

3.2 Revisions and Clarifications

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

Draft EIS Section 3.2 Air Quality and Greenhouse Gas Emissions

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

The federal annual PM_{2.5} standard has not been exceeded in the Puget Sound area since the U.S. EPA established its NAAQS in 2007. The daily federal PM_{2.5} standard has not been exceeded in the Puget Sound dating back to the initiation of monitoring for this pollutant in 2001 (PSCAA 2014). The U.S. EPA recently adopted a more stringent federal standard for PM_{2.5} in December 2012. All areas of Washington State are in attainment with the federal 2012 PM_{2.5} standards., ~~but attainment designations are not expected until December 2014.~~ Notwithstanding the continued attainment of federal PM₁₀ standards, portions of the Puget Sound region continue to be designated as a maintenance area for PM₁₀. Specifically, the majority of EIS analysis Sector 7 is located within the Seattle Duwamish Particulate Matter Maintenance Area.

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

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

Transportation-related Greenhouse Gas Emissions

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

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

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

Pollutant	Station	Averaging Time	2009 max concentration	2010 max concentration	2011 max concentration	2012 max concentration	2013 max concentration	2014 max concentration	NAAQS ¹ Standard
Ozone	Beacon Hill (Sector 8)	8 hour ²	0.049 ppm	0.043 ppm	0.046 ppm	0.049 ppm	0.047 ppm	0.048 ppm	0.075 ppm
		1 hour	1.4 ppm	1.2 ppm	1.1 ppm	1.0 ppm	1.8 ppm	1.1 ppm	35 ppm
Carbon monoxide (CO)	Beacon Hill (Sector 8)	8 hour	1.0 ppm	0.8 ppm	0.9 ppm	0.7 ppm	1.0 ppm	1.0 ppm	9 ppm
		24 hour	23 µg/m ³	21.4 µg/m ³	21.6 µg/m ³	21.8 µg/m ³	26.4 µg/m ³	22.4 µg/m ³	35 µg/m ³
Fine particulate matter (PM _{2.5})	Queen Anne (Sector 3)	Annual	5.9 µg/m ³	6.3 µg/m ³	6.3 µg/m ³	5.7 µg/m ³	7.0 µg/m ³	6.3 µg/m ³	15 µg/m ³
		24 hour	20 µg/m ³	20.4 µg/m ³	20.8 µg/m ³	23.5 µg/m ³	27.1 µg/m ³	21.1 µg/m ³	35 µg/m ³
Fine particulate matter (PM _{2.5})	Olive & Boren (Sector 4)	Annual	5.7 µg/m ³	5.9 µg/m ³	6.4 µg/m ³	6.1 µg/m ³	7.5 µg/m ³	N/A ³	15 µg/m ³
		24 hour	38 µg/m ³	26.1 µg/m ³	26.2 µg/m ³	26.6 µg/m ³	58.2 µg/m ³	26.5 µg/m ³	35 µg/m ³
Fine particulate matter (PM _{2.5})	Duwamish (Sector 7)	Annual	8.0 µg/m ³	8.5 µg/m ³	9.0 µg/m ³	8.2 µg/m ³	9.7 µg/m ³	N/A	15 µg/m ³
		24 hour	34 µg/m ³	23.5 µg/m ³	25.1 µg/m ³	19.5 µg/m ³	41.7 µg/m ³	35.4 µg/m ³	35 µg/m ³
Fine particulate matter (PM _{2.5})	South Park (Sector 7)	Annual	7.6 µg/m ³	8.5 µg/m ³	9.0 µg/m ³	8.9 µg/m ³	10.0 µg/m ³	8.9 µg/m ³	15 µg/m ³
		1 hour	0.070 ppm	0.052 ppm	0.054 ppm	0.057 ppm	0.058 ppm	0.055 ppm	0.100 ppm
Nitrogen dioxide (NO ₂)	Beacon Hill (Sector 8)	Annual	0.015 ppm	0.013 ppm	0.012 ppm	0.012 ppm	0.012 ppm	0.011 ppm	0.053 ppm
		1 hour	0.053 ppm	0.030 ppm	0.028 ppm	0.030 ppm	0.012 ppm	N/A	0.075 ppm
Sulfur dioxide (SO ₂)	Beacon Hill (Sector 8)	24 hour	0.008 ppm	0.009 ppm	0.011 ppm	0.006 ppm	N/A	N/A	0.14 ppm
		Annual	0.002 ppm	0.001 ppm	0.001 ppm	0.001 ppm	0.001 ppm	N/A	0.02 ppm

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

- 1 NAAQS, other than ozone and particulates, and those based on annual averages or annual arithmetic means, are not to be exceeded more than once a year. The 8 hour ozone standard is attained when the 3-year average of the fourth highest daily concentration is 0.08 ppm or less. The 24 hour PM_{2.5} standard is attained when the 3-year average of the 98th percentile is less than the standard.
- 2 The U.S. EPA revoked the national 1 hour ozone standard on June 15, 2005. This state 8 hour ozone standard was approved in April 2005 and became effective in May 2006.
- 3 No Data Available from PSCAA.

Sources: PSCAA, 2012b.

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

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

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

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

Table 3.2-3 Road transportation emissions (2035)

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

Source: Fehr & Peers, 2014; 2016.

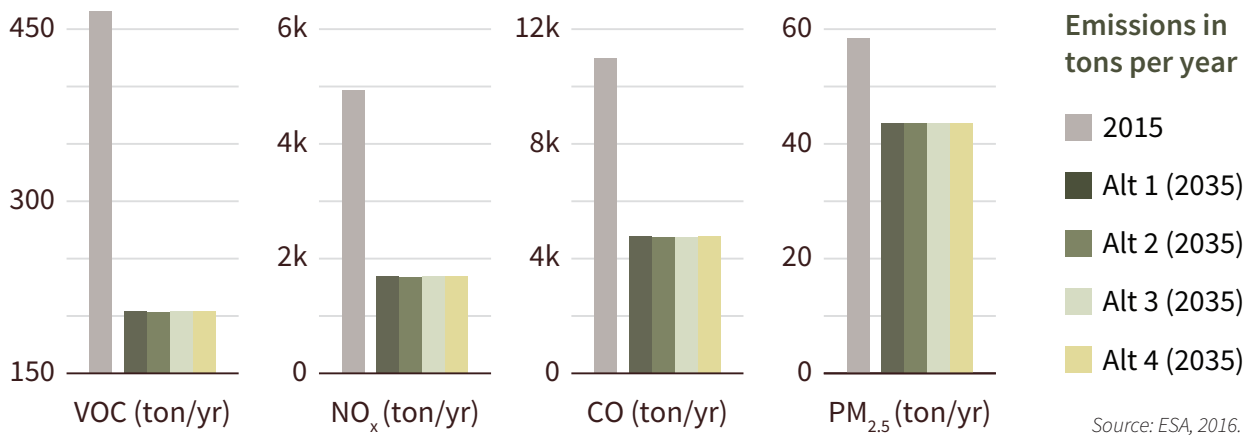
Page 3.2-22, corrections as shown below to text.

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

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

Figure 3.2-6 Road transportation pollutant emissions



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

Total Emissions

Operational GHG emissions from Alternative 1 are presented in Figure 3.2-7 and Appendix A.1. No significant adverse impacts are identified with respect to these GHG emissions. Alternative 1 would result in a net increase of 124,518 metric tons of CO₂e over existing (2015) conditions. The emissions reductions increase from Alternative 1 would be the lowest greatest of any of the four alternatives, largely as the result of greater predicted VMT than the other alternatives, which is a reflection of the greater number of residential development and jobs in the more peripheral urban villages in the city and in places outside urban villages.

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

GREENHOUSE GAS EMISSIONS

GHG emissions under development of Alternative 2 were calculated using the same methodologies as those described for Alternative 1, but reflect the land use differences of increased density of residential development in the urban core. Operational GHG emissions from Alternative 2 are presented in Figure 3.2-8 and Appendix A.1. No significant adverse impacts are identified with respect to these GHG emissions. The emissions reductions from Alternative 2 would be the greatest. While total GHG emissions of Alternative 2 would result in an emissions increase over existing (2015) conditions by 111,303 metric tons of CO₂e, this

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

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

GREENHOUSE GAS EMISSIONS

GHG emissions under development of Alternative 3 were calculated using the same methodologies as those described for Alternative 1, but reflect the land use differences of increased density of residential development in the urban core and places served by light rail. Operational GHG emissions from Alternative 3 are presented in Figure 3.2–9 and Appendix A.1. Total GHG emissions of Alternative 3 would represent an increase over existing (2015) conditions of 116,268 metric tons of CO₂e. No significant adverse impacts are identified with respect to these GHG emissions. The emissions ~~reductions~~ increases realized from implementation of Alternative 3 would be ~~less~~ greater than those of Alternative 2 but ~~greater~~ less than those of Alternative 1, the No Action Alternative. Because this increase is less than that of the No Action Alternative, it is not considered an adverse impact.

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

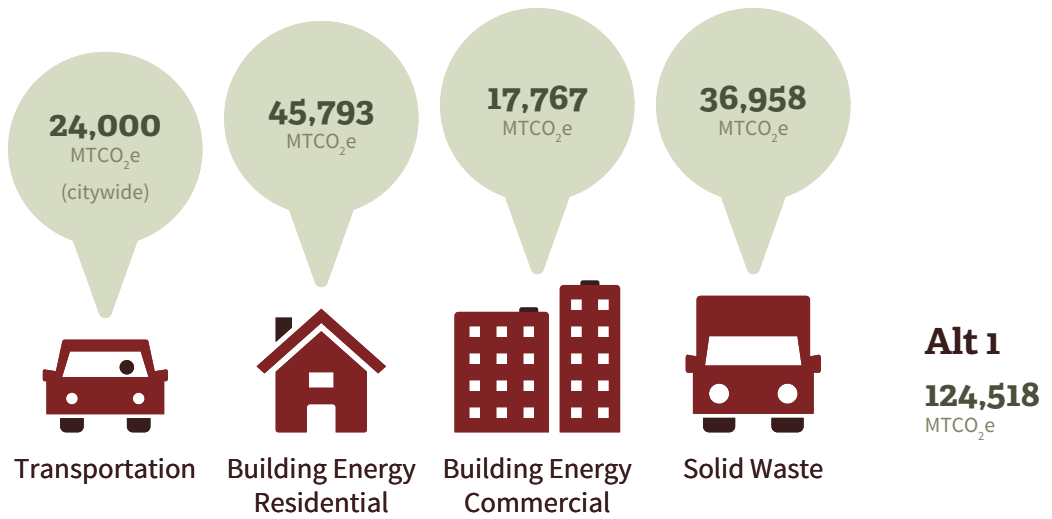
GREENHOUSE GAS EMISSIONS

GHG emissions under development of Alternative 4 were calculated using the same methodologies as those described for Alternative 1, but reflect the land use differences of increased density of residential development in the urban core and selected places served by light rail or bus service. Operational GHG emissions from Alternative 4 are presented in Figure 3.2–10 and Appendix A.1. No significant adverse impacts are identified with respect to these GHG emissions. Total GHG emissions of Alternative 4 would represent an increase over existing (2015) conditions of 117,219 metric tons of CO₂e. The emissions ~~reductions~~ increases realized from implementation of from Alternative 4 would be similar to those of Alternative 3. Because this increase is less than that of the No Action Alternative, it is not considered an adverse impact.

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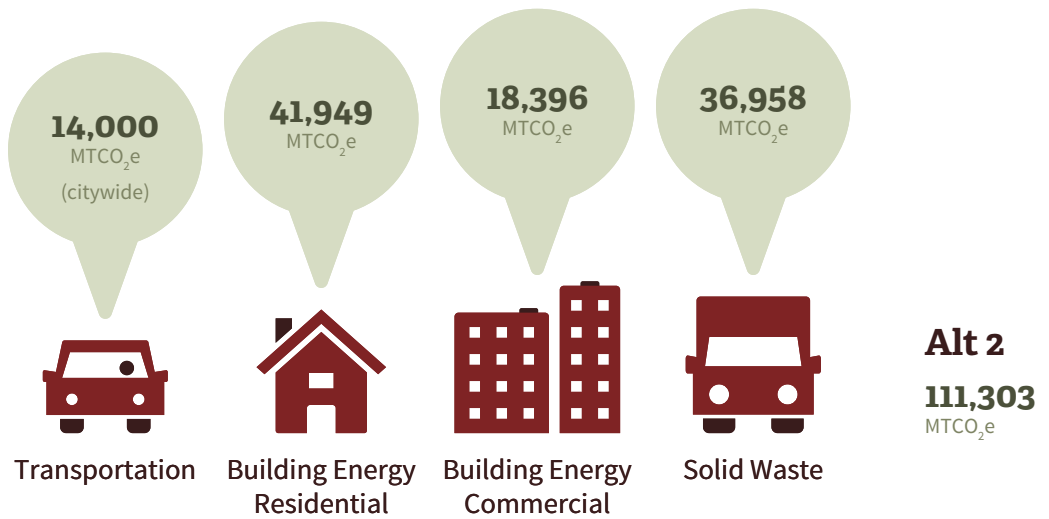
Draft EIS Figures 3.2-7 through 3.2-10 on pages 3.2-24, 3.2-25, 3.2-26 and 3.2-28, corrected as shown below and in Final EIS Appendix B.1.

Figure 3.2-7 Operational GHG emissions of Alternative 1



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

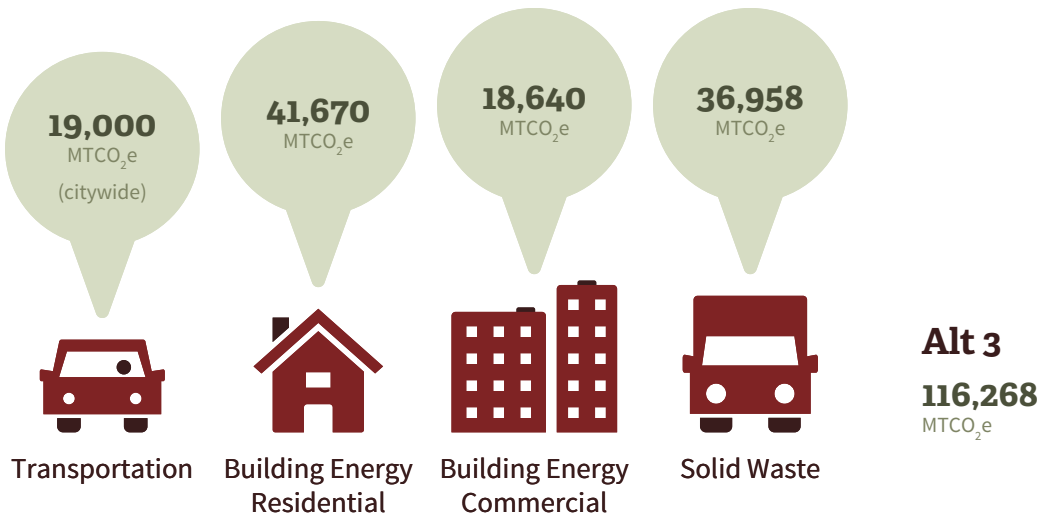
Figure 3.2-8 Operational GHG emissions of Alternative 2



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

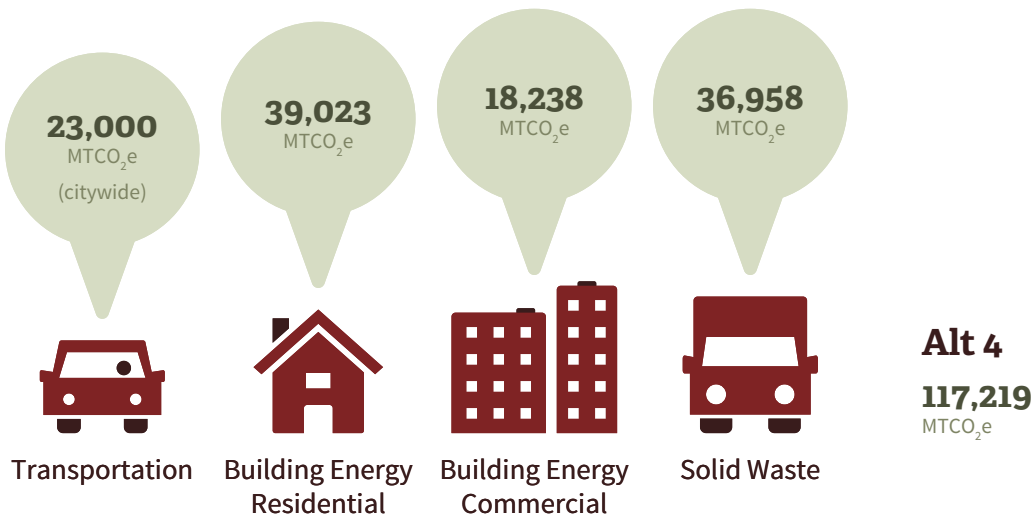
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Figure 3.2-9 Operational GHG emissions of Alternative 3



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

Figure 3.2-10 Operational GHG emissions of Alternative 4



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

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

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

GROWTH-ESTIMATES

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

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

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

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

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

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

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

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

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

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

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

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Draft EIS Section 3.5 Relationship to Plans and Policies

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

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

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

July 8, 2015 Draft Comprehensive Plan

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

LAND USE AND GROWTH STRATEGY ELEMENTS

The Land Use and Growth Strategy elements in the Draft Comprehensive Plan guide future land use and development patterns in the City. The Growth Strategy Element is a new element, consisting primarily of goals and policies from the adopted Urban Village Element. In general, the Growth Strategy Element continues and reinforces the City’s urban village growth strategy, which accommodates the majority of anticipated housing and employment growth in designated urban centers, urban villages and manufacturing/industrial centers. Major policy topics include planning for growth, urban village strategy, distribution of growth, urban design¹, and annexation. Updated goal and policy guidance include having strategies that prepare the City for the challenges and opportunities of growth; accommodate 80 percent of the city’s growth in designated centers and villages; and that maintain and enhance the city’s unique character and sense of place.

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

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

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

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

HOUSING

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

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

TRANSPORTATION

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

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

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

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CAPITAL FACILITIES & UTILITIES ELEMENTS

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

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

ECONOMIC DEVELOPMENT

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

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

ENVIRONMENT

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

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

PARKS AND OPEN SPACE

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

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

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

ARTS AND CULTURE

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

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

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COMMUNITY WELL-BEING

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

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

DISCUSSION

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

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

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

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

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

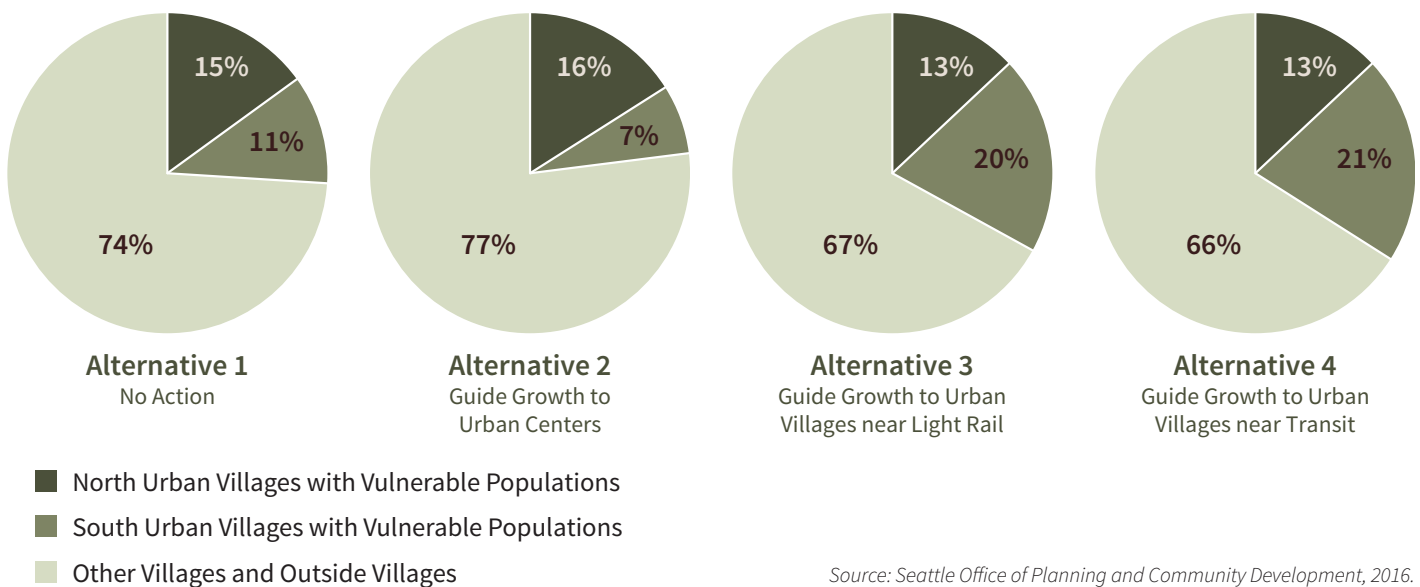
Draft EIS Section 3.6 Population, Employment and Housing

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

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

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

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



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

3.2 Revisions & Clarifications

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

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

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

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

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

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

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

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

Draft EIS Section 3.7 Transportation

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

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

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

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

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

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

Draft EIS Section 3.8 Public Services

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

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

3.2 Revisions & Clarifications

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

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

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

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

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

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

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

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

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

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

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

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

3.2 Revisions & Clarifications

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

Proposed Mitigation Strategies

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

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

Other Possible Mitigation Strategies

PARKS AND RECREATION

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

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

FIRE AND EMERGENCY SERVICES

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

Draft EIS Section 3.9 Utilities

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

Separated Sewers

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

Separated Drainage

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

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

SPU—WATER

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

3.2 Revisions & Clarifications

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

SPU—SEWER AND DRAINAGE

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

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

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

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

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

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

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

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

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

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

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

Draft EIS Chapter 4.0 References

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

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

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

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

3.2 Revisions & Clarifications

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

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

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