Comment noted.
	The solution to (climate change) will require aggressive action by all citiesSeattle can be	A more detailed life-cycle analysis of the impacts of EVs is beyond the scope of this EIS.
	one such leader. The EIS states that transportation emissions are the greatest source of emissions in the city (62%); passenger vehicle emissions account for much more than freight emissions (88% to 12%), meaning that we need to give people real alternatives to driving personal vehicles. Alt 3 places a strong emphasis on vehicle electrification, but it is unclear how much the EIS has studied the full range of effects of EVs.	More detailed assessment of EVs beyond air quality can be assessed and considered as required by state legislation, HB 1181. The City has until 2029 to complete that assessment.
	While the climate impacts of EVs are lower than gasoline powered vehicles, they are not zero. How is the city factoring in the lifetime GHG emissions of EVs into its GHG reduction targets? How is the city factoring in other environmental impacts of EVs on city air quality, water quality, and overall wear and tear on our streets?	

6-12 Sea Level Rise / Climate Change

What number of passenger vehicle trips will Alternative 3 eliminate compared to the No Action Alternative 1? How many more annual passenger vehicle trips will Seattle need to accommodate in the planning period, above today's number, based on Alt 3? The underlying land use from the Comprehensive Plan aligned with transportation Alternatives 2 and 3 generates 22,920,000 VMT for passenger vehicles.

The analysis for transportation provides a qualitative response to the impacts of Alternative 2 and Alternative 3 investment levels.

Given there are more proposed active travel investments in Alternative 3, it is highly likely this alternative will reduce VMT further below 22,920,000 relative to Alternative 2.

6-13 Air Quality Impacts

Data shows that parts of Seattle experience a disproportionately high burden of poor air quality and the health effects. Seattle should be striving to improve air quality above today's level. Reducing emissions requires Seattle to achieve a dramatic mode shift towards walking, biking, and transit – and way from personal vehicles. The EIS states that all three alternatives studied would be expected to reduce air pollutants and GHG emissions, with Alternative 3 making the greatest effects.

The mitigation measures presented to improve air quality are very limited and do not include best practices being implemented in Comment noted. See pages 3-98 to 3-100 of the DEIS.

Transportation-related emissions are expected to be lower in 2044 when compared to existing conditions. This assumes continued fueleconomy, use of clean-fuel alternatives, the state's ban on fossil-fuel vehicle sales by 2035, and increasing adoption of electric vehicles.

With population growth, there will be increased transportation demand. The STP in concert with the city's growth strategy aim to increase opportunities for walking, bicycling, and transit, especially for trips under 3 miles. This will help to reduce pollution and negative impacts on our air quality.

We will, however, still have major highways and roadways with over 100,000 average weekday traffic. These are typically the interstate freeways, some segments of state highways running through the City, and the West Seattle Bridge. Areas within 1,000 feet of these

Number	Comment Summary	Response
	cities across the world e.g., Low Traffic Neighborhoods; Ultra Low Emissions Neighborhoods; Congestion Pricing	roadways may have more sensitivity to air pollution than the broader overall area of the city.
	Is the best-case assumption that air quality will remain the same as it is today, or will it improve under any of these studied alternatives?	
6-14	Air Quality Impacts	Comment noted.
	Data already shows which parts of Seattle experience a disproportionately high burden of poor air quality and the health effects that come from it – how will Alternative 3 improve air quality for people living in these areas, such as South Park, parts of South Seattle closest to the highways, or parts of North Seattle above 85th Street? What mitigations can the city provide specific to these locations?	Alternative 3 mitigation would include improved pedestrian facilities, transit improvements, potential mobility management strategies, bicycle improvements, and these would be matched by more compact land use development as determined by the Comprehensive Plan. Additionally, increased adoption of EVs and transition of commercial trucks to clean-energy fuels would help to mitigate air pollution in areas such as South Park, South Seattle, and North Seattle above 85 th Street.
6-15	Our city needs more permeable surfaces to adapt to changing rain patterns and improve water quality for both the people of Seattle and animal/plant life living in our waterways.	Comment noted. The STP addresses this approach.
	We support city policies that do not add more general-purpose travel lanes and instead transition parts of our right of way into sidewalks, public spaces, transit/bike lanes, and more.	
6-16	Safety / Vision Zero	Safety is a high priority for SDOT. The EIS describes in Alternatives 2
	The EIS does not run through other important impacts that the plan might have on Seattle's transportation system – namely, safety. The only mention of safety in the entire plan is in the Transportation section of the Environmental Impacts, where it describes the current conditions of the city's overall collision	and 3 the increase in crosswalk improvements and additional safety improvements (pgs 3-289 and 3-290).
		The Seattle Transportation Plan includes a safety goal: "prioritize safety for travelers in Seattle, with no serious injury or fatal crashes." And is followed by five "key moves" to help achieve that goal.
		See page I-8 of the STP.
	trends, increases to pedestrian deaths over the past ten years, and points to the city's data collection of the most dangerous streets through its High Injury Network analysis. The	The STP proposes to increase the number of safety improvements. The increase in improvements in sidewalks, crosswalks, and transit stops will contribute to increased levels of safety and perception of safety.
	EIS should go further and analyze how each of the STP Alternatives will negatively or positively impact the ability for people to get around safely in Seattle. It should be clear that more sidewalks, bike lanes, crosswalks, transit lanes, and other multimodal measures are positively associated with increases in safety.	Additionally, increases in multi-modal travel and reduction in VMT can reduce the probability of vehicle crashes. Coupled with improved management of speed limits and compliance—a part of our Vision Zero effort—can also help to avoid serious collisions and traffic-related fatalities. The STP discusses this in detail (page I-11).
6.17		
6-17	Affordability Transportation is the second largest expense for Seattleites after housing. Safety and convenience of those who cannot drive, or cannot afford a car, should take precedence. The EIS should assess how each of the STP	Comment noted. See discussion of the alternatives' Compatibility with Current and Future Land Use and Displacement on beginning on page 3-282.

Number	Comment Summary	Response
	Alternatives will negatively or positively affect the ability for transportation projects to be paired with land use plans and housing projects, to provide ample, affordable housing and meaningful anti-displacement action.	
6-18	Equity Impacts: Alternatives Compatibility with TEF Equity Strategy Drivers We disagree with the DEIS's implication that the Transportation Equity Program is focused solely on implementation (STP DEIS, p.26). SDOT's Transportation Equity Framework (TEF) describes one of its roles as being "to inform policies and investment recommendations such as the Seattle Transportation Plan" (TEF, p.25).	Comment noted. Equity is a laudable goal. SEPA, however, does not require it for an EIS. Analysis of equity impact may be done as part of the monitoring of the STP.
	While implementation is important, the values expressed in TEF should also inform the city's overall processes, including analysis of EIS alternatives and the decision of which alternative to adopt in the final STP.	
	We suggest creating a section of the EIS containing an analysis of the compatibility of each EIS alternative with each Equity Strategy Driver	
	defined in the TEF (pp.16-25). These strategy drivers include the following topic areas: 1. Land Use, Housing and Displacement 2. Economic Development 3. Safety 4. Transit Access 5. Mobility and Transportation Options 6. Infrastructure, Planning and Maintenance 7. COVID-19 - Intersection with Public Health & Transportation 8. Transportation Justice	
	We suggest creating a comparison table which shows the degree of alignment between the three EIS alternatives (columns) and the eight Equity Strategy Drivers (rows), as well as a detailed comparative analysis in prose form.	
7	Goodman	SODO Business Improvement Area (BIA)
7-1	We formally request SDOT to pause and extend the DEIS process, so that the public can adequately review and determine if the Draft STP is aligned with the final 2024 Comprehensive Plan Update.	The request was received. The DEIS process was not extended. See Response 1-6 regarding the preparation of the two EISs and the coordination of land use assumptions. The City provided more than the minimum 30-day comment period on the DEIS.
	The STP is reflective of preliminary findings in the comp plan update. The 2024 Comprehensive Plan Update is not yet publicly available, making it impossible to validate the Draft STP's claims as they pertain to the comp plan. Further, the STP is on track to be	

Number	Comment Summary	Response
	finalized before the 2024 Comprehensive Plan Update. There is risk the STP will be in dissonance with the Comprehensive Plan. By working to release the STP at the same time as the 2024 Comprehensive Plan Update, SDOT created a fundamentally non- transparent and unreliable planning process. The sequence of publication of the draft policy documents is out of order, which results in a confusing, complex, and time-consuming framework for document review. The DEIS is presented to the public prematurely.	
7-2	The framework for document review is further confused by releasing the Draft STP and the DEIS simultaneously. There is too much content for the public to digest, reflect, and comment on, making it inaccessible and limiting who is able to provide content-specific feedback.	Comment noted. SEPA encourages the use of integrated plan and EIS processes. See WAC 197-11-210.
7-3	There is dissonance between the DEIS and the Draft STP, with varied phrasing, definitions, and language between the two languages. The terminology is inconsistent. It is unclear how new objectives of the Draft STP can be introduced in the DEIS when the DEIS should evaluate the Draft STP. More time is needed to align and make the Draft STP and DEIS consistent. A new Final Draft STP and DEIS should be released for public comment separately to rectify this confused and short document review process.	The STP is a plan and the DEIS is analytic. The two documents serve different purposes. The final version of the STP is expected to be released in the 1 st Quarter of 2024. This Final EIS will accompany the revised plan. The draft STP was revised to reflect much input. A new version of the DEIS is not required nor expected to accompany the final STP.
7-4	The DEIS identifies the main policy concepts for each alternative with associated metrics, but it fails to define what those metrics are. e.g., Exhibit 1-6 summarizes the changes to the bike network, and the metric used is "linear miles of corridors with bike facilities." Nowhere in the DEIS are linear miles, corridors, or bike facilities clearly defined. In fact, "bike facilities" has a variable definition. While seemingly small, these different definitions introduce confusion, and the focus of the discussion on the EIS Analysis Zones is inconsistent with that of the policy concepts being analyzed. There is confusion with all policy concepts being measured in the DEIS. The metrics are not clearly defined and they often share the same language with variable, context-specific meanings.	See Exhibits 1-6 to 1-8 with policy concepts and descriptions for each alternative. The alternatives are broad and address citywide and area transportation modes and facilities. This is consistent with a non-project level EIS. See response to the overall theme regarding details on a programmatic EIS. It aims to analyze the possible implementation scenarios of the plan. They are conceptual in nature and thus less specific. The methodology to conduct the analyses by different analysis zones is consistent with SEPA requirements and current state of the practice. Performance measures are now in Part 1 of the STP. Page I-118 - 119.

Number	Comment Summary	Response
7-5	"Corridor" is too vague a term to be used ubiquitously in this manner, especially as a metric for several of the policy concepts being evaluated.	Comment noted. We will make the meaning of corridor clearer in the final iteration of the STP.
	It appears 316 times in the DEIS document but with a variety of modifiers and sometimes no specific modifier. It will also receive a new definition in the 2024 CP Update.	
	Corridors is not defined as a term until its 184 th usage in the document, introducing another layer of confusion.	
7-6	It is difficult to assess if linear miles is a good metric for the bike network without knowing the intended meaning of corridors or bike facilities. Lane miles would be a better metric to measure bike lanes, eliminating the need to look at corridors. If it is necessary to look at corridors, then corridor needs to be defined more clearly e.g., one-way versus two-way	Comment noted. At a non-project level, linear miles provides enough information to assess the completeness of the bike network. Bicycling facilities typically do not take up a whole lane, like that for vehicles.
7-7	There are many unsupported claims throughout the DEIS, such as on page 1-38 "Alternatives 2 and 3 increase the mobility throughput of people and goods by reprioritizing ROW space for priority modes consistent with the City's STP objectives." This claim may or may not be true for the movement of freight and goods, but it would require actual data and adherence to truck street standards. Here, SDOT is using the flexibility of the non- project specific DEIS to make broad claims without supporting evidence. The invocation of the Draft STP's unspecified objectives is concerning, as the Draft STP has practically no references to support the claims made there.	Comment noted. See response to overall theme regarding what mobility throughput is and how it is measured. Using the typically amount of space different modes take up, removing vehicles—people driving personal vehicles, especially single-occupancy vehicles—from the network enables more space for freight. Indeed, this requires people switching modes to more space efficient modes of personal travel. Agreed, it seems counterintuitive. But reprioritizing the ROW to facilitate personal travel into more efficient modes opens up capacity in the remaining roadway, especially for freight, goods movement. This is the integrated approach to moving more people and more goods in the future given we don't have room to expand our roadways. Alternatives 3 would create 19 miles of dedicated freight and bus lanes which would reduce the amount of congestion for freight vehicles by removing general traffic. These lanes would meet King County Metro's desired minimum width for bus lanes which is 11'. Alternatives 2 and 3 would both increase the linear miles of sidewalks and corridors with bus and bike facilities, allowing for the more efficient movement of people.
8	Wasserman	North Seattle Industrial Association
8-1	NSIA did not have much expectations of the STP because we feel it was under resourced by the City. The STP followed most City-wide reports issue identification, but no hard decisions. The lack of a new draft Comprehensive Plan hindered the STP. Many of these issues NSIA brings forth are Comprehensive Plan Issues that should be settled in the Comprehensive Plan.	A final iteration of the STP is expected in the 1 st Quarter of 2024. See responses below to specific comments. See Response to Comments 1-6 and 7-1.

Number	Comment Summary	Response
	There are significant gaps in technical information provided in the Draft STP and therefore are opposed to moving forward with a Final Environmental Impact Statement (FEIS) at this time. We expect a second draft of the STP to be prepared and a new or supplemental DEIS will be prepared	
8-2	The Draft STP and the DEIS do not include baseline or future travel demand data based on future land use. The Draft STP and the DEIS do not include current or future volumes of freight, the movement of freight into and through the city, and the source of the freight – global, state, regional, and generated by the land use in the city. Request: Present travel demand data, freight volume, and truck volumes for existing and future conditions in the DEIS and the Draft STP.	See response to overall theme regarding why the STP EIS did not use travel demand modeling. The STP EIS is programmatic and does not include a constrained project list with which to perform detailed modeling. For details on related data see: Exhibit 3-161. Capacity Constrained Roadways Based on Comprehensive Plan Alternative 5 and STP No Action Alternative – compared alternatives to capacity constrained roadways. See also: Exhibit 3-166. Corridors Evaluated for Transit and/or Freight Priority in Alternative 3.
8-3	The objectives numbered and listed beginning on page 1-9 of the DEIS are not the same as the objectives in the Draft STP, page 9 of the Vision, Goals, and Objectives section. It is unclear how new objectives of the Draft STP can be introduced in the DEIS when the DEIS should evaluate the Draft STP. The title of the section indicates that the DEIS objectives are the Draft STP goals. The overarching title in Exhibit 1-4 does not consistently match the goals in the Draft STP. The Key moves listed in the STP appear to be the objectives listed in Exhibit 1-4. Vision, Goals, Objectives, and Key Moves in the Draft STP are confusing and further confused by changes in nomenclature in the DEIS.	Exhibit 1-4 is intended to reflect the high-level goals of the STP. These are generally in alignment with the STP. The policy assumptions on page 2-47 are a conceptual implementation approach of the STP goals.
	Request: Prepare EIS analysis directly from Goals and Key Moves in the Draft STP rather than generate new objectives and the eleven new policy assumptions on page 2-47 in the DEIS. Prepare an analysis of the impact and mitigation of implementing the Goals and Key Moves, including all key moves by modal element. Provide adequate implementation details of the key moves in order to provide a meaningful analysis of impacts and mitigation.	
8-4	There are network assumptions such as the type and quantities of new facilities for each alternative. There are no changes to the freight network in Alternative 1 and Alternative 2. There are an assumed 19 miles of freight and bus-only lanes in Alternative 3. It is unclear if the list of freight projects in the Draft STP Freight Element was included in the alternatives, or if the alternatives were	The alternatives are not evaluated to the level of detail of the projects listed in the Freight Element as the STP is an unconstrained vision plan. SDOT will explore the impacts of network improvements and their impacts on truck movement in the industrial areas during project development. The guidance for decisions made during project development is outlined within Table 3 (page F-36) of the Freight and Urban Goods Element. This guidance considers factors such as land use context, loading needs, physical roadway design,

Number	Comment Summary	Response
	evaluated with that level of detail. The impacts are generally described qualitatively, and the mitigation measures are broad qualitative statements. Many of the Key Moves in the Draft STP of concern (refer to comments on the Draft STP forthcoming) have the potential for negative impacts on truck mobility and safety. Request: Identify network priorities that could reduce the capacity and mobility for truck movement in industrial areas and on truck streets and disclose the impacts.	and others. The considerations for each factor are aggregated by the classification of freight streets. Alt 3 considers 19 miles of freight-and-bus lanes to assess the maximum level of application of this transportation enhancement. The revised STP project list does not include this level of freight-and-bus lane investment. Currently, a pilot freight-and-bus lane anticipated on Westlake Ave as part of the Route 40 transit-lane improvements. A subsequent evaluation of the pilot and further engagement with the community will help to make decisions about further application of future freight-and-bus lane projects.
8-5	Comment: On page 1-34, in the sentence: "All alternatives would include projects that invest in and improve the transportation network, including pedestrian, transit, and bicycle infrastructure improvements." Request: Clarify if the alternatives would improve the operating environment for truck movement. If the statement above on page 1- 34 is accurate, then add an explicit statement that trucks would be impacted by alternatives that exclusively invest in pedestrian, transit, and bicycle infrastructure improvements. For Alternatives 2 and 3 add freight is applicable and add freight to all similar statements in the DEIS.	The EIS notes where general purpose lanes could be modified and affect miles of roads and congestion. See Response 1-1. All alternatives are intended to include freight mobility improvements that will be further defined in the project development process and in alignment with the strategies and recommendations laid out in the Freight and Urban Goods Element. The updated STP includes 43 projects along designated truck routes. Tier Projects Total Share Along Truck
		Routes 1 13 20 65% 2 13 21 62% 3 17 40 43% Total 43 81 53%
8-6	On Page 1-35 for Alternative 1, the term "committed projects" is undefined. Are these projects in the current modal plans? Or are these only currently funded projects? Request: Define "committed projects". List these projects.	Committed projects are projects expected to be built because they already have funding committed to them. These are projects essentially already in the pipeline for development, such as: - Sound Transit 3 - Modal Implementation Plans - <u>Pedestrian Master Plan</u> - <u>Bicycle Master Plan</u> - Transit Master Plan
8-7	The following sentences are not clear and the Draft STP provides no technical analysis or data to support these sentences. "All alternatives include various levels of investment in bicycle, pedestrian and transit facilities" Also on page 1-37 is the claim, "Alternatives 2 and 3 increase the mobility throughput of people and goods by reprioritizing ROW space for priority modes consistent with the City's STP objectives. No significant adverse impacts to mobility throughput for people and goods are anticipated."	While the STP contains an unconstrained project list, SDOT intends to make investments in freight projects. The current vision list of projects includes 43 projects along freight routes. SDOT will explore the impacts of network improvements and their impacts on truck movement during project development. The guidance for decisions made during project development are outlined within Table 3 (page F-36) of the Freight and Urban Goods Element. This guidance considers factors such as land use context, loading needs, physical roadway design, and others. The considerations for each factor are aggregated by the classification of freight streets. Potential strategies for freight enhancement are also included within The Freight Toolbox section of the Freight and Urban Goods Element beginning on Page F-37.
	Request: Answer the following questions:	With regard to freight, there will be investments made in freight- supportive projects. In the near future, a freight-and-bus lane pilot will provide us more insight on how to implement more of them in key segments of the city. Investments in SDOT freight program,

Number	Comment Summary	Response
	- Will there be an investment in freight projects? If so, add freight to the	including an updated study on the Heavy Haul Network is expected in the near future.
	 sentence. Which are the "City's STP objectives" from which the right-of-way reallocation will be guided. If the right-of-way space is reallocated, how will this affect major truck streets? Will capacity and truck mobility and reliability be maintained? This claim cannot be made for freight and goods without answering these questions. 	 Freight mobility is key aspect of the STP. The goals are intended to support truck mobility and reliability as the city continues to grow. See these components of the STP: Pages F-10 through F-17 of the Freight and Urban Goods Element provide greater detail into the actions supporting each of the key moves. For example: <i>PG4: Enhance economic vitality by supporting freight movement and growth in deliveries.</i> See Element Actions F33 – F43 for detailed actions in support of the key move. SDOT is also developing freight-specific performance targets to track the impacts to the freight network as investments are made. These include improving the reliability of freight corridors by measuring the percentage of the Major Truck Street network that is operating reliably based on a Travel Time Index, as well as a performance measure that tracks the percentage of Major Truck Streets within fair or better pavement conditions. See page F-49 of the Freight and Urban Goods Element.
8-8	Page 1-38 a sentence makes the following claim: "Alternatives 2 and 3 increase the mobility throughput of people and goods by reprioritizing ROW space for priority modes consistent with the City's STP objectives." It is unclear which STP objectives are referred to. The existing objectives and/or policies? The objectives in the Draft STP are only found in the Community Outreach documentation at the end of the Draft STP. This claim may or may not be true for the movement of freight and goods and would require actual data and adherence to truck streets standards and maintain capacity and mobility for trucks, to make the claim. Request: Clarify the STP objectives with a direct reference. Identify network segments where right-of-way could be reprioritized. Identify the modal priority and the impact on truck capacity and mobility on all truck streets.	The STP Objectives are listed in Section 1.5 of the STP Draft EIS. Generally, this aligns with the goal in the STP to improve mobility for people and goods. In the future, with increased travel demand on our roads—for people and goods—and limited to no expansion of the right of way (ROW), managing throughput by more efficiently using the ROW will be necessary. As noted in the narrative, reprioritization of ROW space may be necessary. For example, freight-and-bus lanes will be one way to use ROW space more efficiently. In some cases, transit-only lanes can induce more ridership and reduce drive alone rates and thus improve throughput capacity on our roadways. Corridors where roadway could be considered for reprioritization are identified in Exhibits 3-164 and 3- 167. The potential to affect road capacity is addressed under each alternative in comparison to Exhibit 3-161.
8-9	It appears that the preferred alternative will be developed from the information and response to the DEIS. Page 1-16 includes this statement: "A project list that implements the Preferred Alternative will be generated as part of the STP process and will inform the replacement to the Levy Move Seattle, which expires at the end of 2024." Request: The project list should be provided	The project list was provided for public review in mid-October 2023. It is <u>available here for review</u> . The STP includes a proposed project list in Chapter 5. The list includes 43 projects along designated truck routes. Projects on the list were derived from the range of potential projects in Alternative 2 and 3.
	in the Draft STP, and those projects should be included in the DEIS technical analysis. The	Additionally, the project list from the 2016 Freight Master Plan has been retained within the Freight and Urban Goods Element

Number	Comment Summary	Response
	project list in the freight element of the Draft STP should be maintained in the preferred alternative.	
8-10	On pg 2-42, the methodology for impact analysis is not defined and is unclear, based on the statement "Alternatives are conceptual, they provide high-level direction but are not yet project specific." Request: Define the data collection and analysis methodology of the DEIS. Describe how the data represent existing and future conditions. Describe and provide the methodology used in the DEIS and how it effectively evaluates existing, future baseline, and future conditions resulting from the Draft STP. Provide a methodology report as an appendix to the DEIS.	 This is a non-project EIS. By definition, the alternatives are conceptual and can only provide a high-level direction of potential future transportation interventions and the EIS is broader. See response to overall theme regarding details on a programmatic EIS. Methodology for transportation evaluation: Consistency with Vision 2050, King Countywide planning policies, and Growth Management Areas. This was a qualitative evaluation of how supportive each alternative was of regional planning policies for multimodal transportation. Whether they would result in an increase in VMT per capita. Since this is a non-project EIS, VMT effects could not be directly evaluated. Instead, alternatives were evaluated qualitatively. It was determined that all three alternatives were unlikely to increase VMT since they did not include any increases in overall vehicle capacity. The amount of future job or housing growth accessible from the networks. The networks in each alternative were evaluated based on how much of the projected future job and housing growth could be reached. This included evaluating the projected number of jobs and housing within 300 feet of the sidewalk network, within a quarter mile of the bicycle network, and a half-mile from mobility hub or light rail station and a quarter mile of improved transit lanes and RapidRide lines. The extent of mobility priority for transit and freight. This measure looked at the potential amount of lane miles that could be converted to transit and freight priority lanes. Streets were considered to have the potential for new priority lanes if they had four or more lanes for a two way or three or more lanes for a one-way street and were identified as priority transit streets.
8-11	On page 2-47, each alternative is evaluated according to 11 policy assumptions that implement the objectives of the proposal. "The proposal" is not defined. A reference to the objectives in the Draft STP is needed. The policy assumptions are unclear and confusing relative to the One Seattle Comprehensive Plan policies and the Key Moves in the Draft STP. Request: Define the proposal and reference. Define the objectives and the policy assumptions in the context of the Draft STP. Edit the documents to ensure consistent terminology.	The DEIS identifies the proposal as "the update Seattle's 20-year Transportation Plan (STP)" on page 1-9 and 2-46. The objectives reflect the purpose and need for the proposal. The alternatives were developed based on them. The "policy assumptions" represent the conceptual implementation of the STP. Alternative 1 is the baseline scenario against which Alternatives 2 and 3 are measured. The STP is a non-project proposal and does not include a constrained list of projects or programs. The scenarios analyzed in the EIS are conceptual but still reflect the goals and policy direction of the STP. The policy direction for the STP can be found on pages I-39 through I-71. Additionally, policies currently adopted in the Comprehensive Plan were referenced in the creation of the STP Functional Elements. These policies are outlined within Part II on Pages II-10 – II-12.

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		Alternatives 2 and 3 provide bookend scenarios within which a set of implementation projects are contained that address policy assumptions and are aligned with the broad goals of the STP.
8-12	Exhibit 5-47 Alternative 3 Transportation Network: NW Seattle, EIS Study Area 1 shows 6.42 miles of expanded freight network. Is the expanded freight network the freight and bus-only lanes? If not, what is it? The same questions for each EIS Study area with an expanded freight network. Request: Define the expanded freight network in enough detail to show the reader the expanded freight network and facility type.	Generally, yes, the expansion of the freight network is implementation of freight-and-bus lanes. Overall, Alternative 3 expands the existing freight network by adding 19 miles of shared freight-and-bus lanes. In the STP, in the Freight Element, under the key move of "Enhance economic vitality by supporting freight movement and growth in deliveries, action T58 states "implement dedicated freight lanes and freight-and-bus lanes pending successful results of a pilot project." Analysis of that pilot project and additional consultation with the community will help to determine the implementation of subsequent FAB lanes.
8-13	The DEIS does not reflect an analysis of impacts on freight and truck mobility based on the outcome of the Draft STP. Request: Prepare an analysis of truck capacity and mobility with the implementation of the Draft STP on all truck streets. Such an analysis requires a clear definition of the combined modal networks, right-of-way allocation, and the intended implementation of truck design standards.	See response to overall theme regarding how freight will be considered in the STP. The STP EIS is programmatic and does not include a constrained project list with which to perform detailed modeling or define design standards of independent corridors. The Freight and Urban Goods Element reinforces the design guidance for designated freight routes within Streets Illustrated, and the expectations for evaluating tradeoffs during the project development process. More information can be found in Table 3 on Page F-36. A more detailed analysis of freight and truck mobility would be conducted when implementing capital projects.
8-14	The DEIS does not adequately address the Draft STP. Neither document provides meaningful data. Both introduce confusing, disparate, and overlapping goals, objectives, policies, and key moves. Request: Revise the Draft DEIS after revising the Draft STP. We are opposed to completing a DEIS based on an incomplete STP. We look forward to working with you on the next draft of the STP.	SDOT received an extensive set of comments on the draft STP. They have been reviewed and considered as part of the next iteration of the STP. The STP is intended to be an integrated transportation plan, considering all modes together. Thus, the perceived overlap and inter-relationships between goals and key moves.
8-15	The current framework of the Draft STP makes it nearly impossible to understand the results of implementing the Draft STP and impossible to determine how the plan accommodates future travel demand or existing or future movement of freight and goods. There is not adequate information in the Draft STP to understand the operating environment for trucks in industrial areas and on truck streets. Without such information the DEIS does not	Alternatives 2 and 3 provide bookend-level scenarios within which a potential range of transportation future investments could be made. As the STP is not a constrained plan, this approach allowed for the qualitative assessment of conceptual scenarios. See responses to comments 8-7, 8-11, and 8-13.

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	provide the data, analysis, and results to understand transportation conditions now, in the future, and with the implementation of the Draft STP.	
8-16	A clear and definitive presentation of the changes should be presented in the Draft STP and evaluated for impacts and mitigation in the DEIS.	The STP is a non-project specific type plan. As such, it is beyond the scope to provide a definitive level of changes. Alternatives 2 and 3 provide bookend-level scenarios within which a potential range of transportation future investments could be made. As the STP is not a constrained plan, this approach allowed for the qualitative assessment of conceptual scenarios. See responses to comments 8-7, 8-11, and 8-13.
8-17	The Draft STP does not indicate a magnitude of transportation investment to maintain existing conditions, advance policy or levels of service, and does not indicate any level of investment needed. The Draft STP may not meet the requirements of the Growth Management Act.	The STP includes a Maintenance and Modernization goal and associated actions. The updated STP includes a large capital (potential) projects list. (See page I-100 to I-104). There are 81 projects. Each is estimated to cost more than \$10 million that could be pursued to implement the STP. These projects are within the range of Alternatives 2 and 3. Informed by the STP, a long-term project list will be submitted as part of the Comprehensive Plan update. This list will meet the requirement of the Growth Management Act.
8-18	The Draft STP and Freight and Urban Goods Elements do not define where and how much SDOT will invest in the movement of freight and the required mobility of trucks. It is recommended that the 2016 SDOT City of Seattle Freight Master Plan remain in effect because the 2016 plan provides a more developed, comprehensive, and action specific foundation for implementation of freight and truck mobility improvements.	The project list from the Freight Master Plan remains intact in the STP. Funding for proposed projects were not listed in the FMP. Similarly, they are not described in the STP. Funding is not a SEPA topic per WAC 197-11-448 and 450.
9	Howard	Alliance for Pioneer Square
9-1	Upon the completion of the Alaska Junction Station of the Sound Transit Light Rail service to West Seattle, add a formerly identified project to the plan the retrofit of SR519 / Alaskan Way between Yesler and South King to narrow Alaskan Way by eliminating the transit lane on each side of Alaskan Way, and converting the area of the former transit lane to sidewalks, landscaping, and on-street parking in collaboration with WSDOT.	Comment noted. This comment will be considered as part of our ongoing station area planning in coordination with Sound Transit.
9-2	Incorporate major planned projects (completion of Waterfront Park, West Seattle- to-Ballard Link Extension) into the STP.	Comment noted. This recommended analysis would need to be conducted at a project-level analysis.
	Account for the impacts these projects will have on transit, freight/urban goods, bicycle/emobility, vehicles, and pedestrian access to Pioneer Square.	This is beyond the scope of this non-project level EIS. See response to the overall theme regarding details on a programmatic EIS.

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9-3	Ensure current infrastructure is maintained. Prioritize investment in existing infrastructure to ensure ongoing functionality.	Comment noted. The Maintenance and Modernization goal of the STP addresses this comment.
9-4	Support community-based visions by utilizing existing documents, studies, and concept plans to inform the STP (the Jackson Hub Concept Plan, Pioneer Square Street Concepts Plan, and Pioneer Square Parks and Gateways Concept Plans.	Comment noted. The STP process carried out an extensive community engagement process. A review of past planning policies was also conducted. Coordination with parallel planning processes, which included review of existing planning studies, also informed the STP planning process.
9-5	 Prioritize the following projects: ID #6: 3rd Ave Transit Improvements ID #8: 1st Ave S Multimodal Improvements ID #27: Chinatown International District Station Multimodal Improvements ID #39: Center City Connector ID #40: James St Multimodal Improvements ID #51: S Jackson St Transit Improvement 	Comment noted. Projects will be considered as part of the prioritization process.
10	Horn	Individual
10-1	SEE Exhibit 3-61. DEIS did not include parts of the BINMIC in the Analysis Zone. However in several Alternatives, DEIS includes changes to bike, parking, and freight within the BINMIC. Why wasn't the BINMIC included in the Analysis Zone? Please include industrial areas in the Study Areas if impacted by Alternatives.	The BINMIC is captured in Analysis Zone 3, Exhibit 3-70.
10-2	 SEE Exhibit 3-116. DEIS doesn't acknowledge or study the critical role 14th Ave NW and the surrounding streets have for freight, delivery, parking and related commercial/industrial activities for the Ballard Industrial neighborhood. This area is generally East of 15th, South of Market, North of Leary and West of 8th. Please acknowledge and designate 14th Ave NW between Leary and Market a minor Freight route or a First/Last Mile Connector. Make freight and parking improvements to 14th Ave NW. Make no changes that would make turns or difficult for trucks along 14th Ave NW (for example no curb or corner bump outs!). Please acknowledge and make no changes to streets surrounding 14th Ave NW that would harm the critical activity of loading and 	This is a non-project EIS, thus does not go into detail on specific streets. Assessment at that level would be taken during a project occurring on specific streets. The comment is noted and consideration made for designating 14 th Ave NW between Leary and Market as part of the freight route. See responses to comments 8-7, 8-11, and 8-13 for additional information on assessing and addressing freight.

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	unloading trucks for the East Ballard brewery district in the BINMIC.	
10-3	See Exhibit 2-16. In Alternative 3 for Magnolia/QA/ Ballard, DEIS proposes 14th Ave NW be redefined as a bike street.	Alternative 3 is intended to be one end of the "bookend" for level and pace of investment. Alternative 3 has a higher-level of bicycling investments.
	With the frequency of trucks utilizing this street in this industrial neighborhood, bikers will be at serious risk of death and injury, and industrial logistics will be significantly harmed. Please make design changes in the DEIS that are consistent with both freight routes and bike safety goals. Please include in the DEIS the ongoing study, conflict, and challenges for the Missing Link project that this bike route alternative impacts. 11th Ave NW would be a better bike path, but not without a holistic approach to bike and freight.	The freight element discusses safety key moves (F3, F6) to promote safety between people bicycling and trucks. Key move F6, page F-10 in the STP, speaks to this comment, especially in MICs: "Where a freight route shares a street with a bicycle route, facilities for trucks and bicycles should be clearly separated and comply with width and materials standards, consistent with Streets Illustrated. As we explore appropriate treatments, we'll note the unique character of activities in MICs."
10-4	DEIS did not study the impact of encampments on the transportation network infrastructure, like bus stations. Bus station on Leary are currently not usable or safe due to both crime and encampments.	Comment noted and acknowledged.
		This is a non-project EIS. An assessment of the impacts of encampments is beyond the scope of this EIS.
	Please revise the DEIS to include existing environmental conditions and make safety improvements to the bus stops on Leary.	
10-5	DEIS did not provide enough information about the Alternative for trucks to utilize bus- only lanes. Many commercial vehicles used by in-city industrial businesses are not 50 ft. trucks. Please provide details about types of vehicles allowed, for what purpose deliveries can use the bus lanes, and if all bus lanes are to be included.	Large commercial trucks—26,001 pounds or higher—are initially intended to be allowed to use the freight-and-bus lanes. The FAB lanes will start out as a pilot in one corridor. We will evaluate its effectiveness and then consider it other sections of roadway that are good candidates for a FAB lane. Delivery vehicles are not expected to be allowed to use the FAB lanes.
11	Kruse	Individual
11-1	The DEIS and its appendices consistently omit the freight system, considering only pedestrian, transit, and bicycle networks. The 11 policy assumptions used to evaluate the three alternatives never refer to freight.	Alternatives 1 and 2 maintain the city's existing freight street designations while Alternative 3 builds on that with additional facilities exclusively for use by freight vehicles and buses. While freight is not called out in the 11 policy assumptions, freight movement would benefit from improvements to traffic operations efficiency and mobility management strategies which would improve the flow of people and goods. See also responses to comments 8-7, 8-11, and 8-13 for additional discussion about how freight was evaluated.
11-2	Page 3-171 states the three STP alternatives "do not propose to expand the freight truck network or increase truck volumes within the city."	The STP acknowledges the projected growth of freight demand over the next 20 years.
		The revised freight element speaks to projected growth in freight. And addresses the trend in e-commerce.
		See also responses to comments 8-7, 8-11, and 8-13 for additional discussion about how freight was evaluated.

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	This is a confounding statement considering e- commerce deliveries are growing at double digits and their destination are residences.	
11-3	Dedicated freight and transit lanes are welcome but the crisis in urban freight comes at the destination. There's not enough curb space or off-street loading to handle existing e-commerce deliveries. The DEIS doesn't acknowledge this. Freight is not confined to truck streets; it shares the road with transit, bikes, and general traffic. Its omission from DEIS impact and mitigation scenarios will undermine the other transportation systems.	Comment noted. The STP acknowledges the projected growth of freight demand over the next 20 years. Part II of the STP includes the curb management element to address the challenges of increasing demand for access to the curb, including more and more goods delivery because of the growth in e-commerce. See also responses to comments 8-7, 8-11, and 8-13 for additional discussion about how freight was evaluated.
12	Bueche	Individual
12-1	The DEIS is silent on issues around urban freight mobility and access. This seems counter intuitive with attempts to increase density in downtown and neighborhoods that will increase the need for freight and goods to move about, for both business support and residential support. The existing situation is already troubling and expensive, with the absence of loading docks and bays in many areas creating the need for trucks and service vehicles to circle or block traffic. With the impending construction and implementation of new buildings, this will only become worse. Not only will the lived environment deteriorate but air quality and noise pollution will also continue to increase. More density will demand more freight. To add to the landscape, the multi purposing of many of our streets is already complicated and sometimes dangerous. It's important to take the extra effort to include urban freight as part of this planning and DEIS effort in a meaningful way. Especially in mixed use and multifamily areas where daily, even hourly, freight deliveries are part of life.	The shift and growth in using more efficient modes for personal travel can open up roadway capacity for travel that requires the roadway, including freight. In higher-density areas, the higher demand for goods delivery will also be addressed by more efficient and innovative ways to receive goods and services, and complete the last 50-feet of freight deliveries. For a deeper dive analysis, see SDOT's and the Urban Freight Lab's study on the first-and-last 50-feet of urban goods delivery.
13	Anonymous	Individual
13-1	I'm a bit confused why exactly so much asphalt reconstruction is needed in alternative 3 versus alternative 2. A lot of these bus routes say the frequency level could probably continue with the existing road level of maintenance	More asphalt reconstruction is anticipated in Alternative 3 given the amount transportation investments in active travel, including more bus-priority or transit-only lanes. These transportation infrastructure improvements require more road reconstruction.

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14	Anonymous	Individual
14-1	A little bit confused why Madison Avenue, Rainier Avenue, and Westlake Avenue are listed in "corridors evaluated for Transit/Freight Priority"	The corridors identified in exhibits 3-164 and 3-167 were chosen from the list of transit priority streets with four or more lanes. Corridors with existing transit priority treatments may be considered for additional improvements.
	They are already under construction with RapidRide G, transit plus 7 and transit plus 40. They should be listed under Alternative 1 has transit lanes that already exist or at least Alternative 2.	
14-2	Similar for MLK way, it is already projected to install bike lanes, I'm not sure why it is listed as potential roadway reconstruction under transit alternative 2. Is there a plan to rebuild the road again?	It is noted as "potential" but not a certainty. If bike lanes were to be installed, some level of reconstruction would likely occur. At a minimum, constructing a separated all-ages and abilities bike facility would be necessary.
15	Anonymous	Individual
15-1	My priorities are shown in Alternative 3, rapid progress. I would like more focus on rolling, walking and transportation. Slowing down traffic and making the streets safer.	Comment noted. The STP is aiming to deliver more and safer opportunities for multi-modal travel, including rolling and walking and managing traffic speed throughout the City's road network.
16	Cantor	Seattle Neighborhood Greenways
16-1	What is the decision process that goes into choosing which of the alternatives ends up in	SDOT received comments on the draft project list that was shared with the public in mid-October 2023.
	the STP?	Comments were reviewed and considered as part of an initial tiering process of an aspirational set of projects.
		This list is discussed in Chapter 5, Implementation Strategy, page l- 100.
		The tiered lists reflect how well the projects advanced STP goals and how well they are positioned to address other considerations. This includes a range of community input, alignment with major regional transit investment, leveraging of related projects (save time and money), and availability of potential funding opportunities. See page I-110 in the final STP.
		These projects are within the range of Alternatives 2 and 3.
16-2	How does the assessment of funding opportunities extend beyond our nine-year transportation levy?	Beyond the levy, 10+ years out, funding opportunities are not as clear. Probable sources would be considered, such a levy renewal, federal grants, and other likely revenue sources.
		As part of the Comprehensive Plan and compliance with the Growth Management Act, the STP will inform a 20-year list of projects in the Comprehensive Plan.
16-3	What drives the decision regarding the level of investment?	Chapter 5, Implementation Strategy, discusses the prioritization process and tiering of the aspirational set of projects.
		The prioritization framework is discussed on page I-108 of the updated plan.
		See the tiered lists of projects on pages I-110 – I-111 of the updated plan.

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		The process considers a number of candidate projects and programs. They are assessed against STP goals, strategic considerations (including community input and support), and alignment with available funding.
16-4	The first round of engagement showed that 95% favor Alternative 3. How is that considered?	The community's input and preference for Alternative 3 was considered and factored in the inclusion of candidate projects and programs. Additional factors were also assessed thereafter, as described in the response to comment 16-3, above.
		Chapter 5, Implementation Strategy, includes a discussion of how we move towards "achieving rapid progress." See page I-115 of the STP.
16-5	How will the final STP be presented?	The STP will come in two parts. The first part is a shorter, contextual document with a high-level vision that shares the key moves of what the city will do over the next 20 years. The second part is a more technical document that includes more detail about each of the modal elements.
16-6	Will the transportation metrics, project list, and implementation measures be combined and shared in the final EIS?	Chapter 5, Implementation Strategy, beginning on page I-93 of the STP, includes sections on performance measures, a project list of aspirational projects, and delivery process.
16-7	Will there be an opportunity for the public to see the final EIS before it goes to council?	The final EIS has been released with the final version of the STP. Before Council takes action on the STP, there will a 15-day appeal window for the final EIS.
16-8	It is unclear about the plan's priorities and deciding factors when weighing conflicts. The current plan is open to interpretation and tries to be everything for everyone. Because of that, it is inaccessible and doesn't say much. It would be stronger if it went further and identified priorities and trade-offs in specific contexts e.g., priorities in residential neighborhoods, priorities in freight / industrial areas, etc.	See response to comment 16-3.
17	Schaffer	LMN Architects
17-1	When is the project list in the DEIS going to be developed?	The candidate STP Project List and Programs was shared with public in mid-October 2023.
		A tiered project list is provided in Chapter 5, Implementation Strategy, page I-100 of the STP.
17-2	How will you navigate conflicts with certain priorities? What are deciding factors when weighing these conflicts?	The plan works to honor different contexts of Seattle. For example, a manufacturing and industrial center may have different priorities and approaches than a residential neighborhood. Therefore, priorities are nuanced and contextual. But the priorities will be centered around the six values of equity, sustainability, mobility, livability, maintenance, and modernization, along with co-creation with the community.
17.0		See also response to comment 16-3.
17-3	I read that Alternative 2 could be funded without the mobility management strategies. How is that possible? Does that assume a	SDOT relies on a variety of sources to fund projects. A transportation levy is just one source. Currently, a levy renewal in the process. And

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	transportation levy would fund these projects? Could we request a transportation levy to cover the costs?	a subsequent levy would be proposed to help fund any variation of projects derived from the alternatives over the life of the plan.
17-4	The DEIS was based on comparing the alternatives with Alternative 5 in the comprehensive plan. How does selecting another alternative affect the information in the DEIS?	We are working closely with the Seattle Comprehensive Plan team to ensure that transportation investments align with the eventual proposed land use growth strategy.
		Selecting another alternative—less intense land use—compared to Alternative 5 may alter some information in the DEIS, but not significantly. The alignment of potential transportations enhancement would still align with the major growth areas under another alternative.



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3.1. Marked Comment Letter

City of Seattle Seattle Planning Commission

October 13, 2023

Radcliffe Dacanay, Principal Planner Seattle Department of Transportation SEPA comments on Seattle Transportation Plan Draft Environmental Impact Statement *via e-mail*

Dear Mr. Dacanay,

1-1

1-2

The Seattle Planning Commission appreciates the opportunity to comment on the Seattle Transportation Plan (STP) Draft Environmental Impact Statement (DEIS). The Seattle Planning Commission is a 16-member independent, advisory body. We provide guidance and recommendations to the City of Seattle's Mayor and City Council, as well as City departments, on planning goals, policies, and plans for the physical development of the City. The Planning Commission is excited to see the shift toward prioritizing multimodal transportation in the draft Seattle Transportation Plan. We offer the following comments to help expand the environmental analysis and support the Seattle Department of Transportation (SDOT) in creating the best possible plan for transportation investments for Seattle. We have also provided comments on the Draft Seattle Transportation Plan, which can be found <u>here</u>.

Praise for the Draft Environmental Impact Statement

The Planning Commission noted several components of the DEIS that we appreciate and offer gratitude for their inclusion. We are pleased to see that the DEIS details some of the adverse impacts of the no action alternative. The DEIS makes clear that taking no action or failing to implement the vision of the STP has consequences for the entire transportation system and the communities that system serves. It highlights the need to increase mobility for people and goods by reprioritizing the right-of-way to meet the goals identified in the STP and to avoid conflicts with the Comprehensive Plan's future growth strategy.

The Commission also appreciates the inclusion of the detailed Overview of Historical Planning and Transportation Decisions in the Land Use section of the DEIS. The overview provides an important context of the adverse impacts major planning and transportation projects have had and continue to have on racial equity in Seattle. We hope this context is held front of mind for all during the implementation of the plan.

Letter 1

Commissioners David Goldberg, Co-Chair McCaela Daffern, Co-Chair Xio Alvarez Andrew Dannenberg Matt Hutchins **Rick Mohler** Radhika Nair Dhyana Quintanar **Julio Sanchez** Monika Sharma Lauren Squires Jamie Stroble Kelabe Tewolde Nicholas Whipple Rose Lew Tsai-Le Whitson

Staff

Vanessa Murdock Executive Director

Olivia Baker Policy Analyst

John Hoey, Senior Policy Analyst

Robin Magonegil Administrative Analyst The Commission would also like to acknowledge that the DEIS is written in a clear and easy-to-follow format. The document includes helpful supporting tables and graphics such as:

- o Summary of Network Changes by Mode for Alternatives (2-78)
- o Pedestrian Network Gap map (3-306)
- Exhibits 3-157 through 3-159 which map areas within ¹/₄ mile of improvements for each alternative (3-381)

Areas for Additional Analysis

The Commission offers the following recommendations for additional analysis of the plan in the EIS to fully understand the impacts of the plan as drafted and to inform the selection of a preferred alternative.

Overall Recommendations

• Include an additional overlay analysis for disproportionately impacted communities within sub-areas based on a race and social equity lens.

We appreciate the use of sub-areas in the DEIS to provide deeper analysis, however, we think the sub-areas are still too high-level to understand impacts on specific communities. For example, the sub-area analysis glosses over sea-level rise impacts as non-significant because they will only impact one percent of transportation infrastructure, but that one percent is concentrated in areas like South Park, which will have a significant impact on industrial workers and residents in the area. Similarly, the air quality section notes the negative impacts to residential areas near highways but determines that building codes for better air filtration can make this a non-significant concern. The analysis fails to show the impacts to communities such as the elderly and low-income residents of the Chinatown International District who live near multiple highways and may not have access to improved air filtration.

We value the inclusion of the Transportation Equity Framework (TEF) in the Draft STP, however, we have concerns that the framework is too forward-looking to be used to assess impacts of the plan in the EIS. It is helpful to note that the TEF will be used to mitigate future impacts of the STP, but the EIS should look at the current transportation system's impact on the people in our city who rely on public transportation and experience the most harm from gaps and inadequacies. The EIS should assess how each alternative responds to existing conditions and issues. For example, the EIS should identify areas of the city where sidewalk gaps coincide with communities of color and a high number of pedestrian injuries, and how each alternative can address those gaps.

We recommend that the EIS include an additional overlay analysis that identifies impacts across each section based on overlapping factors of race, socioeconomic status, and a history of disinvestment and harm perpetuated by planning decisions. The analysis could look for impacts to the vulnerable communities identified in the STP or could utilize a financial lens to identify where monetary investments have been made geographically over the last 20 years and what areas of the city have not seen similar investment.

• Study the impact of each alternative on affordability of travel for different modes.

A key move of the STP is to "Provide reliable and affordable travel options that help people and goods get where they need to go" (1-10). One of the goals in the Lead with Transportation Justice section is to "ensure everyone can afford to take the trips they need to make" (1-9). The Commission wholly supports these goals and notes that affordability is not studied in the DEIS. The EIS should study the impact of each alternative on affordability for different modes.

• Tie the EIS analysis to network buildout targets in the Seattle Transportation Plan.

The Commission is concerned by the lack of clarity around how the vision and goals of the STP will be implemented. In our comment letter on the STP, we recommend that SDOT set targets for implementation at different intervals and commit to tracking progress toward those targets. The EIS should analyze the minimum level of system buildout for each alternative that is required to meet those targets and to avoid the significant and unavoidable impacts identified in the DEIS.

Land Use Recommendations

• Conduct additional analysis once a preferred alternative is selected for the Comprehensive Plan to fully align transportation investments with the City's growth strategy.

The Commission appreciates the effort to compare the action alternatives of the STP DEIS to the growth strategy proposed in the Comprehensive Plan major update. We find it difficult, however, to fully evaluate the land use analysis for compatibility with the growth strategy without the draft Comprehensive Plan publicly available during the STP DEIS comment period. While we recognize the challenges of aligning these timelines, any study of the STP and its impacts is incomplete without a full comparison to the City's growth strategy.

• Clarify how SDOT will align transportation investments with community-specific displacement mitigation strategies.

The DEIS notes that transportation infrastructure can play a role in displacement because it "can make neighborhoods more accessible and desirable, resulting in increased property values" and it can "significantly change the perceived value of a neighborhood resulting in higher housing costs or additional demolition or rehabilitation of existing homes" (3-282). Despite this acknowledgement, the DEIS states that due to the uncertainty around land use changes from the Comprehensive Plan, any identified impacts to displacement would be speculative and no significant adverse impacts are identified (3-283). The Commission looks forward to seeing how the final EIS identifies impacts related to displacement once the Comprehensive Plan is further defined and how SDOT and other City agencies will respond to those challenges. We commend the displacement mitigation strategies noted in the land use section (3-293) and fully support their implementation, as they are necessary.

 Conduct additional analysis to identify possible impacts of organizing dense multifamily housing and multimodal transportation next to major arterial streets.

The Commission is concerned by the potential conflicts between the Corridors vision of growth in the forthcoming Draft Comprehensive Plan (as referenced in the Comprehensive Plan EIS Scoping process)

1 - 8

1-4

and the high traffic volume planned for arterials in the STP. The City of Seattle has encouraged the placement of multifamily housing along major arterials like SR-99 and Rainier Ave S for decades and appears poised to further invest in this strategy with the upcoming growth strategy. The DEIS did study the impacts of noise from arterials on residential uses and indicates that several streets such as MLK Jr Way S and Roosevelt Way NE produce enough noise to be a nuisance to adjacent homes (3-157). The analysis should go further to assess potential impacts to air quality and public health when housing is located along busy arterials. Studies show that living, working, and playing within 500-800 feet of high traffic volume roads can lead to increased risk of health impacts such as asthma, cardiovascular disease, and compromised lung development in children.^{1,2} The City cannot continue to ignore these risks in its land use decisions.

The EIS should include analysis to identify impacts to air quality, public health, and safety of this combination of transportation infrastructure and land use. Furthermore, the EIS should suggest associated mitigation strategies. These actions will ensure that Seattle's proposed growth strategy and transportation plans are consistent with <u>King County Countywide Planning Policy H-24</u> that says Seattle must:

Plan for residential neighborhoods that protect and promote the health and well-being of residents by supporting equitable access to parks and open space, safe pedestrian and bicycle routes, clean air, soil and water, fresh and healthy foods, high-quality education from early learning through K-12, affordable and high-quality transit options and living wage jobs and by avoiding or mitigating exposure to environmental hazards and pollutants.³

Transportation Recommendations

• Provide additional analysis of the benefits of prioritizing active travel and transit modes in the right-of-way.

The Commission applauds SDOT for focusing on people and their use of the right-of-way in the STP and in the DEIS rather than focusing on vehicle level of service. We suggest the EIS provide more information on the benefits and impacts of reprioritization of street space. The data could be used to help paint the picture of how some modes may see reduced travel times in the short run, however, redistribution of the right-of-way will create a more reliable and convenient travel experience for all modes in the long run. To help tell this story, we recommend the EIS study:

- What are the impacts of each alternative on travel times for transit, walking, and biking? Consider using a multimodal level of service model such as the one used in the following study: <u>Multimodal Level of Service Analysis for Urban Streets</u>.⁴
- o What benefits of time and convenience will non-car travelers see as a result of each alternative?

¹ Office of Transportation and Air Quality. "Near Roadway Air Pollution and Health: Frequently Asked Questions." US Environmental Protection Agency, 2014. https://www.epa.gov/sites/default/files/2015-11/documents/420f14044_0.pdf ² Bae, Chang-Hee Christine, Gail Sandlin, Alon Bassok, and Sungyop Kim. "The Exposure of Disadvantaged Populations in Freeway Air-Pollution Sheds: A Case Study of the Seattle and Portland Regions." *Environment and Planning B: Planning and Design* 34, no. 1 (2007): 154–70. https://doi.org/10.1068/b32124.

³ King County. "2021 King County Countywide Planning Policies." 2021, 45. <u>https://cdn.kingcounty.gov/-/media/king-county/depts/executive/performance-strategy-budget/regional-planning/cpps/2021_cpps-adopted_19384_amended_19553.pdf?rev=7ea6e59c9810495db4335e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db4335e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db4335e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db4335e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db4335e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db4335e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db4335e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db4335e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db4335e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db4335e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db4335e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db435e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db435e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db435e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db435e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db435e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db435e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db435e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db435e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9_10405db435e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E6E82C42D9_10405db436b48&hash=F319054b448&hash=F319054b448&hash=F319054b448&hash=F319054b48&hash=F318054</u>

⁴ Dowling, Richard G., National Research Council (U.S.), and National Cooperative Highway Research Program, eds. *Multimodal Level of Service Analysis for Urban Streets*. NCHRP Report 616. Washington, D.C: Transportation Research Board, 2008.

- What are the impacts of each alternative on Vision Zero goals and what are the costs of deaths and injuries from the no action alternative?
- What impacts and challenges arise from mode prioritization and the redistribution of space when space and or funding is constrained along a particular street?

Completing this picture will not only help make an informed decision regarding the preferred alternative but can also help to explain the benefits of the plan during the implementation stage.

• Further explore the impacts of parking on the ability to implement each action alternative.

Parking in the public right-of-way has consistently been noted by SDOT as a barrier to expanding access for other modes such as adding transit only lanes or bike lanes. We recommend further exploring how current parking policies will affect the ability to implement each of the alternatives. The City should also follow through on the suggested mitigation strategies of expanding parking management programs such as additional areas of paid parking and reworking the current Restricted Parking Zone (RPZ) program (3-398).

• Provide additional details of estimated changes in Vehicle Miles Traveled (VMT) for each alternative.

The Commission would like to see a more detailed analysis of how each alternative will impact the estimated VMT for the City with a breakdown of how those numbers are calculated. The estimates provided for alternatives two and three (3-104, 3-106) are both based on alternative five of the Comprehensive Plan Update, indicating that the same VMT is expected between alternative two and three despite very different levels of investment. Both estimates appear to be low compared to a 2022 GHG Inventory by the Office of Sustainability and Environment which estimated overall VMT for the city to be over 4 billion.⁵

Climate Change Recommendations

• Study impacts on transit and active mobility users during extreme heat events and forest fire smoke events.

The Commission appreciates that the DEIS covers a detailed evaluation of the impacts of sea level rise and potential for greenhouse gas (GHG) emissions reduction in the STP. The EIS should look at additional potential impacts of climate change such as extreme heat and forest fires on users of the transportation system and identify mitigation strategies. For example, how will an increase in frequency of extreme heat events impact transit users who must wait outside at transit stops?

• Study the impact of extreme heat events and other environment-related emergencies, such as major earthquakes, on the City's transportation infrastructure.

In addition to studying the impacts of extreme heat events on users of the transportation system, the EIS should study potential impacts of such events on transportation infrastructure. We know that extreme heat has the potential to damage roads and temporarily shut down transit lines. Is Seattle's transportation system prepared to respond to damage or service interruptions due to major heat events? Who will be most

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⁵ Seattle Office of Sustainability and Environment. "2020 Community Greenhouse Gas Emissions Inventory Seattle." City of Seattle, 2022, 58.

https://www.seattle.gov/documents/Departments/OSE/ClimateDocs/GHG%20Inventory/2020 GHG Inventory Oct 2022.p df.

impacted by such interruptions and what are potential solutions to avoid serious impacts? The EIS should explore these questions.

Similarly, we note that the DEIS does not discuss emergency preparedness and the system's ability to respond to other environment-related events such as a major earthquake. If a natural disaster damages vital infrastructure, such as bridges or highways, does the system have enough alternatives for key services to continue? Although we did not suggest the EIS study emergency preparedness in our comments during the scoping process, we recommend the EIS study how each alternative supports the transportation system's ability to respond to natural disasters and major climate events.

• Study the impact of paving materials and other impervious surfaces on urban heat island effect. Identify potential solutions such as alternative materials.

The Commission also recommends that the EIS study the impacts of transportation infrastructure on urban heat. We know that areas with high concentrations of paved roads, parking lots, and buildings can hold more heat than less developed areas, causing higher overall temperatures in what is known as a heat island.⁶ The heat island effect has the potential to make extreme heat events even more severe for communities that live in or near these heat islands. The STP acknowledges that heat islands are an issue in Seattle and identifies increasing the City's tree canopy as a possible solution. We recommend looking at additional mitigation strategies for reducing the heat island effect including, for example, exploring the use of different paving materials.

Air Quality Recommendations

• Study impacts to users when active travel modes, community & mobility hubs, and housing are placed alongside polluting travel modes.

The Commission recommends that the EIS explore the impacts to users of transportation infrastructure intended for pedestrians and bicyclists when that infrastructure is located alongside or nearby high-pollution infrastructure like highways and major arterials. For example, what are the air quality impacts and related public health risks for users of a multipurpose trail that runs alongside a multilane arterial? As the STP includes plans to create many new miles of infrastructure for active mobility as well as community & mobility hubs, it will be important to understand the impacts of locating those uses near highways and arterials and to identify strategies to reduce impacts. Additionally, as noted above in the land use recommendations section, the EIS should study the impacts to air quality for other uses, such as housing, when located adjacent to high-traffic volume roads.

General Comments

With the final growth strategy for the Comprehensive Plan update unclear, the City should pursue the most aggressive implementation of the STP in order to avoid the transportation plan becoming a limiting factor

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⁶ US EPA, OAR. "Learn About Heat Islands." Overviews and Factsheets, June 17, 2014. <u>https://www.epa.gov/heatislands/learn-about-heat-islands</u>.

Seattle Planning Commission Page 7

in the growth strategy selected for the Comprehensive Plan. Given the climate crisis we all face and the City's anticipated growth, a robust transportation plan is the only reasonable option to pursue.

The Commission noticed a few uncommon and undefined terms such as Super Slow Streets (2-78) or concepts like community & mobility hubs that are used in the STP, but not defined anywhere in the DEIS. The EIS would benefit from the addition of a glossary or more consistent definitions when conceptual or technical terms are used.

We appreciate the opportunity to provide our comments on the DEIS for the Seattle Transportation Plan. We look forward to seeing the additional analysis included in the final EIS and we are excited to see the evolution of the STP in this new phase of transportation for Seattle. If you have any questions, please do not hesitate to contact Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,



McCaela Daffern and David Goldberg Co-Chairs, Seattle Planning Commission

Cc: Mayor Bruce Harrell Seattle City Councilmembers Adiam Emery, Office of the Mayor Tracy Krawczyk, Jonathan Lewis, Joanna Valencia; Seattle Department of Transportation Rico Quirindongo, Lauren Flemister, Michael Hubner; Office of Planning and Community Development 1-17

- Thank you for the opportunity to review and comment on the Seattle Transportation Plan Draft Programmatic EIS. This input serves as our official comment letter from the NW Seaport Alliance and the Port of Seattle.
- Also, we are incorporating by reference our scoping letter from 7/29/22, because many of the comments we made there are not addressed in the Draft PEIS as we see it. Please advise if you need an additional copy of that from us, we will resend it to you.

Over-arching comments:

Please note that we found it difficult to review the Draft PEIS in concert with the STP, which had a significant number of pages, in the time frame available. As such, we cannot comment on the distinctions among the alternatives studied to understand how or whether the STP would have environmental impacts.

We believe the analysis does not sufficiently provide into on impact to freight mobility in and around the two Manufacturing & Industrial Areas. For example, we would like to understand the impacts of converting existing traffic lanes to active travel and transit modes, especially in the MICs, as we know that trucks have increased start and stop times and emissions associated with start/stop.

Page specific comments:

Pg. 1-9: A Final EIS will be issued in 2024 and will include responses to public comments received during the Draft EIS comment period. Following the EIS process, the City will develop specific policy proposals that will be the subject of public meetings and public hearings by the city council. - How did they write the Plan already if they don't have the public feedback on the alternatives?

Pg. 1-16: The freight network highlights the streets well-suited to truck traffic and the movement of goods throughout the city. Alternatives 1 and 2 maintain this network, while Alternative 3 adds 19 miles of dedicated freight and bus lanes. -Has it been determined that the existing network meets the needs for freight? Do the 19-mile freight/bus lanes include construction of new streets? If not, how can this be considered an expansion.

Pg. 1-16: A project list that implements the Preferred Alternative will be generated as part of the STP process and will inform the replacement to the Levy Move Seattle, which expires at the end of 2024. this project list is significant, but not available for comment or environmental review?

Pg. 1-20 (& 1-21): Traffic operations to increase efficiency. Signal optimization for GP traffic and transit on all major arterials and improvements to reduce congestion at key intersections. -signal optimization 2-5 should also consider trucks and movement of goods throughout the system, not just general and transit

Pg. 1-20 (& 1-21): 218 linear miles of truck streets of which, 19 miles are shared freight- and bus lanes. -This appears to be a reduction of truck dedicated streets, of the 218 miles, 19 of them would have lanes 2-6 changed to also accommodate transit. How does this impact freight – and vehicle emissions if there's more stopping and starting?

pg. 1-24: Support electric vehicle adoption. encourage electric vehicle charging infrastructure in public 2-7 streets and new private development. -Shouldn't the city be open to other clean energy transportation

2-1

2-2

2-3

options besides electricity – unless we can demonstrate the future infrastructure and technology needed to power every vehicle, every business, and every household with electricity	2-7
pg. 1-25: The analysis of potential impacts from the STP is a qualitative assessment based on efficiency indicators and performance metrics such as travel mode, access to transit, access to pedestrian network, access to jobs, personal vehicle and freight electrification. What is freight electrification & what is a realistic time schedule for implementation – we're not hearing a clear path forward on that, and are considering other ways to decarbonize freight movement.	2-8
pg. 1-25: Four sites within the City were monitored from 2019 to 2021 to provide baseline data on ambient air quality conditions and to compare criteria pollutant levels to current NAAQS (National Ambient Air Quality Standards)2019 to 2021, in the heart of the pandemic. How did "work from home" during the pandemic impact the AQ sampling results relative to the rest of the non-pandemic time?	2-9
pg. 1-28: Alternatives 2 and 3 include better access to alternative modes of transportation, which result in less vehicle traffic and provides a net benefit to water quality	2-10
pg. 1-31: With the implementation of minimization and mitigation measures, no significant unavoidable adverse impacts are anticipated with respect to sea-level rise and GHG emissions for all alternatives.	2-11
pg. 1-32: All alternatives include ST3 Sound Transit Link Light Rail Extensions. Light rail train pass-bys, bus access/trips, vehicle parking, and community & mobility hubs at transit stations can result in increased ambient noise levels and a moderate noise impact. Mitigation to reduce this impact is identified belowRail for freight doesn't seem to be included in this plan. There is no discussion or mitigation proposed for freight rail. Is this not a part of the city's transportation system? I'm confused how Sound Transit traffic are considered but not BNSF/UP freight?	2-12
pg. 1-34: All alternatives would include projects that invest in and improve the transportation network, including pedestrian, transit, and bicycle infrastructure improvements. So no differentiation?	2-13
pg. 1-34: Thresholds of significance used include consistency w/ goals related to the GMA, regional planning & local policies; compatibility w/ current & future land use; effects on increasing displacement risk; and access to community assetsthe solutions to land use impacts focus only on displacement risk – this misses compatibility with future land use (like industrial zones) and access to community assets (like jobs).	2-14
Seattle streets are inviting places to linger, gather and play" is not good messaging for safety or freight.	2-15

Letter 3

From: Sturges, Susan (she/her/hers)
Sent: Monday, October 16, 2023 3:42 PM
To: DOT_STP; Dacanay, Radcliffe
Cc: Gockel, Catherine
Subject: EPA Comments on Seattle Transportation Plan and its SEPA Draft EIS

CAUTION: External Email

Thank you for the opportunity to comment on the City of Seattle's draft Seattle Transportation Plan (STP) and its SEPA Draft EIS. EPA recognizes that the STP may include or inform transportation projects that EPA may review once they enter the National Environmental Policy Act (NEPA) process. To aid in these potential future NEPA analyses, EPA provides the following comments related to stormwater.

EPA notes that stormwater elements of the draft STP EIS are mainly geared toward flow control. EPA encourages additional focus on stormwater toxicants, particularly from polluted road runoff, in the stormwater discussion.
 EPA appreciates the mention of Vision 2050's goal to reduce stormwater impacts from transportation projects in the draft STP EIS. We encourage the City to go further, including more information on how the City plans to meet the Vision 2050 goals by addressing polluted road runoff.

As the City is aware, vehicle tires contain the chemical known as "6PPD," which prevents the tires from breaking down due to reactions with ozone and other reactive oxygen species in the air. 6PPD-quinone is a result of 6PPD ozonation. Stormwater from parking lots and streets contains tire wear particles, which are washed into streams and other water bodies during rain events. As a result, 6PPD-quinone may be present, exposing aquatic organisms. A 2021 scientific publication funded by EPA Region 10's Puget Sound Geographic Program demonstrated that 6PPD-quinone is acutely toxic to coho salmon. ^[1]Additional studies have indicated sensitivity of steelhead and Chinook salmon, and rainbow and brook trout. ^{[2] [3]}There is limited information on the fate and transport or human health effects of 6PPD-quinone. 6PPD-quinone's ecotoxicity has the potential to impact salmon populations, affecting tribal treaty rights and ESA-listed species.

EPA encourages the City to develop more specifics for the STP EIS on how it will mitigate polluted road runoff, particularly tire wear particles and 6PPD-quinone in stormwater.

Although the science continues to evolve, available information can inform taking additional action now. Urban runoff mortality syndrome has been documented in Seattle creeks, and roadway runoff is impacting salmon that travel through Seattle.

EPA encourages the City to develop as proactive of a plan as possible for treating polluted road runoff (including, but not limited to, 6PPD-quinone) in order to ensure that every drainage has adequate stormwater treatment, particularly those draining to salmon-bearing streams and the Ballard Locks. We recommend including longer term approaches (e.g., retrofits) and short-term projects to address stormwater pollution now. An example project is installing temporary or near-term stormwater treatment in areas with high traffic volumes and/or inadequate stormwater treatment, such as above ground stormwater treatment, sand/compost bioinfiltration "socks" or treatment boxes. EPA encourages the City to go above and beyond current stormwater permit requirements, accelerating retrofits and incentivizing low impact development wherever possible. *Stormwater Treatment of Tire Contaminants - Best Management Practices Effectiveness* is a resource produced by the Washington Department of Ecology that compiles information on stormwater treatment and 6PPD-quinone that may be of use. ^[4] As the City prioritizes its stormwater retrofits, EPA recommends efforts related to 6PPD-quinone to focus on salmon-bearing streams, including the I-5 ship canal.

3-3

3-4

EPA also encourages the City to explore implementing stormwater parks as a multi-benefit approach to stormwater treatment (see Puget Sound Regional Counsel's *Guidance for Planning Stormwater Parks*.)^[5]

Continued support of other modes of transportation, such as mass transit, can reduce individual driving and tire wear and result in improved water quality.

EPA looks forward to future collaboration on this topic, including thinking big and creatively on implementing stormwater treatment over major bridges and large basins, such as the I-5 ship canal and the North Seattle basin that drains to it.

Thank you for considering these comments.

Sincerely, Susan Sturges NEPA Reviewer, Transportation Sector Lead U.S. Environmental Protection Agency Region 10 Policy and Environmental Review Branch 1200 6th Avenue, Suite 155, MS 14-D12 | Seattle, WA 98101-3144

 ^[1] https://www.science.org/doi/10.1126/science.abd6951. Accessed 10/16/23.
 ^[2] https://pubs.acs.org/doi/10.1021/acs.estlett.2c00467. Accessed 10/16/23.
 ^[3] https://pubs.acs.org/doi/abs/10.1021/acs.estlett.2c0050. Accessed 10/16/23.
 ^[4] https://apps.ecology.wa.gov/publications/documents/2310001.pdf. Accessed 10/16/23.
 ^[5] https://www.psrc.org/our-work/stormwater-parks. Accessed 10/16/23.

From: Grodnik-Nagle, Ann <Ann.Grodnik-Nagle@seattle.gov>
Sent: Monday, October 23, 2023 1:34 PM
To: Dacanay, Radcliffe <Radcliffe.Dacanay@seattle.gov>
Cc: Wallis, Angela <Angela.Wallis@seattle.gov>; Ehlers, Sherell <Sherell.Ehlers@seattle.gov>; Kelleher, Shannon
<Shannon.Kelleher@seattle.gov>; Colwell, Shanti <Shanti.Colwell@seattle.gov>

Subject: SPU Comments on STP + DEIS

Radcliffe,

Thanks for briefing us on the STP components and priorities. We've done our best to consolidate SPU comments on the DEIS and Part I and Part II of the STP. I will note that because of the delay in the public draft of the comp plan update, we're in a weird position as reviewers. If the public draft of the comp plan had already been released (as was planned) then we all would know whether our comments on that (which are a lot like our comments on the STP) were accepted. If they had been accepted into the comp plan draft, then we'd expect to see them flow into the STP. But, without a revised comp plan draft, we're operating blind in terms of overarching City priorities.

Our comments are included in the PDFs linked below and should be visible if you open the docs in Adobe Acrobat.

Overall, our comments were aimed at the following items:

- Sustainability Goal: By focusing on climate change alone, the STP Sustainability goal misses the mark. Sustainability should focus on environmental and human health TODAY and it should include water quality and ecosystem health as well as air quality and GHG emissions. We strongly encourage SDOT to reconsider the framing of this goal to incorporate a more holistic, more accurate definition of sustainability in this goal.
- Water Quality/Stormwater Management: The DEIS is missing an element on water quality and the STP is missing an objective related to water quality. Roads are the largest pollutant contributor to our water bodies in the City and this fact is ignored in the current draft. We ID several specific key moves that could be improved by referencing water quality treatment opportunities that would directly contribute to livability and sustainability in Seattle.
- Streets Illustrated and Complete Streets Checklist: These implementation tools are really where the principles of the STP become relevant. We need to get water quality to show up here as well, so that SDOT and SPU can work together on projects from the same playbooks, with the same objectives.
- Solid Waste Collection: There are several opportunities to allow for solid waste collection access and reduce delay/complications for solid waste trucks.

You can access our consolidated SPU comments via these links, if you open in Adobe:

DEIS: DEIS: Draft EIS 2023 0831 SPU Comments.pdf

Part I: Part I: Primary-Plan-Doc-Final-Draft-August2023_SPU Comments.pdf

Part II: ESTP-Part2-00-Technical-Report-Final-RevOct_SPU Comments.pdf

Also, you can access SPU's comments on the April 2023 draft of the comp plan update here: PU Comments Internal Draft.xlsx

I thought that seeing our comments on specific goals and objectives in the Transportation Element might be useful for the sake of consistency. There is also a tab that includes PSRC guidance on integrating stormwater solutions in comp plans.

Please let me know if you have any questions on any of this!



Ann

Ann Grodnik-Nagle (she/her) Climate Adaptation Policy Advisor City of Seattle, <u>Seattle Public Utilities</u> Corporate Policy and Planning Division T 206-684-5336 | M 206-305-1216 ann.grodnik-nagle@seattle.gov

Summary of comments: 3 - STP Draft EIS_2023_0831_SPU Comments.pdf

Page:30 -- Referring to STP DEIS pg. 1-10 - Climate Action Heading

Number: 1 Author: Colwell, Shanti Date: 2023-10-16 18:39:21

Addressing drainage and specifically water quality and the adverse impact that roads have on water quality is missing. Water quality treatment could be included in some of the sub-objectives under climate change, but given the impact of roads and their conveyance of 6PPD to our creeks, which we know kills salmon, this should be it's own objective. SDOT should be pro-active at addressing this issue, which currently it is not and generally puts up roadblocks, since they manage the largest pollutant contributor to our water bodies in the City.

Page:48 - Refering to STP DEIS pg.1-28 - What are some solutions or mitigation for impacts?

Wumber: 1 Author: Colwell, Shanti Date: 2023-10-16 19:00:21

This section includes a lot of generalities that are unlikely to occur. The results of this plan will more likely result in negative impacts to water quality as long as SDOT does not make water quality treatment for their roads a clear priority in this plan beyond the bare minimum that it is required by stormwater code, including making it easier for others to mitigate for SDOT roads by coming up with creative solutions to meet multiple goals.

Page:68 - Referring to STP DEIS pg. 2-48 - "foster a clean, sustainable transportation system"

Number: 1 Author: Colwell, Shanti Date: 2023-10-16 20:11:23 This should include options for treating stormwater runoff from roads.

4-7

4-5

October 13, 2023

To: Seattle Department of Transportation From: AIA Seattle Urban Design Forum

RE: The Seattle Transportation Plan and Draft Environmental Impact Statement

On behalf of the American Institute of Architects (AIA) Seattle Urban Design Forum, we commend the Seattle Department of Transportation (SDOT) in their efforts to develop an equitable Seattle Transportation Plan (STP) that will address the city's transportation needs and help fight climate change.

We have seen a transformation of our city. Due to the pandemic, we have seen less people commuting downtown for work. It has caused a slow recovery of the commercial core. We not only need more mixed-use zones that activate the street and where people can affordably live downtown, we also need people to feel safe while walking downtown. We need protected bike lanes for people to move freely within the city without the need for a car. We need reliable transit that gets people to and from efficiently as possible. And most importantly, we need to diversify our streets to make them a larger part of urban life where people can enjoy being part of the city.

Statistically nationwide, neighborhood commercial zones have recovered quicker than downtowns. The reach of the STP should also invest in neighborhood commercial zones to improve walkability, bike-ability, and transit access. People should be able to affordably live and work in the same area and be able to reach their needs within 15-minutes. This can reduce congestion, which would help the city reach its climate goals.

The Prioritization Framework of the STP (Part 1, page I-90) solicits feedback on how to prioritize investments. AIA Seattle has developed a Transportation Policy that outlines 8 clear goals:

- 1. Reduce single occupancy vehicle trips throughout our region.
- 2. Target the negative environmental impacts of our region's transportation systems; emphasize lower-emission transportation options.
- 3. Promote equitable access to transportation options for our region's diverse peoples and communities, including all ages and abilities.
- 4. Contribute as planners and designers to compact, walkable, transit-oriented communities that will curb sprawl and worsening environmental conditions.
- 5. Foster connections between communities by building linkages across the city and region.
- 6. Promote community wellness and safety through appropriate design solutions for new and existing transportation facilities.
- 7. Maintain currency with the growing spectrum of new mobility devices and systems. Apply this informed understanding along with design skills to assure that emerging technologies solve transportation problems equitably and without creating new ones.
- Support the flow of goods and services throughout our region, including the use of alleys in our cities, and the planning and design of networks for these services to maintain the economic vibrancy of our region.

We ask that SDOT use these goals to help develop the Prioritization Framework. In addition, the STP's Vision should be clarified and the Key Moves and Goals should be ranked to help identify a project list that supports the Vision.

Vision

The Seattle Transportation Plan is a 20-year plan. Therefore, it needs to not only address the current transportation issues that face Seattle, but also address the future and what we want Seattle to be.

STP's Vision Statement:

"Seattle is an equitable, vibrant, and diverse city where moving around is safe, fair, and sustainable. All people and businesses can access their daily needs and feel connected to their community." (STP, page I-4)

We agree with this Vision. However, people need to be centered within this statement and the Key Moves and Goals need to support that Vision to enhance people's lives by making it not only easier to move around the city, but also for it to be an enjoyable experience. SDOT can make a profound impact on the daily lives of people. The STP notes that streets and city right-of-way make up for 30% of Seattle's area. Simply put, streets need to be prioritized for people, not cars.

Key Moves

The STP's Key Moves address safety, equity, sustainability, mobility, livability, and maintenance and modernization outcomes. These could be vaguely applied to any transportation project. It is understood that right-of-way conditions are nuanced, but priorities need to be set to determine how best to design the urban environment. All the Key Moves seem equally important. However, some Key Moves can be an outcome if other Key Moves are implemented first. For example, if we design our streets for walking and biking (Key Move Mobility), then Safety will follow. We recommend that the Key Moves be prioritized as follows:

- 1. Equity Co-create with community and implement restorative practices to address transportation-related inequities.
 - a. Addressing equity is vital to the livelihood of underrepresented communities. Restoring communities through co-creation will help combat the historic disinvestment that has occurred and ensure that all people can thrive.
- 2. Livability Reimagine city streets as inviting places to linger and play.
 - a. Our city streets need to be livable. Streets need to be enhanced by good design practices to allow for enjoyment of our public spaces. This will inevitably encourage people to walk and bike more.
- 3. Mobility *Provide reliable and affordable travel options that help people and goods get where they need to go.*
 - a. Streets must be designed to allow for multiple methods of transportation. People walking, biking, and transit need to be prioritized.
- 4. Safety Prioritize safety for travelers in Seattle, with no serious injury or fatal crashes.

- a. Safety is paramount to meet Vision Zero goals. However, if streets are designed for people, through wider sidewalks, and traffic calming devices, then increased traffic safety will be a result.
- 5. Sustainability Respond to climate change through innovation and a lens of climate justice.
 - a. Sustainability strategies are important to meet the city's climate goals. However, if alternative forms of transportation are achieved through the Mobility Key Move, then there will be a reduction of Vehicle Miles Traveled (VMT).
- 6. Maintenance & Modernization *Improve city transportation infrastructure and ready it for the future.*
 - a. Maintenance and modernization are important to ensure that the city's infrastructure functions, but encouraging other modes of transportation can lessen the wear and tear on the city's infrastructure.

Goals

Each of the Key Move's goals should be prioritized so potential projects can be determined appropriately. The following is list of prioritized goals:

- 1. Equity
 - a. TJ2: Address inequities in the transportation system by prioritizing investments for impacted communities
 - b. TJ1: Center the voices of communities of color and underrepresented groups in planning and decision-making processes
 - c. TJ3: Remove cost as a barrier so everyone can take the trips they need to make.
- 2. Livability
 - a. PP1: Boldly reallocate street space to prioritize people while preserving access for goods delivery and emergency response.
 - b. PP2: Transform community and mobility hubs into welcoming places.
 - c. PP3: Co-create and enhance public spaces for playing and gathering to improve community health.
 - d. PP4: Activate and maintain public spaces to create a welcoming and age-friendly public realm.
- 3. Mobility
 - a. PG2: Make walking, biking, and rolling easy and enjoyable travel choices.
 - b. PG3: Create world-class access to transit and make service more frequent and reliable.
 - c. PG1: Create seamless travel connections.
 - d. PG5: Manage curb space to reflect city goals and priorities.
 - e. PG4: Enhance economic vitality by supporting freight movement and growth in deliveries.
- 4. Safety
 - a. S4: Provide safer routes to schools, parks, transit, community gathering spaces, and other common destinations.
 - b. S3: Make all journeys safer, from departure to destination.
 - c. S2: Concentrate safety investments at the most collision-prone locations.
 - d. S1: Reduce vehicle speeds to increase safety.
- 5. Sustainability
 - a. CA3: Foster neighborhood vitality and improved community health

- b. CA1: Improve neighborhood air quality and health outcomes by promoting clean, sustainable travel options.
- c. CA2: Green city streets with landscaping and street trees to better handle changing climate.
- d. CA5: Advance mobility management strategies to encourage walking, biking, and transit trips.
- e. CA4: Support the transition from fossil fuel to electric vehicles for personal, commercial, and delivery trips.
- 6. Maintenance & Modernization
 - a. MM2: Reduce neighborhood disparities in the quality of streets, sidewalks, public spaces, and bridges.
 - b. MM3: Ready city streets for new travel options and emerging trends and technologies
 - c. MM1: Transform city streets for safety and sustainable travel choices through optimal timing of asset maintenance and replacement.

Draft Environmental Impact Statement (DEIS) Alternatives

As with the STP, the DEIS also needs priorities set to establish where investments should be made. In terms of the alternatives, Alternative 3 is the far better option. Alternative 1 of the DEIS does not achieve the key moves of the STP and should not be implemented. In addition, it has a significant adverse impact in regard to Alternative 5 of the One Seattle Comprehensive Plan. Alternative 2 is better, but still falls short of meeting transportation needs and the climate goals identified in the plan. Alternative 3 is preferred as it focuses on pedestrian, bike, and transit connections. It reduces the most Vehicle Miles Traveled (VMT) and it aligns to the Alternative 5 of the One Seattle Comprehensive Plan for the future development of the city. However, while the DEIS Alternative 3 makes great strides in addressing our transportation needs now and in the future, the DEIS indicates that all of these alternatives are a spectrum for future investments and not all of them may be implemented. The various investments of Alternative 3 need to be prioritized to determine an appropriate list of projects. The development of the Project List should focus on enhancing the right of way for walking, biking, and transit. In addition, investments in multimodal hubs need to be made for not online efficient transfers but also making them destinations for people to gather.

Project List

It is understood that SDOT will develop a Project List based on the feedback received during the public comment period. Based on the priorities indicated in this letter, we would like to see that transportation investments be allocated for the following:

- Mobility and community hubs should be prioritized and must be aligned to the city's One Comprehensive Plan. These will provide anchors for people within their neighborhoods. (PP2 goal)
- 2. To meet the SDOT goal of 90% zero emissions mobility trips by 2030, bold actions need to occur:
 - a. Stay Healthy Streets could be the baseline standard for Neighborhood Streets and the project list should reflect those investments (PP1 and S4 goals).
 - b. The bike network needs to be drastically expanded and gaps within the network need to be closed (PG1 goal).

- i. Redesign bike system signage for green bike routes and neighborhood greenways (PG2 goal).
- c. Congestion pricing to disincentivize car travel to reduce VMT (CA5 goal).
- Develop slow streets for enhancing public spaces for playing and gathering as well as for providing safer routes and reducing vehicle speeds to increase safety (PP3, S1, and S4 goals).
- 4. Prioritizing people at street crossings by lessening wait times at street crossings (PG2 goal).
- 5. Enhancing Premium Transit Corridors with bus transit only lanes, priority signalization, larger bus stops, higher quality pavement (PG2 and PG3 goals).
- 6. Create better east-west connections. Seattle is north-south oriented which makes it difficult to cross the city (PG1 goal).
- 7. Utilize alleys more effectively to reduce the transportation of goods and services on streets. This will make it safer for people walking, biking, and rolling (S4 goal).
- 8. Maintain public spaces to create a welcoming public realm (PP4 goal). For example, the activation of 3rd Ave to help revitalize downtown.

The draft STP aims to consolidate several street or neighborhood scale transportation plans into one comprehensive transportation plan and use Key Move Goals to create a weighted scale for prioritization of projects. Although it is required to consolidate the several local or multi-modal transportation plans into one, we also need to understand the larger transportation concepts or ideas that will help define Seattle's public realm and transportation network. The Key Move Goals define an evaluation framework, but a clearly defined concept will help articulate the vision for the future of the city. Urban planning ideas such as the 15-minute city help define a vision for the future of how people in the city work, play, and live.

We ask that the Key Move Goals be ranked to ensure that people are the central focus of the plan. Secondly, the DEIS Alternative 3 should be implemented to ensure that our transportation needs are aligned with the One Seattle Comprehensive Plan Alternative 5. Lastly, the project list must be developed to support the Vision that people, not cars, are prioritized.

Thank you for your continued work to help make Seattle a more livable and vibrant city.

Sincerely,

Tyler Schaffer, AIA Seattle Urban Design Forum Co-chair Ranu Singh, AIA Seattle Urban Design Forum Co-chair Dylan Glosecki, AIA Seattle Board of Directors, AIA Seattle Public Policy Board Member

СС

Joanna Valencia, Seattle Department of Transportation Johnathan Lewis, Seattle Department of Transportation Ian Macek, Seattle Department of Transportation Radcliffe Dacanay, Seattle Department of Transportation

To: Mayor's Office, Seattle City Council, SDOT
From: Cascade Bicycle Club, Commute Seattle, Futurewise, Seattle Neighborhood Greenways, The Urbanist, Transportation Choices Coalition
Re: Advocates' Response to the Seattle Transportation Plan Draft EIS
Date: 10/16/2023

Thank you for the opportunity to comment on the draft Environmental Impact Statement (EIS) for the Seattle Transportation Plan (STP). The EIS assesses how, and to what extent, changes to Seattle's transportation system over the next twenty years through the STP will affect our city's mobility, equity, health, climate resilience, transportation access to homes and jobs, and more.

Of the options studied, Alternative 3 would create the most significant expansions to Seattle's pedestrian, bike, and transit networks. The city must advance this alternative to get closer to its climate, equity and safety goals, although the EIS does not provide sufficient clarity that even Alt 3 will get the city to the exact goals. We support the City's decision to analyze its EIS alternative using the growth strategy alternatives listed in the Comprehensive Plan EIS Scoping document rather than the city's current growth strategy. We provide comments and questions regarding all three alternatives studied (a summary of the three alternatives is provided as an addendum) in this letter.

The STP's vision is admirable and bold: "Seattle is an equitable, vibrant, and diverse city where moving around is safe, fair, and sustainable. All people and businesses can access their daily needs and feel connected to their community". As stated in the draft EIS, Alt 3 provides the highest likelihood of reaching our city's transportation, climate, and equity goals by reducing vehicle miles traveled, GHG emissions, and environmental impacts that harm our air and water quality. Alt 3 responds best to the draft 2024 Comprehensive Plan by providing a range of transportation options close to new housing and jobs. According to climate experts, we need GHG emissions to start decreasing in 2025 and be cut in half by 2030 to avoid the worst outcomes of climate change. Alternatives 1 and 2 do not advance our transportation system with enough urgency to meet these objectives and should not be advanced.

While we support Alt 3 as the best of the three alternatives studied, we have the following questions:

- Do the VMT assumptions in Alternative 3 put Seattle on target to meet Seattle's Climate Action goal by 2030? Specifically, will Alt 3 definitely result in at least a 20% reduction in VMT and 75% reduction in GHG emissions?
- 2. Since the lifespan of the Seattle Transportation Plan extends beyond 2030, what is the city's VMT reduction goal for 2044?
- 3. Is the VMT reduction target measured per capita or by total sum? If it's per capita, taking into account Seattle's 20-year population growth projections, what policies and procedures does SDOT plan to put in place to ensure achievement of the 20% total VMT reduction called for in the City's climate action plan?

6-1

We have prioritized five of the seven Environmental Impacts that the EIS studied, and believe there are others that should be included to more thoroughly assess the impacts of the STP. We have identified specific questions that should be answered and included in the final EIS analysis.

Transportation Impacts

We support Alternative 3 because it includes the most investment in and builds out the most miles of Seattle's bike, pedestrian, and transit networks so that people have more options to get where they need to go rather than driving a personal vehicle. The EIS states that in conjunction with Comprehensive Plan Alternative 5 (the most housing and job growth), both STP Alternatives 2 and 3 are "unlikely to raise VMT per capita and more likely to reduce VMT per capita citywide." However, it is not clear if these projected VMT reductions are enough to actually reach the city's stated VMT and GHG emissions goals. 6-5

Questions:

- Is the projected VMT reduction under STP Alt 3 a reduction from current (2023) numbers, or a reduction from the projected No Action Alt 1 numbers?
- What specific policies is the Dept. of Transportation going to put in place to reduce VMT by 2044?
- What are the city's mode share goals? How will the increase in miles to the bike, ped, and transit networks make it so that these modes are the <u>most</u> convenient way to get around, rather than just making it more possible to walk, roll, bike, or take transit?

Land Use Impacts

The 15 minute cities concept is important to the success of Alternative 3. Dense, walkable neighborhoods with a range of housing options, local businesses, and essential services reduce the length of trips and make those trips more manageable by walk, bike, rolling, and transit. We support Alternative 3 because it best supports the land use pattern that is planned for in Comp Plan Alt 5, which allocates the most housing and job growth needed to equitably and sustainably accommodate Seattle's population growth in the next 20 years. The anti-displacement mitigations proposed in this section are critical, regardless of which Alternative is adopted for the STP.

Questions:

- Describe and quantify the amount of access (network miles by mode type) that each alternative would provide to areas a) within urban centers/villages and frequent transit corridors, and b) outside urban centers/villages and frequent transit corridors.
 How will each alternative affect the financial feasibility of developing "middle housing"
- How will each alternative affect the financial feasibility of developing "middle housing" land uses as it relates to the city's implementation of House Bill 1110?
- How will each alternative affect the amount of surface parking land use present in the city between now and 2044?

6-7

Sea Level Rise/Climate Change

The City of Seattle alone cannot solve climate change and sea level rise, but the solution to this vast challenge will require aggressive action by all cities – including ours. Cities should lead on this issue and Seattle can be one such leader. The EIS states that transportation emissions are the greatest source of emissions in the city (62%), and within transportation, passenger vehicle emissions account for much more than freight emissions (88% vs 12%), meaning that we need to give people real alternatives to driving personal vehicles. Alternative 3 places a strong emphasis on vehicle electrification, but it is unclear how much the EIS has studied the full range of effects of EVs.

Questions:

- While the climate impacts of EVs are lower than gasoline powered vehicles, they are not zero. How is the city factoring in the lifetime GHG emissions of EVs into its GHG reduction targets? How is the city factoring in other environmental impacts of EVs on city air quality, water quality, and overall wear and tear on our streets?
- What number of passenger vehicle trips will Alternative 3 eliminate compared to the No Action Alternative 1? How many more annual passenger vehicle trips will Seattle need to accommodate in the planning period, above today's number, based on Alt 3?

Air quality Impacts

Data already shows which parts of Seattle experience a disproportionately high burden of poor air quality and the health effects that come from it. In many neighborhoods, the air quality is below healthy levels, and as a result, life expectancy is not equal across Seattle. This indicates that Seattle should be striving to improve air quality above today's levels, not just maintain current air quality levels.

Reducing emissions that lead to unhealthy air quality requires Seattle to achieve a dramatic mode shift towards walking, biking, and transit – and away from personal vehicles, which generate the vast majority of transportation-related emissions. The EIS states that all three alternatives studied would be expected to reduce air pollutants and GHG emissions over today's levels, with Alternative 3 making the greatest effects.

The mitigation measures presented in the EIS to improve air quality are very limited and do not include best practices being implemented in cities across the world, e.g. Low Traffic Neighborhoods; Ultra Low Emissions Neighborhoods; Congestion Pricing.

Questions:

- Is the best case assumption that air quality will remain the same as it is today, or will it improve under any of these studied alternatives?
- Data already shows which parts of Seattle experience a disproportionately high burden of poor air quality and the health effects that come from it – how will Alternative 3 improve air quality for people living in these areas, such as South Park, parts of South Seattle closest to the highways, or parts of North Seattle above 85th Street? What mitigations can the city provide specific to these locations?

6-11

Water Quality Impacts

Our city needs more permeable surfaces to adapt to changing rain patterns and improve water quality for both the people of Seattle and animal/plant life living in our waterways. We support city policies that do not add more general purpose travel lanes and instead transition parts of our right of way into sidewalks, public spaces, transit/bike lanes, and more.

Other Impacts to Study

Safety/Vision Zero

The EIS does not run through other important impacts that the plan might have on Seattle's transportation system – namely, safety. The only mention of safety in the entire plan is in the Transportation section of the Environmental Impacts, where it describes the current conditions of the city's overall collision trends, increases to pedestrian deaths over the past ten years, and points to the city's data collection of the most dangerous streets through its High Injury Network analysis. The EIS should go further and analyze how each of the STP Alternatives will negatively or positively impact the ability for people to get around safely in Seattle. It should be clear that more sidewalks, bike lanes, crosswalks, transit lanes, and other multimodal measures are positively associated with increases in safety.

Affordability

Transportation is the second largest expense for Seattleites after housing. Safety and convenience of those who cannot drive, or cannot afford a car, should take precedence. The EIS should assess how each of the STP Alternatives will negatively or positively affect the ability for transportation projects to be paired with land use plans and housing projects, to provide ample, affordable housing and meaningful anti-displacement action.

Equity Impacts: Alternatives Compatibility with TEF Equity Strategy Drivers

We disagree with the DEIS's implication that the Transportation Equity Program is focused solely on implementation (STP DEIS, p.26). SDOT's Transportation Equity Framework (TEF) describes one of its roles as being "to inform policies and investment recommendations such as the Seattle Transportation Plan" (TEF, p.25). While implementation is important, the values expressed in TEF should also inform the city's overall processes, including analysis of EIS alternatives and the decision of which alternative to adopt in the final STP.

We suggest creating a section of the EIS containing an analysis of the compatibility of each EIS alternative with each Equity Strategy Driver defined in the TEF (pp.16-25). These strategy drivers include the following topic areas:

- 1. Land Use, Housing and Displacement
- 2. Economic Development
- 3. Safety
- 4. Transit Access
- 5. Mobility and Transportation Options
- 6. Infrastructure, Planning and Maintenance

6-15

6-16

- 7. COVID-19 Intersection with Public Health & Transportation
- 8. Transportation Justice

We suggest creating a comparison table which shows the degree of alignment between the three EIS alternatives (columns) and the eight Equity Strategy Drivers (rows), as well as a detailed comparative analysis in prose form.

Thank you for your consideration, and we look forward to reviewing the final EIS with these additional impacts and questions addressed.

Sincerely,

Cascade Bicycle Club Commute Seattle Futurewise Seattle Neighborhood Greenways The Urbanist Transportation Choices Coalition



Addendum: Summary of EIS Alternatives

The EIS analyzes two alternative scenarios in relation to a "No Action" (Alternative 1) scenario to evaluate the effects of potential changes over the STP's 20 year lifespan. The EIS Alternatives 2 and 3 represent a moderate and rapid pace, respectively, of investment and development in Seattle's transportation system, illustrating a range of different future states. The final STP does not need to exactly match any of these alternatives but must fall somewhere within the considered alternatives, and can mix and match any of the elements from each alternative.

Alternative 1 – No Action: A SEPA-required alternative that would maintain existing transportation networks and approved funding commitments. Roadway operations are optimized at key intersections, limited spot safety improvements are made throughout the network, and very limited slow zones are implemented on key pedestrian spaces. It uses the Comprehensive Plan Alternative 1 – No Action as its baseline.

Alternative 2 – Moderate Pace: Alternative 2 allocates a moderate amount of new funding for multimodal infrastructure. It uses Comprehensive Plan Alternative 5 as its baseline.

- The pedestrian network increases by 127 linear miles of sidewalks;
- the bicycle network adds 53 miles with facilities;
- an additional 45 miles of streets receive additional People Streets Public Space (PSPS) improvements;
- and an additional 33 miles are dedicated as transit corridors.

This plan includes some restricted areas for general purpose traffic, a network of People Streets, and a moderate number of community and mobility hubs. The existing freight network is unchanged.

Alternative 3 – Rapid Progress: Alternative 3 focuses on the expansion of Seattle's pedestrian, bicycle, and transit connections. It uses Comprehensive Plan Alternative 5 as its baseline.

- The pedestrian network increases by 848 linear miles of sidewalks;
- the bicycle network adds 385 miles with facilities;
- an additional 76 miles of streets receive additional People Streets Public Space (PSPS) improvements;
- an additional 123 miles are dedicated as transit corridors;
- and the existing freight network is expanded to include 19 miles of shared freight- andbus (FAB) lanes.

In this alternative, the City fully implements overarching policies of the Seattle Transportation Plan with a greater expansion of PSPS, electrification infrastructure, a wider range of community & mobility hubs, and mobility management strategies in concert with the region.

A note on the Comp Plan inputs to this EIS:

The One Seattle Comprehensive Plan update has also undergone an EIS study with its own alternatives, and they coincide with the STP EIS alternatives. STP Alternative 1 assumes no additional action, just as Comp Plan Alternative 1 does the same in terms of planning for housing and job growth over the next 20 years. STP Alternatives 2 and 3 use Comp Plan Alternative 5 as its baseline, which is the most rapid pace of growth and investment into Seattle's housing plan and would expand types of multi-family housing into more areas of the city than any other alternative.

[end of addendum]

Letter 7

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Business Improvement Area Advocating for a Safe, Clean, Connected and Engaged SODO

Seattle, WA 98134

Seattle Transportation Plan Seattle Department of Transportation City of Seattle Via email: <u>STP@Seattle.gov</u>.

Re: SODO BIA's Comments on the Seattle Transportation Plan DEIS

The SODO Business Improvement Area (SODO BIA) writes this letter on the Seattle Transportation Plan's Draft Environmental Impact Statement (DEIS) with both commendation and concern.

Creating a 20-year vision for Seattle's transportation system and its potential improvements is no small feat. We commend the City of Seattle for this effort, and we appreciate all of the effort that has gone into creating it. The SODO BIA is pleased that the City of Seattle is actively thinking about how SODO's transportation system can be safer, more accessible, more connected, and more reliable. We advocate for a transportation system that serves over 1200 businesses, 560+ properties, tens of thousands of workers, and a limited residential population.

While there is a lot to be excited about in the Draft Seattle Transportation Plan (STP), we have concerns related to the DEIS and its process. The sections to follow outline our broader concerns. Our concerns start broad and slowly narrow in scope. Below is a summary of our key concerns:

- Order of Document Release (Draft STP, Comp. Plan, DEIS)
- Additional Time Needed for Community Review Dense Technical Documents
- Inconsistencies Between Draft STP and its DEIS
- Ambiguity in Metrics and Language in the DEIS
- More Documentation for Findings in the DEIS

These concerns lead us to formally request SDOT to pause and extend the DEIS process, so that the public can adequately review and determine if the Draft STP is aligned with the final 2024 Comprehensive Plan Update.

Interdepartmental Planning Issues

Throughout the STP and its DEIS, Seattle's Comprehensive Plan is named as a guiding document. The STP states on page II-1, "An important objective of the STP is to provide greater detail for how we will achieve the transportation, safety, environmental, and other related goals defined in the One Seattle Comprehensive Plan (2024), the city's updated 20-year growth plan." While the Draft STP is in its final draft form, the 2024 Comprehensive Plan Update is not yet available. As a result, the STP's development process is reflective of **preliminary** findings in the comp plan update. This is confirmed on page II-16 of the STP: "In Fall 2022/Winter 2023, building on the recently developed draft STP vision, goals, and **preliminary**

Comprehensive Plan growth scenarios, the project team began developing each of the 8 functional elements and modernizing the priority network maps" (Seattle Department of Transportation, 2023). That means that the STP, in its early stages, was designed around unverified and potentially inaccurate findings from the Office of Planning and Community Development. The STP's goal development and strategy need to be evaluated after the 2024 Comprehensive Plan Update is available.

Meanwhile, the 2024 Comprehensive Plan Update is not yet publicly available, making it impossible to validate the Draft STP's claims as they pertain to the comprehensive plan. This includes all discussion on key action items, objectives, and discussion on outcomes, as the STP states on page I-6, "New policies defined in the One Seattle Comprehensive Plan will guide how we implement the Key Moves." Instead, the public only has access to a few draft policies.

Further, the STP is on track to be finalized before the 2024 Comprehensive Plan Update. The comprehensive plan still needs to undergo its own DEIS process and should that process prove to be transparent and sensitive to public input, the final growth strategies could still change. The STP claims it will be updated to reflect comp plans: "As time goes on, we'll need to update the STP to reflect changing conditions and evolving needs. We will commit to updating the STP periodically in alignment with Comprehensive Plan updates" (I-88, 2023), but there is the risk that the STP will be in dissonance with the comprehensive plan from the moment the comp plan is finalized. Of course, this is building upon the fact that the STP's development was predicated upon unverified growth strategies.

By working to release the STP at the same time as the 2024 Comprehensive Plan Update, the Seattle Department of Transportation created a fundamentally non-transparent and unreliable planning process. The sequence of publication of the draft policy documents is out of order, which results in a confusing, complex, and time-consuming framework for document review. The Comprehensive Plan and Transportation Element should be updated first as a policy document, followed by a Draft STP that shows how the plan will be implemented (this is a data-driven, GMA-compliant, project priority effort), followed by a Draft EIS (DEIS) of the plan. Because of this confusing process, this DEIS is presented to the public prematurely.

STP-DEIS Interplay Concerns

The framework for document review is further confused by releasing the STP final draft and the DEIS simultaneously. The STP is 720 pages long - without an executive summary - while the DEIS is 444 pages long with 106 pages of appendices. Given that there is a 45-day comment period on the DEIS, this is far too much content for the public to be asked to digest, reflect, and comment on.

Invariably, organizations with greater resources will have more bandwidth to understand and provide feedback, but smaller organizations and individuals cannot be expected to provide the same level of feedback. The sheer size of these documents and their competing short comment periods makes SDOT's body of work inaccessible, limiting who is able to provide content-specific feedback.

There is also dissonance between the DEIS and the Draft STP. Phrasing, definitions, and language all seem to vary greatly between the two documents. For example, the language is confusing between how the documents refer to objectives, goals, and key moves. The terminology is not consistent. Similarly, on page

1-9 of the DEIS, the objectives listed in the beginning are not the same goals and key moves presented in the Draft STP (p. I-8, I-9). It is unclear how new objectives of the Draft STP can be introduced in the DEIS when **the DEIS should evaluate the Draft STP**.

In short, more time is needed for the writers of the Draft STP and DEIS to align and make their work consistent. The public also needs additional time and resources - at all levels of specificity - if SDOT wants to participate in an equitable public engagement process. While the online engagement hub was great for capturing early conceptual feedback, it cannot provide the level of nuanced scrutiny needed for a planning document of this size. Providing content-specific feedback is too much of a burden for most individuals and smaller organizations. After internal realignment between the Draft STP and DEIS, a new Final Draft STP and DEIS should be released for public comment separately to rectify this confused and short document review process.

DEIS-Specific Concerns

The stated purpose of the DEIS is to identify "environmental conditions, potential impacts, and measures to reduce or mitigate any unavoidable adverse impacts that could result from an update to the STP" (p.1-8). Recognizing that the SEPA review process is not project-specific, there is more flexibility in how SDOT approaches this DEIS; however, that flexibility has translated into ambiguous metrics and unsupported claims.

The DEIS identifies the main policy concepts for each alternative with associated metrics, but it fails to define what those metrics are. For example, Exhibit 1-6 summarizes the changes to the bike network, and the metric used is "linear miles of corridors with bike facilities." Nowhere in the DEIS are linear miles, corridors, or bike facilities clearly defined. In fact, "bike facilities" has a variable definition, as it sometimes includes, "multi-use trails, protected or buffered bike lanes, painted bike lanes, greenways and sharrows" (3-323), such as when looking at the EIS Analysis Zones. In many other places, bike facilities are defined as "multi-use trails, protected bicycle lanes, conventional bicycle lanes that meet 'all ages and abilities' guidelines, Healthy Streets, and Neighborhood Greenways. Sharrows are not considered" (1-13). While seemingly small, these different definitions introduce confusion, and the focus of the discussion on the EIS Analysis Zones is inconsistent with that of the policy concepts being analyzed.

Further adding to the confusion, "corridor" or "corridors" appears 316 times in the DEIS document, but it appears with a variety of modifiers, such as that of transit, bike, commercial, major transportation, primary, RapidRide, and freight, to name a few of the many. Other times, there is no specific modifier to the term. Contextually, the term is used differently and assumes an implied meaning specific to a mode or land use. According to the DEIS, "Corridors" will also receive a new definition in the 2024 Comprehensive Plan Update - a document the public has yet to see. The 2024 Comprehensive Plan Update is to define "Corridors" as "areas near frequent transit that allow a wide range of housing types ranging from duplexes, triplexes, and fourplexes to 5-story buildings closer to transit, including in areas currently zoned exclusively for detached homes. Corridors also include areas already zoned for multifamily and commercial use" (3-197). It should be noted that "Corridors" is not defined as a term until its 184th usage in the document. This new definition for the term introduces another layer of the confusion, as it is unrelated to many of the other uses of "corridor.: Simply put, corridor is too vague a term to be used ubiquitously in this manner, especially as a metric for several of the policy concepts being evaluated.

The final component of the bike network exemplifying the ambiguity of the metrics provided is that of linear miles. Not knowing corridors' or bike facilities' intended meaning, it becomes difficult to assess if linear miles are a good metric. Lane miles would probably be a better metric to measure bike lanes, eliminating the need to look at corridors, but this is complicated by the inclusion of other types of facilities. If it is necessary to look at corridors, then corridors need to be defined more clearly in the context of bikes (and other modes). Is it a corridor if there is only a one-way bike lane on a street, or does it need both directions? If linear miles are measuring the corridors and not the bike facilities themselves, as the current metric indicates, would a corridor with a two-lane facility count towards the linear miles in both directions or just one? If corridor linear miles are a directional measurement, would lane miles be more appropriate? The ambiguity of this metric renders it and the expected environmental impacts useless without further clarification.

The confusion exemplified with the bike network policy concepts exists in a similar manner for most, if not all, policy concepts being measured in this DEIS. These metrics are not clearly defined, and they often share the same language with variable, context-specific meanings. That leaves the public unable to determine the accuracy of the claims in the DEIS.

Compounding upon the ambiguity of the metrics, there are many unsupported claims throughout the DEIS. For example, the following claim is made on page 1-38: "Alternatives 2 and 3 increase the mobility throughput of people and goods by reprioritizing ROW space for priority modes consistent with the City's STP objectives." This claim may or may not be true for the movement of freight and goods, but it would undoubtedly require actual data and adherence to truck street standards. Here, <u>SDOT is using the flexibility of the non-project specific DEIS to make broad claims without supporting evidence.</u> The invocation of the Draft STP's unspecified objectives is concerning, as the Draft STP has practically no references to support the claims made there.

Conclusion

The SODO BIA has some concerns that we would like to see addressed with regard to the DEIS. First and foremost, there are limits to understanding the Draft STP and its DEIS without having the 2024 Comprehensive Plan Update finalized and available to the public. There is also the concern that the DEIS and STP - two extensive and detailed documents - were released for comment right around the same time, limiting the public's ability to comment on them. And finally, there are some broad concerns related to the DEIS' content, most notably the prevalence of unsupported claims and ambiguous metrics.

In our estimation, the concerns highlight the need for the Seattle Department of Transportation to rework the Draft STP and restart the DEIS process until after the 2024 Comprehensive Plan Update is finalized and publicly available. We find that the DEIS process began prematurely and without the level of detail necessary for the public to properly gauge its accuracy.

We formally request SDOT to pause and extend the DEIS process, so that the public can adequately review and determine if the Draft STP is aligned with the final 2024 Comprehensive Plan Update.

With this request, we acknowledge the extensive amount of work that has been done, and we look forward to continuing to engage with SDOT on the Draft STP. You and your department should be proud of your work, recognizing that you are in the process of achieving an impressive feat. You have outlined an ambitious vision for Seattle's residents, businesses, and visitors, and we look forward to the improvements it will bring to SODO.

If you have any questions, please do not hesitate to reach out. STP-specific comments will be provided soon.

Sincerely,

Erin Goodman Executive Director

Letter 8

From: Eugene Wasserman Sent: Monday, October 16, 2023 1:55 PM To: Dacanay, Radcliffe Subject: SEPA Comments

CAUTION: External Email

SDOT Draft STP DEIS comments for NSIA October 16, 2023

Radcliffe,

We appreciate the hard work and energy that went into the Draft STP and the Draft Environmental Impact Statement (DEIS). From where you have started, much progress has been made. The knowledge of freight that the STP shows is much improved from where you started.

NSIA represents maritime/industrial businesses and property owners in NW Seattle. We have worked on several transportation plans for our area and are experts on the City of Seattle's transportation issues, especially freight mobility.

NSIA did not have much expectations of the STP because we feel it was underresourced by the City. The STP followed most City-wide reports issue identification, but no hard decisions. The lack of a new draft Comprehensive Plan hindered the STP. Many of these issues NSIA brings forth are Comprehensive Plan issues that should be settled in the Comprehensive Plan.

The NSIA will submit substantive comments on the Draft STP in addition to these comments for the Draft Environmental Impact Statement (DEIS). We note that there are significant gaps in technical information provided in the Draft STP and therefore are opposed to moving forward with a Final Environmental Impact Statement (FEIS) at this time. We expect a second draft of the STP to be prepared and a new or supplemental DEIS will be prepared. Also, due to the gaps in the STP, the comments below on the DEIS focus on key points. The comments are not all inclusive of our concerns.

Comment: The Draft STP and the DEIS do not include baseline or future travel demand data based on future land use. The Draft STP and the DEIS do not include current or future volumes of freight, he movement of freight into and through the city, and the source of the freight – global, state, regional, and generated by the land use in the city.

Request: Present travel demand data, freight volume, and truck volumes for existing and future conditions in the DEIS and the Draft STP.

Comment: The objectives numbered and listed beginning on page 1-9 of the DEIS are not the same as the objectives in the Draft STP, page 9 of the Vision, Goals, and Objectives section. It is unclear how new objectives of the Draft STP can be introduced in the DEIS when the DEIS should evaluate the Draft STP. The title of the section indicates that the DEIS objectives are the Draft STP goals. The overarching title in Exhibit 1-4 does not consistently match the goals in the Draft STP. The Key moves listed in the STP appear to be the objectives listed in Exhibit 1-4. Vision, Goals, Objectives, and Key Moves in the Draft STP are confusing and further confused by changes in nomenclature in the DEIS.

8-2

Request: Prepare EIS analysis directly from Goals and Key Moves in the Draft STP rather than generate new objectives and the eleven new policy assumptions on page 2-47 in the DEIS. Prepare an analysis of the impact and mitigation of implementing the Goals and Key Moves, including all key moves by modal element. Provide adequate implementation details of the key moves in order to provide a meaningful analysis of impacts and mitigation.

Comment: There are network assumptions such as the type and quantities of new facilities for each alternative. There are no changes to the freight network in Alternative 1 and Alternative 2. There are an assumed 19 miles of freight and bus-only lanes in Alternative 3. It is unclear if the list of freight projects in the Draft STP Freight Element was included in the alternatives, or if the alternatives were evaluated with that level of detail. The impacts are generally described qualitatively, and the mitigation measures are broad qualitative statements. Many of the Key Moves in the Draft STP of concern (refer to comments on the Draft STP forthcoming) have the potential for negative impacts on truck mobility and safety.

Request: Identify network priorities that could reduce the capacity and mobility for truck movement in industrial areas and on ruck streets and disclose the impacts.

Comment: On page 1-34, in the sentence: "All alternatives would include projects that invest in and improve the transportation network, including pedestrian, transit, and bicycle infrastructure improvements."

Request: Clarify if the alternatives would improve the operating environment for truck movement. If the statement above on page 1-34 is accurate, the add an explicit statement that trucks would be impacted by alternatives that exclusively invest in pedestrian, transit, and bicycle infrastructure improvements. For Alternatives 2 and 3 add freight is applicable and add freight to all similar statements in the DEIS.

Comment: Page 1-35, for Alternative 1 the term "committed projects" is undefined. Are these projects in the current modal plans? Or are these only currently funded projects?

Request: Define "committed projects". List these projects.

Comment: The following sentences are not clear and the Draft STP provides no technical analysis or data to support these sentences. "All alternatives include various levels of investment in bicycle, pedestrian and transit facilities....." Also on page 1-37 is the claim, "Alternatives 2 and 3 increase the mobility throughput of people and goods by reprioritizing ROW space for priority modes consistent with the City's STP objectives. No significant adverse impacts to mobility throughput for people and goods are anticipated."

Request: Answer the following questions: Will there be an investment in freight projects? If so, add freight to the sentence. Which are the "City's STP objectives" from which the right-of-way reallocation will be guided. If the right-of-way space is reallocated, how will this affect major truck streets? Will capacity and truck mobility and reliability be maintained? This claim cannot be made for freight and goods without answering these questions.

Comment: Page 1-38 a sentence makes the following claim: "Alternatives 2 and 3 increase the mobility throughput of people and goods by reprioritizing ROW space for priority modes consistent with the City's STP objectives." It is unclear which STP objectives are referred to. The existing objectives and/or policies? The objectives in the Draft STP are only found in the Community Outreach documentation at the end of the Draft STP. This claim may or may not be true for the movement of freight and goods and would require actual data and adherence to truck streets standards and maintain capacity and mobility for trucks, to make the claim.

8-6

8-7

Request: Clarify the STP objectives with a direct reference. Identify network segments where right-of-way could be reprioritized. Identify the modal priority and the impact on truck capacity and mobility on all truck streets.	8-8
Comment: It appears that the preferred alternative will be developed from the information and response to the DEIS. Page 1-16 includes this statement: "A project list that implements the Preferred Alternative will be generated as part of the STP process and will inform the replacement to the Levy Move Seattle, which expires at the end of 2024."	8-9
Request: The project list should be provided in the Draft STP, and those projects should be included in the DEIS technical analysis. The project list in the freight element of the Draft STP should be maintained in the preferred alternative.	
Comment: The methodology for impact analysis is not defined and is unclear, based on the statement "Alternatives are conceptual, they provide high-level direction but are not yet project specific." (page 2-42).	
Request: Define the data collection and analysis methodology of the DEIS. Describe how the data represent existing and future conditions. Describe and provide the methodology used in the DEIS and how it effectively evaluates existing, future baseline, and future conditions resulting from the Draft STP. Provide a methodology report as an appendix to the DEIS.	8-10
Comment: Page 2-47 Each alternative is evaluated according to 11 policy assumptions that implement the objectives of the proposal. "The proposal" is not defined. A reference to the objectives in the Draft STP is needed. The policy assumptions are unclear and confusing relative to the One Seattle Comprehensive Plan policies and the Key Moves in the Draft STP.	8-11
Request: Define the proposal and reference. Define the objectives and the policy assumptions in the context of the Draft STP. Edit the documents to ensure consistent terminology.	
Comment: Exhibit 5-47 Alternative 3 Transportation Network: NW Seattle, EIS Study Area 1 shows 6.42 miles of expanded freight network the freight and bus-only lanes? If not, what is it? The same questions for each EIS Study area with an expanded freight network.	8-12
Request: Define the expanded freight network in enough detail to show the reader the expanded freight network and facility type.	
Comment: The DEIS does not reflect an analysis of impacts on freight and truck mobility based on the outcome of the Draft STP.	8-13
Request: Prepare an analysis of truck capacity and mobility with the implementation of the Draft STP on all truck streets. Such an analysis requires a clear definition of the combined modal networks, right-of-way allocation, and the intended implementation of truck design standards.	
Comment: The DEIS does not adequately address the Draft STP. Neither document provides meaningful data. Both introduce confusing, disparate, and overlapping goals, objectives, policies, and key moves.	8-14
Request: Revise the Draft DEIS after revising the Draft STP.	

Conclusions and Recommendations

The NSIA looks forward to working with SDOT to develop the next draft of the STP with an effort to provide more tangible information in the STP. Our comments on the STP will identify areas of the plan needing further detail. The current framework of the Draft STP makes it nearly impossible to understand the results of implementing the Draft STP 8-15 and impossible to determine how the plan accommodates future travel demand or existing or future movement of freight and goods. There is not adequate information in the Draft ST to understand the operating environment for trucks in industrial areas and on truck streets. Without such information the DEIS does not provide the data, analysis, and results to understand transportation conditions now, in the future, and with the implementation of the Draft STP.

The Draft STP and the DEIS are both policy documents and the role of the One Seattle Comprehensive Plan Transportation policies in relation to the Draft STP is unclear. The Draft STP provides a wide-range of broadly stated key 8-16 moves, leaves metrics undefined, and makes numerous and varied statements about modifying transportation policies; Streets Illustrated, and the Complete Streets Ordinance, but says nothing more. A clear and definitive presentation of the changes should be presented in the Draft STP and evaluated for impacts and mitigation in the DEIS.

The Draft STP does not indicate a magnitude of transportation investment to maintain existing conditions, advance 8-17 policy or levels of service, and does not indicate any level of investment needed. The Draft STP may not meet the requirements of the Growth Management Act.

The same concerns apply to the Draft STP Freight and Urban Goods Movement element of the plan. The Draft STP and Freight and Urban Goods Elements do not define where and how much SDOT will invest in the movement of freight and 8-18 the required mobility of trucks. It is recommended that the 2016 SDOT City of Seattle Freight Master Plan remain in effect because the 2016 plan provides a more developed, comprehensive, and action specific foundation for implementation of freight and truck mobility improvements.

There is extensive work to be done on the Draft STP before it is final, and from that perspective we are opposed to completing a DEIS based on an incomplete STP. We look forward to working with you on the next draft of the STP.

Thanks.

Eugene Wasserman 206 440-2660 eugene@ecwassociates.com President, North Seattle Industrial Association http://www.northseattleindustrialassociation.org/ https://www.facebook.com/NorthSeattleIndustrial/



10/31/2023

Re: DEIS comments for the Seattle Transportation Plan

Dear Greg Spotts, Director Seattle Department of Transportation,

Thank you for considering these comments of the Alliance for Pioneer Square on the Draft EIS for the Seattle Transportation Plan. Note the website solicited comments on both until October 31st despite the SEPA register stating the comment period was ending October 16th.

Pioneer Square is a gateway to critical and treasured assets in our region, including the stadiums, ferries, historic neighborhoods, and attractions in downtown Seattle. People come to and travel through Pioneer Square to enjoy the very best our city has to offer.

The Alliance for Pioneer Square advocates on behalf of all users of our neighborhood's streets, sidewalks, alleyways, parks, and public spaces. Key to the future of Pioneer Square's success is intentional planning to deliberately integrate investments in new programs alongside planned projects and existing infrastructure.

To support the Seattle Department of Transportation's (SDOT) Seattle Transportation Plan (STP) process, we offer the following feedback regarding the current draft as it relates to our neighborhood:

- We ask a formerly identified project be added to the plan. Upon completion of the Alaska Junction Station of the Sound Transit Light Rail service to West Seattle, this project consists of a retrofit of SR 519/Alaskan Way between Yesler and South King to narrow Alaskan Way by eliminating the transit lane on each side of Alaskan Way, and converting the area of the former transit lane to sidewalks, landscaping, and on-street parking in collaboration with WSDOT.
- 2. Incorporate major planned projects, such as the completion of Waterfront Park and the West Seattle to Ballard Link extension, into the STP. These projects will dramatically change how people travel to and from Pioneer Square. The STP must recognize and account for both positive and negative the impacts these projects will have on transit, freight/urban goods, bicycle/emobility, vehicles, and pedestrian access to Pioneer Square. Without a direct connection to future light rail stations planned for ST3, Pioneer Square will be cut off from SeaTac airport, south King County and Tacoma. This will present a substantial challenge for companies that have located in Pioneer Square and the community that depends on it to access so much of our city.
- 3. Ensure current infrastructure is maintained. Pioneer Square is privileged to be served by a variety of transportation methods. However, certain elements of our district's infrastructure including our vulnerable areaways need short- and long-term resources to remain safe. While

the STP should consider investing in future projects, it should prioritize investment in existing infrastructure to ensure ongoing functionality.

4. Support community-based visions by utilize existing documents, studies, and concept plans to inform the STP. Organizations, such as the Alliance, have carefully examined their districts' transportation needs and have produced documents, studies, and concept plans to guide future planning efforts. We encourage the STP to be informed by the following documents pertaining to Pioneer Square: the Jackson Hub Concept Plan, Pioneer Square Street Concepts Plan, and Pioneer Square Parks and Gateways Concept Plans.

Of the candidate STP Project List, the Alliance asks SDOT to prioritize the following projects which will positively impact Pioneer Square:

- ID #6: 3rd Ave | Transit Improvements
- ID #8: 1st Ave S | Multimodal Improvements
- ID #27: Chinatown International District Station | Multimodal Improvements
- ID #39: Center City Connector
- ID #40: James St |Multimodal Improvements
- ID #51: S Jackson St | Transit Improvements

Over time, Pioneer Square has seen transit access erode. In 2019, bus routes traveling through and to Pioneer Square were relocated outside the neighborhood. Connectivity to the downtown core and Pike Place Market, promised as part of the streetcar system, is long overdue with no solution in sight. We are at a critical point in time for transportation infrastructure and look towards this process as one avenue to get back on track. The Alliance looks forward to continuing to partner with SDOT to achieve Seattle's transportation vision.

Thank you,

Lisa Howard Executive Director 9-4

Page 2 of 2

Visit: 105 S Main, Suite 201 Seattle, WA 98104 Mail: PO Box 4507 Seattle, WA 98194 T. 206.667.0687 allianceforpioneersquare.org

Wednesday, October 4, 2023

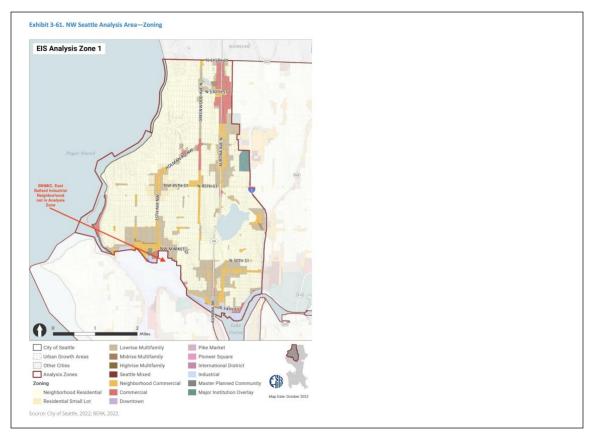
Seattle Department of Transportation Re: Draft Environmental Impact Statement, Seattle Transportation Plan

Greetings,

As a property and brewery owner in the BINMIC, specifically the East Ballard industrial neighborhood, please review and respond to the following comments on SDOT's DEIS for the Seattle Transportation Plan.

1) DEIS did not include parts of the BINMIC in the Analysis Zone, however in several Alternatives, DEIS includes changes to bike, parking, and freight within the BINMIC. Why wasn't the BINMIC included in the Analysis Zone?

Please include industrial areas in the Study Areas if impacted by Alternatives.



 DEIS doesn't acknowledge or study the critical role 14th Ave NW and the surrounding streets have for freight, delivery, parking and related commercial/industrial activities for

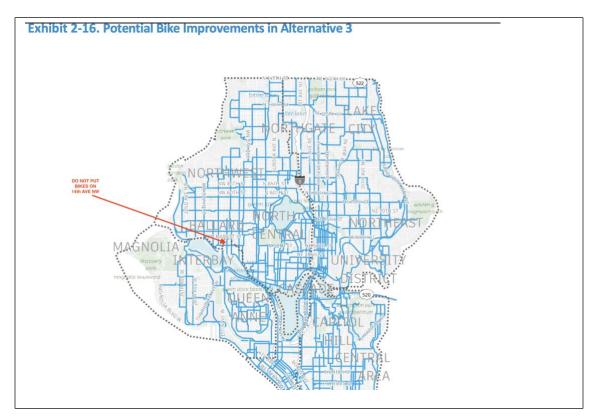
the Ballard Industrial neighborhood. This area is generally East of 15th, South of Market, North of Leary and West of 8th.

Please acknowledge and designate 14th Ave NW between Leary and Market a minor Freight route or a First/Last Mile Connector. Make freight and parking improvements to 14th Ave NW. Make no changes that would make turns or difficult for trucks along 14th Ave NW (for example no curb or corner bump outs!).



Please acknowledge and make no changes to streets surrounding 14th Ave NW that would harm the critical activity of loading and unloading trucks for the East Ballard brewery district in the BINMIC.

3) In Alternative 3 for Magnolia/QA/Ballard, DEIS proposes 14th Ave NW be redefined as a bike street. With the frequency of trucks utilizing this street in this industrial neighborhood, bikers will be at serious risk of death and injury. And industrial logistics will be significantly harmed.



Please make design changes in the DEIS that are consistent with both freight routes and bike safety goals.

Please include in the DEIS the ongoing study, conflict, and challenges for the Missing Link project that this bike route alternative impacts. 11th Ave NW would be a better bike path, but not without a wholistic approach to bike and freight.

4) DEIS did not study the impact of encampments on the transportation network infrastructure, like bus stations. Bus station on Leary are currently not usable or safe due to both crime and encampments.

Please revise the DEIS to include existing environmental conditions and make safety improvements to the bus stops on Leary.

5) DEIS did not provide enough information about the Alternative for trucks to utilize bus only lanes. Many commercial vehicles used by in-city industrial businesses are not 50ft

trucks. Please provide details about types of vehicles allowed, for what purpose deliveries can use the bus lanes, and if all bus lanes are to be included.

All the best,

Colleen Horn

Seattle Transportation Plan DEIS Comments **Megan Kruse** October 13, 2023

The Seattle Transportation Plan (STP) integrates four previous stand-alone transportation systems for Pedestrian, Transit, Bicycle and Freight. The DEIS goal is to identify environmental impacts and explore potential mitigations so these systems operate cohesively to support Seattle's 20 year growth projections. Yet, in over 550 pages of analysis, the DEIS and its appendices consistently omit the freight system.

The environmental analyses, land use and transportation subarea impact studies consider only Pedestrian, Transit and Bicycle networks. The 11 policy assumptions (P. 2-47) used to evaluate the three alternatives mention bikes, transit, sidewalk cafes, car-free space, general purpose traffic, electric vehicles and charging stations but never refer to freight.

Page 3-171 states the three STP alternatives "do not propose to expand the freight truck network or increase truck volumes within the city." This is a confounding statement considering e-commerce deliveries are growing at double digits and their destination are residences.

The rise in e-commerce helps explain Exhibit 3-21 on P. 3-140 showing emissions from trucks growing 1100-1200% while automobile emission drop over 50%.

	Existing	Alternative 1	Baseline for Alternatives 2 and 3
Cars	30,275	13,416	14,268
Trucks	705	8,184	8,692
Buses	89	7,809	8,286
Total	31,070	29,408	31,246

Exhibit 3-21. Road Transportation Emissions (MTCO₂e)

Source: Kimley-Horn, 2023

The DEIS sole idea for mitigating freight is converting 19 miles of the existing 218 miles of citywide truck corridors into combination freight and transit lanes (P. 2-52). Even that proposal is hedged on P. 2-68 by saying they will be "adjusted for feasibility and proximity to manufacturing/industrial centers."

Dedicated freight and transit lanes are welcome but the crisis in urban freight comes at the destination. There's not enough curb space or off-street loading to handle existing e-commerce deliveries. The DEIS doesn't acknowledge this.

11-2

11 - 3

For example, the DEIS shows the Downtown/Lake Union Analysis Zone 4 now has 36,754 housing units and anticipates growth of 19,000 units. A survey of package deliveries to downtown residential towers shows an average of 2.5 deliveries per unit per week for a total of 92,000 weekly residential deliveries. An additional 19,000 units would bring the total to over 139,000 weekly residential deliveries. Trucks already circle Belltown for up to 18 minutes looking for space to off load. That's in addition to commercial and office truck deliveries and TNCs. In this scenario, no amount of fuel economy will reduce the coming surge in downtown VMT as the DEIS suggests without evidence.

Downtown was the first neighborhood to add significant density but new urban hubs and villages across the city will soon share its issues with congestion, pollution, and safety problems from freight unless the DEIS analysis corrects course. Freight is not confined to truck streets, it shares the road with transit, bikes, and general traffic. Its omission from DEIS impact and mitigation scenarios will undermine the other transportation systems.

City planners, professional consultants and academic institutions have data and tools that can help predict, plan and mitigate rising urban freight growth. To provide valid guidance for decision makers and future legislation, urban freight impacts and analyses must be included in the final EIS. Thank you for your consideration.

The following pages contain summaries and links to recent studies on urban freight impacts, planning and mitigation by independent researchers and consultants, including studies specific to Seattle.

Annotated study excerpts on urban freight impacts and mitigation

1) Stemming the Tide: Approaching Urban Freight in the Era of e-Commerce https://trid.trb.org/View/2015243

This article discusses the tumultuous transition that the relationship between cities and freight is undergoing. While e-commerce has long been chipping away at traditional flows of goods, the COVID-19 pandemic caused a massive acceleration of trends, with some **experts estimating that 10 years' worth of e-commerce adoption took place in the space of 3 months. This shift has had a profound effect on goods movement, and consequently, the transportation systems on which it depends.** The number of small parcels delivered in the United States rose from 14.7 billion in 2019 to 20.2 billion in 2020. Crucially, a large portion of these parcels end up at individual residences rather than consolidated at retail locations. At the same time, customers expect goods to arrive faster than ever, often in 2 days or less. This rapid increase in volume, disaggregation, and speed requires a constant flow of delivery vehicles that manifests as urban truck traffic

• Availability:

 Find a library where document is available. Order URL: http://worldcat.org/oclc/614107147

2) Do commercial vehicles cruise for parking? Empirical evidence from Seattle

https://depts.washington.edu/sctlctr/sites/default/files/research_pub_files/CV-parkingcruising.pdf

Excerpt:

"In this study we propose a simple method to quantitively explore the parking cruising behavior of commercial vehicle drivers in urban areas using widely available GPS data, and how urban transport infrastructure impacts parking cruising times.

We applied the method to a sample of 2900 trips performed by a fleet of commercial vehicles, delivering and picking up parcels in Seattle downtown. We obtain an average estimated parking cruising time of 2.3 min per trip, contributing on average for 28 percent of total trip time. We also found that cruising for parking decreased as more curb-space was allocated to commercial vehicles load zones and paid parking and as more off-street parking areas were available at trip destinations, whereas it increased as more curb space was allocated to bus zones."

3) Identifying the Challenges to Sustainable Urban Last-Mile Deliveries: Perspectives from Public and Private Stakeholders

https://www.mdpi.com/2071-1050/14/8/4701/htm

Seattle is an historic port city and link in the national and international supply chain. Our businesses and consumers rely on freight deliveries every day. According to <u>UW researchers</u>, retail and wholesale freight movement in Seattle accounts for over USD 50 billion in economic activity and employs more than 62,000 people. For an activity so vital to our survival, it needs to be considered in our growth plan.

4) Urban freight and road safety in the era of e-commerce

https://www.tandfonline.com/doi/full/10.1080/15389588.2019.1651930

Conclusions: Freight-involved injury and fatality rates are rising more rapidly than overall road traffic-related rates, both in all areas and in urban areas. These crashes are also increasingly occurring on local roads and arterials as opposed to interstates. These findings can help policymakers better understand the changing patterns of freight-related safety issues. As freight volumes increase in commercial and residential areas, planners must increasingly consider freight needs and ensure that space is allocated to this function.

5) Visualizing VMT per Capita

https://www.fehrandpeers.com/visualizing-vmt-per-capita/ Published: January 03, 2023

Vehicle Miles Traveled (VMT) is an essential metric for measuring the impacts of land use and transportation network decisions. While the metric can be expressed in many forms, VMT per capita is commonly needed for various California transportation planning applications including:

- CEQA transportation impacts
- Competitive grant applications
- Greenhouse gas (GHG) and air pollutant emissions modeling
- Land use scenario analysis for general and specific plans

6) Fehr & Peers VMT Environmental Equivalencies

https://www.fehrandpeers.com/vmt-impacts/

VMT provides direct equivalencies for other environmental effects, such as emissions and energy consumption. It is also an indicator for safety, because areas with low VMT generation rates have less frequent and less severe collisions.

The following measurements are equivalent to 1 additional VMT:

+0.88

Pounds of Greenhouse Gas Emissions (GHG)

+0.045

Gallons of Gasoline (Energy Consumption)

California was the first state to mandate the use of VMT as the preferred metric for environmental impacts to the transportation system. Because of the important connection between VMT and greenhouse gas (GHG)/air pollutant emissions, safety, energy consumption, and land use efficiency, public agencies in other states such as Maryland, Oregon, Virginia, and **Washington** are now investigating VMT impact applications.

7) Fehr & Peers re: curb space

https://www.fehrandpeers.com/freight-curb-space-during-covid-19/

What we're hearing

• More Curb Space – Is more required to support the increase in deliveries and retail 'dark store/pick-up' models? What are the impacts to other curb users, and who should have priority access to the curb?

• **Tool Availability**– What tools are available, and how can they be implemented quickly and at low cost to manage increases in curb space pick-up/delivery?

• Operational and Policy Changes – What are the operational changes needed by retail to optimize the use of pick-up/delivery for curb spaces? What policies are needed to support these changes?

How we're responding

- Expanding Online Retail Travel Impacts For deeper understanding, we are diving into literature review and data analysis on how expanded online retail and delivery are impacting consumer travel patterns and last mile freight delivery.
- Enhancing our CurbSpace+ Tool We are making adjustments to CurbSpace+ so that it better forecasts how demand for the curb (from buses, pick-up/drop-off, deliveries,

retail transactions, TNCs/taxis, and parking) **translates into linear feet and the effect on** roadway traffic of different curb-supply scenarios.

In addition to the accelerated items above, we have other actions on our R&D agenda targeted for later in the year:

- Measurement and Tracking of Key Travel Pattern Shifts Working with our partners in the public and private sector, including transit agencies, public works departments, departments of transportation, and big data vendors, we will be actively monitoring the major travel pattern trends we have seen change in response to COVID-19, including telecommuting, reduced business travel, less transit travel, increased online shopping, and increased walking/biking (in some areas).
- Urban Freight Data Analysis Phase 2 We will expand on our Phase 1 analysis of urban freight demand, using data from Seattle to collect new data and further identify urban freight delivery generation; now in a post-COVID-19 condition.
- Autonomous Freight Research Expanding on our NCHRP Freight Preparedness Study, we will develop guidance on the potential infrastructure needs of autonomous freight vehicles, the potential timing for when improvements may be needed, and strategies on sharing infrastructure costs between the public and private sector.
- Freight VMT Analysis Freight represents the fastest growing sector of transportation greenhouse gas (GHG) emissions; a trend likely to accelerate in a post-COVID-19 environment. To support state and local vehicle miles traveled (VMT) and GHG emissions reductions goals and regulations, we will expand on our freight VMT research and tools developed for clients such as ODOT and Caltrans to be updated to current conditions and with modern freight vehicle technologies. Mitigation measures to reduce VMT and GHG emissions will also be identified.
- Freight OD Big Data We will test new big data sources to evaluate freight vehicle origin-destination flows. Additionally, we plan to partner with East and West Coast ports and Big Data vendors to evaluate flows and compare those to traditionally collected data in order to refine suggested practices for using Big Data.

Sent/received	Date received	Title	Communication
			Mon 10/16/2023 8:09 AM
			CAUTION: External Email
			The DEIS is silent from what I can see on issues around urban freight mobility and access. This seems counter intuitive in the time of an attempt to increase density especially throughout downtown and near neighborhoods which will necessarily increase the need for freight and goods to move about, for both business support and residential support . The existing situation is already troubling and expensive, with the absence of loading docks and bays in many areas creating the need for trucks and service vehicles to circle or block traffic. With the impending construction and implementation of new buildings this will only become worse, and not only will the lived environment deteriorate but air quality and noise pollution will also continue to increase. More density will demand more freight. To add to the landscape, the multi purposing of many of our streets is already complicated and sometimes dangerous. It's important to take the extra effort to include urban freight as part of this planning and DEIS effort in a meaningful way. Especially in mixed use and multifamily areas where daily, even hourly, freight deliveries are part of life. I'll be happy to share my condo if someone on the planning team would like to experience today's reality. Tina Bueche
Received	10/16/2023	DEIS comment	Sent from my iPad

Comments 13 - 15

Engagement Hub Received Comments			
Use this comment box to share your feedback on the Draft EIS	Timestamp		
I'm a bit confused why exactly so much asphalt reconstruction is needed in alternative 3 versus alternative 2. a lot of these bus route say the 36 the frequency level could probably continue with the existing road level of maintenance	9/1/2023 16:29		
A little bit confused why Madison Avenue, Rainier Avenue, and Westlake Avenue are listed in "corridors evaluated for Transit/Freight Priority" considering that they are already under construction with RapidRide G, transit plus 7 and transit plus 40. They should be listed under alternative 1 has transit lanes that already exist or at least Alternative 2.	9/2/2023 20:07		
Similar for MLK way, it is already projected to install bike lanes, I'm not sure why it is listed as potential roadway reconstruction under transit alternative 2? Unless if the plan is to rebuild the road again.			
My priorities are shown in Alternative 3, rapid progress. I would like more focus on rolling, walking and transportation. Slowing down traffic and making the streets safer.	10/17/2023 22:08		

DEIS Public Input Session September 26, 2023

0:0:0.0 --> 0:0:11.370 Dacanay, Radcliffe Great, it started to record well since we have two folks here already, I'm going to go through just sort of a presentation deck.

0:0:11.380 --> 0:0:17.210 Dacanay, Radcliffe Very short, just overview of the DEIS.

0:0:19.70 --> 0:0:26.540 Dacanay, Radcliffe Since you all are here, you probably already have taken a look at it, so if you'll bear with me one moment.

0:0:40.900 --> 0:0:44.330 Dacanay, Radcliffe That's a little bit further, OK.

0:0:46.710 --> 0:0:47.540 Dacanay, Radcliffe We're at the right spot.

0:0:49.230 --> 0:0:50.760 Dacanay, Radcliffe Welcome, Tyler and Clara.

0:0:50.770 --> 0:0:51.710 Dacanay, Radcliffe Thanks for being here.

0:0:52.830 --> 0:1:11.10 Dacanay, Radcliffe And so the drafting barrel impact we are requesting comments be submitted by October 16th and you can send your comments directly to meradcliffe.deccani@seattle.gov.

0:1:11.640 --> 0:1:19.110 Dacanay, Radcliffe So you can send it as an individual, but you can also send it as a letter or a group comment.

0:1:19.240 --> 0:1:21.880 Dacanay, Radcliffe If you're representing an organization.

0:1:24.870 --> 0:1:44.430

Dacanay, Radcliffe And you can find the draft environmental impact statement in ummtheseattle.gov website for the transportation plan, you'll need to scroll all the way to the bottom and open the link and uh about what is the environmental. 0:1:46.590 --> 0:1:54.20 Dacanay, Radcliffe Analysis Peaks there you can download the EIS and also the accompanying.

0:1:56.100 --> 0:1:56.980 Dacanay, Radcliffe Appendix.

0:2:0.250 --> 0:2:7.280 Dacanay, Radcliffe I just wanted to iterate that the draft environmental impact statement is, uh, this is for a plan.

0:2:7.290 --> 0:2:11.120 Dacanay, Radcliffe So it's a non project environmental review.

0:2:11.290 --> 0:2:19.560 Dacanay, Radcliffe The level of analysis is is quite broad to taking a look at the impacts at a very broad level.

0:2:19.990 --> 0:2:36.100 Dacanay, Radcliffe The alternatives that we present are based on vision concepts and aren't necessarily the projects that we would be doing, but just sort of ideas of what kinds of investments or levels of investments we would do.

0:2:36.570 --> 0:2:42.120 Dacanay, Radcliffe And then also the mitigation to address any of the impacts.

0:2:42.790 --> 0:2:53.560 Dacanay, Radcliffe Again, our broad, they're not adjusting any of the project specifically, but these would be changes in policies or plans, regulations or code.

0:2:55.850 --> 0:3:4.510 Dacanay, Radcliffe And then we are looking at at 7 aspects that are required by the state and environmental, uh, my zipper.

0:3:6.910 --> 0:3:10.980 Dacanay, Radcliffe Air quality, water resources, sea level rise, climate change.

0:3:10.990 --> 0:3:12.400 Dacanay, Radcliffe Transportation noise.

0:3:12.670 --> 0:3:13.620 Dacanay, Radcliffe Land use patterns. 0:3:15.340 --> 0:3:23.750 Dacanay, Radcliffe Utilities for electric power for transition to EV and then in this uh EIS, we've got 3 alternatives.

0:3:24.380 --> 0:3:26.700 Dacanay, Radcliffe I mean alternative one is essentially the no action.

0:3:27.550 --> 0:3:38.240 Dacanay, Radcliffe Uh, that's the existing conditions and then we've got two sort of vision approaches, moderate pace and rapid progress.

0:3:38.250 --> 0:3:45.280 Dacanay, Radcliffe These two are what we would describe as bookends of the type of levels of investment in the transportation.

0:3:47.720 --> 0:3:59.610 Dacanay, Radcliffe That we would make, and this is all measured against the impact to the alternative five of the comp plan or proposed land use growth strategy.

0:3:59.780 --> 0:4:8.510 Dacanay, Radcliffe So the highest intensity growth strategy, these transportation concepts are being analyzed.

0:4:12.770 --> 0:4:21.380 Dacanay, Radcliffe And then the timeline for this EIS, we released it on August 31st, 45 day.

0:4:23.640 --> 0:4:37.410 Dacanay, Radcliffe Period for comment that is ends up Tober 16th and then we'll receive all the comments and and then respond to them and then uh update.

0:4:37.460 --> 0:4:49.930 Dacanay, Radcliffe Uh create a a final EIS and then move into the legislation or proposed legislation to approve the Seattle the drafts Seattle Transportation plan.

0:4:50.360 --> 0:4:54.590 Dacanay, Radcliffe So I'll pause there real quick and got a question from Tyler.

0:4:55.810 --> 0:4:56.100 Tyler Schaffer Yeah. 0:4:56.110 --> 0:4:56.490 Tyler Schaffer Thank you.

0:4:58.30 --> 0:5:2.20 Tyler Schaffer I had a question about the the due date for the comments.

0:5:2.30 --> 0:5:9.420 Tyler Schaffer So the I understand the EIS is due October 16th, but isn't the other the the sound?

0:5:9.670 --> 0:5:17.440 Tyler Schaffer The Seattle Transportation Plan comments due the 23rd of October and how are these different?

0:5:17.550 --> 0:5:21.20 Tyler Schaffer How is the deis different than the this?

0:5:20.900 --> 0:5:21.820 Dacanay, Radcliffe That's a good question.

0:5:21.30 --> 0:5:23.100 Tyler Schaffer Yeah, Seattle transportation plan.

0:5:23.970 --> 0:5:33.510 Dacanay, Radcliffe So the Seattle transportation plan, indeed the the comment period for that and ends on a week later on October 23rd.

0:5:34.590 --> 0:5:51.110 Dacanay, Radcliffe Umm, there there are two different documents that the Seattle Transportation plan is the plan that's talking about all of the possible ways we might invest in our transportation system.

0:5:52.240 --> 0:5:53.750 Dacanay, Radcliffe The DIS?

0:5:53.800 --> 0:6:0.710 Dacanay, Radcliffe Uh, does an analysis of possible combinations of those investment levels.

0:6:1.20 --> 0:6:2.470 Dacanay, Radcliffe So This is why I say the book ends. 0:6:2.480 --> 0:6:10.730 Dacanay, Radcliffe So alternative too, being a moderate pace of investment relative to what we have today or the the no build scenario.

0:6:11.70 --> 0:6:13.190 Dacanay, Radcliffe And then we have the most.

0:6:15.570 --> 0:6:18.680 Dacanay, Radcliffe I would say a rapid progress.

0:6:19.310 --> 0:6:42.670 Dacanay, Radcliffe Most intense investment in our transportation system that would be alternative three and somewhere in the middle is probably where we might land a a selection or combination of of investments that would move into the final version of the Seattle Transportation plan.

0:6:43.140 --> 0:6:56.530 Dacanay, Radcliffe So this is the the DES in some ways is OK, tries to get a sense of any major impacts to the system and also to the land use helmet.

0:6:56.540 --> 0:7:2.780 Dacanay, Radcliffe This is why it's measured against the comp plans proposed most intense growth scenario.

0:7:5.30 --> 0:7:5.270 Tyler Schaffer OK.

0:7:6.550 --> 0:7:6.890 Tyler Schaffer Thank you.

0:7:8.450 --> 0:7:8.770 Dacanay, Radcliffe Great.

0:7:9.620 --> 0:7:19.220 Dacanay, Radcliffe And and before we move any further, would it be OK for you, Tyler and Clara, to introduce yourselves just for the record?

0:7:21.620 --> 0:7:21.890 Tyler Schaffer Sure. 0:7:21.900 --> 0:7:22.400 Tyler Schaffer I don't mind.

0:7:22.740 --> 0:7:23.190 Tyler Schaffer Go first.

0:7:23.200 --> 0:7:25.350 Tyler Schaffer I'm Tyler Schafer with I'll live in architects.

0:7:25.800 --> 0:7:29.380 Tyler Schaffer I'm interested in them stable transportation plan.

0:7:30.540 --> 0:7:30.770 Dacanay, Radcliffe Great.

0:7:30.780 --> 0:7:32.660 Dacanay, Radcliffe Thank you, Tyler Clara.

0:7:32.510 --> 0:7:32.800 Clara Cantor (Guest) Yeah.

0:7:32.810 --> 0:7:36.550 Clara Cantor (Guest) And then Clara Kanter, community organizer with Seattle neighborhood greenways.

0:7:37.910 --> 0:7:38.300 Dacanay, Radcliffe Great.

0:7:38.450 --> 0:7:39.150 Dacanay, Radcliffe Thank you both we.

0:7:38.650 --> 0:7:40.760 Clara Cantor (Guest) Also interested in a Seattle transportation plan.

0:7:42.200 --> 0:7:43.0 Tyler Schaffer Which is why we're here. 0:7:41.790 --> 0:7:43.190 Dacanay, Radcliffe Well, thank you both for being here.

0:7:44.140 --> 0:7:46.310 Dacanay, Radcliffe Umm, happy to.

0:7:46.380 --> 0:7:51.680 Dacanay, Radcliffe We can talk both about the Seattle Transportation plan and the DISI think it makes sense.

0:7:51.920 --> 0:7:53.740 Dacanay, Radcliffe That's a given.

0:7:54.970 --> 0:7:56.560 Dacanay, Radcliffe They're very connected, of course.

0:7:56.570 --> 0:8:4.570 Dacanay, Radcliffe And any questions you might have about the DIS might address some questions you might have about the STP and vice versa.

0:8:9.150 --> 0:8:13.40 Dacanay, Radcliffe And until music is here, she's our environment manager.

0:8:13.340 --> 0:8:22.0 Dacanay, Radcliffe She's gonna be able to answer some questions specific to environmental things that I might not be able to.

0:8:22.10 --> 0:8:23.190 Dacanay, Radcliffe So thank you for being here in jail.

0:8:29.940 --> 0:8:30.280 Dacanay, Radcliffe All right.

0:8:34.270 --> 0:8:36.160 Dacanay, Radcliffe Do either of you have any questions for us?

0:8:40.210 --> 0:8:41.410 Clara Cantor (Guest) So I have a question. 0:8:41.940 --> 0:8:42.120 Dacanay, Radcliffe Sure.

0:8:43.580 --> 0:8:45.20 Clara Cantor (Guest) The DEIS I think.

0:8:46.250 --> 0:8:55.970 Clara Cantor (Guest) Uh lays out, you know, a lot of the like, actual numbers that we might have been excited to see in the sale transportation plan.

0:9:3.600 --> 0:9:3.840 Dacanay, Radcliffe Right.

0:8:57.100 --> 0:9:19.490 Clara Cantor (Guest) Umm, in terms of like, you know the big picture numbers of like this amount of miles of bike lanes and sidewalks and you know, this amount of vehicle miles traveled reduced and all that, what is the like decision process that goes into choosing which of these alternatives ends up in the SDP?

0:9:21.360 --> 0:9:22.700 Dacanay, Radcliffe Thanks for that question Clara.

0:9:23.390 --> 0:9:30.880 Dacanay, Radcliffe And I wanna clarify that the alternatives again are are bookends.

0:9:31.190 --> 0:9:40.850 Dacanay, Radcliffe We may not exactly pick the the modest investment or the alternative 3 being all of the projects.

0:9:41.640 --> 0:9:47.350 Dacanay, Radcliffe I think what's going to happen is we will land a list of projects somewhere in between the two.

0:9:48.400 --> 0:10:24.500

Dacanay, Radcliffe

So I think what we what we're learning from the EIS and then our ongoing engagement in this next phase, I will help us inform what level of investment we would include in the final version of the plan and then then in that case there may be more detail in the final iteration of the plan as sort of we might expect to have say 19 or 20 miles of create and bus lanes.

0:10:24.560 --> 0:10:28.750 Dacanay, Radcliffe I think that was in the, uh, most intense. 0:10:30.740 --> 0:10:32.910 Dacanay, Radcliffe Level of investment or maybe not.

0:10:32.920 --> 0:10:36.410 Dacanay, Radcliffe Maybe we're somewhere in between zero and the 19.

0:10:36.420 --> 0:10:57.630 Dacanay, Radcliffe We choose 10 or 12 because after having conversation with the community, that's probably what could work for the Community and also what could work from a financially reasonable assessment of our funding opportunities.

0:11:2.830 --> 0:11:13.450 Clara Cantor (Guest)

So, umm, a financially reasonable assessment of funding opportunities doesn't make as much sense to me, because this is a 20 year plan.

0:11:14.730 --> 0:11:14.990 Dacanay, Radcliffe Right.

0:11:16.760 --> 0:11:20.840 Clara Cantor (Guest) So like it goes beyond even our next nine year transportation levy.

0:11:21.840 --> 0:11:25.140 Dacanay, Radcliffe It does, but we will still come out with a 20 year.

0:11:26.780 --> 0:11:31.360 Dacanay, Radcliffe List a project list, but even there would be.

0:11:31.510 --> 0:11:34.630 Dacanay, Radcliffe Right now we would have it like a sort of a zero to five list.

0:11:36.450 --> 0:11:44.920 Dacanay, Radcliffe And and beyond that list would be the continuation of other projects that we we think we could fund and then that that fuzzy.

0:11:46.740 --> 0:11:57.470 Dacanay, Radcliffe Area between 10 and 20 years, we have ideas of what other funding could possibly come in and and this has to be balanced out. 0:11:57.480 --> 0:12:9.630 Dacanay, Radcliffe This is a part of what's a the comp plan is saying, you know, we gotta make sure that we have reasonable assessments of what we could pay for.

0:12:10.590 --> 0:12:12.800 Dacanay, Radcliffe But this is where your comments could come in too.

0:12:12.810 --> 0:12:27.870

Dacanay, Radcliffe

If we want to generate more funding for this or say alternative three or a higher level of investment, we need to be able to have conversations about other funding sources.

0:12:31.310 --> 0:12:31.690 Clara Cantor (Guest) Gotcha.

0:12:34.820 --> 0:12:51.760 Tyler Schaffer I have a follow up question kind of related to that is umm, because the DISI had these different alternatives, but they're kind of broad and their scope when is the project list going to be developed?

0:12:51.770 --> 0:12:54.450 Tyler Schaffer Is that part of the FEIS period?

0:12:56.70 --> 0:12:58.310 Dacanay, Radcliffe It's a right.

0:12:55.260 --> 0:12:58.450 Tyler Schaffer You can get feedback for the DIS and or is it?

0:12:58.460 --> 0:13:1.280 Tyler Schaffer Or is it follow FIS in terms of timeline?

0:13:0.640 --> 0:13:25.280

Dacanay, Radcliffe

So it's it's a, it's actually being developed now as we're hearing the comments throughout this process and then learning from the DIS as well, there will be a draft iteration of a 20 year project list that will improve, inform the levy and that should be coming out relatively soon in the next few weeks.

0:13:25.980 --> 0:13:26.460 Tyler Schaffer Oh, OK.

0:13:28.590 --> 0:13:39.850 Dacanay, Radcliffe And so did that gives you an idea of where we might be landing between these bookends of the modest level of investment and the the rapid pace of investment?

0:13:43.30 --> 0:13:52.730 Clara Cantor (Guest) Have another question going back to the UM, how the decision is made between, you know, not lane or lane B, but you know the space between lane A&B.

0:13:53.620 --> 0:13:55.30 Clara Cantor (Guest) Umm you said?

0:13:56.780 --> 0:14:3.30 Clara Cantor (Guest) Your assessment of funding levels and engagement are the primary things driving that decision.

0:14:4.850 --> 0:14:7.440 Dacanay, Radcliffe I wouldn't say those are the primary.

0:14:7.590 --> 0:14:13.360 Dacanay, Radcliffe I mean those this we we take those into account, of course, umm.

0:14:13.900 --> 0:14:20.730 Dacanay, Radcliffe But I'm sure you can all appreciate the the politics of the process as well.

0:14:21.340 --> 0:14:34.900 Dacanay, Radcliffe So all of these ideas that we take based on how we're best assessments of funding, what we've heard from the Community, essentially we'll also go through a filter of mayor.

0:14:34.910 --> 0:14:36.380 Dacanay, Radcliffe This is what we've recommended.

0:14:37.110 --> 0:14:40.120 Dacanay, Radcliffe Uh, what are your thoughts on this?

0:14:40.530 --> 0:14:43.640 Dacanay, Radcliffe And there will be interested council members as well to. 0:14:45.490 --> 0:14:52.320 Dacanay, Radcliffe Hear what on those lists and they may provide feedback or they may not.

0:14:53.290 --> 0:14:56.270 Dacanay, Radcliffe Umm, so there are definitely.

0:15:0.590 --> 0:15:4.780 Dacanay, Radcliffe Some some decisions that are going to be made.

0:15:5.410 --> 0:15:9.790 Dacanay, Radcliffe Uh, given the review of different levels of leadership here at the city.

0:15:16.530 --> 0:15:31.410 Clara Cantor (Guest) Catcha and the first round of engagement that you all conducted, I think you had like 95% of respondents in favor of the rapid progress option.

0:15:30.720 --> 0:15:32.310 Dacanay, Radcliffe That's that's correct.

0:15:34.240 --> 0:15:39.770 Dacanay, Radcliffe So this is this is something that we as staff would say to leadership.

0:15:39.840 --> 0:15:41.530 Dacanay, Radcliffe This is what we're hearing from the community.

0:15:41.540 --> 0:15:56.360 Dacanay, Radcliffe This is what we've matched some of our proposed ideas relative to what we're hearing to the Community and try to match that as best to what we're hearing from that input.

0:15:56.580 --> 0:16:7.170 Dacanay, Radcliffe And then also balancing it also against the the possible and probable funding opportunities that we have in the foreseeable future.

0:16:7.180 --> 0:16:14.760 Dacanay, Radcliffe And then also in the longer term, uh, being reasonable about what we could expect could help fund.

0:16:16.840 --> 0:16:19.950 Dacanay, Radcliffe Projects beyond 1010 years out from now.

0:16:27.790 --> 0:17:1.350

Dacanay, Radcliffe So for example, if we were confident that we could have a funding stream that paid for, in essence the wish list of projects that I think many community members want, and many of the projects that staff and project developers internally have suggested, we would probably easily suggest a list of uh projects that match more closely to alternative three.

0:17:2.660 --> 0:17:16.540

Dacanay, Radcliffe

And knowing that there are some limitations to what kind of funding we can expect right now at least knowing what we know now, there is some pairing back from that.

0:17:17.460 --> 0:17:29.310

Dacanay, Radcliffe Umm, I think ideally what we could recommend as staff would be close to a alternative three, but there is definitely a back and forth of.

0:17:31.980 --> 0:17:38.340 Dacanay, Radcliffe Reviewing these options and then of course with leadership review as well.

0:17:40.70 --> 0:17:50.560 Dacanay, Radcliffe So it it absent a dedicated funding stream or funding stream that we're confident in?

0:17:51.770 --> 0:17:55.820 Dacanay, Radcliffe Uh, it it likely would be a paired back version from.

0:17:58.120 --> 0:18:9.150

Dacanay, Radcliffe The rapid progress, but hopefully close enough that we still, you know, can move forward and then this plan does, can and will be updated again in another cycle.

0:18:22.460 --> 0:18:25.860 Clara Cantor (Guest) So just to clarify, UM, the.

0:18:27.590 --> 0:18:31.110 Clara Cantor (Guest) The draft STP that came out recently.

0:18:31.770 --> 0:18:31.890 Dacanay, Radcliffe Yes. 0:18:33.370 --> 0:18:39.100 Clara Cantor (Guest) The the kind of metrics and implementation pieces of that are sort of coming out stage by stage.

0:18:44.300 --> 0:18:44.790 Dacanay, Radcliffe Right.

0:18:48.240 --> 0:18:48.580 Dacanay, Radcliffe Right.

0:18:41.630 --> 0:18:49.990

Clara Cantor (Guest) You know from now through the winter, including the DIS, which has some metrics and the implementation or the you just said project list.

0:18:50.270 --> 0:19:6.230 Dacanay, Radcliffe So those those uh, some of the metrics, uh are evolving right now as we work with staff internally of what is measurable, what can we tell a compelling story around certain data.

0:19:6.440 --> 0:19:12.310 Dacanay, Radcliffe I know there have been questions from all of you, even around vehicle miles traveled.

0:19:12.780 --> 0:19:14.80 Dacanay, Radcliffe I think we're getting close to.

0:19:16.530 --> 0:19:37.600

Dacanay, Radcliffe

Sourcing data that we are comfortable with that we can analyze and and make some sound judgment on vehicle miles traveled and how much we can reduce given the probable investments that we would make.

0:19:38.250 --> 0:19:51.590 Dacanay, Radcliffe In the past we've used different tools that you know I would say would feel more back of the envelope and that's not do in this next iteration of of this plan.

0:19:51.740 --> 0:20:10.120

Dacanay, Radcliffe

So I think in the coming months, hearing from what we've heard from the community of how do we get a a more sound analysis on vehicle miles traveled and what those targets could be will likely show up in the next iteration of the plan.

0:20:14.940 --> 0:20:22.200 Clara Cantor (Guest)

Yeah, I mean that all sounds great, but just as an aside, I I don't know that that matters so much to me personally.

0:20:22.430 --> 0:20:27.500 Clara Cantor (Guest) Like, I feel like the most of the transportation metrics that we have are pretty back of the napkin.

0:20:27.880 --> 0:20:29.940 Clara Cantor (Guest) You know, like the way that we estimate how many people are.

0:20:31.630 --> 0:20:35.220 Clara Cantor (Guest) Walking and biking are are all kind of extrapolations too.

0:20:38.240 --> 0:20:40.540 Clara Cantor (Guest) But any metrics are better than nothing.

0:20:44.330 --> 0:20:44.680 Dacanay, Radcliffe Great.

0:20:44.690 --> 0:20:50.220 Dacanay, Radcliffe Hopefully the metrics that we do come out with uh will be enough to.

0:20:52.350 --> 0:20:53.280 Dacanay, Radcliffe Help us.

0:20:56.170 --> 0:21:9.500 Dacanay, Radcliffe

You know, hold our feet to the fire and and in a sense, and moved in in that direction of delivering the projects and programs that ultimately will be in the final.

0:21:14.920 --> 0:21:15.340 Clara Cantor (Guest) Gotcha.

0:21:12.640 --> 0:21:15.820 Dacanay, Radcliffe List of of the plan and it.

0:21:15.900 --> 0:21:50.960

Dacanay, Radcliffe

And I think it's not to say part of these metrics too aren't necessarily say ohh we we we said we would do X amount of miles of something and we're headed in that direction really I think in a bigger picture these are indicators of we're trying to make our system more efficient for all the different ways uh we move around and I would say move around for people but also moving around have goods and services and.

0:21:52.820 --> 0:21:58.970 Dacanay, Radcliffe How we make use of our limited right of way uh.

0:21:59.270 --> 0:22:5.590 Dacanay, Radcliffe And at the same time, reducing greenhouse gas emissions, increasing equity.

0:22:7.130 --> 0:22:13.360 Dacanay, Radcliffe Especially in the different areas of the city that are designated equity areas.

0:22:15.840 --> 0:22:21.620 Dacanay, Radcliffe And so those are all part of helping to tell a story that we're moving in the right direction.

0:22:22.330 --> 0:22:25.470 Dacanay, Radcliffe I'm with the moves that were we're making.

0:22:30.330 --> 0:22:36.920 Clara Cantor (Guest) OK, so my general question was all of these different pieces that are coming out kind of every couple of weeks.

0:22:37.490 --> 0:22:47.490 Clara Cantor (Guest) Are those all gonna be kind of like put together and combined into the final SDP or is it going to continue to be sort of separate documents for all these different things?

0:22:49.480 --> 0:22:52.330 Dacanay, Radcliffe Right now the SDP comes in in two parts.

0:22:53.170 --> 0:23:14.910 Dacanay, Radcliffe Uh, so part one is, uh, sort of the contextual document, high level vision and it's something that folks can read more like a magazine style and give you the general flavor of the key moves that we would do for the city over the next 20 years.

0:23:15.330 --> 0:23:24.660 Dacanay, Radcliffe The more detailed technical document would be Part 2, and I think it's our intention to keep them separate. But. 0:23:27.30 --> 0:23:32.240 Dacanay, Radcliffe Really combine them as a compendium so that you don't have to lug around.

0:23:34.210 --> 0:23:36.280 Dacanay, Radcliffe An 800 page document.

0:23:36.290 --> 0:24:20.60 Dacanay, Radcliffe

You can have this this shorter part one gives you the essence of of what we're doing for the future and then the technical document would be a bit more detail showing maps and inserted the types of investments we would be making related to each of the elements you know from transit, biking, freight and pet improvements and then four new elements around new and emerging mobility, how we manage our curb better uh vehicle and then a public space and people spaces.

0:24:25.280 --> 0:24:26.10 Clara Cantor (Guest) Yeah, right.

0:24:26.20 --> 0:24:34.760

Clara Cantor (Guest)

But the final STP draft, that's your timeline shows is moving or I guess the other timeline not the one that's up on the screen right now.

0:24:41.520 --> 0:24:42.210 Dacanay, Radcliffe Right.

0:24:42.440 --> 0:24:43.720 Dacanay, Radcliffe That's that's correct.

0:24:45.160 --> 0:24:45.950 Dacanay, Radcliffe That's correct.

0:24:34.770 --> 0:24:46.20 Clara Cantor (Guest) The SP timeline shows as moving in the spring that would all that would include like the project lists and implementation details and the the metrics that are included in the DS.

0:24:46.70 --> 0:24:46.710 Clara Cantor (Guest) OK. Gotcha.

0:24:56.380 --> 0:24:56.970 Dacanay, Radcliffe So I know. 0:24:56.980 --> 0:25:13.40 Dacanay, Radcliffe Uh, this giraffe STP is out in the world, but I think the final version will certainly, uh, look at tad bit more different because there's some details that are just are not available yet for the draft.

0:25:13.230 --> 0:25:19.280 Dacanay, Radcliffe For example, what is our implementation framework without a list?

0:25:19.290 --> 0:25:23.40 Dacanay, Radcliffe It's hard to put out the implementation framework.

0:25:23.50 --> 0:25:43.30 Dacanay, Radcliffe We do describe what that implementation framework would be like, but in the next iteration, umm, there would be more content around how that implementation framework would would happen, given that conversation is happening right now, that would feed into the final version of the plan.

0:25:54.60 --> 0:25:54.450 Clara Cantor (Guest) OK.

0:25:54.460 --> 0:25:54.800 Clara Cantor (Guest) And and.

0:25:56.590 --> 0:26:4.50 Clara Cantor (Guest) Once all of that is public, is there going to be any kind of a public process then or is it just gonna go straight to council for approval and?

0:26:6.280 --> 0:26:6.710 Clara Cantor (Guest) Patty.

0:26:5.970 --> 0:26:7.280 Dacanay, Radcliffe Uh, I'm not quite certain.

0:26:7.290 --> 0:26:16.110 Dacanay, Radcliffe I'm sure there's going to be an opportunity for the public to see the final iteration of the plan before it goes to to council.

0:26:19.930 --> 0:26:20.760 Dacanay, Radcliffe I mean, that's a comment.

0:26:20.770 --> 0:26:21.600 Dacanay, Radcliffe You could also make.

0:26:24.610 --> 0:26:31.140 Dacanay, Radcliffe To ensure that that a step, an interim step before going to Council, that that it makes sense to do that.

0:26:33.380 --> 0:26:35.770 Dacanay, Radcliffe Are we referring to the EIS or the plan?

0:26:36.240 --> 0:26:37.380 Dacanay, Radcliffe I I think I heard the plan.

0:26:37.570 --> 0:26:37.730 Chasanov, Amy Right.

0:26:39.640 --> 0:26:40.150 Clara Cantor (Guest) Yeah.

0:26:40.160 --> 0:26:42.70 Clara Cantor (Guest) On the the whole plan like.

0:26:42.270 --> 0:26:42.540 Dacanay, Radcliffe Correct.

0:26:43.640 --> 0:26:44.360 Dacanay, Radcliffe I see. OK.

0:26:53.330 --> 0:26:53.630 Dacanay, Radcliffe Right.

0:26:44.680 --> 0:26:55.260 Clara Cantor (Guest) Including the metrics that are in the DES, I guess I I'm assuming that the whole plan will kind of include which of these options or which lists, which spectrum of these options we're going towards?

0:26:55.710 --> 0:26:55.990 Dacanay, Radcliffe Correct. 0:27:6.130 --> 0:27:8.90 Dacanay, Radcliffe Tyler, any thoughts from you?

0:27:12.80 --> 0:27:13.330 Tyler Schaffer Not on schedule.

0:27:13.410 --> 0:27:16.570 Tyler Schaffer That'll make sense, but I I had similar questions as Clara.

0:27:17.40 --> 0:27:18.340 Dacanay, Radcliffe OK, great.

0:27:16.620 --> 0:27:19.690 Tyler Schaffer So appreciate you filling us in.

0:27:24.910 --> 0:27:39.640 Dacanay, Radcliffe And then as you review either the documents and feel free to reach out to me directly, and I'm gonna go back screen or two, you have my email.

0:27:39.650 --> 0:27:45.110 Dacanay, Radcliffe Clara, we've been in touch previously before, so I'm happy to answer any of your questions.

0:27:46.400 --> 0:27:46.660 Chasanov, Amy 1.

0:27:56.700 --> 0:27:56.830 Chasanov, Amy Yeah.

0:27:45.680 --> 0:27:59.860

Dacanay, Radcliffe

The as you review the document, I know the document is quite dense and I don't expect you all to do a sit down once and read it all through.

0:27:59.960 --> 0:28:6.930

Dacanay, Radcliffe

Maybe chapter by chapter here and there, and if you do have any questions or comments as you, uh, read through the document.

0:28:7.180 --> 0:28:9.420 Dacanay, Radcliffe And I'm happy to.

0:28:11.590 --> 0:28:14.770 Dacanay, Radcliffe Help you read the document and and respond to your comments.

0:28:22.390 --> 0:28:22.710 Clara Cantor (Guest) Great.

0:28:22.720 --> 0:28:23.90 Clara Cantor (Guest) Thank you.

0:28:23.740 --> 0:28:25.700 Tyler Schaffer Do you have more slides to go through?

0:28:26.450 --> 0:28:27.440 Dacanay, Radcliffe No, I I don't.

0:28:31.110 --> 0:28:31.280 Dacanay, Radcliffe Sure.

0:28:27.990 --> 0:28:33.460 Tyler Schaffer OK well I have some questions that I was I was waiting to to ask them.

0:28:36.570 --> 0:28:49.170

Tyler Schaffer

I'm curious and maybe this will come out of your process when you start looking at your project list, but I'm curious how you.

0:28:52.110 --> 0:28:57.160 Tyler Schaffer Navigate conflicts with certain priorities, like what?

0:28:57.270 --> 0:29:2.960 Tyler Schaffer What is your set of priorities in terms of these projects?

0:29:3.600 --> 0:29:5.390 Tyler Schaffer What are what are decisive?

0:29:5.440 --> 0:29:12.640 Tyler Schaffer You know what are deciding factors when you weigh different conflicts with these these projects?

0:29:14.310 --> 0:29:22.420 Dacanay, Radcliffe I think with this plan has tried to do is try to honor the different context of of Seattle.

0:29:24.470 --> 0:29:26.380 Dacanay, Radcliffe I'll step back a little bit sometimes.

0:29:26.390 --> 0:29:32.840 Dacanay, Radcliffe We've heard we'd love to see a priority pyramid or hierarchy.

0:29:32.910 --> 0:29:34.420 Dacanay, Radcliffe You know where you see sometimes.

0:29:35.540 --> 0:29:43.970 Dacanay, Radcliffe Uh, the pedestrian is at top and then bicycles passes and then you see at the very bottom cars.

0:29:44.250 --> 0:29:48.460 Dacanay, Radcliffe And that's sort of what our priorities are. Umm.

0:29:50.660 --> 0:29:58.860 Dacanay, Radcliffe We've thought about it in that way, but in certain contexts that's not always the right priority.

0:29:58.870 --> 0:30:6.390 Dacanay, Radcliffe So I think the attempt has been in certain situations these priorities get mixed a little bit.

0:30:6.520 --> 0:30:13.680 Dacanay, Radcliffe So for example in and the manufacturer manufacturing and industrial centers.

0:30:14.570 --> 0:30:50.240

Dacanay, Radcliffe

And what we've heard from the freight community is in certain streets or corridors, the freight vehicles who are using those streets to access businesses and require big large trucks to access them, maybe our design priority is for those larger trucks, but also being mindful of other users and making sure that maybe for bikes and for people who are walking we we separate the facility. Umm.

0:30:52.230 --> 0:30:55.460 Dacanay, Radcliffe Is that saying which is prioritize there.

0:30:55.470 --> 0:31:6.550 Dacanay, Radcliffe But it's being sort of mindful again of of that context would say in in a more denser urban setting, say either downtown or Capitol Hill, maybe even in some of the neighborhoods.

0:31:7.720 --> 0:31:10.620 Dacanay, Radcliffe Uh, our thinking adjust a little bit.

0:31:11.770 --> 0:31:19.50 Dacanay, Radcliffe So I think the the this question is great, but the the prioritization is very nuanced relative to.

0:31:20.860 --> 0:31:33.160 Dacanay, Radcliffe The different geography of the city as part of this plan that we're introducing some ideas and concepts that are talked about in that people space and public spaces section.

0:31:33.210 --> 0:31:43.890 Dacanay, Radcliffe So low pollution neighborhoods and those particular areas, perhaps the priority becomes more evident that it's for people walking and for people cycling.

0:31:45.490 --> 0:31:55.50 Dacanay, Radcliffe And so I think it's, it's not so cut and dry to what are our priorities and we try to set it up in our values.

0:31:55.120 --> 0:31:57.160 Dacanay, Radcliffe The 6th values around safety.

0:31:58.140 --> 0:31:58.630 Dacanay, Radcliffe Uh.

0:31:58.920 --> 0:32:2.900 Dacanay, Radcliffe Equity sustainability, mobility, livability.

0:32:3.770 --> 0:32:7.460 Dacanay, Radcliffe A minutes and modernization and try to. 0:32:8.830 --> 0:32:11.220 Dacanay, Radcliffe Use that as our set of values and goals to.

0:32:12.200 --> 0:32:17.890 Dacanay, Radcliffe Uh, make sure they bleed across all the different work that we're doing.

0:32:18.160 --> 0:32:23.670 Dacanay, Radcliffe And I would say safety being one of the top ones, I knowing what we know about.

0:32:25.870 --> 0:32:32.490 Dacanay, Radcliffe Car crashes and collisions, and So what we've heard from the community is trying to make sure that.

0:32:35.40 --> 0:32:45.740 Dacanay, Radcliffe We eliminate as part of our Vision zero effort and transition to a much more safe transportation system.

0:32:47.120 --> 0:32:50.380 Dacanay, Radcliffe That's not to say that we are perfect in doing that.

0:32:50.860 --> 0:32:58.690 Dacanay, Radcliffe I think the comments that we receive help us push the envelope on what we can do.

0:32:59.750 --> 0:33:7.30 Dacanay, Radcliffe Umm, there are a lot of people commenting on this of what should be done, what shouldn't be done.

0:33:7.220 --> 0:33:12.520 Dacanay, Radcliffe Should we have cameras in all different parts of the city's stuff might say yes.

0:33:12.530 --> 0:33:24.460 Dacanay, Radcliffe So I might say no and how that becomes prioritized becomes very contextual, and the kinds of conversations we have with the community to.

0:33:26.20 --> 0:33:27.830 Dacanay, Radcliffe Respond to those nuances.

0:33:28.80 --> 0:33:28.750 Dacanay, Radcliffe Nuances.

0:33:29.100> 0:33:32.550 Dacanay, Radcliffe Some communities might not want cameras, some might.	
0:33:32.620> 0:33:48.330 Dacanay, Radcliffe So those are taken into consideration as we're making decisions and but again with with our six goals in mind and then how we Co create with the Community, what is the right approach for them?	
0:33:58.360> 0:33:59.400 Tyler Schaffer Yeah, yeah.	
0:33:52.150> 0:34:0.300 Dacanay, Radcliffe I know that's a long winded answer, not cut and dry their Tyler, but I hope you can appreciate the new ones of of how these decisions are made.	
0:34:1.780> 0:34:2.370 Tyler Schaffer Yeah.	
0:34:2.660> 0:34:9.990 Tyler Schaffer No, it's good that you're taking other considerations into and into effect.	
0:34:12.330> 0:34:15.870 Tyler Schaffer Another question I have for you is regarding the mobile management strategies.	
0:34:18.380> 0:34:20.720 Tyler Schaffer I have read in the DIS that.	
0:34:23.190> 0:34:32.340 Tyler Schaffer Alternate to could be funded without additional mobile mobility management strategies and how is that possible?	
0:34:32.350> 0:34:39.540 Tyler Schaffer Is that assuming that there's still will be a transportation levy that will fund these projects? Umm.	

0:34:41.470 --> 0:34:42.520 Tyler Schaffer I'm just curious how.

0:34:45.670 --> 0:34:46.750 Tyler Schaffer How that can be afforded?

0:34:44.870 --> 0:34:50.650 Dacanay, Radcliffe Yeah, I think the the modest level of investment, sorry for interrupting there.

0:34:50.770 --> 0:35:2.240

Dacanay, Radcliffe Yeah, the the modest level of investment sort of just turns up the notch, a little bit of the sort of beyond the the levy types of investments that we're making now.

0:35:2.250 --> 0:35:17.230 Dacanay, Radcliffe You know, going back out to the voters and asking please fund these projects, the mobility management strategies and I would say would be an umbrella for increasing different, uh.

0:35:18.730 --> 0:35:25.500 Dacanay, Radcliffe Road kinds of fees Rd user fees that can range from parking.

0:35:25.630 --> 0:35:28.490 Dacanay, Radcliffe I think it has a description and what those are.

0:35:30.970 --> 0:35:34.980 Dacanay, Radcliffe And yeah, this is the taboo topic.

0:35:35.430 --> 0:35:42.760 Dacanay, Radcliffe Probably get fired for saying it, but congestion pricing and it's often talked about as.

0:35:44.650 --> 0:36:7.500

Dacanay, Radcliffe

Road user charges and coordination with our partner, regional partners, so PSRC Wash Dot so any other mobility management strategy that could yield a large levels of revenue would be in partnership with those organizations and our regional partners.

0:36:7.510 --> 0:36:9.600 Dacanay, Radcliffe It wouldn't be with the city alone.

0:36:9.870 --> 0:36:12.130 Dacanay, Radcliffe I say this because it it would be difficult for. 0:36:14.460 --> 0:36:19.770 Dacanay, Radcliffe We're challenging for the city to to, you know, sort of put a cordon say around.

0:36:21.660 --> 0:36:25.30 Dacanay, Radcliffe I'm looking right now at the freeway of who, who?

0:36:25.80 --> 0:36:33.840 Dacanay, Radcliffe Who controls that we have right now some tolls, but we have to work in partnership with Wash Dot and with our regional.

0:36:34.510 --> 0:36:34.840 Dacanay, Radcliffe Yeah.

0:36:35.630 --> 0:36:36.580 Dacanay, Radcliffe MPO.

0:36:36.590 --> 0:36:40.540 Dacanay, Radcliffe That's our Metropolitan planning organization to deliver.

0:36:41.600 --> 0:36:44.100 Dacanay, Radcliffe Uh, what kinds of?

0:36:46.840 --> 0:36:59.480

Dacanay, Radcliffe

Strategies Rd user charge fees tolling what have you have to generate revenue and at the same time manage uh, our automobile mobility.

0:37:3.290 --> 0:37:18.210

Dacanay, Radcliffe That's likely not going to happen in in Alternative 2, but for alternative three that would probably be necessary if we want to pay for again all of the things that.

0:37:19.750 --> 0:37:26.30 Dacanay, Radcliffe Many people have noted ought to be in a plan.

0:37:27.670 --> 0:37:32.80 Tyler Schaffer That is, unless we could get a transportation levy passed that covers that cost, right? 0:37:33.190 --> 0:37:41.580 Dacanay, Radcliffe Yeah, I think it's difficult to ask for a transportation levy at that scale and that's ongoing.

0:37:42.60 --> 0:37:48.820 Dacanay, Radcliffe I mean, there's lots of different and these are conversations that are going to, uh, happen.

0:37:48.830 --> 0:38:0.980 Dacanay, Radcliffe And I would say in the very near future, as we're politicians are saying, hey, we need to transition into electric vehicles, our revenue for gas tax is going to be going down.

0:38:1.570 --> 0:38:4.440 Dacanay, Radcliffe That conversation is already happening at the state.

0:38:4.730 --> 0:38:23.360 Dacanay, Radcliffe I've just had a meeting with folks from washed out and commerce and this is going to be picking up as we transition away from internal combustion engines, buying gas and switching over to electric vehicles.

0:38:24.190 --> 0:38:29.200 Dacanay, Radcliffe Electric powered, you know, getting our energy from somewhere else to move these vehicles.

0:38:29.610 --> 0:38:59.850

Dacanay, Radcliffe So it's a, it's an ongoing conversation when we have a deeper dive and the city about that, I'll admit that is a a political uh conversation and if we receive more and more comments that say, hey, we need to create a revenue stream that pays for more of what we want and this revenue stream could be XYZ, then there's more.

0:39:0.860 --> 0:39:8.430 Dacanay, Radcliffe I think legs to stand on to say that conversation needs to happen sooner than later and just a just to put this out there.

0:39:8.840 --> 0:39:16.670 Dacanay, Radcliffe That type of comment seems like it would probably be more appropriate on the plan itself rather than the the DEIS, which doesn't really consider funding.

0:39:16.680 --> 0:39:20.540 Dacanay, Radcliffe It's just kind of looking at this range of options and the potential environmental impacts. 0:39:26.310 --> 0:39:30.220 Tyler Schaffer All, all funding questions should really be directed to the STP then.

0:39:31.60 --> 0:39:31.400 Dacanay, Radcliffe Right, yeah.

0:39:32.300 --> 0:39:32.620 Tyler Schaffer OK.

0:39:35.490 --> 0:39:35.980 Tyler Schaffer Umm.

0:39:37.860 --> 0:39:39.970 Tyler Schaffer Unrelated to all this, I'm curious.

0:39:39.980 --> 0:39:43.60 Tyler Schaffer I think there was some language in the SDP.

0:39:43.860 --> 0:39:47.830 Tyler Schaffer Umm, but coordination with the comprehensive plan.

0:39:48.220 --> 0:39:51.210 Tyler Schaffer I know these efforts kind of paralleled.

0:39:52.350 --> 0:39:55.750 Tyler Schaffer Uh, the DIS for STP of course.

0:39:58.180 --> 0:39:58.970 Tyler Schaffer Has been released.

0:39:58.980 --> 0:40:1.770 Tyler Schaffer The comp plan still still working on it.

0:40:2.420 --> 0:40:15.220 Tyler Schaffer I understand that that EIS, excuse me, the EIS was based on comparing the alternatives to alternative five of the comp plan.

0:40:15.230 --> 0:40:15.730 **Tyler Schaffer** Is that right? 0:40:16.250 --> 0:40:16.550 Dacanay, Radcliffe Right. 0:40:17.270 --> 0:40:17.820 **Tyler Schaffer** Umm. 0:40:21.280 --> 0:40:27.470 Tyler Schaffer 17-4 Assuming there's some other alternatives selected, how does that then inform what we have in the DIS? 0:40:27.480 --> 0:40:29.880 Tyler Schaffer I guess it's it's kind of bookends, right? 0:40:31.630 --> 0:40:31.890 Dacanay, Radcliffe Right. 0:40:29.890 --> 0:40:33.770 Tyler Schaffer So I guess you just scale back potentially what the project list is? 0:40:35.120 --> 0:40:35.590 Dacanay, Radcliffe Right. 0:40:42.660 --> 0:40:42.970 Tyler Schaffer Mm-hmm. 0:40:35.600 --> 0:40:43.660 Dacanay, Radcliffe But I think this is the we we chose alternative 5 because it would be the most intense land use proposed that. 0:40:46.20 --> 0:40:47.750 Dacanay, Radcliffe Would be proposed in the comp plan. 0:40:47.940 --> 0:41:16.450 Dacanay, Radcliffe Anything less than that, we believe then if if we've meet the the uh analysis and that in the in in the

transportation D EIS EIS then if we scale back from an alternative five then any other transportation uh list that we come out with should meet the needs of that.

0:41:16.520 --> 0:41:16.700 Dacanay, Radcliffe At.

0:41:18.930 --> 0:41:23.420 Dacanay, Radcliffe Land use low, you know, less intense land use.

0:41:23.430 --> 0:41:24.590 Dacanay, Radcliffe Uh, proposal.

0:41:26.240 --> 0:41:30.170 Dacanay, Radcliffe That's the concept, but we are working closely with that team over.

0:41:32.730 --> 0:41:48.240 Dacanay, Radcliffe In working on the count plan to make sure that any changes to that we are aligning the transportation investments to the proposed land use scenario.

0:41:58.10 --> 0:41:58.880 Tyler Schaffer Yeah, that makes sense.

0:42:0.280 --> 0:42:0.580 Clara Cantor (Guest) So.

0:42:0.530 --> 0:42:1.900 Tyler Schaffer Those are my initial questions.

0:42:1.910 --> 0:42:2.530 Tyler Schaffer Sorry, go ahead.

0:42:3.680 --> 0:42:3.970 Dacanay, Radcliffe Great.

0:42:3.980 --> 0:42:4.540 Dacanay, Radcliffe Thanks, Tyler.

0:42:4.100> 0:42:7.790
Clara Cantor (Guest) Oh, I just wanted to go back Tyler to one of your previous questions, actually.
0:42:8.290> 0:42:14.0 Clara Cantor (Guest) Umm, about kind of the the the priorities are deciding factors when you wake conflicts?
0:42:15.90> 0:42:25.690 Clara Cantor (Guest) Umm and I I totally understand the need for different different factors being weighed more or less heavily depending on the the context of the neighborhood and and the needs there.
0:42:26.830> 0:42:30.100 Clara Cantor (Guest) Umm so I totally hear you on that.
0:42:30.110> 0:42:39.10 Clara Cantor (Guest) But I feel like when I was reading through this plan, one of the biggest things that stuck out at me is that it's sort of open to interpretation.
0:42:40.390> 0:42:54.860 Clara Cantor (Guest) Like whatever your world view, you can interpret this plan to say what you want it to be saying, like it tries to be all the things to everybody instead of kind of like making those hard trade offs and prioritization lists.
0:42:56.440> 0:42:57.600 Clara Cantor (Guest) And I feel like.
0:43:0.840> 0:43:11.140 Clara Cantor (Guest) It would be a lot stronger if it went a little further in some of those, even if it laid out like in residential neighborhoods where XY&Z.
0:43:11.150> 0:43:13.600 Clara Cantor (Guest) These are the kinds of things will be prioritizing in urban areas.

0:43:13.610 --> 0:43:15.550 Clara Cantor (Guest) These are things to be prioritizing in freight areas.

0:43:15.560 --> 0:43:18.200 Clara Cantor (Guest) This is we're gonna be writing and laying it out that way.

0:43:18.210 --> 0:43:23.50 Clara Cantor (Guest) Whereas now it's so open to interpretation that it's not actually saying anything.

0:43:25.460 --> 0:43:25.850 Dacanay, Radcliffe OK.

0:43:25.860 --> 0:43:27.650 Dacanay, Radcliffe That's that's a great comment, Clara.

0:43:27.660 --> 0:43:40.900

Dacanay, Radcliffe I I think this is something that we've tried to represent in, in the plan, if it's not coming across that way, we'll take a second look and be a bit more clear, umm and how that is represented.

0:43:52.290 --> 0:43:52.650 Dacanay, Radcliffe Great.

0:43:54.270 --> 0:44:4.850 Dacanay, Radcliffe We're coming up on time and I just wanted to give you an opportunity for any last comments or questions and then if none again, like I said, I'm happy to.

0:44:5.820 --> 0:44:8.930 Dacanay, Radcliffe A have conversation with you.

0:44:8.940 --> 0:44:15.90 Dacanay, Radcliffe Again, just reach out to me by email and we can go from there.

0:44:15.590 --> 0:44:17.10 Dacanay, Radcliffe Any other last thoughts?

0:44:17.280 --> 0:44:18.210 Dacanay, Radcliffe Tyler or Clara?

0:44:24.70 --> 0:44:25.130 Tyler Schaffer I I don't think so.

0:44:31.450 --> 0:44:31.760 Dacanay, Radcliffe Great. 0:44:34.420 --> 0:44:34.630 Dacanay, Radcliffe 3.

0:44:29.340 --> 0:44:35.180

Tyler Schaffer I think you hit my high level questions that I wanted to to know about, so I appreciate appreciate you spending time doing that.

0:44:35.190 --> 0:44:35.520 Tyler Schaffer Thank you.

0:44:38.280 --> 0:44:38.900 Clara Cantor (Guest) Yeah, I think.

0:44:45.450 --> 0:44:52.770 Clara Cantor (Guest) That the prioritization thing was my biggest question or comment for you and I I don't know that you have an answer for that.

0:44:54.280 --> 0:45:6.730 Clara Cantor (Guest) Umm I I just you know, I feel like in this plan there's like, there's so many of these different like strategies or keys or whatever.

0:45:7.680 --> 0:45:8.340 Dacanay, Radcliffe And the key moves.

0:45:6.740 --> 0:45:9.580 Clara Cantor (Guest) What are they called that the key moves.

0:45:9.590 --> 0:45:13.830 Clara Cantor (Guest) There's like, so many key moves for every single thing.

0:45:14.820 --> 0:45:15.180 Clara Cantor (Guest) Umm.

0:45:16.850 --> 0:45:37.560 Clara Cantor (Guest)

And they don't really seem to be like prioritized in any way or like there's no like strategy for how to weigh them against each other or how to move forward on some of them or any of them that this plan feels really sort of like untouchable or inaccessible because it's it's trying to be all those things at once.

0:45:40.180 --> 0:45:40.590 Dacanay, Radcliffe Right.

0:45:40.640 --> 0:45:49.510 Dacanay, Radcliffe OK, that's a that's a great comment and we'll see what we can do to reflect it back out that there is the, the prioritization.

0:45:51.830 --> 0:45:59.380 Dacanay, Radcliffe He spelled out, and if not, we'll describe how we got through that prioritization piece through the processes that we did.

0:46:0.290 --> 0:46:0.530 Clara Cantor (Guest) Yeah.

0:45:59.730 --> 0:46:1.180 Dacanay, Radcliffe So thank you for your comment on that.

0:46:1.280 --> 0:46:3.80 Dacanay, Radcliffe And I just wanna one more plug.

0:46:3.90 --> 0:46:23.110 Dacanay, Radcliffe I think this is clear, but I just wanna make sure it sounds like these are comments on the STP rather than the DEIS, so I would highly recommend I don't know how you're planning to do this, but I think this session was specific to the EIS, so I would recommend if you would like to formally submit these comments on the SCP to do that through those appropriate channels, right.

0:46:25.240 --> 0:46:25.930 Clara Cantor (Guest) I hear you.

0:46:26.600 --> 0:46:32.560 Clara Cantor (Guest) I I think from the outside they're sort of interchangeable and I'm not sure exactly how you're drawing that line internally.

0:46:33.910 --> 0:46:39.900 Dacanay, Radcliffe One, the EIS has very specific kind of instructions for how to comment on the EIS.

0:46:40.570 --> 0:46:48.700 Dacanay, Radcliffe As far as the kind of content of those, I think that's the purpose of meetings like this is to make sure people are aware of the distinctions.

0:46:49.690 --> 0:46:51.770 Dacanay, Radcliffe You know, we're trying our best to make sure that's clear.

0:46:51.780 --> 0:46:59.710 Dacanay, Radcliffe I understand it's confusing the comp plans coming out the STP, the comp plan, EIS, the SDP, DIS, I understand there's a lot going on.

0:46:59.750 --> 0:47:11.960

Dacanay, Radcliffe I'm trying to make sure that's clear so that if are you want to make a formal comment that you see that reflected in the appropriate document with a an answer, a comment response that is satisfying.

0:47:19.480 --> 0:47:52.420

Dacanay, Radcliffe

And if nothing else, I think one last thing, as you're sending comments when you are sending comments to me for the DAS, if you could just be clear that this is a comment related to the draft impact in draft environmental impact statement document and then uh the avenues for the draft Seattle Transportation plan, you can directly comment on the engagement website and then also send your comments to the STP.

0:47:54.390 --> 0:47:55.430 Dacanay, Radcliffe General email.

0:47:59.570 --> 0:48:0.40 Dacanay, Radcliffe Great.

0:48:0.490 --> 0:48:2.510 Dacanay, Radcliffe Thank you for go ahead.

0:48:0.710 --> 0:48:12.870 Clara Cantor (Guest) So just to clarify, sorry, just to clarify, within the DEIS, you're looking for comments exclusively on the DIS, but not on the STP, that it relates to.

0:48:14.330 --> 0:48:14.840 Dacanay, Radcliffe That's correct.

0:48:14.850 --> 0:48:20.580 Dacanay, Radcliffe We're looking for comments on the environment, the impacts associated with the environmental analysis.

0:48:24.440 --> 0:48:30.950 Dacanay, Radcliffe So there's seven elements around air quality water. Uh.

0:48:33.50 --> 0:48:39.330 Dacanay, Radcliffe The those are the comments that we would you can expect for the DEA S.

0:48:43.190 --> 0:48:49.410 Dacanay, Radcliffe And I think as as I received the comments too, I'll sift through them to the extent that I can and ones that.

0:48:51.740 --> 0:49:5.100 Dacanay, Radcliffe Meet the continents were the DRI S will respond to them in that way, and then others that reflect comments to the STP will move over into the STP draft STP bucket.

0:49:12.510 --> 0:49:12.880 Dacanay, Radcliffe All right.

0:49:12.850 --> 0:49:13.100 Clara Cantor (Guest) OK.

0:49:12.890 --> 0:49:13.510 Dacanay, Radcliffe Thank you both.

0:49:16.340 --> 0:49:16.660 Tyler Schaffer Thank you.

0:49:16.210 --> 0:49:26.600 Dacanay, Radcliffe For attending the session and again feel free to reach out to me if you have any other questions and I'm happy to work through them with you.

0:49:28.150 --> 0:49:28.830 Clara Cantor (Guest) Thank you so much.

0:49:29.470 --> 0:49:29.690 Dacanay, Radcliffe Yes. 0:49:29.700 --> 0:49:30.540 Dacanay, Radcliffe Thank you for your time.

0:49:30.830 --> 0:49:31.410 Dacanay, Radcliffe Thanks, Claire.

0:49:31.420 --> 0:49:32.340 Dacanay, Radcliffe Thanks Tyler for being here.

0:49:33.40 --> 0:49:33.490 Tyler Schaffer Thank you.

0:49:33.170 --> 0:49:33.860 Dacanay, Radcliffe Have a good afternoon.

0:49:33.700 --> 0:49:34.190 Tyler Schaffer Bye.

0:49:34.480 --> 0:49:34.750 Tyler Schaffer You too.