

B.4 Letters Received Late

Introduction

Appendix B.4 contains late letters received after the close of the comment period for the Draft EIS. Late letters are not responded to in the Final EIS and are not part of the formal record.

Many of the issues raised in the late letters are addressed in Chapter 4 of the Final EIS. Section 4.3.2 provides responses to commonly raised issues including the alternatives, the growth and equity analysis, schools, public outreach and housing affordability. Section 4.3.2 also responds to general comments and policy recommendations that do not comment on the EIS analysis or alternatives. Additionally, Section 4.3.1 provides responses to individual letters submitted during the comment period for the Draft EIS. These responses cover a wide range of issues including some raised in the late letters such as historic preservation (Letter No. 15), the urban forest (Letter No. 5), policies LU 59 and LU 60 from the City's current Comprehensive Plan (Letter No. 8, Comment No. 4) and transportation analysis (multiple letters).

B.4 Letters Received Late

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June 19, 2015

City of Seattle Department of Planning and Development
Attn: Gordon Clowers
PO Box 34019
Seattle, WA 98104

Dear Department of Planning and Development,

AIA Seattle appreciates the opportunity to review the draft DEIS for the Comprehensive Plan and the companion document addressing Growth and Equity. We are encouraged by the general action the city is taking to manage the anticipated 70,000 additional housing units and 115,000 new jobs yet there are many areas of concern as we plan for the next twenty years. We believe the Seattle 2035 Plan requires more detail particularly in how this growth is handled through appropriate urban design guidance and a transparent proactive approach to social equity.

Add Urban Design Guidance

The Comprehensive Plan should have an Urban Design Element that is more than a collection of policy statements. Each of the alternatives should include locale specific physical recommendations for our public realm in both verbal and graphic form, including plans and illustrations so that the recommendations and capacity can be visualized and understood by all city residents.

A *physical* urban design element is important because an urban design framework plan will identify opportunities that may not be readily apparent and without plan guidance will not be creative. By identifying a collection of common, unifying goals, objectives and projects regarding physical improvements and benefits to our city, the urban design framework will provide focus and direction for many singular public and private actions toward achieving those goals and objectives. Concern for our public realm is critical because from 25% to 30% of our land area is in the form of streets and sidewalks and public space. It provides for critical movement and connections between destinations as well as a potential system of open spaces. In many ways, those "connectors" stitch our public and private spaces together creating the interaction so important for a healthy community. The plan relies on current policies that are inherent with conflicts in how public realm space is allocated and transitioned to private parcels. A synergy results where the resultant whole can far exceed the sum of the individual acts.



Such a visionary plan would assure that our public realm be safe and comfortable for pedestrian travel encouraging more activity and increased interaction of people. A visual plan would minimize uncertainty by illustrating holistic environments that embrace the pattern and form of our urban surroundings, that incentivize amenities and conveniences resulting in pedestrian environments and circulation networks that are safe and comfortable, that offer opportunities for making connections and interacting socially with friends and neighbors, and that contribute to the life and vitality of our city.

Connect Growth and Equity

This verbal and visual representation through illustrative physical plans is critical if we hold to our “core value” of social equity and Mayor Murray’s Executive Order 2014-02 committing to equitable development. It is not apparent that the alternatives have been tested and the policy based plan does not communicate to the general public. Relying on current or future policies and “complaints” is not appropriate for land use decisions. Seattle 2035 should guide our city welcoming growth and concurrent vibrant public realm investments that are shared throughout the city not directed by market forces to direct development resulting in unbalanced public investment.

We encourage you to step back and provide more detail for each alternative so that we can work together to grow our city and provide for an interactive social life:

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Anderson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Eric Anderson, AIA
Chair
AIA Seattle Public Policy Board

Name (Last, First)	Date Received	Comment
Beck, Brian	06/19/2015	<p>June 18, 2015</p> <p>Honorable Edward B. Murray City of Seattle PO Box 94749 Seattle, WA 98124</p> <p>Dear Mayor Murray,</p> <p>I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.</p> <p>These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands – areas that feature a unique mix of land uses and should not be painted with the same broad brush.</p> <p>Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.</p> <p>In Georgetown, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.</p>

Name (Last, First)	Date Received	Comment
		<p>I'm equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in Georgetown for the foreseeable future. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses down the road.</p> <p>When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a comprehensive review of Georgetown, as well as number of studies and other actions. In the intervening years, much of that promised work (via Resolution 31026) was never completed or implemented only in partial form, raising major concerns about the implications of the proposed amendments for Georgetown.</p> <p>I am also concerned about the lack of outreach associated with the Department of Planning and Development Studies that led up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to residents of Georgetown, as prescribed by Resolution 31026. Recommendations from this plan were then advanced without discussion from residents and other stakeholders into the 2035 Comprehensive Plan Amendment process as a fait accompli.</p> <p>Georgetown residents are consistently left out of the discussion when it comes to the direction of industrial land in our community. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground perspective from residents, property owners, businesses and landholders – and instead only reflects the interests of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.</p>

Name (Last, First)	Date Received	Comment
		<p>Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.</p> <p>As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.</p> <p>Sincerely,</p> <p>Georgetown Resident Mailing address and/or email address</p> <p>cc: 2035@seattle.gov Kate Joncas, Deputy Mayor, City of Seattle Diane Sugimura, Director, Seattle Department of Planning & Development Tim Burgess, Seattle City Council Bruce Harrell, Seattle City Council Mike O'Brien, Seattle City Council Tom Rasmussen, Seattle City Council Kathy Nyland, Acting Director, Department of Neighborhoods</p>
Bleakney, Ross	06/19/2015	<p>Please consider the suggestions made here for growth in Seattle: http://www.theurbanist.org/2015/06/16/support-alternative-5-for-seattle-2035/</p> <p>I support all of these suggestions. I believe the first is the most important one. Our Accessory Dwelling Unit regulations are extremely prohibitive, and this contributes to very high housing costs. If we liberalize the rules (make them more like Vancouver BC or Portland OR) then it will go a long way towards making the city more vibrant and affordable.</p> <p>Sincerely,</p> <p>Ross Bleakney</p>

Name (Last, First)	Date Received	Comment
Burnstein, Daniel	6/24/2015	<p>Dear Gordon Clowers:</p> <p>As part of the city's Comprehensive Plan update, please consider preservation of the built environment as an important civic asset. Most people are particularly attracted to neighborhoods that maintain a significant amount of building stock built prior to World War II. Please help keep Seattle beautiful and livable by enhancing zoning or other regulations that will ensure that these properties will be saved from demolition.</p> <p>Thank you, Daniel Burnstein Professor Emeritus of History, Seattle University home address: 2106 48th Ave. SW, Seattle 98116</p> <p>--</p>
Cullen, Joanna	06/19/2015	<p>I am adding to my comments in hope that they will count as having been delivered on 6/18"</p> <p>On Fri, Jun 19, 2015 at 12:00 AM, Joanna Cullen - jfoxcullen@gmail.com- wrote:</p> <p>The City's Comprehensive Plan is a critical opportunity to address the issues and move forward with a vision for the City that plans for a growing region while creating opportunity for all.</p> <p>Plan for schools. Ensure that the District and the City work together to ensure that the neighborhood school facilities that exist are being used in a way that ensures maximum opportunity for children and families to walk to and have access to schools. Then plan for new buildings if necessary.</p> <p>Plan for parks and open space. Ensure that all have a very walkable public park and especially add to those as development is added. Plan for parks in areas that are deficit of parks such as 23rd and E, Union,</p> <p>Plan for families. Do not take away the space for single</p>

Name (Last, First)	Date Received	Comment
		<p>family housing for apartments, Ensure that development lowrise and highrise include family units providing for mixed income communities. Distribute density so that perhaps it is around the light rail stations for instance but with single family home yards and canopy as you move away from that. Do not become concrete everywhere. Ensure adequate transitions from 65 to 40 to single family, Townhouses in lowrise areas provide an opportunity for family housing. More family housing for all income levels is needed,</p> <p>http://www.seattle.gov/Documents/Departments/SeattlePlanningCommission/AffordableHousingAgenda/FamSizePC_dig_final1.pdf</p> <p>http://www.seattletimes.com/seattle-news/data/seattle-no-1-for-techies-looking-to-flee-california/</p> <p>Plan for mixed income communities. Do not destroy existing low income housing but then distribute new low income and affordable housing to areas where it does not currently exist.</p> <p>Plan for transit and transportation. Be realistic in the planning for needs. Do not underestimate the automobile needs, Do studies of each area during planning. Maintain a great distributed system of neighborhood connections while adding to it. Encourage more use of transit making easily accessible with few complications, The fewer transfers the better for people of all ages, Do not put bicycle and walking paths near the most congested streets where the air is dirty. Exercise is good. Breathing bad air is not good. 10 minute walking is not the same for all. Transit should exist within a block of major grocery stores. Small children and disabilities change this for many, This is rather disingenuous measure. When measuring travel time add my walk.</p> <p>It is much preferable for students to not have to transfer.</p> <p>Distribute density in a way that makes it so all neighborhoods have areas of density and single family homes. This will also efficiently feed a good distributed transit network that works for everyone, Perhaps work with schools and families to ensure that all students have an</p>

Name (Last, First)	Date Received	Comment
		<p>Orca pass.</p> <p>Plan for clean air and water. Ban as many pesticides and toxic substances as possible, Educate the public about how to prevent such substances including those in prescription drugs and cosmetics from entering the environment. Good solid environmental practices including retaining our trees will help reduce climate change. Demolition of buildings is not good for the air or for the environment. Add incentives to the codes which discourage demolition of structures. Encourage the inclusion of the existing structures where new development is allowed,</p> <p>Plan for some beauty. I know that Seattle architects must be more talented than many of the new structures demonstrate, The new structure at 12th and Madison where the Under Arms once existed is an example of a tall unattractive building, Plan for the view of the city to and from a building, The plan should look at the street experience and the distant view of a building, The appearance of the city as one approaches from our waterways should also be taken into account. We do not want or need wall to wall concrete, We have to be careful not to ruin our beautiful city and the many attributes that make Seattle a desirable place to live, Design and reflecting the most beautiful parts of a neighborhood should be the goal of new buildings. We need to retain some of our character and have a sense of place and history.</p> <p>--</p> <p>Joanna Cullen</p> <p>975 21st Avenue, Seattle, WA 206-329-8514 jfoxcullen@gmail.com</p>
Cullen, Joanna	06/19/2015	The City's Comprehensive Plan is a critical opportunity to address the issues and move forward with a vision for the City that plans for a growing region while creating opportunity for all.

Name (Last, First)	Date Received	Comment
		<p>Plan for schools. Ensure that the District and the City work together to ensure that the neighborhood school facilities that exist are being used in a way that ensures maximum opportunity for children and families to walk to and have access to schools. Then plan for new buildings if necessary.</p> <p>Plan for parks and open space. Ensure that all have a very walkable public park and especially add to those as development is added. Plan for parks in areas that are deficit of parks such as 23rd and E, Union,</p> <p>Plan for families. Do not take away the space for single family housing for apartments, Ensure that development lowrise and highrise include family units providing for mixed income communities. Distribute density so that perhaps it is around the light rail stations for instance but with single family home yards and canopy as you move away from that. Do not become concrete everywhere. Ensure adequate transitions from 65 to 40 to single family, Townhouses in lowrise areas provide an opportunity for family housing. http://www.seattle.gov/Documents/Departments/SeattlePlanningCommission/AffordableHousingAgenda/FamSizePC_dig_final1.pdf http://www.seattletimes.com/seattle-news/data/seattle-no-1-for-techies-looking-to-flee-california/</p> <p>Plan for mixed income communities. Do not destroy existing low income housing but then distribute new low income and affordable housing to areas where it does not currently exist.</p> <p>Plan for transit and transportation. Be realistic in the planning for needs. Do not underestimate the automobile needs, Do studies of each area during planning. Maintain a great distributed system of neighborhood connections while adding to it. Encourage more use bu making easily accessible with few complications, The fewer transfers the better for people of all ages, Do not put bicycles and</p> <p>--</p>

Name (Last, First)	Date Received	Comment
		Joanna Cullen 206-329-8514 jfoxcullen@gmail.com

June 17th, 2015
Gordon Clowers,
City of Seattle Department of Planning and Development
PO Box 34019
Seattle WA, 98124
RE: City of Seattle Comprehensive Plan Draft Environmental Impact Statement (DEIS)



**Note: submitted by Rachel Eagan
06/19/2015**

Dear Mr. Clowers,

On Board Othello is a coalition of 25+ Southeast Seattle community leaders working to create, coordinate, and implement a shared vision of equitable growth for the Othello neighborhood. On Board Othello's vision and priorities are grounded in the goals the community developed through the Othello Neighborhood Plan Update in 2009. Together, On Board Othello and community partners are working to foster a strong sense of place, thoughtfully designed development, and equitable growth opportunities at Othello.

We are pleased to participate in Seattle's growth strategy and applaud the City for including racial and social equity in its visioning of the future. We strongly encourage the inclusion of the Equity Analysis in the Environmental Impact Statement, either incorporated in to the text or as an appendix.

We support equitable growth at Othello and prefer Alternative 4, guided growth to urban villages near transit. We do not agree with alternatives that would prevent growth from happening in our community. We believe that equitable growth can bring community amenities and access to opportunities for historically underserved communities. For example, we want more people to live at Othello because we believe that will generate new customers and increased revenues for the numerous small businesses, many of them that operate here.

Preventing growth at Othello and Southeast Seattle will not prevent displacement. Displacement is already happening due to the strong regional economy. We support equitable growth strategies that make critical public investments to mitigate displacement and help people, businesses, and cultural communities prosper in place. We urge you to approve an alternative that brings equitable growth to Othello and includes critical public investments, such as:

1. **Façade Improvements:** On Board Othello and the City of Seattle Office of Economic Development recently completed a façade improvement project to a strip of 8 businesses on the NW corner of Othello and MLK Jr Way, adjacent to the Othello Light Rail station. Bright colored paint, new visible signage, and the removal of safety bars from windows and installation of protective window film provide a cohesive look, a clean, safe, and walkable shopping environment, and added visibility from the Light Rail station. The project was completed with the support and guidance of the business owners and investment from the property owner, which was unprecedented. The new look and feel of this entry way to Othello will spur additional economic investment in the community by increasing foot traffic throughout the business district and attracting new customers who previously felt unsafe. Investment in additional façade improvements will support business and job retention, increase investment in local business districts, and serve to mitigate displacement.
2. **Technical Assistance for Local Businesses:** Southeast Seattle, and the Othello neighborhood in particular, have historically been an incubator for small, immigrant and refugee owned businesses. They provide a vast array of retail and services that are culturally appropriate for our

diverse population. Through the advocacy of the MLK Business Association and in collaboration with community partners, the Othello business district is gaining popularity as Seattle's local global market. Yet many of these small businesses are facing displacement as rents continue to climb and gentrification of the area increases. TA and expansion support for local businesses provide opportunities that create a continuum for business growth. Business classes, conducted with a cultural lens, provide much needed know how on managing books, updating software, managing a website, and marketing to help our local businesses remain competitive in a quickly changing environment. Public investment in Technical Assistance programming, the Business Associations that advocate for small/local business owners, and expansion of Business Improvement Areas will help our businesses and the people that depend on them for goods and services remain in our neighborhoods.

3. **Anchoring community, cultural, and faith based institutions:** Currently, community, cultural, and faith based institutions are centrally located in the City of Seattle and act as first-stop and one-stop shops providing a broad range of vital services to diverse constituents from a variety of backgrounds, cultures, languages, and faiths. They also help connect clients to additional neighboring services in Seattle. As pillars of their various communities, these institutions also provide a sense of place and belonging to individuals relocating from around the world and across the United States. A major concern in Southeast Seattle is the very real potential that these institutions will soon disappear, forced out by rising rents. Investing in community ownership and looking at creative ways to create ownership opportunities to prevent community, cultural, and faith based institutions from being displaced will provide stability and predictability not only for these institutions but also for the constituents who depend on them. The Multi-Cultural Community Center is a coalition that resulted from the City of Seattle's Community Cornerstones program that is exploring community ownership options, despite funding for the coalition being cut.

(NOTE: Should these institutions be displaced, and the services they offer with them, constituents would have to travel further—potentially driving if not relocated by public transit—or be displaced themselves to access necessary services. This would decentralize the vast service offerings currently in Seattle and could add strain to public transportation and/or place additional vehicles on the road, impacting traffic and climate. The DEIS fails to assess the environmental consequences of displacement.)

4. **Jobs:** While the DEIS does not detail what kinds of jobs the 115,000 will be, we support investment in jobs that complement the unique fabric of our community and that are accessible to communities with barriers to good jobs. Development is already underway at Othello, expanding employment opportunities is necessary for the stabilization of the neighborhood. On Board Othello is currently focused on business attraction and retention in the Othello neighborhood. Beyond bolstering our service industry, potential employment growth in health has been a subject of much community discussion, especially around culturally competent health care. Encouraging more office jobs in Othello will in turn support our business district by having customers to patronize the businesses during the day.
5. **An Economic Opportunity Center:** Southeast Seattle is ripe with potential for economic growth but we are held back due to a sore lack of accessible, culturally appropriate access to education, good jobs, and business services. We support investment in an Opportunity Center in Southeast Seattle that is a one-stop location where residents can access post-secondary education that is job- and skill-specific, get a job, or develop a business and where services and programs are

delivered by culturally competent staff in a variety of the area’s prominent languages. Need for an Opportunity Center has been identified by the community and a feasibility assessment was completed and published in partnership with Community Cornerstones, Grow Seattle, Impact Capital, SEED, and SkillUp Washington.

6. **A Graham Street Light Rail Station:** A top priority for Southeast Seattle communities, Rainier Valley in particular, is a new light rail station at Graham Street. Reinvigorating a business and cultural district cut off by light rail construction and isolated now by lack of access to transit, a Graham Street Light Rail station could be an anchor for equitable development. By investing in the locally owned businesses and cultural institutions surrounding the Graham Street node with a Light Rail station, Seattle residents—throughout the city, not just in Southeast—will invigorate the local economy, retain jobs, and preserve the unique, multicultural fabric of the community.
7. **Housing:** Rent prices in Seattle have been steadily increasing and will continue to do so throughout the city with or without direct development in a particular Urban Village. Public investment in preserving and expanding homeownership opportunities—looking at residential and commercial land trusts, rehab programs for existing owners, and exploring creative solutions for breaking barriers to ownership—in Southeast Seattle and beyond will help stifle the displacement that is already taking place. We support the Mayor’s Housing Affordability and Livability Agenda’s committee in exploring solutions to increase density while preserving neighborhood character through detached dwelling units, “mother-in-law” units that don’t require driveways/parking, and the ability to create duplexes out of single family homes. In addition, we support multi-family housing—including workforce housing, expanding zoning for moderate density as opposed to exacerbating density only around TOD sites, advance rezoning of redeployment sites, and a linkage fee that directs housing dollars to targeted areas of risk to prevent displacement and encourages an equitable approach in supporting investment—especially job creating commercial development—in underinvested areas.

Regardless of what alternative is chosen, the thriving economy throughout the city is going to impact Southeast Seattle. We need public investment to mitigate the displacement that is currently happening and to ensure equitable growth throughout all of Seattle. On Board Othello is committed to working with the City to create equitable development in Southeast Seattle and a prosperous city for all.

Sincerely,

HomeSight
MLK Business Association
Othello Park Alliance (OPA)
Puget Sound Sage
Rainier Beach Action Coalition (RBAC)
Rainier Valley Food Bank
Somali Community Services of Seattle
Van Gogh Development Corporation
HopeCentral
Huarachitos
Filipino Community of Seattle
Penniless Projects
Union Gospel Mission

East African Community Services (EACS)
Othello Neighborhood Alliance (ONA)
Othello Station Community Action Team (OSCAT)
Rainier Beach Merchants Association
Rainier Chamber of Commerce
Rainier Valley Community Development Fund (RVCDF)
SouthEast Effective Development (SEED)
Vietnamese Friendship Association (VFA)
Olympic Express
Artspace
Rainier Restaurant
Puget Sound Sage
West Coast Commercial Realty

Name (Last, First)	Date Received	Comment
Eals, Clay	6/23/2015	<p>Gordon:</p> <p>I realize that I am sending in a comment one week late, but it has been a hectic season for us, and I am just now digesting the DEIS of the Seattle 2035 comp plan. I hope that you can include our organizational voice in the comments, even though this missive is tardy.</p> <p>Our organization's comment is short and straightforward. The DEIS, if I am reading it correctly, seems to omit any significant reference to preservation and its role in community diversity and character, economic vitality and environmental stewardship. This would seem to be a big (and potentially inadvertent) error, given the city's strong landmarks preservation program and its long and deep track record in this arena -- all the way up to and including countless decisions of the city council over the decades. We ask that preservation be inserted as a key value during the next stages of consideration of the Seattle 2035 comp plan.</p> <p>Our organizational mission chimes in with that of many others in Seattle: to preserve local heritage through education, preservation and advocacy. No one can reasonably argue that our city's long-range plan should not include preservation as a key value. Thank you for considering this sentiment. I would be happy to answer any questions you may have.</p> <p>Clay Eals executive director Southwest Seattle Historical Society c/o "Birthplace of Seattle" Log House Museum 3003 61st Ave. S.W. Seattle, WA 98116-2810</p> <p>206-938-5293 (museum: noon-4 p.m. Thursday-Sunday) 206-484-8008 (cell)</p> <p>clay.eals@loghousemuseum.info http://www.loghousemuseum.info</p>

From: Richard L. Ellison
8003 28th Ave NE, Seattle, WA 98115

To: Gordon Clowers
Department of Planning and Development, 700 5th Avenue, Suite 2000, Seattle, WA 98124

June 18, 2015.

Dear Mr. Clowers,

I have the following comments and concerns about the draft Environmental Impact Statement (DEIS) for the Seattle 2035 Comprehensive Plan.

1. Impacts on the Urban Forest due to Increased Density

Projections are that Seattle will see a significant increase of 120,000 new residents, 115,000 additional jobs and 70,000 new housing units. The dEIS fails to adequately plan for the impacts of projected growth to mature trees, tree groves, overall forest canopy, urban native wildlife (birds, amphibians and salmon habitats), toxic urban street runoff, aesthetics, and urban island heat effect. Plan Open Space needs for Seattle based on projected growth. Innovative habitat, corridor, watershed, or urban forest plans can assist in mitigation planning.

The DEIS concludes there is no problem because we have the Urban Forest Stewardship Plan and provisions in SMC 25.11, which are currently failing to significantly protect Seattle's magnificent mature trees and urban forest from losses due to development.

The draft EIS provides no direct or detailed evaluation of the yearly or cumulative loss of urban forest canopy due to development and growth and the associated impacts on air pollution and human health, noise, storm water runoff, wildlife habitat, open space, or heat island effects.

2. Impacts to Fish and Wildlife

What are the impacts to urban wildlife (particularly native birds) as a result of current growth and projected growth and development? Create plans to restore the position of an Urban Wildlife Biologist (lost decades ago in budget cuts) and update and implement the already created Urban Wildlife Program. Make special efforts to protect the six bird species of special status. Salmon are a special legacy- make special notes in the Comp Plan. Watershed ecology demands a look at land cover changes throughout the basin and not just streamside.

Do we need a Wildlife Biologist (we lost our City's only one recently in budget cuts? Do we need an office of the City Ecologist, with one person who can oversee all environmental activities and coordinates them? Or is it every City department making the best of the chaos. What is the 20 year vision?

The number and diversity of Seattle's native bird species is declining fast as neighborhoods lose big canopied trees, particularly native tree species. We knew this back in 1984 from Steve Penland's UW's Ph.D. thesis and in 1991 UW professor Dee Boersma's 1991 research confirmed this. Regional habitat fragmentation continues to add to this. "It is not surprising that birds are closely attuned to vegetation. They eat seeds, fruits, and nectar that the plants produce and the insects that feed on plants."

Natives include Downy Woodpecker, Red-breasted Nuthatch, Chestnut-backed Chickadees, and Cedar waxwings are losing ground because they nest and roost only in native trees. Many non-natives prefer nesting in building eaves and highway overpasses. These non-native birds are becoming dominant now, i.e. crows, english sparrows, rock doves (pigeons), and starlings, and they're driving native birds to local extinction.

But what about the special status species that live in Seattle: Pileated woodpeckers, great blue herons, bald eagles, green herons, hooded mergansers? What about wildlife corridors, open space issues, noise abatement problems, fish and amphibians as food, water quality, human ecology, and steep slope development issues?

Chief Seattle, the first City Ecologist? A myth exists that in being moved on to the reservation, Chief Seattle is purported to have asked the Great White Father to save the animals, to treat them as his brother. Now the animals are all gone, except for the birds, who live in the trees. Save Chief Seattle's dream.

3. Steep Slopes.

Much of Seattle's steep slope areas have trees being choked by invasive species such as English Ivy and Clematis. Should mitigation of development on or adjacent to steep slopes require invasive plant species control? What are the current impacts of failing to control invasives on the landslide potential of steep slopes?

Scientific literature repeatedly documents how slope stability is greatly enhanced by trees and other vegetation. Non-native vines such as may choke and shade out trees throughout Seattle. Smaller trees and shrubs are simply pulled down and choked by masses of vines. Taller trees are shaded across main branches, become stressed and weak, producing fewer leaves and root hairs. These roots do not hold the soil as readily as fast growing roots from big healthy trees. This can lead to slope failure under saturated soil conditions.

4. Forest Canopy

The current City Comprehensive Plan calls for no net loss of canopy. The City does not require an evaluation of impacts to the canopy by each development. There is no accumulated accounting for trees lost with each development project, and so cumulative short and long impacts are not possible to evaluate. Additionally, projected growth of saplings to mitigate loss of mature trees may not accurately estimate future canopy size due to the historic low survival of newly planted trees in Seattle.

Sites undergoing development should include the following evaluations:

Tree Species: speaks to size of canopy and amount of storm water benefit.

DBH: speaks to age of tree and canopy coverage.

Tree Height: speaks to canopy volume and amount of environmental benefit.

Canopy Width (area): speaks to canopy volume and environmental benefit.

Tree Condition: speaks to overall forest health and environmental impacts.

Photographs of the trees on the parcel and adjacent properties.

Canopy coverage as a percent of area pre- and post-project development.

5. Inadequate Tree Protection in Current Code

So called protection of exceptional trees under SMC 25.11 is based on a complaint system and is unfortunately not protecting exceptional trees. It is utterly failing to protect the majority of mature trees from being removed in development, particularly in urban growth areas and light rail transportation corridors.

Unless the remaining significant trees are preserved, how can the City hope to truly establish a network of green space connections? Significant trees on private property play a crucial role in connecting public greenspaces. And these connections are crucial in their habitat value, because they allow patches of habitat to connect.

6. Removal of the Current 40% Canopy Cover Long-Term Goal

The Draft EIS proposes eliminating the City's long-term goal of a 40% tree canopy in the current comprehensive plan and replace it with the Urban Forest Stewardship Plan goal of 30% by 2037.

Seattle should not reduce its long term canopy goals. The Urban Forest Commission canopy goals, adopted by the Seattle City Council, and in the current Comprehensive Plan under ENVIRONMENT ELEMENT H Seattle's trees E23 states:

“Achieve no net loss of tree canopy coverage, and strive to increase tree canopy coverage to 40 percent, to reduce storm runoff, absorb air pollutants, reduce noise, stabilize soil, provide habitat, and mitigate the heat island effect of developed areas.”

Robert E. Fellows

Note: received 06/19/2015

115 N. 84th Street
Seattle, WA. 98103
(206) 399-0482
Rob.Fellows@mac.com

June 18 2015

City of Seattle Department of Planning and Development
Attn: Gordon Clowers
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, WA 98124

Dear Mr. Clowers:

Thank you for the opportunity to comment on the Seattle 2035 draft environmental impact statement (DEIS). This is a strange document, because it describes potential impacts of actions that are not specified. Without knowing what actions are proposed, it is meaningless to describe impacts of hypothetical population and employment distributions, and it is impossible to comment on whether the alternatives have been appropriately specified or impacts disclosed.

There is nothing aspirational in this document. There is no discussion about the characteristics and diversity of communities and housing we desire to create. There no stated objectives for the alternatives, and there is no rationale for selecting one alternative over another. It is left to the reader to reverse-engineer the intent of each alternative, providing no way to evaluate whether the intent would be achieved. I could not divine any “plan” hidden within the impacts assessed.

SEPA requires actions be specified.

While there are four “alternatives” considered in the DEIS, there are no “actions” associated with them. The intent of SEPA is to disclose the results of an action, not the impacts of hypothetical population and employment distributions that the city has no mechanism to achieve. The DEIS seems to be designed to provide environmental coverage for any carte blanche policy that might emerge through the unfinished process of developing the final plan.

With no stated current or proposed mechanism to direct growth beyond the zoning capacity shown in the future land use map (changes to which are not specified), this is a thought experiment describing impact of theoretical distributions of activity with no link to city regulatory actions or infrastructure investment that would cause them. Even changes to the urban village boundaries would have little practical effect without policy changes to the underlying zoning. This document has not disclosed those actions or their implications.

In my opinion, **controversial new elements to the comprehensive plan will still require SEPA disclosure.** This document cannot be construed to disclose the many impacts that could result from the types of action hinted at but not specified in the plan, such as wholesale changes to the future land use map (FLUM) or changing the meaning of zoning or urban village designations.

This is important not only for legal and environmental reasons, but to ensure a full and open discussion of the impacts controversial policies would have on specific neighborhoods to facilitate their informed participation and response. The current document provides no basis for this discussion, and little disclosure to most readers that significant policy changes are under consideration in the first place.

Urban village boundaries and types must be reaffirmed.

Urban villages established under neighborhood planning in 1999 were the result of intensive outreach. At that time urban villages were described as places that would (by definition) accept the bulk of new development due to their zoning capacity. Designation as an urban village conveyed a commitment by Seattle to focus its infrastructure improvements toward creating high quality urban neighborhoods. Neighborhoods that affirmed urban village designation did so with the understanding it would bring city attention and infrastructure.

Over the past three years city policy has changed the meaning of the term urban village to signify locations where the city would encourage new development by lowering costs and standards facing developers. The most significant effect of an urban village today is elimination of minimum parking requirements for new development regardless of context, and without opportunity for public input. New policies hinted at but not specified in the EIS would go further, allowing higher density in the roughly 1/3 of urban village properties currently zoned for single family houses.

The change in focus for urban villages is disheartening. I have been a strong supporter of the urban village policy since it was adopted because city investment in infrastructure, urban planning and social services need to be focused on places that are becoming dense and accepting the lion's share of new development and its impacts. In the Aurora-Licton Springs urban village, for example, there has been a massive increase in development and density, but no complementary investment of public attention or investment to make it a walkable, thriving business district. Now that goal of public investment and attention seems to be discarded.

Given these existing and potential wholesale changes in the meaning of an urban village designation, the designation means something very different from when these boundaries were established and endorsed through neighborhood plans. In my opinion, **every neighborhood will need to re-assess the urban village boundaries they agreed to previously.**

Comprehensive planning should ensure that growth and infrastructure are synchronized.

The intent of growth management is to ensure that infrastructure and growth are in sync. While there is discussion about impacts of different alternatives, there is not a clear assessment of the infrastructure requirements and implications associated with each of the alternatives. If it's assumed that the capital program would be entirely unaffected by these different growth distributions (should they occur), then comprehensive planning would not be needed. **Without setting forth the alternative investment plans needed to support the alternatives, the impacts and costs cannot be properly understood** as growth management intended.

For example, the analysis does not lay out the costs needed to serve the significant new development in Northwest Seattle, rather it simply assumes that rail will be complete between downtown Seattle and Ballard. While we would love to see this occur, it does not seem appropriate simply to assume it will occur in an environmental document when there has been no commitment to either the plan or its funding.

Discussion is needed over causes of unaffordability and displacement.

There is significant discussion needed over the causes and mitigations for unaffordable housing to assess impacts appropriately. The development community and DPD seem to accept that only the supply and demand are factors, and that any added housing and increased density will improve affordability. But there are many other factors affecting affordability; among them are the market segments and housing types developers are choosing to target, aimed only at the highest income homeowners and lowest standard apartment.

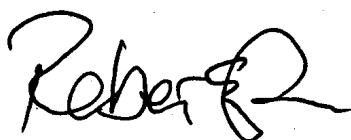
Rather than to “encourage” development and density in what is now a hot real estate market, DPD needs to understand that developers no longer need encouragement to develop in Seattle, and that the city now has more leverage to encourage the types of housing we desire. Rather than to boost developer margins for building mega-houses and micro-apartments, city policies should consider what tools are available to affect the relative profitability of building housing that serves people and families of more moderate means, and to build multi-family housing that is actually targeted to families.

Neighborhood aspirations need to be reflected in the plan.

The overall feeling one gets reading the DEIS and following recent land use debates is that advocates for density believe that the fate of the world depends on its urgent implementation regardless of what current residents desire for their neighborhoods. Many feel neighborhoods should be adapted to serve the needs of transportation (instead of the opposite), and many disagree about the value of rapid densification to affordable housing or neighborhoods.

I fervently believe that planning should be based around the aspirations of people. Community visions and participation is part of having a healthy urban neighborhoods. In almost every case I can think of, projects have been improved because of dialogue with neighborhoods. Most all of us working on neighborhood issues believe more density is coming and will be good for Seattle, but we also want it to occur in a way that fits and enhances our unique neighborhood forms and character. I hope the plan, when complete, will reflect the aspirations of neighborhoods and value of participation in its implementing.

Sincerely,

A handwritten signature in black ink that reads "Rob Fellows". The signature is stylized and cursive.

Rob Fellows

Name (Last, First)	Date Received	Comment
Flanigan, Bill	6/30/2015	<p>Perhaps I missed it, but I don't see anything specifically addressing housing affordability. Affordability is a goal and implied in several discussions, but I'm referring to substantive measures to improve affordability.</p> <p>Has the city considered changing some of the policies it has that add cost, sometimes without adding value? 5 over 2 construction with a concrete podium and wooden framing above is particularly problematic in my eyes. To make the money work, developers are eager to put in retail regardless of a specific site's suitability for ground floor retail/office and a lot of the building's internal services need to be upgraded to commercial grade. That's separate from the cost of the steel & concrete and the environmental impact of said materials. Engineered wood has been shown to perform very well in BC and Europe and could be a locally sourced carbon sink. There is also a great deal of uncertainty and cost associated with the design review process that a move towards form based codes, where appropriate, could address. Instead of trying to achieve a specific result through massing and pages and pages of additional code, simply ask for it from the get go, you know?</p> <p>I think that we are seeing a cycle of displacement and gentrification in large part because it's difficult for developers to build cheaply in the current regulatory climate. South Seattle, for instance, could substantially benefit from reduced housing costs where apartments and flexible spaces make the most sense.</p> <p>Thank you.</p> <p>Bill Flanigan Graduate Intern Market Development King County Metro Transit 201 South Jackson Street Bill.flanigan@kingcounty.gov</p>
Hill, Gregory	06/19/2015	<p>From: Liz Campbell [mailto:campbellhill1215@msn.com] Sent: Thursday, June 18, 2015 10:42 PM To: 'Gordon.Clowers@seattle.gov' Subject: Seattle 2035 Draft EIS</p>

Name (Last, First)	Date Received	Comment
		<p>City of Seattle Department of Planning and Development ATT: Gordon Clowers 700 5th Avenue, Suite 2000 P.O. Box 34109 Seattle, WA 98124 Via 2035@seattle.gov</p> <p>RE: Comments on Seattle 2035 Draft EIS</p> <p>Dear Mr. Clowers,</p> <p>One of the things that has made Seattle a most livable city is the ability to own a house on a small lot within the city. For most homeowners, their home represents their single largest investment. Single family home owners are disproportionate participants in all manner of public activities that benefit the city.</p> <p>Section 3.4 and 3.5 advocate removing policies LU 59 and LU 60 from the Comprehensive Plan.</p> <p>Because these policies preserve the Single Family zoning in Seattle, removing them will have far reaching effects. While Section 3.4 enumerates Alternatives 2, 3 & 4, that actively require the removal of single family zoning in specific areas, Section 3.5 suggests thinly fabricated reasons why the policies have no place in the Comprehensive Plan.</p> <p>First, I disagree with the notion that removing the policies would have no effect. The Mayor would not bother to advocate their removal if he did not have specific plans in the place to go further to eliminate the single family zones, for which the removal was not a critical element. The Comp Plan is full of policies that have virtually no enforceable related action other than to satisfy Seattle's urge to feel good about itself, and those policies are not planned for elimination.</p> <p>Please address the unidentified plan, for which removal of these policies is essential for the unidentified plan to be carried out.</p> <p>Second, I believe the reference to LU 59 and LU 60 in Section 3.5 is a Trojan horse to ease the rezoning of large areas of SF zoning.</p> <p>Please address how the removal of these policies will hasten the rezoning of areas not identified in Alts 2, 3 & 4.</p>

Name (Last, First)	Date Received	Comment
		<p>Third, I believe the Mayor has in mind removing multiple areas of SF zoning to facilitate the ability of so called “non-profit” developers to have access to a greater range of land parcels for development.</p> <p>Please address how removal of SF zoning will affect the following:</p> <ol style="list-style-type: none"> 1. The supply of Family Housing. 2. The price of single family homes. 3. The affordability of housing for large families based on the value of property, and therefore the amount of property tax paid, for property in SF zones in single family use, when the underlying zoning is changed to multifamily. 4. The likely change to family size, based on the loss of single family homes. 5. The likely change to the population of children living in the city. 6. The likely changes to the participation of citizens in public affairs as the population of home owners declines. 7. The likely change to the income profile of city residents as the number of single family homes declines. 8. The likely change to the number of trees and other plants in the city as the number of lots in single family use declines. Specifically identify the likely tree lose. <p>Fourth, for the record, I favor Alt 1. When the urban village boundaries were drawn, many citizens objected to including areas of SF zoning within the villages. The city planners attached to each neighborhood planning group announced that the there was no plan to change zoning and that the present SF zoning criteria (LU59 and LU60) would prevent any change to the zoning. They further noted that the only reason the SF areas were included within the planning area was to make easier to draw simple lines identifying the zoning.</p> <p>Please clarify if there will be a process to redraw the boundaries of the villages.</p>

Name (Last, First)	Date Received	Comment
		<p>Please address how removal of SF zoning policies LU 59 and LU 60 are tied to the ability to rezone SF zoned areas going forward.</p> <p>Sincerely,</p> <p>Gregory Hill</p>
Hill-Force, Alicia	06/19/2015	<p>To whom it may concern,</p> <p>I am writing to express a community concern. Seattle is a city undergoing a great deal of growth and momentous change. However, in our haste to grow we often forget about the small businesses that have helped build our city. In the last last five years, I've watch three of my friends lose or come close to losing their businesses because of said growth.</p> <p>The latest businesses on the chopping block are in the U-district. Some that have been there for at least 20 years. The same length of time that some of my friends who have lost their businesses on capital hill had been there.</p> <p>Therefore, I oppose the upzone proposals suggested in the EIS studies, and I believe that the implementation of an increase in building heights will have a devastating impact on the adjacent businesses. The character will change so much that the businesses will not be able to survive in this environment.</p> <p>If you have any questions you may email me or call at (206)250-7884. Thank you.</p> <p>Sincerely,</p> <p>Alicia F. Hill-Force</p>

16 June 2015

TO: Gordon Clowers
Sent via e-mail - 2035@seattle.gov

FR: Kate Krafft
Krafft & Krafft Architecture
2422 29th Avenue W.
Seattle, WA 98199

RE: SEATTLE 2035 DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
PUBLIC COMMENT

Please be aware that I along with many other Seattle residents am very seriously concerned about the following failures of the Draft EIS proposal.

1. The Draft EIS proposal states that “*All Comprehensive Plan elements will be reviewed and updated as part of the proposal.*” However, the draft document **does not address** Economic Development, Neighborhood Planning, Cultural Resource, and Urban Design.
2. The current plan includes preservation under the “Cultural Resource” element (CR11-CR16). The new Comp Plan replaces “Cultural Resource” with an “Arts and Culture” element. This new element focuses on art (public art, cultural space, arts education, creative economy, creative placemaking) and **appears to have eliminated historic preservation and protection of cultural resources**. Please clarify:

How will preservation be specifically addressed in the future Comp Plan?

How are the city’s existing preservation policies and regulations going to be addressed?

3. The “Environment” element addresses environmental stewardship, one of the plan’s core values. Environmental stewardship is primarily defined within the context of the natural environment (air, land, and water resources) and not the **built environment**. The role of **preservation vs demolition in terms of environmental stewardship** must also receive analysis and be addressed.

Furthermore, I wish to reiterate several well-established facts regarding preservation that are broadly accepted and should be seriously considered in the preparation of any meaningful planning document.

Preservation Matters! Preserving historic places is important to community diversity and character, economic vitality, and environmental stewardship. Preservation and creative adaptive reuse of our existing building stock cuts across *all four core values of the Comp Plan—Community, Environmental Stewardship, Economic Opportunity, and Social Equity*.

Preservation enhances community vibrancy and cultural identity. Historic buildings in older neighborhoods lend vibrancy to communities and help define the sense of place or personality of cities. It’s well documented: people are drawn to communities that retain their distinctive character and heritage. Restaurants, shops, and services follow preservation. *They are a vital part of promoting healthy, complete communities.*

Preservation is an economic driver. Investing in historic buildings sparks economic revitalization and acts as a linchpin in neighborhood development.

Preservation conserves resources. Rehab of existing structures reduces waste and saves energy. Approximately 25% of the material in landfills is demolition and construction waste. Building reuse almost always offers environmental savings over demolition and new construction. Recent research on the environmental impacts of new construction (in terms of energy, carbon, water, materials, toxicity, etc) shows that it takes decades for the greenest building to pay back these up-front costs. Additionally, life spans for new buildings are often **30-40 years** vs. more than **100 years** for most historic structures.

Preservation contributes to social equity. Rehab investment occurs in culturally and economically diverse communities. Reusing our historic building stock – whether it’s an old warehouse, school, or former church – provides much-needed, creative spaces for housing, arts, offices, and community centers.

Thank you for your serious consideration of these concerns and comments.

Name (Last, First)	Date Received	Comment
Martin, Justin	06/19/2015	<p>I am concerned about whether the Comprehensive Plan is doing enough to foster more sustainable transportation options than continued levels of use of single-occupancy vehicles. Vehicle traffic is a big danger in our communities, causes multiple types of pollution that impact our quality of life (noise, air, light, etc), creates health impacts that affect us all, and is a big contributor to climate change and our unsustainable fossil fuel based economy.</p> <p>I would request that you recommend options that would provide more aggressive reductions in single occupancy vehicle trips, and much greater shift in mode share to walking, biking and transit.</p> <p>I would further request that you:</p> <ol style="list-style-type: none"> 1) Use a multi-modal, person-trip level of service standard rather than a vehicle level of service. 2) Count all trips, not just commute trips to work. 3) Make sure Seattle 2035 is in alignment with existing Seattle plans (e.g. Climate Action Plan, Bicycle, Pedestrian and Transit Master Plans, urban forestry plan, etc). 4) Build transportation models that push the envelope rather than following business as usual. <p>Thank you for your consideration.</p>
McKenna, Jessie	06/19/2015	<p>Greetings,</p> <p>I am writing to express my concerns over the language in the current draft of the 2035 Environmental Impact Statement. My neighbors explained to me that the current language in the 2035 draft Environmental Impact Statement implies that the 40% tree canopy coverage goal currently in effect would be slashed by up to 25% over the next two decades. This concerns me greatly.</p> <p>The first thing that took my breath away when I came up the I-5 from Sea-Tac airport to visit Seattle in 1998 as a guest of this great city was the Gorgeous Seattle Skyline, Space Needle and all--the second thing, was all the trees! In front of me and to my left was all city-scape, planes taking</p>

Name (Last, First)	Date Received	Comment
		<p>off and landing from Boeing field, industrial Georgetown and SoDo, but to my right was Beacon Hill, my home now for nearly ten years, and the fall colors of leaves of hundreds of species of plants and trees overwhelmed my vision (and the car windows!).</p> <p>As a community leader and activist, as a homeowner of Seattle, I wish to convey my deep love for Seattle's trees. They are without a doubt one of the key features of our beautiful city and we have an obligation to protect them-- obligation or not, we ought to! They took my breath on day one, but they've been supplying clean oxygen every day since, helping to filter out the pollutants us humans create inadvertently by living out our lives here among our native trees.</p> <p>Please ensure the wording in the 2035 draft Environmental Impact Statement does not put our trees in peril. This is not a tree-hugging hippy issue, this is a quality of life issue for Seattle residents, visitors, businesses, our resident wildlife-- for us all.</p> <p>Thank you.</p> <p>--</p> <p>Jessie McKenna Freelance writer, nanny, rockstar, etc.</p>
Murphy, John	06/19/2015	<p>I am writing in opposition for the consideration of height increase in the University District.</p> <p>Seattle is losing all of the quaint neighborhoods in the historic districts. As we have seen in South Lake Union the effect son livability and the Seattle Culture are not manifesting as the original planners had said they would. Development and developers have not been placed in check and the end result will have far reaching negative implications.</p> <p>The University District is already seeing prices of housing</p>

Name (Last, First)	Date Received	Comment
		<p>skyrocket completely out of control. I live 20 miles from he U-District and I house students who can not afford to live near the school. I see everyday how the commute harms their studies. Do the developers and the city have students interests in mind? This is the next generation, this is the lifeblood of Seattle.</p> <p>We need to do what is good for the city, mores than what is good for the corporate developers.</p> <p>Please do not allow upscale development in the University district.</p> <p>John Murphy</p> <p>~~~~~</p> <p>John Murphy johnsmurphy@gmail.com</p>
Royal, Sharon	6/27/2015	<p>Hello,</p> <p>I am coming late to this conversation, only recently becoming aware of the four different plans and the comment period, now closed.</p> <p>I have lived in Seattle for 22 years and have lived-in and owned homes in several different neighborhoods while here. As a city, the most wonderful and unique aspect of Seattle is the 'small town' neighborhoods, each with their own character and commercial center. I am not someone who thinks bigger is better and that infinite unchecked growth should be the aim. That said, Seattle is growing. People want to live here.</p> <p>It seems to me that in this era of great change Seattle leaders have a real opportunity to create a thoughtfully considered, well-designed, genuinely progressive city. But that is not happening. Watching from the sidelines, I am angered by the purely economic decisions that overshadow livability and quality of life.</p>

Name (Last, First)	Date Received	Comment
		<p>It appears that we talk about balance in ideal terms, but fail to develop a politically difficult plan that truly builds-in real and balanced opportunity for different income levels, families and older-folks at every step. The current town homes replacing single family houses are primarily designed for one, young, able-bodied demographic. This creates a "college campus" atmosphere in the walkable neighborhoods (with all related problems) and severely restricts access to a walkable lifestyle for families and empty-nesters (with less-than-perfect knees and income).</p> <p>Until real public transportation is prioritized, along with car-alternative modes of commuting, densification will be a "more sustainable" alternative in theory only.</p> <p>From the description, I vote for alternative number 4 which appears to spread out opportunity in a more sensible way. But, none of these will make a good, strong and livable city if we do not consider the existing infrastructure and mandate balance for different cultures, ages and incomes in every sector.</p> <p>Along with that, if "green" is more than lip-service and city planners truly seek to create a progressive, game-changing city, mandating that developers design into every project things like permeable driveways and gray water collection, and at the very least, that all commercial buildings produce their own electricity from solar panels on the wasted flat roof-tops. Not to mention decreasing their carbon footprint by creating living greenspace on the roof.</p> <p>I cannot understand, given what we know now, how it is responsible to continue building as wastefully as we have been. A progressive city would address this in real terms. With the climate changing for real, all of us need to stop acting as if policies that admit and compensate for the impacts of density and building are excessive, affluent concepts.</p> <p>Thank you for the opportunity for this conversation about planned growth. I hope that it is not just to appease the</p>

Name (Last, First)	Date Received	Comment
		<p>public (as some other infamous city projects have been). There are a lot of good minds and good designers in this town whose voices are usually obscured by economic growth.</p> <p>Sharon Royal</p> <p>Fremont</p>

West Seattle Transportation Coalition Comments, June 2015
Re: Environmental Impact Statement for
2035 Seattle Comprehensive Plan

Background

The West Seattle Transportation Coalition (WSTC) is a Peninsula-wide organization working to address transportation and mobility issues for Seattle's largest constituency – the 100,000 people living on the 10 square mile area between the Duwamish River and Puget Sound.

The WSTC formed in September 2013, as a local response to the 27% cuts King County Metro planned for West Seattle's bus services. The WSTC is now a unified voice for Peninsula transportation issues, providing anecdotal and data-driven research and lobbying efforts that public agencies, leaders and elected officials use to improve mobility options and service for West Seattle.

Transportation concerns Seattle citizens' more than affordable housing. When a June 2015 EMC Research poll asked Seattle voters to name "the most important problem facing the city today that the city needs to address," 40% named transportation (#1), 17% named housing (#2).

Summary

The City of Seattle is out of compliance with DPD and GMA levels of service (LOS) for West Seattle. This should trigger a moratorium on West Seattle building development, and must be noted in the 2035 Comprehensive Plan. But WSTC does not expect Seattle to stop development, as setting LOS is arbitrary.

WSTC does expect the City of Seattle to concurrently improve transportation and mobility options, and capacity management as residential and commercial developments proceed. These linkages must be made in the 2035 Comprehensive Plan.

Likewise, West Seattle ingress-egress issues must be addressed, particularly improvements in mobility and capacity management on the corridor between I-5 and the West Seattle Peninsula – home to 20% of Seattle's population.

Finally, negative impacts on productivity and efficiency; air quality, public health and carbon footprint must be priced, and incorporated into asset management calculations, to provide actual costs associated with these development issues. Failing to do so promotes false budgeting and poor decision-making.

Adding density can add commercial life and robust local feeling, but density without amenity is worse than sprawl.

Comments

1. The City of Seattle is out of compliance with DPD Director's Rule 5-2009, and with the Washington State Growth Management Act (GMA), RCW Sec. 36.70A.070, on transportation levels of service (LOS) from I-5 to West Seattle. The GMA requires counties and cities to include transportation LOS standards in their Comprehensive Plans. The city lists no LOS for the Spokane St. low (swing) bridge, which carries more than 13,000 vehicles per day; and the West Seattle high bridge appears to be out of LOS compliance at 93,000 vehicles per day. This failure should trigger a moratorium on West Seattle building development and Urban Village growth, until the city addresses capacity management and mobility options for this corridor between I-5 and the West Seattle Peninsula. As setting LOS is arbitrary, WSTC does not expect non-compliance to stop the growing City of Seattle from continuing development.

2. Therefore, the Proposed Comprehensive Plan (PCP) must directly link improvements in capacity management, public transportation and mobility options to housing and commercial development. The current PCP allows building development to outstrip the capacities of public transportation and other mobility options. Transportation infrastructure provides the means for Seattle residents, suppliers and enterprises to reach each other, and for residents to access places of work, entertainment and recreation. Public transportation is a preferred option for Peninsula residents, but out-of-scale development has overwhelmed limited bus service, and encouraged residents to increasingly rely on private vehicles. This results in congestion of limited road space within West Seattle and on its ingress-egress routes, and vast negative costs in productivity, efficiency, pollution, public health and carbon footprint.

3. Arterial capacity and travel time increases are significantly inaccurate in the Transportation Appendix (pp. 37 & 43). While PCP contends that West Seattle can handle 20% to 30% more growth, there's less per capita vehicle capacity and public transportation in West Seattle now than ten years ago, due to dramatic population growth (up to 300% in some areas). Travel times by car and bus range from 5-60 minutes longer within, and to and from the Peninsula, depending upon activities on and outside of it – including congestion or delayed accident clearing on the West Seattle Bridge, SR 99 and I-5, Port of Seattle freight activities, SODO railroad cross-traffic, and downtown tunnel construction.

4. The Transportation Section (3.7) of the PCP uses the words "West Seattle" primarily as map labels. This glaring oversight indicates how little consideration was accorded Seattle's largest contiguous area and population. Further, where the PCP mentions West Seattle public transportation options, it focuses primarily on two transit corridors – Delridge and Fauntleroy, and two Metro routes – the 120 and the Rapid Ride C. More mobility routes and options must be considered to cover a Peninsula that is five miles long and two miles wide.

5. The PCP does not mention light rail, dedicated bus lanes, signal coordination, or several other possibilities for relieving West Seattle traffic

congestion, improving Peninsula-related mobility, or bringing the City of Seattle into compliance with Director's Rule 5-2009, and the WA State GMA. The City of Seattle's 2012 Transit Master Plan pays no attention to addressing public transportation deserts, mobility restrictions and service time limits that Peninsula residents face and want solved. Peninsula residents are seeking a dedicated West Seattle Bridge (WSB) bus lane to SR 99, signal coordination from the WSB north-bound on 4th Avenue, a Lander Street Overpass and other options.

6. In transportation planning, PCP must apportion separate routes for separate transportation modes. For example, we suggest following Portland, Oregon's example, and put bicycles on separate, parallel streets designated as bicycle routes. Research indicates that cyclists are given false senses of security when they ride at-grade in separated lanes on multi-modal corridors. In West Seattle, we suggest using either (a) separate, safer streets running parallel to main roads as bicycle routes, or (b) on multi-modal corridors, using grade separated bicycle routes. We applaud the city for designating 9th Ave. as a bike lane north of downtown, running separately & parallel to the dangerous Westlake Ave., and want to see more use of this option, such as slotting a safer, less traffic-impactful bicycle lane on 3rd Ave., rather than removing a traffic lane on 2nd Ave. for bikes, which causes two-mile back-ups during evening rush hours.

7. The PCP does not address increased freight activity planned for Port of Seattle Terminals 5 and 18. West Seattle's main ingress and egress routes cross these areas, and operate above capacity for more than six hours a day, during morning and evening peak drive times. Frequent back-ups, sometimes as long as two hours, occur due to container truck congestion or accidents in this area. West Seattle needs to see improvements addressed promptly for these areas.

8. The Comprehensive Plan must assign private and commercial vehicle parking costs to vehicle owners. Past City Councils excused building developers from providing adequate garage space, because they expected public transit growth to keep pace with building growth. This did not occur. Instead, residents without garage space now park their vehicles on public streets, burdening city taxpayers with congestion and parking costs. Portland, Oregon charges fees for overnight street parking; Seattle can approve more zone restrictions in high-density neighborhoods and other areas, and provide flexibility to modify them to meet specific needs.

9. To assess true costs of transportation and development, Seattle's Comprehensive Plan must incorporate externality pricing into its asset management and budgeting. Traffic congestion caused by over-capacity road use, and development without concurrent public transit and infrastructure upgrades, present huge opportunity costs, as noted above. Without this accounting, cost estimates will be inaccurate and false, and encourage poorly-informed decision-making.

10. No funding suggestions, mechanisms or priorities are outlined as means

to pay for the infrastructure improvements that anticipated growth will require. Development directly impacts transportation, mobility, utility, education and other infrastructure, yet PCP does not address covering their costs. There is no mention of long term bond vs. levy assessment. Nor does the PCP explore high leverage options – those that yield maximum public benefit for minimum public investment. West Seattle needs projects that improve egress and ingress for the peninsula, yet the Move Seattle initiative is proposing to fund the Fauntleroy Boulevard Project – primarily a beautification scheme. We strongly recommend spending scarce resources where they will create the most functional benefits.