

**Letter 1**  
**Washington State Department of Transportation, Aviation Division**

1. Your comments with respect to future building development and its relationship to airspace for the Harborview helipad and King County International/Boeing Field are noted. DPD anticipates that design review, permitting and environmental review processes can help future development avoid airspace conflicts even with the maximum recommended zoned height of 240 feet in the Yesler Way vicinity.

**Letter 2**  
**Puget Sound Clean Air Agency**

1. Your comments on air quality, public health and climate protection are noted. The suggested edit to the “area of most concern” for air pollution has been made in this Final EIS. However, per further conversation with Mr. Carr in February 2008, the edits provide additional clarification with respect to the 200-meter distance for measuring the “area of most concern.” Because the height of Interstate 90 ramps varies from roughly 10 to 50 feet in elevation, the area most affected by vehicle-generated airborne particulates would vary between 100 and 200 meters (approximately 320 to 650 feet) with the high end of this range expected from higher portions of the ramps.

**Letter 3**  
**Port of Seattle**

1. Your overview comments about the EIS analysis, potential conflicts with Port operations, and your advice on zoning and freight mobility planning strategies, are noted. The Port’s long-term land use goals and its interests in good transportation connections and round-the-clock activities are acknowledged. Please review this Final EIS for edits made to improve clarity and provide additional information on pertinent impact topics. The lead agency concludes that the EIS adequately analyzes the likely adverse cumulative noise, light, glare and similar land use-related impacts (that you describe as “gentrification impacts”), particularly with the edits made in this Final EIS. Also, see the responses to other comments in this letter for further discussion of your concerns.
2. Your comments indicating that likely impacts of “gentrification” on nearby industrial uses were not examined in sufficient detail, or not at all, are noted. However, the lead agency disagrees with several premises in this comment about the purported lack of cumulative impact analysis, the use of the term “gentrification impacts,” and purported “deficiencies.” The lead agency asserts that the EIS already provides cumulative impact analysis in sufficient detail that meets and exceeds the requirements of SEPA for this programmatic EIS.
  - It is incorrect to state that “the analysis does not include the western side” [of the study area] because the Stadium Area is explicitly analyzed for the environmental elements most applicable to it, not only in the main volume of the EIS but the appendices as well. This includes land use, height/bulk/scale, light/glare, noise, hazardous substances, transportation, and relationship to plans and policies sections, as well as describing what the EIS alternatives represent in the Chapter 2 project description. The reader may also review the analyses in Appendix A and other appendices for more information.
  - The comment’s use of the term “gentrification” obscures the intended meaning of the Port’s comments, although it may be interpreted as relating to the compatibility between the Port’s

land uses and other nearby land uses. More specifically, the comment attaches this term only to the residential uses proposed for the WOSCA property under Alternatives 1 and 3. The Port's apparent concerns relate to topics such as residential land use compatibility, noise, light/glare, traffic interactions and similar operational compatibility concerns. The EIS already materially addresses and discloses a range of impacts and mitigation, when necessary, for these elements of the environment in a manner that meets and exceeds requirements of SEPA for a programmatic EIS.

3. Your comments requesting that the WOSCA property not be rezoned due to inconsistency with the existing Manufacturing and Industrial Center Plan, and describing that property's role as a buffer for industrial uses, are noted. This programmatic EIS does include land use impact analyses related to this topic, as indicated in the response to comment #2 above. The EIS does consider the role of this vicinity (including the Stadium Transition Area Overlay) "in the context of the future of the neighborhood." See all of the land use-related sections, including the Relationship to Plans and Policies sections in Chapter 3 of this FEIS for edits that provide expanded discussion relevant to this comment.
4. Your comments indicating higher probable future noise levels than measured for the EIS, due to future increases in Port operations and measurements taken during off-peak times, are noted. The Draft EIS noise study found that under existing conditions noise from traffic on SR 99 is the dominant noise source on the WOSCA property. Because it is adjacent to the WOSCA property, noise from traffic on SR99 is loud. As shown in Table 3-30 (Draft EIS page 3-140), noise measurements at the WOSCA site recorded the highest 24-hour average noise of the locations sampled. Potential increased activity at Terminal 46 likely would have minimal effects on future noise measurements at the WOSCA property because the WOSCA property is on the other side of the SR 99 Alaskan Way Viaduct. Given this current configuration of SR 99, the noise from SR 99 traffic effectively masks most of the noise from Terminal 46. If a viaduct would continue to be present in the future condition, traffic noise from SR 99 would similarly continue to mask increases in noise from Terminal 46. Depending upon the future highway or street configuration, however, noise conditions and the degree of masking could change (ESA, 2008).

The Draft EIS found that existing noise sources in Livable South Downtown would necessitate additional sound insulation if residential uses were located in the most affected locations. As indicated on Draft EIS page 3-145, these sound insulation measures could be implemented through future Master Use Permit reviews on a case-by-case basis. For the WOSCA property, such reviews would be able to consider the long-term configurations of SR99 and its resulting noise levels, and the probable effects of additional noise contributed by Terminal 46 activities. For perspective, the EIS reader should also review pages 1 through 7 of Appendix F and particularly page 4, which describes how multiple noise sources are physically perceived by the human ear. As is noted there, two identical noise sources that produce noise levels of 50 dBA, for example, would together be experienced as a combined sound level of 53 dBA rather than as a sum total of the two noise sources.

5. Your comments, disagreeing with the conclusions of the noise, light and glare impact analyses and the effectiveness of suggested mitigation strategies, are noted. However, the lead agency disagrees with your conclusions. The first paragraph of this comment fails to acknowledge that conclusions of adverse light/glare impacts are provided on DEIS page 3-46, a fact that is only indirectly acknowledged in the second paragraph of the comment. Contrary to this comment, the EIS text (see in particular the "compatibility" discussion in the Land Use section of this Final EIS) properly identifies the potential for such light/glare impacts and properly identifies possible mitigation strategies to shield and reduce the potential severity of a light/glare impact on potential

residential uses. “Quantification” of light/glare impacts is not necessary to provide in this programmatic EIS, in part because the EIS Scope specifies qualitative-level requirements for the analysis.

Your comments about the ineffectiveness of suggested light/glare and noise mitigation strategies are noted. However, the lead agency concludes that these are possible effective noise-reduction strategies (e.g., to reduce interior noise levels to 45 dBA). This conclusion remains accurate even if potential Port-related noise is somewhat higher in the future. Also, see the response to comment 4 in this letter.

6. Your opinions about the potential future uses of the WOSCA property in light of SR 99 highway plans are noted. The lead agency disagrees with the comment’s premise that the property cannot be rezoned to accommodate a mix of non-residential and residential uses at this time. However, the Preferred Alternative does not propose a zone that would allow for residential uses on that property.
7. Your comments that interpret the findings of the transportation analysis are noted. The S. Atlantic Street corridor is expected to degrade in arterial operations between the years 2007 and 2030, as shown in Tables 5-7 and 5-9 of Appendix G. This is due to the general increase of traffic, including truck traffic, which is expected to occur in the area. The improvements expected from the implementation of the SR 519 Phase 2 project would limit the level of increased delays along the S. Atlantic Street Corridor especially during the earlier years of its initial service, but operations are still expected to degrade in later years of the study period if the projected amounts of growth assumed in this EIS and Puget Sound Regional Council forecasts occur. The Action Alternatives studied in the programmatic EIS do not significantly contribute to further reduction in arterial operations along S. Atlantic Street, as is documented by the corridor operations and travel speed conclusions shown for S. Atlantic Street in Tables 3-47 and 3-49 for AM and PM peak hour conditions. These conclusions show no difference between the No Action Alternative and the Action Alternatives in either arterial level of service or travel speeds, even with the full amount of assumed growth to year 2030.

Your comments endorsing various possible freight mobility mitigation strategies mentioned in the EIS are noted.

8. Your preference for a more comprehensive approach to determining and implementing freight mobility for the Duwamish MIC is noted. It is not necessary for this programmatic EIS to “show conclusively” that potential conflicts between freight mobility and transit-aiding mitigation strategies can be “adequately mitigated.” The continuing planning and decisionmaking efforts of the Seattle Department of Transportation and other agencies will further evaluate and determine future improvements and strategies to undertake. Also, the analysis did not identify any significant impacts as a result of the implementation of the Action Alternatives. Instead, the No Action and Action Alternatives perform much the same with regard to freight mobility.

The transportation analysis assumed completion of concept 10C as part of the Alaskan Way Viaduct Replacement project because this was considered the most likely option when the transportation analysis was conducted. Since then, the alternative known as Option 6 has emerged as the most likely option, as you pointed out. There are changes in travel patterns associated with this change in the transportation system. Most importantly, Option 6 would result in less through traffic along S. Atlantic Street and more traffic using 1<sup>st</sup> Avenue South to connect with SR 99. However, these changes in travel patterns would likely not contribute to significantly greater adverse effects on operations along S. Atlantic Street, because the intersection of S. Atlantic

Street and 1<sup>st</sup> Avenue South would be configured differently and signal timings would also be modified. This means that larger amounts of 1<sup>st</sup> Avenue S. traffic could pass through this intersection without increasing the incidence of further adverse impacts on S. Atlantic Street operations. Therefore, no new findings about additional adverse impacts on S. Atlantic Street need to be included in the findings of this EIS traffic study, with respect to differences between the 10C and Option 6 concepts.

9. Your comments indicating needed corrections to selected facts in the transportation analysis are noted. Edits to the Final EIS provide these corrections.
10. Your comments with regards to truck distribution are noted. Figure 5-8 in Appendix G has been updated to clarify the intent of the information presented. The purpose of the figure was to identify at a broad level the origin and destination of study area truck trips, including delivery trucks. The arrows on the figure show the general direction of truck distributions and not the actual route the truck may navigate. The three percent figure along the western edge of the study area in the DEIS Appendix G graphic was meant to represent that some trucks have an origin and destination to areas west of the study area, including West Seattle and Kitsap County. The arrow does not represent truck trips heading to and from Terminal 46.
11. Your comment about the SR 99 south-end alternative that was assumed as part of the traffic analysis is noted. Please see the response to comment 8 in this letter.
12. Your comments regarding truck traffic from T-46 and T-30 are noted. The analysis focused on truck travel at a broad programmatic level, while accounting for known increases in truck trips assumed as part of the Port of Seattle Container Terminal Access Study (Year 2003 Update, October 2003, Heffron Transportation). These increases in truck trips were manually entered into the volume forecasts for the AM and PM peak hour periods based on information contained in that report. S. Atlantic Street is assumed to continue to serve the highest amount of truck traffic in the future due to the probable closure of S. Holgate Street and relocation of the SR 519 westbound ramp.
13. Your comment clarifying the definition of a tail track has been noted. The corrections have been incorporated into the Final EIS.
14. Your comment regarding the designation of Colorado Avenue S. is noted (refer to Figure 4-4 in Appendix G). This corridor will be discussed and considered as a Major Truck Street during the next Transportation Strategic Plan update.
15. Your comment regarding the ability of trucks to use S. Atlantic Street when S. Royal Brougham Way is blocked by a train is noted. The text in Section 6.6.3 of Appendix G has been updated to reflect this situation.
16. Your comment regarding the differences in the AM peak hour westbound travel speeds listed in Table 5-15 as compared to Tables 5-6 and 5-7 is noted. However, the tables present information using different corridor extents. Table 5-15 summarizes travel speeds for S. Atlantic Street between 1<sup>st</sup> Avenue S. and 4<sup>th</sup> Avenue S. Tables 5-6 and 5-7 summarize travel speeds between Alaskan Way S. and 4<sup>th</sup> Avenue S. The corridor travel speeds highlighted in Tables 5-6 and 5-7 are lower than those in Table 5-15 because they take into account the delays expected at the intersections of S. Atlantic Street with the assumed SR 99 “frontage road” and Alaskan Way South.

**Letter 4**  
**Washington State Public Stadium Authority (PSA)**

1. Your comments are noted. Please see the responses to comments #1 and #2 in Letter 7 (Seattle Mariners).
2. Your comments are noted, but the lead agency disagrees with several premises within the comments.
  - The EIS transportation, parking and utility analyses evaluate the impacts to these elements of the environment, within the context of a programmatic EIS. This comment does not identify specific shortcomings of the analyses.
  - Adoption of zoning changes will not “become determinative of the availability and adequacy of public facilities for all future development.” Nor will the City “be left without a key tool to require future development to mitigate its adverse impacts on the community, neighborhoods, and on public and private infrastructure.” The SEPA concept of phased review is applicable, meaning future project-level reviews can specify other impacts applicable to projects, and can specify mitigation measures if significant adverse impacts are identified. The content of the cited analyses accommodates the potential for further phased review. Zoning changes are not “determinative” in relation to public facilities as suggested.
3. Your comments are noted, but the lead agency disagrees with several premises within the comments.
  - The EIS acknowledges and analyzes impacts with respect to the stadia/event centers and the balance of the study area in which they reside, per the needs of a programmatic EIS. In general, a programmatic EIS does not analyze potential impacts to specific lots, businesses or individuals within the planning area. See edits made within this Final EIS.
  - It is disagreed that “at a minimum” the identified topics need to be further analyzed in this EIS. See edits made within this Final EIS.
  - The alternatives’ relationships to the Comprehensive Plan and zoning have been analyzed in this EIS, particularly when considering edits made within the Final EIS.
4. Your comments are noted. Please see the response to comment #71 in Letter 7.
5. Your opinion about the adequacy of the mitigation strategies discussed in this EIS is noted. Edits made within this Final EIS clarify the mitigation discussions so that existing transportation management plan responsibilities of the stadia are not described as mitigation strategies for the rezones evaluated in this EIS.
6. Your comments are noted. Please see the response to comment #3 in this letter.
7. As also referenced in the response to comment #2 in Letter 7, neither the planning study nor the EIS is inconsistent with the growth targets. The EIS does not “generally ignore” applicable overlay districts. See the Land Use and Relationships to Plans and Policies sections in Chapter 3 of this Final EIS for edits that improve clarity and further discuss the Stadium Transition Area Overlay District.
8. Please see the response to comment #2 in Letter 7.

9. Your comment on maps identifying the stadia/event center facilities is noted. These facilities were identified on the most applicable identification map which is Figure 2-3. Nearly all of the EIS graphics would not have included these facilities due to their subject matter.
10. Your comments are noted.
11. Your opinions on building bulk are noted.
12. The lead agency's scoping for the EIS, and subsequent planning work, did not identify business/economic impacts on the business operations of Qwest Field and Event Center as a topic for analysis in this programmatic EIS, nor does SEPA require such an analysis.
13. Please see the "Major Conclusions" section in Chapter 1 of this Final EIS to see any edits to the text.
14. By definition, this SEPA analysis pertains to proposed legislation, not legislation that has been adopted.
15. This comment requests expression of summary information on corridor traffic speeds in terms of percentage declines. The lead agency reviewed this request, and concludes that the information presented is correct and further edits do not need to be made to this summary table. Please see Table 1-1 in Chapter 1 of this Final EIS.
16. With respect to the significance of the transit operating speed impacts, the EIS transportation analysis does not necessarily conclude that these impacts are significant adverse impacts, particularly as a blanket conclusion. The identified differences in speed, per average travel speed in 2030 as a percentage of posted speed limits, range from a 0% to a 4% difference, comparing between the No Action and Action Alternatives. Overall transit performance should be interpreted according to the multiple criteria of frequency, span of service, travel speed, and passenger loading as was presented in Section 5.5.3 of Appendix G. Please see Table 1-1 in Chapter 1 of this Final EIS for edits.
17. Please see the response to comment #9 in this letter.
18. This comment requesting representation of these stakeholders' interests as "objectives of the Livable South Downtown planning process" (see Draft EIS page 2-3) is noted.
19. Your comment to update and include the final planning recommendations is noted.
20. The requested edits identifying the "Stadium Transition Area Overlay District" have been made.
21. The requested edit has been made, with the observation that the WAMU Theater is a particular configuration within the Event Center for concert activities, rather than a "property" per se.
22. Please see the response to comments #1, #47, #48 and #53 of this letter.
23. Regarding Figure 2-6, your comment is noted and that figure has been corrected to note the proposed change to an 85-foot maximum height limit in the Qwest Field and Event Center vicinity. Regarding the other figures, your comment with respect to the 85'/120' zone (labeled with a "120'") is incorrect. Alternatives 1, 2, 3 and 4's zoning for the cited zone primarily addressing properties on the east side of 1<sup>st</sup> Avenue S. is a retention of the existing PSM 85'/120'

zone designation (as was depicted on Figure 2-7 in the Draft EIS). Please see Figures 2-4, 2-5, 2-6 and 2-7 in this Final EIS for any edits to graphics and notations. As suggested by the notes on these graphics, the labeled heights in these EIS figures indicate maximum height limits of zoning.

24. Your comment on the SDM zone is noted, with the observation that “impacts of the change” were evaluated in the Draft EIS and are evaluated in the Final EIS.
25. Please see the response to comments #1, #47, #48 and #53 of this letter.
26. Your comment noting a possible benefit of reserving action related to SR99 and the WOSCA property is acknowledged.
27. No errors or inconsistencies are identified with respect to the content of this comment. In fact, a word search of several sections of the EIS including Chapter 1, Chapter 2 and relevant portions of Chapter 3 indicate no instances of “PSM 150’/240’” in the text. Figure 2-5 of Alternative 2 correctly depicts the zoning category of PSM and correctly labels the 150-foot and 240-foot maximum heights for the correct portions of the north lot vicinity, per the graphic’s intent and labeling format. The Table 2-1 headings (see DEIS page 2-19) for this area indicate the relevant area as having a PSM 85’/240’ zone designation, which would in fact be accurate for the entire affected property under Alternative 2 even if the northern portion were limited to a maximum height of 150 feet. As noted on page 2-17 where Table 2-1 is introduced, “*Table 2-1 summarizes details of Alternatives 1, 2 and 3,*” which is self-explanatory.
28. This comment incorrectly interprets the discussion on page 3-3 of the Draft EIS. The Draft EIS does not refer to “stadium events” as “intermittent.” The word “intermittently” is used twice, both referring to intermittent effects on traffic conditions in the 1<sup>st</sup> Avenue S., 4<sup>th</sup> Avenue S., S. Royal Brougham Way and Occidental Avenue S. corridors. This characterization is accurate, as the range of small and large events do not constantly affect traffic congestion but tend to generate more effects at some times than others. As already acknowledged in the paragraph on page 3-3, stadium and event center activities include “*80+ baseball games a year, 10 football games a year, and numerous other regularly scheduled soccer, tradeshow and concert activities.*” (emphasis added) By phrasing in this manner, the Draft EIS acknowledges the regularity and diversity of activities occurring at the two stadia and the event center. Also see Chapter 3 of this Final EIS for additional edits to the Transportation section with regard to the description of event traffic management.
29. See Chapter 3 of this Final EIS for additional edits with regard to the Stadium Transition Area Overlay District.
30. Please see the responses to comments #1 and #2 in Letter 7.
31. It is disagreed that “squaring off” the current curved zoning boundary would constitute a change that would require amendments to the Comprehensive Plan for this area.
32. The lead agency disagrees with the premises in this comment.
  - The cited height-related impact is separately addressed in the Land Use—Height, Bulk, Scale and Compatibility section (see page 3-23 of the Draft EIS), with a sufficiently detailed characterization of the potential significant adverse impacts. Therefore, this impact does not need to be discussed in the cited section on page 3-10 of the Draft EIS, and the text already cross-references the height/bulk/scale section.

- This comment’s dismissal of the value of height/bulk/scale controls is noted, but as indicated in the Draft EIS text such controls would be possible. See Chapter 2 of the Final EIS for further information on proposed controls.
33. Your comment requesting that the inconsistency of the Stadium Area Overlay District with the “proposed changes in Stadium area zoning” be acknowledged in the EIS is noted. However, this comment does not substantiate why such changes would be inconsistent with the Stadium Transition Area Overlay District. See edits to the Chapter 3 Land Use—Zoning, Land Use and Development Patterns and Relationship to Plans and Policies sections for further information provided about the relationship to the Stadium Area Overlay District zoning. Also, please see response to comment #1 in Letter 7.
  34. Your comment regarding a mitigation strategy applicable to the Stadium Area is noted.
  35. Your comments doubting the appropriate analysis and disclosure of impacts along 4<sup>th</sup> Avenue S., and the “ability of this corridor to accommodate this level of development without significantly impairing freight and general traffic” are noted. However, the lead agency disagrees with the conclusions of this comment, which does not provide any specifics about why such analyses in the EIS are not appropriate. See the responses to comments # 2, 4, 16, 32, 37, 39-43, 47, 49, 57, 58, 60, 62 and 63 in this letter for further discussion.
  36. Your comments on construction staging uses of properties for SR 99 construction are noted.
  37. Attendance numbers have been corrected in the Final EIS. Draft EIS page 3-21 clearly describes Qwest Field and Safeco Field as part of the existing uses in the Stadium Area. The lead agency disagrees with the premise that Alternative 2’s zoning to 240 feet would be incompatible with the “edges of Qwest Field.” The relevant comparison is to the stadium’s overall height, bulk and scale, not merely the edges of the stadium concourse. Also, the 300+ foot distance between the potential development site and the stadium is relevant to interpreting potential adverse height/bulk/scale impacts. Further, the cited text describes existing conditions, not the future condition, so no text edits are warranted.
  38. Please see the relevant Final EIS sections for any edits that have been made, including the impacts discussion for “compatibility”, which begins on page 3-42 in the Draft EIS. This comment refers only to the Affected Environment discussion. Also, see the response to comment #6 in this letter and the response to comment #1 in Letter 7. It is noted that neither this comment nor past comments substantiate an actual probable significant adverse shadow impact on Qwest Field that warrants discussion in this programmatic EIS.
  39. Your comments are noted. Your characterization of a “doubling or nearly tripling of existing allowed heights” (emphasis added) is not accurate because the existing maximum allowed heights in the zone at the north lot location reach 120 feet. It is acknowledged that only under Alternative 2, the maximum height limit in a portion of the North Lot property would represent a “doubling” of “allowing heights” but “tripling” is inaccurate. The significance of the identified potential impacts has already been noted in the EIS text. See Chapter 2 of this Final EIS for more information about possible height/bulk/scale controls.
  40. See Chapter 2 of this Final EIS for more information about possible height/bulk/scale controls, as are described for the Preferred Alternative. Please note that the level of specificity of the mitigation strategies is consistent with the level required for a programmatic EIS.

41. Your comment is noted but the lead agency disagrees with several premises in this comment. Draft EIS Figures 3-3 and 3-4 reflect existing limitations of proposed easements cited in this comment, and do not understate the potential impacts. This comment incorrectly interprets the depicted hypothetical buildings on Figures 3-3 and 3-4 as portraying height limit envelopes. The easement and height limits are shown in revisions to these figures in the Final EIS using the “dotted-line” approach. See Chapter 2 of this Final EIS for more information about proposed height/bulk/scale controls for the Preferred Alternative.
42. Your comments about the significance of height/bulk/scale impacts in the Stadium Area are noted, although the lead agency disagrees with the comment’s linkage of the impacts “to and from public facilities.” The level of detail describing potential mitigation is appropriate for a programmatic EIS.
43. As also referenced in the response to comment #41 in this letter, your comment incorrectly assumes that the buildings depicted in comments 3-18 and 3-19 are “building envelopes.” The buildings (referenced as such in the figures’ footnotes) illustrate the number and hypothetical shape of buildings included in the EIS growth scenario for 2030 under the alternatives. As such, the figures were accurate as shown in the Draft EIS. All possible building envelopes do not need to be portrayed. Review the figures in Chapter 3 of this Final EIS for graphic updates that have been made.
44. Your comment on shadow impacts is noted. Please see the response to comment #38 in this letter.
45. Your comment on land use controls and development regulations is noted. Please see Chapters 2 and 3 of this Final EIS for any edits that may provide new information or improved clarity.
46. Please see the response to comment 12 in this letter.
47. See the response to comments #1, #48 and #53 in this letter. The cited section does not need to “acknowledge that the proposed South Downtown Plan is fundamentally inconsistent with the basic growth assumptions made for this area in the City’s Comprehensive Plan” because that is an incorrect statement. This EIS does not “set out on its own and establish a household growth target of 6,000.” Rather, it conducts an impact analysis on a growth scenario for year 2030 that aligns with projections of the Puget Sound Regional Council. This was described in multiple locations in the EIS text, including pages 1-1, 2-9, 3-82 and 3-98. The growth targets indicated in the city’s Comprehensive Plan express minimum levels of desired growth and are not actual growth forecasts of future growth to year 2030, and they are not identical to the growth projections provided by the Puget Sound Regional Council’s econometric modeling. That modeling provides 2030 growth projections of future conditions in subareas that are used for transportation trip forecasting and are therefore preferable to use for a consistent set of growth-related impact analyses.
48. See the response to comments #1, #47 and #53 in this letter. It is noted that the No Action Alternative in the EIS already defines a less aggressive growth scenario. However, for the reasons cited in response to these other comments, other “less aggressive growth assumptions” are not necessary to further study in this EIS.
49. See additional discussion about the Stadium Transition Area Overlay district in the cited section of Chapter 3 in this Final EIS. Also, see the response to comment #33 in this letter, and the response to comment #1 in Letter 7.

50. Your disagreement with the conclusion of adverse but not significant adverse impacts for the 150-foot maximum height limit under Alternative 3 is noted.
51. Please see the referenced discussion items in Chapter 3 of this Final EIS for edits that respond to this comment.
52. Your comment supporting increased density in South Downtown in the form of new residential and commercial development in the area is noted.
53. This comment incorrectly relates the Comprehensive Plan’s “growth target of 2,000 new households” to the “projected growth of 6,000 additional dwelling units by 2030” that is evaluated in the EIS impact analysis growth scenarios. The capacity discussion provided on page 3-82 of the Draft EIS does not need to be amended as suggested. Growth target information is already described in the Population and Employment section (see DEIS pages 3-95 and 3-97). Also see the responses to comments #1, #47 and #48 in this letter.
54. The cited growth distribution represents residential growth projected to occur under the EIS growth scenarios for impact analysis purposes. Such growth is by definition a hypothetical projection to year 2030 for the given area, for the purposes of the programmatic environmental review.
55. The requested development capacity information is accounted for in the Pioneer Square numbers in Table 3-27.
56. Your comment on 180-foot zoning is noted. Regarding the North Lot, since it is separated from the PSM 100’ zone by the 100-foot wide S. King Street right-of-way, its “border” is different from the “railroad gap” area’s closer proximity to adjacent property that is within the same block, across a 16-foot alley.
57. Your comments on views are noted, but the lead agency disagrees with the premises in the comments. It is further noted that this comment’s supposition of proposed changes to the PSM 85’/120’ zone south of S. King Street is incorrect. See the responses to comments #4 and #23 in this letter.
58. Please see the response to comment #71 in Letter 7.
59. This comment on noise is noted, but the lead agency disagrees with the purported significance of such impacts.
  - During EIS scoping, the potential for such noise impacts was considered and judged to not have probable significant impact potential.
  - The lead agency disagrees with the characterization of a “box canyon” as a result of future development.
  - This comment does not substantiate a probable significant adverse noise impact.
  - The stadium’s event-related generation of noise by attendees is a known phenomenon, but the relative infrequency of such large-attendance high-noise-generating events in the stadium bowl, the distance of nearby uses from the stadium, and the intervention of the stadium structure itself when considering “east and west” directions are appreciable elements that limit adverse impact potential.
  - Commercial buildings would maintain lesser noise sensitivity than residential uses.

- Noise reflection, while possible, also is not substantiated in this comment with factual information that would justify a finding of a probable significant adverse impact. Although noise does reflect off buildings, rarely does this result in noise impacts, because the reflected sound energy is diffused when reflected and sound energy is also absorbed by buildings (ESA, 2008).

60. Your concern about the impact analyses for public services and utilities is noted, but the lead agency disagrees with the suggestion that the City will be foreclosed from mitigating the effects of future growth unless additional detail is included in this EIS.
61. These venues are functionally equivalent to private entertainment facilities (requiring paid admission), and an analysis of the potential impacts of the proposal on such facilities is not required in a programmatic EIS.
62. The event-day information provided in this comment is noted. See the Transportation section in Chapter 3 of this Final EIS for any edits that may pertain to this topic. Such edits provide additional information about the relationship of event traffic conditions to the traffic conditions evaluated in this EIS.

The Draft EIS text on “event management strategies” in the Mitigation Strategies discussion (page 3-236) is acknowledged as incorrectly suggesting that adaptation of the stadia transportation mitigation plans (TMPs) would be a “mitigation strategy” for the impacts of the EIS alternatives. Future changes to the TMPs prepared each year for the stadia are not “mitigation” for impacts discussed in this EIS. The Final EIS text reflects changes to correct this error.

63. This comment refers to the phrasing of the “Significant Unavoidable Adverse Impacts” item in the Transportation section. The Transportation section does clearly disclose the significant adverse impacts to decisionmakers, and does not suggest an absence of impacts. The first underlined word “accommodate” is not relevant to transportation impacts but merely indicates that under the zoning alternatives additional development would be accommodated. The other underlined phrases describe the anticipated reductions in efficiency and performance of the transportation system. What this comment does not recognize is that the analytic results represent modeling of the worst-case unmitigated traffic conditions. With implementation of a range of possible mitigation strategies, transportation conditions by 2030 could avoid at least some of the reported worst-case traffic conditions. Future traffic conditions would furthermore depend on several choices made between now and 2030 that would influence the dimensions and capacity of the transportation network. In light of information provided in the Transportation study itself and this response, the characterization of the Significant Unavoidable Adverse Impacts in the Draft and Final EISs is accurate. Please see Chapter 3 of this Final EIS for edits made to the Transportation analysis.
64. Your comments on parking impacts are noted. The Chapter 3 Parking section analyzes potential parking impacts at a suitable level of detail for this programmatic EIS. Impacts related to displaced parking and the parking losses associated with the SR99 project are indicated in the section. The EIS is not obligated to analyze “how or where” such parking will be replaced, but it does discuss a range of possible mitigation strategies.

**Letter 5**  
**First & Goal, Inc.**

1. Your comments on Qwest Field operations and relationships to existing and future uses are noted. Many of these comments, particularly those relating to staging/move-in and move-out activities, are addressed by an agreement between the City and First & Goal, entitled “Event Traffic Management Plan, Plan Years 2008-2010,” prepared May 2007. This is an example of the proactive approach you request that has already been accomplished in planning and city actions to date.

The EIS transportation analysis focuses more attention on the high-attendance baseball and football events because they are the type most likely to overlap with peak hour traffic (such for a weekday afternoon baseball game or a weeknight early evening football game) and have a bearing on worst-case traffic conditions. These are also the most common high-attendance event scenarios that require police postings, even though postings may also frequently occur for other events such as concerts and tradeshow. See the Final EIS Chapter 3 Transportation section for any edits to the event-traffic sections that improve the acknowledgement of other events and relevant transportation matters.

The EIS informs decisionmakers by evaluating land use, compatibility and other impacts across several environmental elements. For example, see in particular the “Qwest Field north parking lot” discussion on pages 3-10 and 3-11 of the Draft EIS.

2. Please see the discussion of impacts related to event management on pages 3-228 through 2-230 of the Draft EIS. Also, see the Final EIS Chapter 3 Transportation section for edits to the event-traffic sections that improve the acknowledgement of other events and relevant transportation matters. As indicated in the response to comment #1 of this letter, topics relating to staging move-in and move-out activities are addressed by an agreement between the City and First & Goal, entitled “Event Traffic Management Plan, Plan Years 2008-2010,” prepared May 2007. Contrary to this comment, a wide variety of possible mitigation strategies for significant adverse transportation impacts are described in the Chapter 3 Transportation section. Further discussion of overall transportation mitigation strategies is either not necessary for this programmatic EIS or has already been documented in the “Event Traffic Management Plan, Years 2008-2010 signed by the City and First & Goal.

The Draft EIS text on “event management strategies” in the Mitigation Strategies discussion (page 3-236) is acknowledged as incorrectly suggesting that adaptation of the stadia transportation mitigation plans (TMPs) would be a mitigation strategy for the impacts of the EIS alternatives. Future changes to the TMPs prepared each year for the stadia are not “mitigation” for impacts discussed in this EIS. The Final EIS text reflects changes to correct this error.

3. Your comments on noise and lighting impacts are noted. Regarding noise impacts, see the response to comment #59 in Letter 4, and note that study area noise sources were cited as including “athletic facility events and associated activities” on page 3-139 in the DEIS. An edit also has been made to the first paragraph of the noise compatibility impact discussion (see DEIS page 3-145) to acknowledge this in the list of noise sources.

Regarding event lighting for nighttime events in relation to possible residential buildings, such lighting is acknowledged as an occasional occurrence, but is not identified as a significant adverse impact. See the Land Use—Height, Bulk, Scale and Compatibility section of Chapter 3 in this Final EIS for edits that address this matter (under the Compatibility—Light, Glare and

Shadows—Pioneer Square heading). Future site-specific project review processes would provide opportunities to further pursue additional environmental review and design review guidance that could help minimize adverse consequences with future development.

4. Your comments on views are noted. Please see the response to comment #71 in Letter 7.
5. Please see the response to comment #1 in this letter.
6. Your comments on shadow impacts are noted, but the lead agency disagrees with several premises in the comments. This includes the suppositions about the EIS analysis, the purported imperative to study such impacts and the purported significance of such impacts. This comment does not provide information that substantiates the degree of such impacts or their significance. Please see the response to comment #38 in Letter 4.

### **Letter 6**

#### **Washington State Major League Baseball Stadium Public Facilities District (PFD)**

1. Your comments expressing support for appropriate redevelopment in South Downtown, and your concern about increased height and densities to the west of Safeco Field, are noted. Please see the response to comments #4 and #58 in Letter 4, and the response to comment #71 in Letter 7, for more discussion about views.
2. These comments on traffic evaluation inadequacies, including for event traffic, are noted. These comments do not specify why traffic impacts are underestimated or why the event traffic analysis was not objective. See the Transportation section in Chapter 3 of this Final EIS for edits to the event-traffic sections that may improve the acknowledgement of other events and relevant transportation matters. Also, see the responses to comments #28 and #62 in Letter 4, the responses to comments #1 and #2 in Letter 5, and the responses to comments #44, #45, #46 and #47 in this letter.
3. Your comment about the scarcity of information on the Stadium Transition Area Overlay District is noted. Please see the Land Use—Zoning, Land Use and Development Patterns and Relationship to Plans and Policies sections in Chapter 3 of this Final EIS for edits that provide more information about the Overlay District. Please see the response to comment #1 in Letter 7.
4. Your comments about significant impacts of the alternatives are noted. Regarding the study of an alternative with less density and lower heights, the EIS already includes three different action alternatives with varying heights and densities. This comment also refers to topics addressed in the responses to comments #29 and #38 in this letter. Also see the response to comment #1 in Letter 4, and the response to comment #4 in Letter 7.
5. Please see the response to comment #1 in this letter.
6. Your comments on inadequacies of mitigation measures are noted. Please see Chapter 2 of this Final EIS for more information on recommended height/bulk controls, design controls, special review processes and other measures, described in this programmatic EIS.
7. While one graphic notation of 85 feet at Qwest Field on Draft EIS Figure 2-6 was not properly underlined as a change, other actual graphic errors, omissions or inconsistencies are not identified. The commenter may confuse the hypothetical buildings depicted on height/bulk/scale

graphics as depicting height limits or building “envelopes.” See the responses to comments #23, #27, #41 and #43 in Letter 4, and review graphics in Chapter 3 for any edits or updates.

8. Your comment indicating the need to update the Chapter 1 summary is noted.
9. Your comment on graphically depicting the Stadium Transition Area Overlay District, Safeco Field and associated parking garage on Figure 1-1 are noted. However, these updates are instead depicted on an edited Figure 2-3 in this Final EIS.
10. Your comment disagreeing with major conclusions and level of detail of mitigation strategies is noted.
11. Your skepticism about the effectiveness of bonus and transfer of development rights programs is noted.
12. Your request to study business and economic impacts on Safeco Field is noted. However, see the response to comments #12 and #46 in Letter 4.
13. Your comment noting few differences in transportation impacts is noted, but the lead agency disagrees with the premises in the comment. The evaluation of comparable growth assumptions across the action alternatives is preferable for the EIS impact analysis, in order to properly compare and distinguish differences in impacts among the alternatives. Such distinctions were in fact identified. Differing distributions of growth among the studied subareas in the action alternatives also aided the impact analysis. Differences between the No Action Alternative (Alternative 4) and the other Alternatives provide perspective about impacts under differing growth assumptions.
14. Your comment on the need to update the impact summary table is noted. However, the lead agency disagrees with the need for update of the cited topics of views and business/economic impacts on Safeco Field.
15. Your disagreement with a part of the Alternative 1 and 2 conclusions on height/bulk/scale impacts in the impact summary table is noted. See Chapter 2 of this Final EIS for more information about special review processes within proposed South Downtown Mixed zones.
16. Your comment on the vagueness of Chapter 2 descriptions is noted, but the lead agency disagrees with this characterization. Such information is properly acknowledged in Chapter 2. Please see Figure 2-2 on page 2-6, and references to residential uses in the Alternative 1 “overview of planning concept” and “increased residential development capacity at edges of core neighborhoods” paragraphs on page 2-10 in the Draft EIS.
17. This comment requesting representation of these stakeholders’ interests as “objectives of the Livable South Downtown planning process” (see Draft EIS page 2-3) is noted. The extent to which the special interests of any particular business, landowner or citizen are to be promoted as part of the public planning process is a policy and political issue for elected officials, and does not affect the adequacy of the FEIS.
18. The cited transaction approximately halving the “WOSCA Property” is acknowledged, and Figure 2-3 has been updated.
19. The requested clarification in Table 2-1 has been made in this Final EIS.

20. The cited inconsistencies in the Table 2-1 summary of zone changes for “other properties south of S. Royal Brougham Way to S. Holgate” are acknowledged and corrections have been made in this Final EIS. The distinctions relate to the zoning of the Safeco Field property, and a failure to specifically note the rezone from IG2 U/85’ in a portion of the “Pyramid Brewery block.”
21. Your perspectives on the purpose of the Stadium Transition Area Overlay District are noted. See the cited section and the Relationship to Plans and Policies section for any edits made to improve clarity about this Overlay District. Also, see edits to Figure 2-3 to show the Overlay District, rather than the requested Figure 2-1.
22. Your comment requesting more specificity on the proposed South Downtown Mixed zone is noted. Please see Chapter 2 of this Final EIS for further information.
23. Your comment perceiving the significance of land use impacts at the “WOSCA property” is noted. Conclusions are already noted in the Table 1-1 Summary of Impacts table. See the response to comment #51 in Letter 7 for related discussion.
24. Your request for acknowledgement on DEIS page 3-14 of changes in the WOSCA property due to SR 99 related property acquisition is noted. See the cited section in this Final EIS for any edits made to improve clarity. This comment’s perspectives on construction timing and resulting lack of need for a rezone are noted.
25. Your disagreement with two sentences that make impact conclusions about the 1<sup>st</sup> Avenue S. corridor is noted. One of these sentences in the paragraph addressing lodging uses under Alternative 3 (DEIS page 3-14) has been deleted in this Final EIS because it does not relate well to the remaining text. However, the other sentence addressing the Pyramid Brewery block is retained.
26. Your opposition to any increase in the height limit for the “Pyramid Brewery block” west of Safeco Field is noted.
27. Please see the response to comment #12 in Letter 4.
28. Your comments on heights and development economics are noted. However, due to differences in typical property size, likely future uses, and various details of the zoning scenarios, the cited development feasibility conclusions on pages 3-54 and 3-58 are inapplicable to the 1<sup>st</sup> Avenue S. corridor in the Stadium Area, particularly for the 160-foot height scenario in Alternative 1.
29. Your comments on growth targets are noted. However, the lead agency disagrees with the premises of this comment. See the response to comments #1, #47, #48 and #53 in Letter 4.
30. Your comments disagreeing with the “relatively limited” phrasing of a statement at the end of page 3-63 in the Draft EIS are noted. See the cited text in Chapter 3 of this Final EIS for any edits that clarify or revise this statement. However, please note that the lead agency disagrees with this comment’s rationales for suggesting such edits.
31. Your comment disagreeing with the first statement on “economy” on page 3-64 of the Draft EIS is noted. See the cited text in Chapter 3 of this Final EIS for any edits that clarify or revise this statement. Please see the response to comment #12 in Letter 4.

32. Your comment requesting more information on potential localized improvements is noted. The DEIS text was accurate as written but a few edits have been made in this Final EIS. It is not possible at this time to identify where such improvements may be needed. That will depend on the nature of future project-specific development proposals. Therefore, there is no need to identify such information and additional specificity is not necessary for this programmatic EIS. An EIS is not required to identify mitigation measures that will avoid or mitigate all potential impacts, or guarantee that mitigation will be successful. The nature and amount of mitigation that is proposed in response to this proposal is a policy decision for the City Council.
33. Your comments questioning “more efficient” growth are noted. However, no edits to the EIS are needed. Within the regional growth-management-related context of the comment, the increased density of infill growth encouraged by the action alternatives’ zoning by definition would be “more efficient” in use of land than potential growth under existing zoning.
34. Your comments about the Stadium Transition Area Overlay District are noted. See the Chapter 3 “Relationship to Plans and Policies” section in this FEIS for additional text describing this Overlay District and relationships to the alternatives.
35. See the response to comment #34 in this letter.
36. See the response to comment #25 in this letter. This comment incorrectly attributes “purposefully limited heights and densities” to the Overlay District regulations “...in order to maintain these physical and visual connections between the ballpark and Pioneer Square, First Avenue, and the waterfront and downtown areas farther north.” This comment mis-characterizes the content of the Overlay District regulations (see the Chapter 3 Relationship to Plans and Policies section in this FEIS for more discussion).
37. Please see the Chapter 3 Relationship to Plans and Policies section in this FEIS for additional text describing this Overlay District and relationships to the alternatives, and the description of related zoning topics in the Preferred Alternative in Chapter 2 of this Final EIS.
38. See the response to comment #29 in this letter and the other cross-referenced responses to comments in Letter 4.
39. Your comment noting an error in table headings is acknowledged. This error has been fixed in Chapter 3 of this Final EIS.
40. Please see the response to comment #71 in Letter 7.
41. Please see the response to comment #71 in Letter 7.
42. This comment may confuse the estimated *development capacity* under the alternatives’ zoning, as shown on page 3-82 in the Draft EIS, with the EIS growth scenario assumptions summarized in the second column of Table 3-33 on page 3-158 in the Draft EIS. If the comment seeks to relate page 3-82’s reference to “approximately 6,000 dwelling units” for Alternatives 1, 2 and 3 to the “approx. 5,700 – 6,100” in the second column of Table 3-33 on page 3-158, there is no inconsistency. The reader should examine the structure and relationship between the three columns of Table 3-33 to understand its conclusions. No inconsistency is identified and no corrections need to be made to the parks analysis on this basis.
43. Please see the responses to comment #61 in Letter 4 and to comment #1 in Letter 7.

44. Your comments on event traffic management are noted. However, the lead agency disagrees with several premises in this comment.
- While the comment notes the conclusions presented in the Draft EIS summary chapter's Table 1-1, it is disagreed that these are the only conclusions related to transportation and the stadia. See the entire content of information related to this topic in the Transportation section of the Draft EIS and Final EIS.
  - The content on pages 3-195 to 3-196 is description of the Affected Environment. This comment either fails to recognize the related impact analysis on pages 3-228 through 3-330 of the Draft EIS or inaccurately characterizes it as "short" and "subjective" and consisting only of "observations" or "some suggestions." Rather, it provides a variety of pertinent analysis on vehicle and pedestrian traffic.
  - The lead agency's opinion is that the event traffic management impact analysis in the Draft EIS was neither inadequate nor unacceptable. See the Transportation section in Chapter 3 of this Final EIS for edits that provide additional information describing this topic.
45. Your comments on the number and range of events at Safeco Field are noted. See the response to comment #44 in this letter, and the Transportation section in Chapter 3 of this Final EIS for any edits that provide additional information describing this topic. Also, please see the response to comment #12 in Letter 4.
46. The Draft EIS text on "event management strategies in the Mitigation Strategies discussion (page 3-236) is acknowledged as incorrectly suggesting that adaptation of the stadia transportation mitigation plans (TMPs) would be a "mitigation strategy" for the impacts of the EIS alternatives. Future changes to the TMPs prepared each year for the stadia are not "mitigation" for impacts discussed in this EIS. The Final EIS text reflects changes to correct this error.
47. Your comments are noted.

**Letter 7**  
**Seattle Mariners**

1. Your summarized concerns in this comment are noted. By definition, the proposal entails changes to existing City policies and regulations. The potential environmental impacts of that proposal are described in this programmatic EIS. As a programmatic document, this EIS generally does not describe potential impacts to specific lots within the planning area.
2. The content of Chapter 2 in the Draft and Final EISs describes the planning process in detail. It includes reference to a March 2006 preliminary recommendations document, an "overall vision," goals and specific objectives for the planning process, other key issues that planning recommendations should address, and "geographic themes" of the planning effort's consideration of future uses (see pages 2-1 through 2-9). With regard to this comment's reference to 6,000 new dwelling units, this is described in the EIS and in FEIS responses to other comments as an EIS growth scenario, aligned with projections of the Puget Sound Regional Council, which is used to study growth-related impacts to year 2030. The growth targets in the Comprehensive Plan represent the minimum level of desired growth, rather than a ceiling on growth.
3. Your comments are noted. However, the lead agency disagrees with the premises of this comment. It is not necessary for this EIS to elaborate on the statement about city leaders or provide other information requested in this comment.

4. Your comments are noted. The EIS presents a range of zoning alternatives that will help achieve the policy goal of increased housing and job growth in the planning area. It does not consider alternatives to the goal itself because such alternatives would not, by definition, meet the policy objective of increased housing and job growth.
5. Your comment is noted, and the “elements of the environment” list on pages xi and xii has been updated in this Final EIS.
6. This is a programmatic EIS that generally does not describe potential impacts to specific lots or buildings within the planning area. The potential for changes to views designated as protected by SEPA, and any other discussion of view-related impacts, is described in the FEIS Chapter 3 Public View Protection section.
7. Your comment is noted. Please see response to comment #1 in this letter with respect to the issue of consistency with plans, and response to comment #2 in this letter with respect to the nature of the growth projections considered in the proposal.
8. Your comment is noted. Even though the Draft EIS text at the cited location on page 1-1 is not in error, an edit has been made in this Final EIS to address this comment.
9. Your comment incorrectly identifies the “DEIS” as the subject of the statement. Actually, the cited sentence ascribes the intended analysis to “South Downtown planning.” The EIS provides a body of information that is available to be used in decisions about whether a change of direction is warranted. See edits made to the cited section in this Final EIS, which amend the quoted text.
10. See the response to comment #3 in this letter.
11. Your comments are noted. Please see response to comment #1 in this letter.
12. The cited statement is written in a generalized manner applicable to the entire study area, and refers to the notion that existing regulations could be changed to better achieve the proposal’s objectives.
13. See the response to comment #17 in Letter 6.
14. Your comment disagreeing with the generality of the objectives is noted. It is not necessary for the planning process objectives to be made less general. However, please review Chapter 3 of the Final EIS (including the Relationship to Plans and Policies section) for edits that improve clarity with respect to the relationship to the Duwamish Plan.
15. Please see the response to comment #1 in this letter.
16. The planning recommendations are contained in the Livable South Downtown recommendations report that is issued with this FEIS.
17. With regard to the “overall vision” text expressed on pages 2-4 and 2-5, the presence of the ballpark and event venues is mentioned in the second sentence of the first paragraph as the “largest sport entertainment venues.” Please also see the response to comment #17 in Letter 6.

18. Your comment is noted. However, the lead agency disagrees with the premises of this comment. The cited sentence beginning at the bottom of page 2-4 indicates the element of consistency as being that the planning process “envisions neighborhoods that are complemented by new developments that incorporate appropriate mixes of uses and are compatible with their surroundings due to high-quality and sensitive architectural design.” As this is accurate, no revision is necessary. The planning recommendations do not address a departure from the “population goals and allocations of the Comprehensive Plan.” The fact that residential uses are evaluated in EIS alternatives for locations currently within the Greater Duwamish Manufacturing and Industrial Center is acknowledged here and is also discussed in the Draft EIS, such as at pages 3-70 and 3-71, and in the FEIS. Please see response to comment #1 in this letter.
19. Clarifying edits have been made to the graphic and text information on pages 2-6 and 2-7 that refer to the preliminary recommendations’ depiction of a land use concept map with the term “emerging areas.” Please see the response to comments #1 and #3 in this letter.
20. The WOSCA property is located within the “Stadium Area” evaluated in this EIS. The separate listing and description of these individual geographic descriptive terms is correct as written.
21. As this comment notes, page 3-40 of the Draft EIS refers to the cited change in the west half of the WOSCA property. The relevance of this property condition has already been factored in as an assumed future condition. This includes, but is not limited to, the topics of land use, environmental health and transportation and the adjacency of the highway right-of-way to the WOSCA property. See other edits in Chapter 3 of this Final EIS that describe the status of the WOSCA property.
22. Edits in this Final EIS provide additional information describing the Stadium Transition Area Overlay District, including the cited text and in the Chapter 3 Relationship to Plans and Policies section.
23. None of the action alternatives (Alternatives 1, 2 and 3) evaluated in the Draft EIS are a preferred alternative. When compared to each other, each of the action alternatives could feasibly attain or approximate the planning process objectives. The differing nature of the alternatives, including but not limited to differences in geographic distribution and magnitude of zoning changes, allow for comparisons of the relative magnitude of environmental costs among them. This also applies to the Preferred Alternative included in this Final EIS (see Chapter 2 for more information). Please see the response to comment #4 in this letter.
24. Your comments about clarity of description of the alternatives in text and graphics are noted. See Chapter 2 of this Final EIS for any edits that may have been made to assist in clarifying the alternatives. However, the lead agency disagrees with the suggested method of expanding the text to further discuss how each alternative would change existing “plans and zoning.” The suggested method would become too unwieldy in its length and description, given the detailed nature of the changes and affected locations. Rather, the comment’s purpose is fulfilled by reading the text, comparing amongst the alternatives’ graphics (Figures 2-4 through 2-7) and reviewing the content of Table 2-1. Also beneficial is the fact that the Figure 2-7 “No Action/Existing Zones” graphic is located adjacent to Table 2-1, allowing for comparisons to be made.
25. Your comment on clarity of the alternatives’ zoning graphics is noted. See Chapter 2 of this Final EIS for any edits that may assist in clarifying the graphic depictions. It should be noted that these graphics’ use of a system of underlining where new zones are proposed already addresses this

comment's concern. Also, the use of letters (IDM, IC, SDM) with a legend to identify the zones is already a satisfactory manner of identifying zones.

26. This programmatic EIS is prepared to fulfill SEPA requirements. The extent to which the proposal entails changes to the City's Comprehensive Plan, including neighborhood plans included in the Comprehensive Plan, is described in Chapter 2 of this FEIS in the text cited in this comment. It is also indicated in the FEIS Chapter 3 Land Use—Zoning, Land Use and Development Patterns and the Chapter 3 Relationship to Plans and Policies sections where the discussion indicates Comprehensive Plan changes and relationship to the Greater Duwamish Manufacturing and Industrial Center Plan. See these Chapters and sections of the FEIS for any edits that update and improve the clarity of information on this topic.
27. Your comment on graphically depicting the Stadium Transition Area Overlay District is noted. See edits to Figures 2-7 and 3-1 in this Final EIS which depict existing zoning, and also review Figures 2-4, 2-5 and 2-6 for any changes that may have been made to clarify the alternatives' relationship to that Overlay District.
28. Your comment seeking increased clarity in identifying residential use capabilities under Alternative 1 is noted. However, the lead agency disagrees with the comment "this can only be determined by reviewing other sections later in the DEIS" because the intent is described by the last paragraph's heading and content, including the text excerpt at the bottom of page 2-10 and top of page 2-12. See Chapter 2 of the Final EIS for any edits that may have been made to improve clarity.
29. As an alternative zoning concept, the zone boundaries shown for Alternative 1 are approximate boundaries that would contribute to fulfilling the purposes indicated in Chapter 2 of this FEIS, which include "increased residential development capacity at edges [inside or just outside] of core neighborhoods" for the "approximate northern third" of the property between S. Royal Brougham Way and S. Railroad Way.
30. As a prospective statement of probable benefits of residential use adjacent to the Pioneer Square neighborhood, and as part of the "overview of planning concept," the statement does not require elaboration.  
  
This comment inaccurately interprets the EIS text in the last paragraph on page 2-10 of the Draft EIS. The referenced zone changes and related residential presence "at the edges of the neighborhood cores" are described as contributing to revitalizing the established neighborhoods. To clarify this text, an edit is made in the Final EIS for this to read "...at the edges (inside or just outside) of the neighborhood cores..." This statement does broadly correspond with at least the northern third of the WOSCA property.
31. Your comment is noted. The change to the Comprehensive Plan designation is not treated as an after-thought, but, as this comment notes, is already discussed in the description of the alternative. See Chapter 2 of the Final EIS for any edits that may have been made to improve clarity.
32. Your comment is noted. See Chapter 2 of the Final EIS for any edits that may have been made to improve clarity and provide additional information about South Downtown Mixed zoning.
33. Your comment is noted. However, the lead agency disagrees with the premises of this comment. As the cited text represents a concept-level description of the intended benefits of the South

Downtown Mixed zone, it is an appropriate description of general zoning intent. The DEIS does not assume that good urban design can be achieved only if building heights are raised.

34. Your concern about Alternative 1's proposal for increased height limit to 85 feet is noted. A possible increase in height limit without an increase in density limit affords possible increased flexibility in siting buildings and arranging their bulk, in ways that might allow better accommodation of parking uses as well as optimized bulk arrangements.
35. Your comment requesting specific characterizations of Alternative 2 in relation to the 1<sup>st</sup> Avenue S. corridor is noted. However, it is noted that text on DEIS pages 2-12 and 2-14 already convey similar information, so no edits are necessary.
36. Please see the response to comment #29 in this letter.
37. Your comments about Alternative 3's description in Chapter 2 are noted. See Chapter 2 of this Final EIS for any edits that may improve clarity. Also, see the response to comment #34 in this letter.
38. The lodging (hotel) use is included in Alternative 3 in order to include it as a possible use change in this environmental review, to evaluate its potential impacts in the balance of the EIS.
39. Your comments about residential use on the WOSCA property and relationship to the Comprehensive Plan designations are noted. See the response to comment #1 in this letter.
40. Your comment requesting the basis for height increases, and theoretical public benefits and public concerns of the same on the WOSCA property, is noted. Please see the response to comments #1 and #3 in this letter.
41. Please see the response to comment #29 in this letter.
42. As described in the response to comment #2 in this letter, the action alternatives do not "involve revisions to the population and employment growth targets established in the Comprehensive Plan."
43. It is acknowledged that, as written in the Draft EIS, the cited "disadvantage of reserving implementation" refers to the Downtown Urban Center neighborhoods.
44. The lead agency disagrees with the premises of this comment on affordable housing. The DEIS does not "acknowledge that the development spurred by the zoning changes will result in the loss of hundreds of existing affordable housing units." See the Draft EIS analysis on pages 3-85 to 3-88 and updated analysis in the FEIS for an accurate description of the cited potential impacts. The balance of this comment is noted, but the lead agency disagrees with its content.
45. Your comment about a potential "benefit of reserving implementation" with respect to SR 99 and use of the adjacent WOSCA property is noted. Uncertainty of long-term status of properties' uses is a phenomenon generally applicable to almost all properties in the study area. Also, the first bulleted point under "benefits of reserving implementation" sufficiently addresses this comment's concern.

46. This comment's request to acknowledge a "benefit of reserving implementation" of potentially "preserving" the ballpark's views rather than their "being lost forever" is noted as the commenter's perspective. Please see the response to comment #1 in this letter.
47. Your comment requesting expansion of the "Summary of Alternative Zoning Details" table, Table 2-1, is noted. See the response to comment #24 in this letter. This table contains detail that allows for comparing and understanding differences among the alternatives. Other edits to headings or additional details could become unwieldy and more difficult to understand. See Chapter 2 of this Final EIS for any edits made to improve clarity.
48. Figures 2-7 and 3-1 have been amended to depict the boundary of the Stadium Transition Area Overlay District. See text on page 3-6 and the Relationship to Plans and Policies section in this Final EIS for edits made to improve clarity and expand description of the Stadium Transition Area Overlay District. This comment's documentation of past history in zoning decisions on height limits is acknowledged. Please see the response to comment #1 in this letter.
49. This comment's interest in the Greater Duwamish Manufacturing and Industrial Plan receiving equal treatment or "status" is noted. Also, the comment's observations about land use and zoning considerations within the Stadium Area are noted. The extent to which the special interests of any particular business, such as the Seattle Mariners, are to be promoted as part of the public planning process is a policy and political issue for elected officials, and does not affect the adequacy of the FEIS. Information about zoning around stadia in other cities is not required to be included in this programmatic EIS.
50. See the Chapter 3 Land Use—Height, Bulk, Scale and Compatibility section in this Final EIS for text revisions that provide more information about hypothetical potential for light/glare impacts on Safeco Field. These arise from potential future development on a certain segment of the "over-tracks" property, if a building was to be built approximately at or south of where the current Interstate 90 off-ramp intersects with 4<sup>th</sup> Avenue S. Similar to the response to comments about Qwest Field wind impacts, it is noted that the lead agency considered comments about possible wind impacts during EIS scoping but concluded there was not a probable significant adverse wind impact on Safeco Field that warranted discussion.
51. This comment correctly cites the Draft EIS text on page 3-13 as indicating the "significant shift in the City's land use policy" conclusion, which refers to a shift in the Comprehensive Plan's preferred land use pattern from "Manufacturing & Industrial Center" to "Downtown Urban Center." However, this comment incorrectly characterizes this as a "significant impact." Because of the nature of the referenced action, it is not characterized as a "significant impact." While the change is already identified in Chapter 2 as part of Alternatives 1 and 3 regarding the 1<sup>st</sup> Avenue S. corridor, it is not necessary for Chapter 2 or the Chapter 1 Summary to identify it as a "significant impact." This is particularly so for Chapter 2 because it describes the alternatives rather than including impact analysis. Also, please see the response to comment #1 in this letter.
52. Your comment, indicating uncertainty as to whether incompatibilities of residential use could be mitigated by constraining the location and orientation to shield residential uses, is noted. Despite your uncertainty, this is a valid possible mitigation strategy that could be implemented even with the current narrowed shape of the WOSCA property.
53. See the response to comment #25 in Letter 6. One of the cited sentences with impact conclusions on DEIS page 3-14 has been deleted because it does not relate well to the text, but another similar sentence relating to the Pyramid Brewery block has been retained. With respect to possible

effects of development near Safeco Field on the level of enjoyment experienced by the Mariners' customers, their enjoyment is not an element of the environment that must be analyzed in an EIS. However, the Mariners may provide that information to the City Council as part of the general public comment opportunities that will be provided for the proposal. Also, please see the response to comment #1 in this letter.

54. Your comments about PSM 85'/120' zoning are noted. The Draft EIS discussion as written identified the residential use criterion and suggested that vacant parcels are the probable location of future development. The Draft EIS noted the possibility of future development to 120 feet, not that it "will likely" occur. It is not necessary for this EIS to provide further evaluation of which buildings are landmarks or landmark-eligible, because the cited text is adequately descriptive. See the cited text in Chapter 3 of this Final EIS for any edits that may have been made for clarity.
55. It is not necessary for the lead agency to revise the cited text at Draft EIS page 3-21 to explain why the 65-foot height limit was established. As indicated by the section headings, the cited text is about existing conditions and is meant to describe "compatibility among existing uses" and "land use patterns and height transitions." See the Impacts discussion in the Land Use—Height, Bulk, Scale and Compatibility section in Chapter 3 of this Final EIS and the Relationship to Plans and Policies section for any edits that may have been made to clarify or expand the discussion of such impacts. Please see the response to comment #1 in this letter.
56. The specific kinds of open space outside Downtown that are listed in the cited SEPA Policy (SMC 25.05.675.Q.2.a) are "publicly owned parks, public schoolyards, private schools which allow public use of school yards during non-school hours, and publicly owned street ends in shoreline areas." For the portions of the study area that are outside the existing Downtown Urban Center, the only location that would appear to meet any of these criteria is the public school yard at Bailey Gatzert School, which is near Little Saigon north of Boren Avenue S. near Main Street. Safeco Field is not a publicly owned park as that term is used here, instead it is functionally equivalent to a private entertainment facility. Please see the response to comment #1 in this letter.
57. The conclusions on page 3-46 with respect to future possible development on the WOSCA property and its relationship to light/glare from the Port of Seattle are not technically affected by sale of part of the WOSCA property. It would, of course, preclude a potential residentially developable area in the western portion of the original WOSCA property. An edit has been made to this section in the Final EIS to denote that buildings "or other uses within the same building" might be able to provide shielding, to cover a scenario where residential uses and non-residential uses might be present in the same building.
58. These comments relating to the City's growth strategies are noted. Please see the responses to comments #1 and #2 in this letter.
59. See the cited text in Chapter 3 of this Final EIS for text revisions made to improve clarity. Also, see the responses to comments #1 and #53 in this letter.
60. Your comments requesting that the EIS include more discussion of the Duwamish Plan, height limits and uses, are noted. The cited text already mentions the relationship of the Stadium Transition Area Overlay District to the MIC Plan, and mentions the inconsistency of zone proposals under Alternatives 1 and 3. See the cited text in Chapter 3 of this Final EIS (equivalent to DEIS pages 3-70 through 3-74) for any edits made to provide additional information and improve clarity. Under Alternatives 1 and 3, the amount of industrially-zoned property area in the MIC that would be rezoned to non-industrial zone categories would be approximately 14

gross acres under Alternative 1 and approximately 55 gross acres under Alternative 3 (this calculation includes land in rights-of-way). For the same area, there would be no change under Alternatives 2, 4 or the Preferred Alternative.

61. See the Relationship to Plans and Policies section in Chapter 3 of this FEIS for edits that address this comment and provide other related expanded discussion. Also, see the response to comment #1 in this letter.
62. See the responses to comment #2 in this letter and comment #47 in Letter 4. It is inaccurate to state that “no explanation is provided of this planning assumption,” because it was described in multiple locations in the EIS text, including pages 1-1, 2-9, 3-82 and 3-98. See Chapters 2 and 3 of this Final EIS for any additional edits made for clarity.
63. This comment incorrectly characterizes the EIS analysis by suggesting it assumes “demand would be taken from traditionally preferred areas.” Rather, the EIS growth scenario for impact analysis aligns with the PSRC’s 2030 growth projections relating to the study area.
64. See the responses to comment #2 in this letter and #47 in Letter 4.
65. Please see the response to comment #1 in this letter, and the Livable South Downtown recommendations report issued with this EIS.
66. See the responses to comments #62 and 63 in this letter.
67. The EIS growth scenarios for the alternatives assume few instances of building demolitions because the projected growth can be accommodated largely within parcels without existing buildings. Information in the Chapter 3 Parking section responds to your comment about parking lots and spaces.
68. As written, the Draft EIS text at pages 3-83 to 3-84 used explicitly-cited factors to estimate total housing demand generated by new South Downtown employment and the subset of that demand that might be attracted to the Downtown Urban Center. On page 3-84, the DEIS text suggested that some of those employees would likely be among those seeking affordable housing in South Downtown. See the Housing section in Chapter 3 of this Final EIS for edits that amend the findings.
69. Your comments critiquing the housing impact analysis are noted. However, the comments incorrectly characterize the content of the cited analysis, and the lead agency disagrees with your conclusion of understated impacts. Data from the City’s Office of Housing (OH) inform the counts of currently subsidized affordable housing units at-risk and the unsubsidized rental units that are shown in Tables 3-17 and 3-18. According to the best available data, the amounts (which were reviewed and updated in this Final EIS) represent the number of housing units that are at risk of future rent level changes. The text in the first paragraph of Draft EIS page 3-87 indicates a conclusion of a lack of direct impact potential for these units, but it also explicitly notes that a “potential indirect adverse impact of increases in rent levels could be anticipated in some cases.” This discloses the potential for indirect housing impacts.

The second paragraph on page 3-87 documents those properties with affordable units that would be directly affected by possible zoning changes, with a corresponding potential for direct impacts (also summarized on Table 3-19). In order to incur the total impact implied by Table 3-19, all of the cited buildings would need to be redeveloped, converted or experience rent increases.

70. Your comments relating to the “incentive” or inclusionary zoning requirements for affordable housing, and their potential low value as mitigation for housing impacts, are noted. Calculations shown on Draft EIS pages 3-90 and 3-91 are based for each alternative on the growth scenarios used for impact analysis purposes, through year 2030. For this programmatic EIS, the 75% of projects estimated to take advantage was an analytic assumption of the level of participation by future development applicants, and a basis for the calculations in Table 3-21, although those calculations have been revised. The findings are identified as “estimates” in the table’s title. See the cited section in this Final EIS for edits made that clarify and revise the findings.

It is not reasonably possible to pinpoint a single probable outcome with respect to affordable housing supply dynamics through 2030. However, the EIS reader may compare the potential impacts described in Tables 3-17, 3-18 and 3-19 with the potential positive influences on affordable housing supply described in Tables 3-20, 3-21 and the accompanying text.

An EIS is not required to identify mitigation measures that will avoid or mitigate all potential impacts, or guarantee that mitigation will be successful. The nature and amount of mitigation that is proposed in response to this proposal is a policy decision for the City Council.

71. The extent to which views from Safeco Field might be changed by future development in the surrounding area is information that can be provided to decisionmakers in a variety of ways. For example, and as noted in the comment, the City’s rezone criteria (SMC 23.34.009) provide that changes to views are a factor to be considered in determining whether to approve rezoning, and information regarding views would typically be presented in DPD’s Director’s Report analyzing proposed rezoning. Additionally, the Mariners can present such information to the City Council in the course of public comment opportunities provided in connection with this proposal. In the context of a programmatic EIS, however, analysis of potential changes to views from specific, individual buildings or lots is not generally required. Such analysis could occur in a project level EIS, where the impacts of a specific, proposed development upon views from nearby buildings might be described.
72. The lead agency disagrees with premises in this comment, and notes contradictory elements in this comment. The comment’s first paragraph acknowledges that the existing development context is shown in the cited graphics, but then asserts “there is nothing depicting the existing condition.” Note that the EIS does describe existing conditions (for example, see all lighter-shaded buildings in the graphic depictions of height, bulk and scale) and also provides some graphics in a photographic montage manner. For this programmatic EIS, there does not need to be more information on the building models, nor additional types of views. However, please see Chapters 2 and/or 3 of this Final EIS for edits that include additional graphic portrayals related to the Preferred Alternative.
73. Your comments about the graphics’ viewpoints are noted. The reader may note that all graphics provided in the Chapter 3 “Public View Protection” section are from eye-level. The viewpoints of the height/bulk/scale graphics were selected to portray and compare the relative effects of the proposed building heights and densities.
74. See the response to comment #59 in Letter 4. A programmatic EIS generally does not analyze the potential adverse impacts of the proposal upon specific lots or parcels.
75. Technically, the DEIS does not conclude that “there would be significant adverse noise impacts on residential uses on the WOSCA property.” Rather, on DEIS page 3-145 it notes that future

residential development in locales within roughly one block of the SR 99 Viaduct would face the “greatest adverse exposure to high noise levels” and in the next paragraph describes these as “significant adverse noise conditions.” This portrays the high levels of noise at the subject property but does not technically identify the finding as a significant adverse impact of the rezone per se.

Your comments on noise impacts and SEPA policies are noted. The lead agency disagrees with the comment’s implication that the City lacks authority to mitigate for potential noisy conditions at a noise-receiving property.

76. Your comments on fire/emergency impacts, mitigation strategies and growth targets are noted. However, the lead agency disagrees with several premises in this comment.
- Technically, the DEIS notes on page 3-152, “*Explore methods to address cost impacts to SFD of providing additional staffing and equipment to serve cumulative future growth in the study area. Consider defining impact fees or similar strategies that would be proportional to the level of impact anticipated with individual developments.*” This might occur via legislation occurring either in the short-term or the long-term. Potential mitigation measures need not be fully developed or discussed in a programmatic EIS.
  - As noted elsewhere in this chapter, this comment’s premise of a “three-fold increase in the population targets for this area of the City” is incorrect.
77. See the Police Protection section in Chapter 3 of the Final EIS for any edits made to generally acknowledge the event traffic control function provided by police. This section does not need to further address event traffic control at the ballpark, which is addressed in the Transportation section and associated transportation discipline report in Appendix G. The lead agency disagrees with the comment’s premise that residential traffic might cause police staffing to not be available for event traffic control.
78. See the response to comment #42 in Letter 6. No actual mismatches or differences are identified in this comment.
79. While it might be possible for the City to consider parks/open-space-related impact fees, the DEIS did not identify the cited impacts as significant adverse impacts. Between now and 2030, such park/open space needs might be satisfied via numerous actions such as public agency provision of such facilities and/or provision of on-site open space through future private development projects.
80. Your comment seeking more quantification of future open space outcomes is noted. However, it is reasonable to conclude that the provision of private open space will mitigate the need for additional open space as a result of future growth. Additionally, the requested analysis fails to consider the extent to which the demand for open space may be met by future possible public agency provision of park/open space (which is not reasonably possible to predict at this time).
81. The lead agency disagrees with several premises of the critique of the event traffic analysis in this comment. However, the reader should review the Chapter 3 Transportation section in this Final EIS for additional analysis that fulfills the EIS scope on this topic.

The Draft EIS text on “event management strategies” in the Mitigation Strategies discussion (page 3-236) is acknowledged as incorrectly suggesting that adaptation of the stadia transportation mitigation plans (TMPs) would be a “mitigation strategy” for the impacts of the EIS alternatives. Future changes to the TMPs prepared each year for the stadia are not

“mitigation” for impacts discussed in this EIS. The Final EIS text reflects changes to correct this error.

Your comment with respect to the number of police postings addressed in the ballpark’s Transportation Management Plan is noted.

### **Letter 8**

#### **Joint letter: PSA, First & Goal Inc., PFD, Seattle Mariners**

1. Your comments noting the public investment in the stadium and event center facilities, the need to disclose impacts on those facilities, and the need to further acknowledge the Stadium Transition Area Overlay District, are noted. See edits made in the Land Use and Relationship to Plans and Policies sections in Chapter 3 of this Final EIS for additional information about the Overlay District. The lead agency disagrees with how this comment characterizes the analysis to date and the degree to which further analysis is needed in this programmatic EIS. Your support for increased housing and density in “certain areas” is noted.
2. Your comments indicating a perceived understating of traffic impacts and other shortcomings in the event-related traffic analysis, and a need for proactive mitigation strategies for transportation impacts, are noted. While the Draft EIS incorrectly noted that the stadia’s transportation mitigation plans (TMPs) would be “mitigation strategies” for impacts identified within this EIS, that text has been revised in this Final EIS. A wide variety of other possible transportation mitigation strategies are included in the Transportation section in Chapter 3 of this EIS for the range of identified significant adverse traffic impacts. Therefore, the lead agency disagrees with this comment’s characterization that the EIS “leaves the problem to be solved in future stadium Transportation Management Plans.” The lead agency acknowledges the agencies’ comments about the perceived severity of adverse impacts, but does not agree that negative impacts on the stadia will cause “the quality of life and economic vitality for all area residents and businesses [to] be highly compromised.” See the Transportation section in Chapter 3 of this Final EIS for edits made to improve clarity about event-related traffic and event traffic management.
3. Your comments on view-related topics are noted. The lead agency disagrees with the characterization that condos or offices would “wall in the ballpark and football stadium” and the number of affected individuals. See the response to comments #4 and #58 in Letter 4.

### **Letter 9**

#### **Seattle Steam Company**

1. Your comments favoring district energy concepts and integrated energy planning for this study area are noted. See the Final EIS Chapter 3 Energy section for edits that update and expand information provided about proposed energy strategies.
2. Your comments on thermal energy demands are noted. See the Final EIS Chapter 3 Energy section for edits that describe proposed energy strategies, including policy or regulatory actions that encourage hydronic strategies and discourage reliance on electrical methods of serving thermal loads.

3. Your comments on low carbon technologies are noted. See the Final EIS Chapter 3 Energy section for edits that describe proposed energy strategies relating to carbon emissions and any additional analysis provided on carbon and greenhouse gas emissions.
4. See the response to comment #3 in this letter. Your comment describes potential economic and environmental implications, at the macroscopic level, of energy choices. Interpreting the precise degree to which these implications relate to Seattle City Light operations is beyond the scope of this EIS discussion. However, see the Final EIS Chapter 3 Energy section for any additional information that further describes the alternatives, the City's proposal to date, and their implications.
5. The Washington State Governor's Executive Order on Climate Change includes actions related to the construction of buildings and reducing greenhouse emissions. Taking steps to implement these will move Washington State to at least 60% of the 2020 goal and grow the clean energy economy. Relevant topics pertain to constructing high performance green buildings, and maintaining the highest levels of efficiency in our state's energy code and regularly updating and enhancing those standards.

The City's proposal contains provisions for density-bonused and "planned community development (PCD)" projects in South Downtown that would require green building energy performance approximately equivalent to the level of LEED Gold with 8 LEED EA1 credits, and also require energy cost savings of 20% beyond current Seattle Energy Code (SEC) compliance. Further, by City Council Resolution 30280, the City is required to periodically revisit the commercial portion of the SEC to revise it to achieve performance 20% beyond the ASHRAE 90.1 standard currently in effect. Independently and beyond the purview of the EIS, the City is developing a variety of initiatives, proposals and programs to achieve the goals of the Executive Order.

6. Your comments relating to district energy systems, fuel switching, and carbon neutrality, are noted. The City's proposal indicates support for strategies that would reduce natural gas consumption. See the Final EIS Chapter 3 Energy section for additional description of such proposals and their broad implications.

**Letter 10**  
**Downtown Seattle Association**

1. Your comments preferring increased heights and densities and a historic transfer of development rights program applicable to historic buildings are noted.
2. Your comments in opposition to the No Action Alternative are noted.

**Letter 11**  
**Futurewise**

1. Your comments supporting infill growth in the Downtown Urban Center (including the study area) on the basis of increased efficiencies in land use, transportation and greenhouse gas emissions are noted.

2. Your comments agreeing with the zoning strategy for historic and culturally significant portions of Pioneer Square and Chinatown/I.D. are noted.
3. Your comments with respect to industrial lands are noted. DPD is undertaking further analysis of industrial lands south of the study area in 2008.
4. Your comments supporting a bolder “hybrid” alternative set of zoning changes is noted. See Chapter 2 of this Final EIS for discussion of the Preferred Alternative that is a hybrid of zoning options studied in the other EIS Alternatives.
5. Your comments with respect to density, incentives for infill development, green building standards, and public investments in pedestrian connections and public spaces, are noted.

**Letter 12**  
**International District “Vision 2030” stakeholders group**

1. Your comments describing a neighborhood vision, a holistic planning approach that captures public benefits, a requested package of recommendations with financial, regulatory and other tools, and interests in attaining more affordable housing while minimizing gentrification pressures, are noted. DPD planning staff are considering these recommendations and will present this information to decisionmakers for their consideration. See Chapter 2 of this Final EIS for a further description of a Preferred Alternative.
2. Your comments describing the “Vision 2030” and related neighborhood goals for the entire Chinatown/I.D. neighborhood are noted.
3. Your comments on housing, building rehabilitation, balanced development, financial programs including a growth related fund, incentive zoning and transfer of development rights programs, are noted.
4. Your comments advocating for more effective code enforcement of current building, health and safety codes, are noted.
5. Your comments requesting limitations on the size of retail businesses newly locating in the community are noted.
6. Your comments, supporting an additional process beyond the International Special Review District for the purpose of assessing proposed “formula businesses,” are noted.
7. Your comments, on a possible different design review process for Little Saigon east of I-5, are noted.
8. Your comments, about shared parking, sufficiency of parking for residential and commercial vitality, and a community parking structure, are noted. These parking topics would be subject to future ongoing planning and decisionmaking by City departments, including but not limited to the Department of Planning and Development and the Seattle Department of Transportation. In general, “community parking structures” are difficult to achieve using public funding. However, it is conceivable that shared off-street parking arrangements can be made in the future, with private developments, which would help provide for the long-term parking needs of the Chinatown/I.D. neighborhood.

9. Your recommendation to expand the Metro free-ride zone to Rainier Avenue S. is noted. Feasibility of this potential action could relate to total costs of making such a change and overall prioritization of transit service to the city as a whole.
10. Your comments, about expanding Green Street designations on S. Washington Street, S. King Street and S. Weller Street, are noted. The Preferred Alternative proposes several extensions of Green Streets, a number of which appear to be the same as these recommendations.
11. Your comments, advocating for one staff person in the City to work on neighborhood objectives, are noted.
12. Your comments, advocating for IDM 100'/200' zoning in the 4<sup>th</sup>/5<sup>th</sup> Avenue S. vicinity north of S. Jackson Street, and an IDR 200' zone east of 5<sup>th</sup> Avenue S., with approximate setback recommendations for avoiding shadow and view impacts, are noted.
13. Your comments, advocating for IDM zoning with 125-foot or 150-foot height limits across the core area of the Chinatown/I.D. neighborhood, with approximate setback recommendations, are noted.
14. Your comments, advocating for a zone similar to IDM and NC2 zones, with 65-foot, 85-foot and 150-foot height limits, street level use and transparency requirements, maximum sizes of use to 25,000 or 50,000 square feet, housing preferred above street level, and an additional review process for formula businesses, are noted.
15. Your comments, advocating for an NC3 style of zoning with 180'/240' height limits (for commercial and residential uses, respectively) in the south-of-Dearborn vicinity and over-tracks vicinity, are noted.

**Letter 13**  
**Inter\*Im Community Development Association**

1. Your preference for a holistic planning approach that will capture public benefits in exchange for development, as described in the Vision 2030 letter, is noted. Your preference for the required use of financial and regulatory tools and programs implemented concurrent with land use/zoning changes is noted.

The commentary on “goals and targets” is noted, but the lead agency disagrees with some of the premises of this comment.

- More specific goals and targets of the kind suggested in this comment are not necessary to discuss further in this EIS, which already includes discussion that meets and exceeds the needs for a programmatic environmental impact analysis per SEPA. Comprehensive Plan policies already provide direction that establishes applicable goals.
- Mathematical assessment of future scenarios and consideration of goals and target concepts can facilitate further discussion of housing policy over time between neighborhood stakeholders and City departments. However, the lead agency disagrees that otherwise the EIS or planning effort is merely a “hypothetical urban design exercise.” Similarly, it is not clear that without more specific goals and targets the EIS or planning effort lacks understanding of how scenarios would “play out in the real world of real estate development.” The lead agency suggests that establishing more specific goals and targets may involve numerous speculative assumptions about real estate markets and potential

government actions. Such efforts are beyond the scope of this EIS. These are matters better discussed and evaluated through the ongoing policymaking and implementation efforts of the City departments that address housing and development issues.

- The lead agency disagrees with the premises of the stated concept that “existing City plans and policies, including the Comprehensive Plan, are not adequately used as a framework to establish specific goals and targets by which to evaluate anticipated outcomes of the Alternatives.” This is contrary to the City’s plans and policies including the Comprehensive Plan and other housing-related plans. Also see comment #17 in this letter which “at the very basic level” supports addressing and meeting, at a minimum, the Comprehensive Plan housing related goals.
2. Your comment noting incorrect table headings on DEIS page 3-97 is noted. These table column headings have been corrected.
  3. The cited difference on DEIS page 3-99 in residential growth assumption is correctly portrayed. This limited difference in residential growth assumption for Alternative 1 is considered acceptable for impact analysis purposes, and is related to assumptions about how many buildings would be constructed to accommodate the future growth under the alternatives. See Chapter 2 and the cited text in Chapter 3 of this Final EIS for any edits made for clarity, or in relation to the Preferred Alternative.
  4. This comment apparently refers to the population and employment impact conclusions at the bottom of Draft EIS page 1-13. Your disagreement with the conclusions on grounds of affordable housing loss and gentrification pressures is noted. However, this EIS does not conclude that such impacts would occur in a significant adverse manner (see analysis in the Chapter 3 Housing section of this Final EIS). This includes discussion of potential loss of affordable housing units. The “demographic evaluation of who these low income residents are” is discussed on DEIS pages 3-94 and 3-95. Therefore, no substantive lack of analysis is demonstrated by this comment.
  5. Hypothetical building bulk massing and associated westward view impacts from Danny Woo Garden and an optimal street view near Kobe Terrace Park are already provided in the Draft EIS (see Figures 3-27 and 3-28 on DEIS pages 3-122 and 3-124. No further views or modifications of the hypothetical bulk scenarios presented are necessary to respond to this comment. However, it is agreed that these are designated areas for view protection, so future buildings on relevant properties should be designed and reviewed with an eye toward being consistent with such protections.
  6. This comment cites two data points that are indicators of households and housing units derived from different information sources. This response acknowledges there are disparities in these measures, even though there are also differences in what is counted: e.g., individuals or groups of individuals forming a single “household” as compared to numbers of residential units. The comment attempts to further relate these two data points to existing identified “gaps” in open space provision, which are identified from another Seattle Parks Department study. Because the cited data points from three separate sources cannot be reliably linked in a mathematical sense, the quantitative conclusion derived in the comment is not justified. Rather, the EIS reader may rely on the existing “gap” information that is provided at page 3-157 in the DEIS.
  7. Undoubtedly, noise from Interstate 5 traffic contributes to elevated noise levels in portions of the Kobe Terrace/Danny Woo Gardens park. It is not necessary in this EIS to conduct a noise study at this location or to propose sound mitigation, because this condition is not an impact of the alternatives studied in the EIS and so no mitigation is required.

8. Your preference for new programs to be created to help support community livability strategies is noted.
9. Your support for extending an IDM 100'/200' zone east to the intersection of 6<sup>th</sup> Avenue S. and S. Main Street is noted. The lead agency agrees with the rationale expressed in this comment, and clarifies that the observation on DEIS Appendix page A-14 referred primarily to S. Washington Street. Main Street between 5<sup>th</sup> and 6<sup>th</sup> Avenue S. has a relatively modest slope where new businesses could be feasible and complementary to the existing setting. It is also noted that one building on the south side of Main Street that would be affected by this zoning concept is located within this neighborhood's National Register historic district.
10. Your support for a rezone to NC3 65' for the block east of Rainier Avenue S. containing the Japanese Language School landmark is noted. See Letter #14 for more details.
11. The lead agency agrees with the objective of limiting shadow impacts and their effect on the Danny Woo Gardens. The City's review of future specific development proposals in locations near the gardens would provide one venue for ensuring building bulk is well-located and conditioned to avoid significant adverse impacts.

For this programmatic EIS, new sun and shadow analysis was performed to yield more perspective on the potential extent of impact. The analysis confirms there are shadows relating to garden areas, but only at certain times of year, certain times of day, and generated predominantly by hypothetical future development of one property at the southwest corner of the intersection of Main Street and 7<sup>th</sup> Avenue S. Morning shadows until roughly 11 a.m. in the months of October through mid-March could be generated on the garden area if a 150-foot tall building was built at 7<sup>th</sup>/Main. However, during other Spring and Summer periods, the shifting position of the sun in the sky negates the possibility of this impact. This is identified as a potential adverse shadow impact, but it is also considered to be of minor magnitude. The judgment of minor magnitude also relates to the modest differences between the existing IDR 150' zone and the proposed amended 150' zone.

12. Your preference for regulations to mitigate possible impacts to the historic core in the Chinatown/I.D. neighborhood is noted. The Preferred Alternative, as discussed in Chapter 2 of this Final EIS, contains proposals for setbacks in the cited vicinity. "Variable height limits" such as currently used in the Pioneer Square PSM 100' zone are not included in the Preferred Alternative, and are not likely relevant to the identified "old Uwajimaya grocery" block because the likely development would occur under one property ownership probably through a single development plan and not in an intermittent and dispersed single-property fashion as has been the case in Pioneer Square.
13. Your comments, which summarize several of the conclusions made in the business/economic impact analysis with respect to Little Saigon (see Appendices C-1, C-2 and C-3) but disagree with the strength of the conclusions about the severity of the identified potential impacts, are noted. While this comment suggests an inadequacy of analysis, the lead agency concludes that there is no inadequacy of the analysis under SEPA requirements, but the commenter simply disagrees with the strength of the findings and conclusions about the probable likelihood of occurrence. The lead agency concludes that the EIS already "closely evaluate[s] the likely development outcomes by the Alternatives for this area, and the impact on existing small businesses, along with effective mitigation strategies."

14. Livable South Downtown planning, including the City’s efforts to define and evaluate a range of alternatives in the EIS, have considered the values and character of the community in detail, and the distinctive nature of each part of the Chinatown/I.D. neighborhood. Your comment’s disagreement with the nature of one EIS alternative’s zoning for Little Saigon and the conclusion of no significant adverse land use/development pattern impacts for Alternative 1 on DEIS page 3-12 are noted. However, the lead agency disagrees with this comment. As is clarified in the detailed land use analysis on EIS Appendix page A-16, this particular conclusion was informed by interpretation of the degree of zoning change. This includes noting that Alternative 1 zone changes north of S. Jackson Street would be from “Commercial” 1 to “Neighborhood Commercial” 3 zones without increases in zoned height limits. Given the characteristics inherent in those zones, such a change may be interpreted as a minor change for that location. Similarly, a rezone from an Industrial Commercial 65’ zone to a Neighborhood Commercial 3 85’ zone would likely lead to land use patterns that evolve away from heavier commercial and industrial uses as noted in the DEIS, and this can be construed as having negative and positive implications with a reasonable conclusion that does not indicate “significant adverse” impacts. See the Preferred Alternative description in Chapter 2 of this Final EIS as to how it relates to Little Saigon.
15. The perspectives, values and goals included in this comment about development patterns and zoning choices are noted. See the Preferred Alternative description in Chapter 2 of this Final EIS as to how the Preferred Alternative recommendations relate to Little Saigon.
16. Your comments favoring implementation strategies that include community development financing tools, community renewal designations, an interagency initiative and impact fees, are noted. See the Preferred Alternative description in Chapter 2 of this Final EIS as to how the Preferred Alternative recommendations relate to Little Saigon.
17. The perspectives, values and objectives in this comment about the housing study, goals, relationships to the Comprehensive Plan, and future development are noted. It is acknowledged that the cited Comprehensive Plan policies H30 and H34 are relevant to the discussion of housing production objectives. Encouraging family housing, limiting residential displacement, and encouraging rehabilitation of vacant and substandard buildings are noted as preferable objectives.  
  
The lead agency notes that the EIS study does not need to establish quantifiable goals for future affordable housing production. These are better defined by the Comprehensive Plan, other City housing policies and plans, and related ongoing policymaking and implementation efforts by City departments such as OH. Also see the response to comment #1 of this letter.
18. The numbers as cited in this comment are consistent with the information presented on DEIS pages 3-98 and 3-99. The initial text in the Impacts discussion on page 3-98 explains the basis for the EIS growth scenarios used in the impact analysis, which include their alignment with projections made by the Puget Sound Regional Council. See the cited section in the Final EIS for any edits made to improve clarity and/or update the analysis with respect to the Preferred Alternative.
19. With the assistance of OH, the information presented in Table 3-11 has been reviewed and corrected using the latest housing inventory information, and is now much closer to the number you cite. The corresponding housing unit total is now shown as 2,394 units, and the number of subsidized rental units is shown as 1,347 units. The housing inventory information, as of 2008, is included in Appendix E.1 to this FEIS.

20. OH has clarified that the Multifamily Property Tax Exemption projects are not considered “subsidized,” but a number of those units are considered “affordable.” According to rent level information available to OH, units in the Metropolitan Park and Ticino buildings are considered “affordable.” Regarding an identified disparity about either 683 or 819 dwelling units having regulatory agreements at least to year 2030, the difference of 136 units may be due to the newest completed building known as Washington Terrace at 6<sup>th</sup>/Yesler. The housing inventory information, as of 2008, is included in Appendix E.1 to this FEIS.

21. The lead agency acknowledges that achieving additional affordable housing growth will entail making effective use of a range of available tools and strategies via public sector and private sector efforts. The information provided in this comment illustrates future needs that can be discussed over time by the City and neighborhood stakeholders. However, a couple of specific details about the information presented warrant further response.

The estimation of needs in the second table in this comment is an example of a “balance sheet” approach that the lead agency considers to be unreliable for identifying levels of environmental impact, but may be useful in later discussions between stakeholders and City departments. The most pertinent example of an inaccuracy in that table (for impact analysis purposes) is its assumption that “at-risk” housing will be lost and therefore will add to the numbers of affordable housing needed to be replaced in the future. This cannot be assumed as likely to happen merely because zoning would change, in some cases only in minor increments, on the affected properties shown on Table 3-19 (DEIS page 3-88).

In the first table within the comment, it appears that the “new housing units” totals presented for Alternatives 3 and 4 are not correct. Rather, based on Table 3-25, the projected growth through 2030 of new housing units is 3,837 dwelling units for Alternative 3 in Chinatown/I.D. including the south-of-Dearborn vicinity, and 1,826 dwelling units for Alternative 4 (the No Action Alternative).

22. Your comment disagreeing with the statement about funding 2,800 dwelling units through capital subsidies if trends continue into the future (see DEIS page 3-88), is noted. That sentence has been deleted from the Final EIS because it is too presumptive about future trends.

23. Table 3-20 contains projections relating to the Commercial Bonus Program, which currently is limited to supporting production of units at or below 80% median income.

24. Your comments advocating for particular transfer of development rights concepts and rezones within the historic core of Chinatown/I.D. are noted. See the Livable South Downtown recommendations report, and Chapters 2 and 3 of this Final EIS for edits, which further describe preferred approaches that include transfer of development rights concepts applicable to Chinatown/I.D. The lead agency disagrees with this comment’s premise that not rezoning the historic core would “preclude” vacant and substandard buildings from securing resources from transfer of development rights proceeds.

25. The Draft EIS indication on page 3-89 that some existing housing units in privately owned buildings may become more affordable over time describes a possible future trend, reflecting what City staff have observed in other neighborhoods in the City. That doesn’t necessarily mean it will happen in South Downtown, and it is not intended to be part of a “strategy for housing affordability.”

26. Your comments, indicating a preference for a progressive incentive zoning program that includes on-site (inclusionary) affordable housing construction or payment-in-lieu, a well-valued in-lieu payment amount, and an in-perpetuity commitment to affordability for the produced units, are noted. The City is pursuing an expansion of the Incentive Zoning Program separate from this EIS process. Your comments on how best to accomplish that program activity also should be provided as input to the Incentive Zoning proposal's decision-making process.
27. Your comments on the low proportion of affordable housing as compared to future projected development are noted. See Chapters 2 and 3 in this Final EIS for any edits that further describe the Preferred Alternative and the housing impacts.
28. Your summarizing comments on housing impacts are noted. See the responses to several other comments in this letter, including comments #1 and #17-27. The EIS Housing section evaluates and discloses a range of possible adverse impacts, but does not conclude that the potential impacts constitute a "significant adverse" or a "significant unavoidable adverse" impact. Your comments and suggestions about other financial and legislative tools that should be implemented to help achieve your preferred outcomes are noted.
29. Your comments in the attachment, which represent the Vision 2030 group's proposal of several strategies to address community concerns about future development's effects, are noted.

#### **Letter 14**

#### **Japanese Cultural and Community Center of Washington (Nikkei Heritage Association of Washington)**

1. Thank you for your comments requesting Neighborhood Commercial 3 65' zoning on the "Japanese Language School" property located between Rainier Avenue S., 16<sup>th</sup> Avenue S., S. King Street and S. Weller Street. Refer to Chapter 2 of this Final EIS for details on the Preferred Alternative.

#### **Letter 15**

#### **Seattle Chinatown International District Preservation and Development Authority (SCIDPDA)**

1. Thank you for your comments requesting additional zoning incentives and strategies to address building rehabilitation objectives in the historic core of Chinatown/I.D. The Preferred Alternative (see Chapter 2 of this Final EIS) addresses this topic by strategies including additional capabilities to use transfer of development rights strategies.

#### **Letter 16**

#### **Jackson Place Community Council, Jill Moe**

1. Thank you for your comments addressing the public process, the geographic scope of the EIS analysis, and the need to evaluate indirect, direct and cumulative impacts for transportation and other environmental elements.

With regard to your request for response to your EIS scoping letter, you should be aware that SEPA does not require the lead agency to provide a letter response to comment letter writers on the scope of an EIS. After scoping, DPD planning staff did contact and meet with your group to describe the planning process and answer questions.

The size and extensive nature of the study area means that the impact analysis considered effects of growth across a wide-ranging portion of the city. Based on preliminary assessment during scoping as well as subsequent analysis for the EIS, no further extension of the EIS study area was considered needed by the lead agency for the impact analysis.

The potential for indirect impacts across a broader area was considered as staff prepared the EIS analysis, but few potential indirect impacts relevant to Jackson Place were identified. Examples of EIS discussions relating to a broader area than the study area include the following. 1) The EIS analysis mentions a relative consistency between Livable South Downtown land use alternatives and your vicinity's Central Area Neighborhood Plan. 2) It discusses the limited potential for direct land use and height/bulk/scale impacts of proposed changes as they relate to the eastern edge of the study area which is the Jackson Place vicinity nearest the study area. 3) The EIS includes review for historic landmark character of a few buildings located just outside the study area in the Rainier Avenue S. vicinity. 4) The Transportation section evaluates impacts on some intersections outside the study area (such as at S. Spokane and S. Lander Streets); and 5) also evaluates some transit loading impacts that have indirect effects on other areas served by those routes, including non-study-area neighborhoods east of I-5. Also note the transportation information in the paragraph below.

The EIS analysis as a whole examines a reasonable amount of residential and employment growth that could occur within the study area between the present and 2030, which corresponds to regional growth projections from the Puget Sound Regional Council as they relate to Seattle. The transportation analysis similarly uses growth projections and models that fully account for projected growth not only within the study area but in a widespread area outside the study area as well. For example, all growth in the City and region has been incorporated into the model to account for the expected increase in travel on all modes of transportation caused by development outside the study area. This means that traffic from specific developments now underway on S. Jackson Street and at Hiawatha do not need to be explicitly included in the transportation analysis because they are already accounted for as a part of anticipated future growth in Seattle. Therefore, the transportation analysis already addresses cumulative impacts and does not underestimate transportation impacts as suggested. Only known development projects located within the study area were listed explicitly in Table 5-2 of Appendix G.

2. Your comments regarding LOS F traffic conditions along S. Dearborn Street, Rainier Avenue S., and S. Jackson Street are noted. Arterial operations along these corridors are expected to remain at LOS E and F conditions under each of the alternatives, including the No Action Alternative, as shown in Tables 5-7 and 5-9 in DEIS Appendix G. It is expected that strategies to reduce the dependency on the automobile and advanced traffic management measures, as highlighted in Chapter 6 of Appendix G, can be implemented to help manage traffic conditions on these arterials. This means it would be possible to mitigate and reduce the worst-case significant adverse traffic conditions at the identified locations.
3. The City has already allocated \$600,000 for designing and implementing traffic calming improvements in the immediate Jackson Place vicinity just east of the study area. This should be able to sufficiently address the identified cut-through traffic issues with a practical set of traffic calming improvements, such that further improvements would not be likely needed. This EIS has not identified spillover parking impacts in Jackson Place as adverse, significant adverse or significant unavoidable adverse impacts, and therefore no mitigation for this is proposed.
4. It is acknowledged that the EIS discussion of possible mitigation strategies, such as those relating to bus services, does not create an obligation for other agencies such as King County Metro to

provide additional services. Bus service hours are determined according to the availability of those agencies' funding resources and their decisions that allocate and distribute service to their system's routes inside and outside of Seattle. The Seattle Department of Transportation has on their work plan for 2008 a study to continue on with consideration of options such as those described in the Livable South Downtown EIS.

5. Your comments about air quality, traffic, energy efficiency and "green" strategies for addressing air pollutant presence are noted. Increased traffic in South Downtown would likely contribute to additional amounts of air pollutant loading. However, scoping processes for the EIS (including conferring with a representative of the Clean Air Agency) resulted in the lead agency concluding that potential traffic-specific air quality impacts would not rise to the level of probable significant adverse impacts, and thus did not warrant quantitative analysis. The Livable South Downtown planning process endorses the environmental benefits of "green" strategies as they may relate to achieving benefits such as greater energy efficiency, improved drainage performance, greenhouse gas emission reductions, and improved air quality. This topic is acknowledged in various sections within the Draft EIS and in the FEIS Chapter 3 Energy section, and further information is available in the Livable South Downtown recommendations report.
6. Please see the response to comment 1 in this letter.
7. As is noted in the EIS Scope under the Land Use element, light/glare and shadow impacts were to be analyzed as follows: "*Qualitatively describe the adverse impact implications of potential noise, odor, light/glare and shadowing factors to the extent they relate to overall judgments of land use compatibility between types of uses prescribed in the alternatives.*" The Draft EIS included discussion of these topics mostly in relation to the Stadium Area and the Kobe Terrace Park/Danny Woo Gardens. The Land Use—Height, Bulk, Scale and Compatibility section in Chapter 3 of this Final EIS now includes an additional sentence characterizing potential for light/glare impacts for the Rainier Avenue S. vicinity under the Preferred Alternative.
8. The impact analysis for this EIS does include evaluation of a shopping center/mixed-use development at the Goodwill property as part of the growth scenario for Alternatives 1, 2 and 3. Alternative 4, which is the No Action Alternative, evaluates a smaller development at that site. Specifically, this includes the land use-related, economic/business and transportation sections of the EIS as well as any other impact analysis that evaluates impacts related to the amount of growth. Such analysis was conducted at a programmatic level suited to the environmental review needs of the Livable South Downtown planning study. The analysis to date has not identified inconsistencies of a commercial/mixed-use development at the Goodwill site with the zoning evaluated in the EIS alternatives. The site-specific environmental impact statement completed for the Goodwill site proposal prior to this EIS also includes extensive impact analysis addressing most of the elements of the environment. Please see the Preferred Alternative's zoning recommendations described in Chapter 2 of this Final EIS.

**Letter 17**  
**Kelly Lawrence**

1. Your comments recommending a street-level solution and removal of the Alaskan Way Viaduct are noted.

**Letter 18**  
**Seattle Great City Initiative, Michael McGinn**

1. Your comments supporting infill growth in South Downtown on the basis of land use, transportation, and environmental health efficiencies and associated positive effects on greenhouse gas emissions, resource consumption, sprawl, and natural environment pollution are noted. The positive implications were already acknowledged in the EIS impact analysis, but your point that the No Action Alternative also leads to adverse impacts has been acknowledged in edits to the Environmental Health section.
2. Your comments in favor of considering higher height limits for the purpose of generating additional housing, amenities and achieving other objectives are noted.
3. Your comments describing the transit hub and walkability of the central portion of the study area, and the preference to design streets for all users not just single-occupant vehicles, are noted.
4. Your comments in favor of further planning for enhanced parks, green streets and open spaces so that new development can meet “green infrastructure” objectives is noted.
5. Your comments in favor of sustainability, including in relation to energy efficiency strategies, are noted.
6. Your comments on the benefits of jointly planning for parks, transportation and sustainability objectives to achieve integrated “green infrastructure” results are noted. The recommendations from Livable South Downtown planning include strategies that may assist in making progress toward those objectives.

**Letter 19**  
**RealSolutions Capital LLC, Joe Nabbefeld**

1. Your comments favoring the goals and objectives of the Livable South Downtown planning study are noted. To clarify a point made at the end of this comment, the different geographic allocations of growth studied in the EIS alternatives were defined for impact analysis purposes, and are not meant to endorse growth only in one portion of the study area or another.
2. Your comment noting the “carbon footprint” benefits of concentrating growth in the Downtown urban center, and the associated adverse impacts of not concentrating such growth (implied by the “no action” alternative), are noted.

**Letter 20**  
**Daniels Development, Kevin Daniels**

1. Your comments describing the “Over-Tracks” property and its development, and your zoning preferences, are noted.
2. The conceptual benefits of increased height in zoning regulations are acknowledged. The City’s SEPA policies on height, bulk and scale describe the potential for impacts in relation to possible incongruities or incompatibilities (SMC 25.05.675 G). They also indicate a preference for land use regulation to provide for smooth transitions between areas in different use.

The programmatic-level impact analyses on this topic in this EIS consider the potential for impacts under a “worst-case” scenario describing what theoretically might occur if height and bulk controls were absent or insufficiently defined in zoning regulations. This not only satisfies SEPA impact analysis purposes but can inform and influence the lead agency’s development of final zoning recommendations and decision-makers’ decisions.

**Letter 21**  
**Nitze-Stagen & Co., Inc., Kevin Daniels**

1. Your comments describing the “North Lot” property and its development, and your preferences for analyzing a new PSM 200’ zone at this location, are noted. See Chapter 2 of this Final EIS for further information on the Preferred Alternative.
2. Please see the response to comments 4 through 8 in this letter.
3. The conceptual benefits of increased height in zoning regulations are acknowledged. With regard to the last bullet point in this comment, it is inaccurate to conclude that in this EIS there is a “stated assumption that all height increases...cause adverse impacts.”

The City’s SEPA policies on height, bulk and scale describe the potential for impacts in relation to possible incongruities or incompatibilities (SMC 25.05.675 G). They also indicate a preference for land use regulation to provide for smooth transitions between areas in different use.

The programmatic-level impact analyses on this topic in this EIS typically consider the potential for impacts under a “worst-case” scenario describing what theoretically might occur if height and bulk controls were absent or insufficiently defined in zoning regulations. This not only satisfies SEPA impact analysis purposes but may inform and influence the lead agency’s development of final zoning recommendations. Additional information included within Chapter 2 of this Final EIS provides more details about preferred height and bulk controls that would help avoid the worst-case impacts.

4. Your comments regarding the differences in land use assumptions specific to the “North Lot” are noted. The transportation analysis was conducted at a non-project-specific level, looking more broadly at the land use scenarios that could occur in each neighborhood under the proposed zoning. While individual development project assumptions might vary, the goal of the EIS transportation analysis was to identify approximate types and amounts of land use growth that might occur in the neighborhood. To begin this process, land use was estimated based on many sources of data, including preliminary development discussions. Prospective future development information was then summarized within the City’s travel demand model’s Transportation Analysis Zones (TAZs). Review Section 5.3 of DEIS Appendix G for a description of how the travel forecasts were prepared. This provides a reasonable estimation of future development to year 2030 in each particular neighborhood under each alternative. The transportation analysis is flexible enough and conservative in its growth assumptions such that it “covers” impact analysis for a number of different possibilities for future development at specific locations. Future project-specific reviews and analysis for specific development proposals could help further clarify project-related traffic impacts in the area, as is intended by SEPA policies.
5. Your comments regarding mode split and internal trips are noted. Tables 5-4 and 5-5 in DEIS Appendix G indicate a minimum 1% shift to non-passenger-car vehicles is likely to occur under the alternatives when compared to the No Action Alternative. Only 29% of the trips are expected

by single-occupancy vehicle. The City's travel demand model provides the best indication for future travel behavior based upon a series of assumptions including type of land use, vehicle delays, parking costs, transit network, etc. All these systems work together to define the population's particular transportation choices. No other tools are available to further model travel behavior for a geographic area as complex as this study area. Although it is recognized that additional shift to other modes might take place in the future, the City's travel demand model is the best available tool. In addition, the current analysis is a conservative estimate of possible impacts and therefore is preferable with respect to the disclosure purposes of this EIS.

6. Your comments regarding the need for additional transit improvements are noted. The mitigation strategies described in Chapter 6 of DEIS Appendix G highlight several types of strategies and improvements that could be made to the transit system to facilitate and improve this mode of travel. The transportation analysis indicates that new service alone would not be enough to address the deficiencies shown for each of the alternatives, including the No Action Alternative. New transit-only facilities (such as transit traffic lanes) are likely needed to improve transit speed and reliability through the study area. Transit improvements are being studied by the City as part of the Urban Mobility Plan, and such efforts will consider the strategies and issues raised by this transportation analysis.
7. Your comments regarding the loss of off-street parking spaces are noted. A comment about the contract provision to replace the lost surface spaces in the "North Lot" has been included in the Final EIS. The transportation analysis evaluated the likely number of surface parking stalls that could be lost to redevelopment opportunities, by neighborhood, as shown in Chapter 5.7 of Appendix G. It is likely any parking stalls created as part of new development would be prioritized first for the businesses or residents using that development. The City has a maximum limit on the amount of new parking stalls that can be built as part of new developments. This limits the amount of parking, including for general public use, that could be replaced when surface lots are redeveloped.
8. Your comments regarding the need for specific transit improvements and a transit-service-related sensitivity analysis are noted. The Transportation section of this EIS discloses adverse impacts and identifies potential improvements and strategies to mitigate them. Several types of transit improvements have been identified in Chapter 6.5 of DEIS Appendix G, including items such as bus or HOV lanes, transit signal priority, and increased bus service. These items are being evaluated as part of the City's Urban Mobility Plan that is taking a broader look at what can be done in the study area. Improvements in transit service are believed to be needed to address the future predicted mode split which anticipates larger volumes of transit ridership. An even greater shift to transit would require an even more significant additional investment in transit. These transit investments need to be evaluated over time and prioritized against other improvement needs and balanced against all system users.

## **Letter 22**

### **Urban Visions, Gregory B. Smith**

1. Your preference for a 6 FAR density for the south-of-Dearborn vicinity that is not conditioned on the presence of mixed-use development is noted. Your preference for the study of higher height limits up to 240 feet in this area is noted.
2. Your comments describing the sufficiency of SEPA and MUP processes, and a preference to avoid "public meeting and negotiation processes" in development approval processes, are noted.

3. Your comments describing a preference for the EIS to study greater heights and densities in the Stadium Area are noted.
4. Your comment opposing a zoning choice that would prohibit residential uses on the WOSCA property is noted. However, such a choice would continue to be an option. Your comment about the potential for effective noise mitigation strategies is acknowledged.
5. Your comments noting a preference to avoid “public meeting and negotiation processes” in development approval processes are noted.

**Letter 23**  
**Uwajimaya, Inc., Tomio Moriguchi**

1. Your comments in support of the recommendations of the Vision 2030 group of stakeholders, and support for tools and zoning to realize the favored improvements in South Downtown, is noted.

**Letter 24**  
**Vietnamese American Economic Development Association, Quang Nguyen**

1. Your comments in support of guiding principles that would favor small business districts, cultural character, balanced income-mix in housing production, and discourage encroachment of out-of-scale retailers in the study area neighborhoods, are noted.
2. Your comments in support of the recommendations of the Vision 2030 group of stakeholders, and opposition to NC3 zoning in Little Saigon, are noted.
3. Your comments preferring inclusion of the Dearborn Street (Goodwill site) project within the Livable South Downtown process are noted.
4. Your comments on the inadequacies of the case study examples in the “Phase II” business and economic study (Appendix C-2), and their irrelevance to assessing a large shopping center’s impacts in Little Saigon, are noted. These case studies allowed the consultants to reach a variety of “lessons learned” conclusions that predominantly relate to neighborhood-based community development strategies. This is a body of information that is complementary to the purposes of understanding the existing situation of the Little Saigon and Chinatown/I.D. neighborhoods, and other information in the Phase II study also assists in characterizing the sensitivity of existing business districts and the degree of overlap between existing retail uses and those proposed in the Dearborn Street project. The other Phase I and III studies also contribute to a meaningful body of information.
5. Due to the availability of pro-forma real estate development analyses comparing existing zoning and alternative zoning scenarios, the lead agency was able to make conclusions about the degree to which potential value of development would shift. Under the 85-foot height limit alternatives, the difference in profitability is predicted to be 1-7%, while the 125-foot height limit alternative is predicted to result in reduced profitability due to higher construction costs. These figures and the other analysis of the consultant inform a conclusion of a “modest” increase in potential value of development. See pages 3-53 and 3-54 in the Draft EIS, and pages 30 and 31 of Appendix C-2.

6. Your objections to the description of mass-market customer exposure effects on Little Saigon are noted. See pages 3-54 to 3-55 in the Draft EIS, and pages 33-35 of Appendix C-2. A straightforward reading of the impact discussion shows that it does clearly identify a range of positive and negative possible effects of a new large shopping center at the Goodwill site. It does not diminish the importance of the points cited in this comment. First, it highlights the importance and sensitivity of parking resources available for the existing range of Little Saigon businesses. Second, it acknowledges that customer behavior, locational and topographic factors may discourage most shopping center customers from walking to other Little Saigon businesses outside the shopping center unless they re-park their vehicle elsewhere. Third, the study comments on the capacity and potential interest of Little Saigon businesses in responding to this customer base.

To clarify one point made in your comment, the consultant does not describe the situation as one where “in order for those customers to shop in Little Saigon...” they would “have to park twice” (emphasis added). Rather, the consultant indicates that parking twice would be one possibility that is “considered to be a challenge by the retail industry.”

7. Your comments with respect to the terms “low probability,” “speculative,” and “difficult to predict” are acknowledged. While the terms “low probability” and “speculative” can be construed in a neutral sense that together may convey a sense of their likelihood, it may be preferable to use another term such as “less probable impacts” to avoid possible negative or dismissive connotations. Edits to these terms have been made in the Land Use—Business and Economic Impacts section of Chapter 3 in this Final EIS. The analytic discussion on these points has otherwise been retained.
8. Your comments favoring respect of neighborhood plans and goals and neighborhood-strengthening actions, are noted.