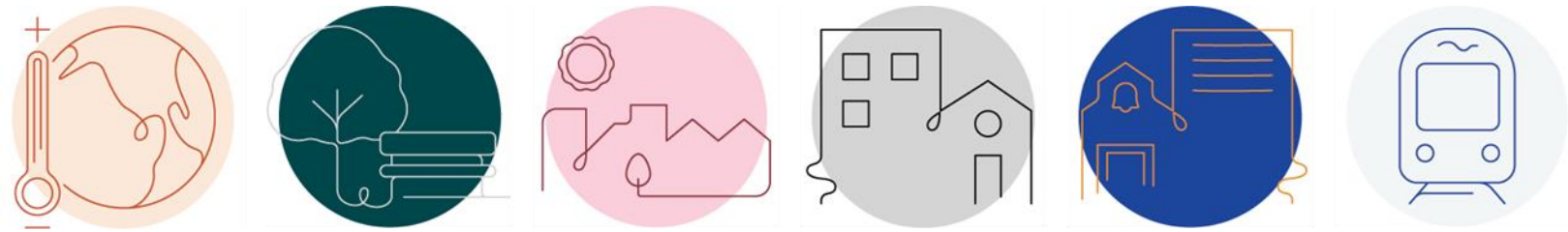


# 6 APPENDICES



Source: City of Seattle, 2023.

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## A Scoping Notice & Comment Summary

This appendix includes the main scoping report published November 2022, which contains the summary of written comments, engagement hub responses received, and stakeholder and public meeting input. The full scoping report, including the complete compilation of comment letters, is available online at:

<https://www.seattle.gov/opcd/one-seattle-plan/project-documents>

## **B Detailed Estimated Growth by Alternative**

## Growth by Alternative

	Analysis Zone 1		Analysis Zone 2		Analysis Zone 3		Analysis Zone 4		Analysis Zone 5		Analysis Zone 6		Analysis Zone 7		Analysis Zone 8		Total	
	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target
<b>Alternative 1</b>																		
Urban Centers	-	-	6,049	6,740	3,595	2,646	18,265	90,214	9,061	3,359	-	-	-	-	-	-	36,970	102,959
Hub Urban Villages	7,588	6,504	927	622	-	-	-	-	-	-	3,128	1,597	-	-	1,242	3,053	12,885	11,776
Residential Urban Villages	3,822	2,020	1,466	366	402	281	1,010	281	3,193	1,067	1,143	897	259	450	3,469	2,373	14,764	7,735
Manufacturing Industrial Centers	-	-	-	-	628	6,100	-	-	-	-	-	-	848	12,700	-	-	1,476	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	144	-	-	-	392	-	140	-	676	-
Outside Subareas (This Alternative)	1,040	1,377	2,006	1,376	534	447	-	-	570	102	1,225	1,027	168	412	951	2,075	6,494	6,816
Outside Subareas (No Change All Alternatives)	1,302	1,999	2,346	1,777	859	1,060	138	238	286	164	683	1,533	262	1,007	859	2,136	6,735	9,914
<b>Total</b>	<b>13,752</b>	<b>11,900</b>	<b>12,794</b>	<b>10,881</b>	<b>6,018</b>	<b>10,534</b>	<b>19,413</b>	<b>90,733</b>	<b>13,254</b>	<b>4,692</b>	<b>6,179</b>	<b>5,054</b>	<b>1,929</b>	<b>14,569</b>	<b>6,661</b>	<b>9,637</b>	<b>80,000</b>	<b>158,000</b>
Share of Target	17.2%	7.5%	16.0%	6.9%	7.5%	6.7%	24.3%	57.4%	16.6%	3.0%	7.7%	3.2%	2.4%	9.2%	8.3%	6.1%		

	Analysis Zone 1		Analysis Zone 2		Analysis Zone 3		Analysis Zone 4		Analysis Zone 5		Analysis Zone 6		Analysis Zone 7		Analysis Zone 8		Total	
	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target
<b>Alternative 2</b>																		
Urban Centers	-	-	6,049	6,538	3,595	2,566	18,265	87,508	9,061	3,258	-	-	-	-	-	-	36,970	99,870
Hub Urban Villages	7,588	6,310	927	603	-	-	-	-	-	-	3,128	1,543	-	-	1,242	2,961	12,885	11,417
Residential Urban Villages	3,822	1,957	1,466	355	402	273	1,010	273	3,193	1,035	1,143	870	259	437	3,469	2,335	14,764	7,535
Manufacturing Industrial Centers	-	-	-	-	628	6,100	-	-	-	-	-	-	848	12,700	-	-	1,476	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	144	-	-	-	392	-	140	-	676	-
Neighborhood Anchor - Low Risk	5,394	2,236	6,541	2,198	2,402	857	-	-	3,430	723	1,706	441	-	-	546	128	20,019	6,583
Neighborhood Anchor - High Risk	-	-	453	122	-	-	-	-	-	-	2,308	1,217	506	471	881	235	4,148	2,045
Outside Subareas (This Alternative)	262	64	482	157	183	5	-	-	217	19	459	22	4	-	720	1,866	2,327	2,133
Outside Subareas (No Change All Alternatives)	1,302	1,939	2,346	1,724	859	1,028	138	230	286	159	683	1,488	262	977	859	2,072	6,735	9,617
<b>Total</b>	<b>18,368</b>	<b>12,506</b>	<b>18,264</b>	<b>11,697</b>	<b>8,069</b>	<b>10,829</b>	<b>19,413</b>	<b>88,011</b>	<b>16,331</b>	<b>5,194</b>	<b>9,427</b>	<b>5,581</b>	<b>2,271</b>	<b>14,585</b>	<b>7,857</b>	<b>9,597</b>	<b>100,000</b>	<b>158,000</b>
Share of Target	18.4%	7.9%	18.3%	7.4%	8.1%	6.9%	19.4%	55.7%	16.3%	3.3%	9.4%	3.5%	2.3%	9.2%	7.9%	6.1%		

	Analysis Zone 1		Analysis Zone 2		Analysis Zone 3		Analysis Zone 4		Analysis Zone 5		Analysis Zone 6		Analysis Zone 7		Analysis Zone 8		Total	
	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target
<b>Alternative 3</b>																		
Urban Centers	-	-	6,049	6,538	3,595	2,566	18,265	87,508	9,061	3,258	-	-	-	-	-	-	36,970	99,870
Hub Urban Villages	7,588	6,310	927	603	-	-	-	-	-	-	3,128	1,543	-	-	1,242	2,961	12,885	11,417
Residential Urban Villages	3,822	1,957	1,466	355	402	273	1,010	273	3,193	1,035	1,143	870	259	437	3,469	2,335	14,764	7,535
Manufacturing Industrial Centers	-	-	-	-	628	6,100	-	-	-	-	-	-	848	12,700	-	-	1,476	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	144	-	-	-	392	-	140	-	676	-
Neighborhood Residential	4,095	754	7,921	221	875	18	-	-	741	284	4,480	23	21	-	4,290	4,606	22,423	5,906
Outside Subareas (This Alternative)	760	1,330	1,497	1,389	355	439	-	-	334	87	743	1,056	165	401	217	153	4,071	4,855
Outside Subareas (No Change All Alternatives)	1,302	1,939	2,346	1,724	859	1,028	138	230	286	159	683	1,488	262	977	859	2,072	6,735	9,617
<b>Total</b>	<b>17,567</b>	<b>12,290</b>	<b>20,206</b>	<b>10,830</b>	<b>6,714</b>	<b>10,424</b>	<b>19,413</b>	<b>88,011</b>	<b>13,759</b>	<b>4,823</b>	<b>10,177</b>	<b>4,980</b>	<b>1,947</b>	<b>14,515</b>	<b>10,217</b>	<b>12,127</b>	<b>100,000</b>	<b>158,000</b>
Share of Target	17.6%	7.8%	20.2%	6.9%	6.7%	6.6%	19.4%	55.7%	13.8%	3.1%	10.2%	3.2%	1.9%	9.2%	10.2%	7.7%		

	Analysis Zone 1		Analysis Zone 2		Analysis Zone 3		Analysis Zone 4		Analysis Zone 5		Analysis Zone 6		Analysis Zone 7		Analysis Zone 8		Total	
	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target
<b>Alternative 4</b>																		
Urban Centers	-	-	6,049	6,538	3,595	2,566	18,265	87,508	9,061	3,258	-	-	-	-	-	-	36,970	99,870
Hub Urban Villages	7,588	6,310	927	603	-	-	-	-	-	-	3,128	1,543	-	-	1,242	2,961	12,885	11,417
Residential Urban Villages	3,822	1,957	1,466	355	402	273	1,010	273	3,193	1,035	1,143	870	259	437	3,469	2,335	14,764	7,535
Manufacturing Industrial Centers	-	-	-	-	628	6,100	-	-	-	-	-	-	848	12,700	-	-	1,476	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	144	-	-	-	392	-	140	-	676	-
Neighborhood Residential-Corridor	3,579	1,165	8,484	129	694	-	-	-	719	449	4,114	12	33	-	3,584	2,155	21,207	3,910
Outside Subareas (This Alternative)	910	1,371	1,769	1,549	460	447	-	-	404	91	993	1,098	164	401	587	1,894	5,287	6,851
Outside Subareas (No Change All Alternatives)	1,302	1,939	2,346	1,724	859	1,028	138	230	286	159	683	1,488	262	977	859	2,072	6,735	9,617
<b>Total</b>	<b>17,201</b>	<b>12,742</b>	<b>21,041</b>	<b>10,898</b>	<b>6,638</b>	<b>10,414</b>	<b>19,413</b>	<b>88,011</b>	<b>13,807</b>	<b>4,992</b>	<b>10,061</b>	<b>5,011</b>	<b>1,958</b>	<b>14,515</b>	<b>9,881</b>	<b>11,417</b>	<b>100,000</b>	<b>158,000</b>
Share of Target	17.2%	8.1%	21.0%	6.9%	6.6%	6.6%	19.4%	55.7%	13.8%	3.2%	10.1%	3.2%	2.0%	9.2%	9.9%	7.2%		

	Analysis Zone 1		Analysis Zone 2		Analysis Zone 3		Analysis Zone 4		Analysis Zone 5		Analysis Zone 6		Analysis Zone 7		Analysis Zone 8		Total	
	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target
<b>Alternative 5</b>																		
Urban Centers	6,042	4,097	6,049	6,403	3,634	2,514	18,265	85,703	9,061	3,191	-	-	-	-	-	-	43,051	101,908
Hub Urban Villages	2,546	2,256	927	591	-	-	-	-	-	-	3,140	1,526	-	-	1,242	2,900	7,855	7,273
Residential Urban Villages	3,838	1,928	3,110	704	429	267	1,010	267	3,194	1,014	2,884	1,152	1,659	671	6,738	2,875	22,862	8,878
Manufacturing Industrial Centers	-	-	-	-	628	6,100	-	-	-	-	-	-	848	12,700	-	-	1,476	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	144	-	-	-	392	-	140	-	676	-
Neighborhood Anchor - Low Risk	4,495	1,893	5,127	1,799	2,002	707	-	-	2,830	510	1,406	333	-	-	446	92	16,306	5,334
Neighborhood Anchor - High Risk	-	-	-	-	-	-	-	-	-	-	2,083	1,101	461	443	791	194	3,335	1,738
Neighborhood Residential	1,885	6	2,569	84	310	4	-	-	240	-	1,878	14	-	-	1,966	3,005	8,848	3,113
Neighborhood Residential-Corridor	1,390	457	3,429	49	305	-	-	-	346	177	1,674	5	14	-	1,698	850	8,856	1,538
Outside Subareas (This Alternative)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Outside Subareas (No Change All Alternatives)	1,302	1,899	2,346	1,688	859	1,007	138	226	286	156	683	1,457	262	956	859	2,029	6,735	9,418
<b>Total</b>	<b>21,498</b>	<b>12,536</b>	<b>23,557</b>	<b>11,318</b>	<b>8,167</b>	<b>10,599</b>	<b>19,413</b>	<b>86,196</b>	<b>16,101</b>	<b>5,048</b>	<b>13,748</b>	<b>5,588</b>	<b>3,636</b>	<b>14,770</b>	<b>13,880</b>	<b>11,945</b>	<b>120,000</b>	<b>158,000</b>
Share of Target	17.9%	7.9%	19.6%	7.2%	6.8%	6.7%	16.2%	54.6%	13.4%	3.2%	11.5%	3.5%	3.0%	9.3%	11.6%	7.6%		

	Analysis Zone 1		Analysis Zone 2		Analysis Zone 3		Analysis Zone 4		Analysis Zone 5		Analysis Zone 6		Analysis Zone 7		Analysis Zone 8		Total	
	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target	HU Target	Jobs Target
<b>Preferred Alternative</b>																		
Urban Centers	6,000	4,000	6,000	6,000	3,500	2,500	18,000	85,500	9,500	3,000	-	-	-	-	-	-	43,000	101,000
Hub Urban Villages	2,545	2,375	925	620	-	-	-	-	-	-	3,630	1,600	-	-	1,240	3,050	8,340	7,645
Residential Urban Villages	4,320	2,025	2,965	725	900	280	1,010	280	3,985	1,060	2,145	895	-	-	5,355	2,370	20,680	7,635
Manufacturing Industrial Centers	-	-	-	-	300	6,100	-	-	-	-	-	-	500	12,700	-	-	800	18,800
Neighborhood Anchor	2,960	835	2,550	835	1,260	415	-	-	1,245	160	2,055	1,325	710	1,835	780	105	11,560	5,510
Neighborhood Residential	7,630	1,650	6,010	700	2,325	840	10	-	1,780	200	3,835	1,810	295	790	1,725	5,480	23,610	11,470
Neighborhood Residential-Corridor	2,215	1,200	5,065	1,710	690	780	105	205	1,130	145	1,100	510	110	685	1,595	705	12,010	5,940
<b>Total</b>	<b>25,670</b>	<b>12,085</b>	<b>23,515</b>	<b>10,590</b>	<b>8,975</b>	<b>10,915</b>	<b>19,125</b>	<b>85,985</b>	<b>17,640</b>	<b>4,565</b>	<b>12,765</b>	<b>6,140</b>	<b>1,615</b>	<b>16,010</b>	<b>10,695</b>	<b>11,710</b>	<b>120,000</b>	<b>158,000</b>
Share of Target	21.4%	7.7%	19.6%	6.7%	7.5%	6.9%	15.9%	54.4%	14.7%	2.9%	10.6%	3.9%	1.4%	10.1%	5.9%	7.4%		

### Total Existing and Net New Housing Units by Alternative

Alt 1 Type	Name of Center	Total Existing Units (DEIS)	Net Units (HU Target) (DEIS)					2024 Existing Units (FEIS)	Net Units (FEIS) Pref Alt	Total Existing Jobs (DEIS)	Net Jobs (Jobs Target) (DEIS)					2023 PSRC Existing Jobs (FEIS)	Net Jobs (FEIS) Pref Alt
			No Action	Alt 2	Alt 3	Alt 4	Alt 5				No Action	Alt 2	Alt 3	Alt 4	Alt 5		
UC	Downtown	34,696	13,658	13,658	13,658	13,658	13,658	34,862	13,500	288,234	63,149	61,255	61,255	61,255	59,992	187,799	60,000
UC	First Hill/Capitol Hill	40,139	9,061	9,061	9,061	9,061	9,061	43,861	9,500	45,527	3,359	3,258	3,258	3,258	3,191	50,654	3,000
UC	University District	11,792	3,862	3,862	3,862	3,862	3,862	15,743	4,000	16,911	3,888	3,771	3,771	3,771	3,694	36,741	3,500
UC	South Lake Union	11,199	4,607	4,607	4,607	4,607	4,607	11,627	4,500	57,498	27,065	26,253	26,253	26,253	25,712	77,542	25,500
UC	Uptown	8,837	3,595	3,595	3,595	3,595	3,634	11,392	3,500	25,643	2,646	2,567	2,567	2,567	2,514	15,174	2,500
UC	Northgate	5,171	2,187	2,187	2,187	2,187	2,187	5,274	2,000	13,010	2,852	2,766	2,766	2,766	2,709	10,222	2,500
HUV	Ballard	12,259	5,042	5,042	5,042	5,042	6,042	12,465	6,000	8,434	4,129	4,005	4,005	4,005	4,097	8,430	4,000
HUV	Bitter Lake Village	3,439	1,009	1,009	1,009	1,009	1,009	3,997	1,010	8,965	2,064	2,002	2,002	2,002	1,961	4,142	2,065
HUV	Fremont	3,990	1,537	1,537	1,537	1,537	1,537	4,418	1,535	7,251	311	302	302	302	295	7,552	310
HUV	Lake City	2,834	927	927	927	927	927	3,375	925	2,387	622	603	603	603	591	1,379	620
HUV	Mt Baker	4,295	1,242	1,242	1,242	1,242	1,242	4,320	1,240	8,884	3,053	2,961	2,961	2,961	2,900	5,236	3,050
HUV	West Seattle Junction	6,452	3,128	3,128	3,128	3,128	3,140	7,662	3,630	5,745	1,597	1,543	1,543	1,543	1,526	4,879	1,600
n/a	130 <sup>th</sup> Street (Pinehurst)	1,436	194	1,049	n/a	n/a	1,644	1,489	1,500	1,062	109	284	n/a	n/a	356	494	360
RUV	23rd & Union-Jackson	8,577	1,977	1,977	1,977	1,977	1,977	n/a	n/a	6,765	679	659	659	659	645	n/a	n/a
n/a	Central District	n/a	n/a	n/a	n/a	n/a	n/a	3,317	1,370	n/a	n/a	n/a	n/a	n/a	n/a	1,180	132
n/a	Judkins Park	n/a	n/a	n/a	n/a	n/a	n/a	7,230	1,400	n/a	n/a	n/a	n/a	n/a	n/a	5,037	548
RUV	Admiral	1,265	415	415	415	415	845	2,107	915	2,249	250	243	243	243	311	2,100	250
RUV	Aurora-Licton Springs	4,268	952	952	952	952	952	4,268	950	5,679	416	404	404	404	395	2,653	415
RUV	Columbia City	4,023	1,484	1,484	1,484	1,484	1,484	4,462	1,485	3,105	1,048	1,017	1,017	1,017	996	3,301	1,050
RUV	Crown Hill	2,636	643	643	643	643	643	2,984	645	1,459	328	318	318	318	312	1,181	330
RUV	Eastlake	4,090	1,010	1,010	1,010	1,010	1,010	4,566	1,010	5,601	281	273	273	273	267	6,318	280
RUV	Green Lake	2,791	809	809	809	809	809	2,777	810	1,953	167	162	162	162	159	1,879	170
RUV	Greenwood-Phinney Ridge	2,546	501	501	501	501	517	3,404	1,000	2,737	583	564	563	563	563	2,207	585
RUV	Madison-Miller	3,770	1,216	1,216	1,216	1,216	1,216	3,822	1,215	1,759	388	376	376	376	369	1,978	380
RUV	Morgan Junction	1,549	329	329	329	329	1,439	2,325	830	690	171	166	166	166	354	861	170
RUV	North Beacon Hill	3,138	482	482	482	482	482	3,329	480	1,073	702	681	681	681	667	1,424	700
RUV	Othello	4,357	1,129	1,129	1,129	1,129	2,648	n/a	n/a	2,892	342	365	365	365	642	n/a	n/a
n/a	Graham	n/a	n/a	n/a	n/a	n/a	n/a	1,519	1,478	n/a	n/a	n/a	n/a	n/a	n/a	894	229
n/a	Othello	n/a	n/a	n/a	n/a	n/a	n/a	4,348	539	n/a	n/a	n/a	n/a	n/a	n/a	886	111
RUV	Rainier Beach	2,365	374	374	374	374	2,124	2,517	1,375	3,119	281	273	273	273	571	1,106	280
RUV	Roosevelt	3,540	1,466	1,466	1,466	1,466	1,466	4,586	1,465	3,191	366	355	355	355	348	1,959	365
RUV	South Park	1,368	259	259	259	259	1,659	n/a	n/a	1,075	450	437	437	437	671	n/a	n/a
RUV	Upper Queen Anne	1,564	402	402	402	402	429	3,007	900	1,503	281	273	273	273	267	2,608	280
RUV	Wallingford	3,425	917	917	917	917	917	3,965	915	3,847	526	510	510	510	500	2,888	525
RUV	Westwood-Highland Park	2,486	399	399	399	399	600	2,605	400	2,572	476	462	462	462	487	1,613	475
MIC	Ballard-Interbay-Northend	138	628	628	628	628	628	651	300	17,377	6,100	6,100	6,100	6,100	6,100	17,942	6,100
MIC	Greater Duwamish	204	848	848	848	848	848	446	500	61,917	12,700	12,700	12,700	12,700	12,700	66,631	12,700

### Total Housing Units and Jobs by Alternative

Alt 1 Type	Name	Total Housing Units								Total Jobs							
		Existing (DEIS)	No Action	Alt 2	Alt 3	Alt 4	Alt 5	2024 Base	Pref Alt	Existing (DEIS)	No Action	Alt 2	Alt 3	Alt 4	Alt 5	2023 PSRC	Pref Alt
UC	Downtown	34,696	48,354	48,354	48,354	48,354	48,354	34,862	48,362	288,234	351,383	349,489	349,489	349,489	348,226	187,799	247,799
UC	First Hill/Capitol Hill	40,139	49,200	49,200	49,200	49,200	49,200	43,861	53,361	45,527	48,886	48,785	48,785	48,785	48,718	50,654	53,654
UC	University District	11,792	15,654	15,654	15,654	15,654	15,654	15,743	19,743	16,911	20,799	20,682	20,682	20,682	20,605	36,741	40,241
UC	South Lake Union	11,199	15,806	15,806	15,806	15,806	15,806	11,627	16,127	57,498	84,563	83,751	83,751	83,751	83,210	77,542	103,042
UC	Uptown	8,837	12,432	12,432	12,432	12,432	12,471	11,392	14,892	25,643	28,289	28,210	28,210	28,210	28,157	15,174	17,674
UC	Northgate	5,171	7,358	7,358	7,358	7,358	7,358	5,274	7,274	13,010	15,862	15,776	15,776	15,776	15,719	10,222	12,722
HUV	Ballard	12,259	17,301	17,301	17,301	17,301	18,301	12,465	18,465	8,434	12,563	12,439	12,439	12,439	12,531	8,430	12,430
HUV	Bitter Lake Village	3,439	4,448	4,448	4,448	4,448	4,448	3,997	5,007	8,965	11,029	10,967	10,967	10,967	10,926	4,142	6,207
HUV	Fremont	3,990	5,527	5,527	5,527	5,527	5,527	4,418	5,953	7,251	7,562	7,553	7,553	7,553	7,546	7,552	7,862
HUV	Lake City	2,834	3,761	3,761	3,761	3,761	3,761	3,375	4,300	2,387	3,009	2,990	2,990	2,990	2,978	1,379	1,999
HUV	Mt Baker	4,295	5,537	5,537	5,537	5,537	5,537	4,320	5,560	8,884	11,937	11,845	11,845	11,845	11,784	5,236	8,286
HUV	West Seattle Junction	6,452	9,580	9,580	9,580	9,580	9,592	7,662	11,292	5,745	7,342	7,288	7,288	7,288	7,271	4,879	6,479
n/a	130 <sup>th</sup> Street (Pinehurst)	1,436	1,630	2,485	2,035	2,205	3,080	1,489	2,989	1,062	1,171	1,346	1,254	1,288	1,418	494	854
RUV	23 <sup>rd</sup> & Union-Jackson	8,577	10,554	10,554	10,554	10,554	10,554	n/a	n/a	6,765	7,444	7,424	7,424	7,424	7,410	n/a	n/a
n/a	Central District	n/a	n/a	n/a	n/a	n/a	n/a	3,317	4,687	n/a	n/a	n/a	n/a	n/a	n/a	1,180	1,312
n/a	Judkins Park	n/a	n/a	n/a	n/a	n/a	n/a	7,230	8,630	n/a	n/a	n/a	n/a	n/a	n/a	5,037	5,585
RUV	Admiral	1,265	1,680	1,680	1,680	1,680	2,110	2,107	3,022	2,249	2,499	2,492	2,492	2,492	2,560	2,100	2,350
RUV	Aurora-Licton Springs	4,268	5,220	5,220	5,220	5,220	5,220	4,268	5,218	5,679	6,095	6,083	6,083	6,083	6,074	2,653	3,068
RUV	Columbia City	4,023	5,507	5,507	5,507	5,507	5,507	4,462	5,947	3,105	4,153	4,122	4,122	4,122	4,101	3,301	4,351
RUV	Crown Hill	2,636	3,279	3,279	3,279	3,279	3,279	2,984	3,629	1,459	1,787	1,777	1,777	1,777	1,771	1,181	1,511
RUV	Eastlake	4,090	5,100	5,100	5,100	5,100	5,100	4,566	5,576	5,601	5,882	5,874	5,874	5,874	5,868	6,318	6,598
RUV	Green Lake	2,791	3,600	3,600	3,600	3,600	3,600	2,777	3,587	1,953	2,120	2,115	2,115	2,115	2,112	1,879	2,049
RUV	Greenwood-Phinney Ridge	2,546	3,047	3,047	3,047	3,047	3,063	3,404	4,404	2,737	3,320	3,301	3,300	3,300	3,300	2,207	2,792
RUV	Madison-Miller	3,770	4,986	4,986	4,986	4,986	4,986	3,822	5,037	1,759	2,147	2,135	2,135	2,135	2,128	1,978	2,358
RUV	Morgan Junction	1,549	1,878	1,878	1,878	1,878	2,988	2,325	3,155	690	861	856	856	856	1,044	861	1,031
RUV	North Beacon Hill	3,138	3,620	3,620	3,620	3,620	3,620	3,329	3,809	1,073	1,775	1,754	1,754	1,754	1,740	1,424	2,124
RUV	Othello	4,357	5,486	5,486	5,486	5,486	7,005	n/a	n/a	2,892	3,234	3,257	3,257	3,257	3,534	n/a	n/a
n/a	Graham	n/a	n/a	n/a	n/a	n/a	n/a	1,519	2,996	NA	n/a	n/a	n/a	n/a	n/a	894	1,123
n/a	Othello	n/a	n/a	n/a	n/a	n/a	n/a	4,348	4,887	NA	n/a	n/a	n/a	n/a	n/a	886	997
RUV	Rainier Beach	2,365	2,739	2,739	2,739	2,739	4,489	2,517	3,892	3,119	3,400	3,392	3,392	3,392	3,690	1,106	1,386
RUV	Roosevelt	3,540	5,006	5,006	5,006	5,006	5,006	4,586	6,051	3,191	3,557	3,546	3,546	3,546	3,539	1,959	2,324
RUV	South Park	1,368	1,627	1,627	1,627	1,627	3,027	n/a	n/a	1,075	1,525	1,512	1,512	1,512	1,746	n/a	n/a
RUV	Upper Queen Anne	1,564	1,966	1,966	1,966	1,966	1,993	3,007	3,907	1,503	1,784	1,776	1,776	1,776	1,770	2,608	2,888
RUV	Wallingford	3,425	4,342	4,342	4,342	4,342	4,342	3,965	4,880	3,847	4,373	4,357	4,357	4,357	4,347	2,888	3,413
RUV	Westwood-Highland Park	2,486	2,885	2,885	2,885	2,885	3,086	2,605	3,005	2,572	3,048	3,034	3,034	3,034	3,059	1,613	2,088
MIC	Ballard-Interbay-Northend	138	766	766	766	766	766	651	951	17,377	23,477	23,477	23,477	23,477	23,477	17,942	24,042
MIC	Greater Duwamish	204	1,052	1,052	1,052	1,052	1,052	446	946	61,917	74,617	74,617	74,617	74,617	74,617	66,631	79,331



## **C Infill Exemption Summary of Law & List of Codes as Mitigation**

# C HOUSING & INFILL EXEMPTION

## 1 Introduction

Seattle is considering updating our thresholds for environment review consistent with the housing and infill exemption provisions of the State Environmental Policy Act (SEPA).

Currently, Seattle exempts single-family residential development of 4 units or less from undergoing review under SEPA. Using the housing and infill exemption under RCW 43.21c.229, the City has varied the exemption levels depending on if the proposal is inside or outside of an urban center or urban village and if that area is below or above planned growth estimates. The basic residential exemptions until recently were set at low levels that vary by zone type outside of urban centers or urban villages, ranging from 4 to 20 units depending on zone category. However, state bill ESSHB 5412, which was passed in 2023, removed SEPA review for most residential uses through at least September 2025. Seattle Director’s Rule 9-2023 describes the current SEPA thresholds on an interim basis due to the influence of changes related to ESSHB 5412. Commercial uses in some commercial or industrial zones are in the range of default and maximum exemptions. See [Exhibit 1](#).

**Exhibit 1. Categorical Exemptions—State Rules and City Regulations**

Project Type	Outside UC/UV	In UC/UV Growth Less Than Estimates	In UC/UV Growth Greater than Estimates
<b>Single family residential</b>	4	4	4
<b>Multifamily residential</b>	4	NR, RSL, I: 4 MPC-YT: 30 Downtown: 250 LR, NC, C, MR, HR, SM: 200	NR, RSL, I: 4 All others: 20
<b>Office, school, commercial (square feet) w/parking or stand-alone parking lot</b>	NR, RSL, and LR, MR, HR, NC: 4,000 sf C1, C2, and SM, Industrial: 12,000 sf	NR, RSL, LR1, MPC-YT, Industrial: 12,000 sf (not part of mixed use dev)	12,000 sf

Project Type	Outside UC/UV	In UC/UV Growth Less Than Estimates	In UC/UV Growth Greater than Estimates
		LR2, LR3, MR, HR, NC1, NC2, NC3, C1, C2, SM, Downtown: 30,000 sf if part of mixed use development	

UC = Urban Center, UV = Urban Village. Other acronyms refer to zone names. See this link for more context: [https://library.municode.com/wa/seattle/codes/municipal\\_code?nodeId=TIT25ENPRHIPR\\_CH25.05ENPOPR\\_SUBCHAPTER\\_IXCAEX\\_25.05.800CAEX](https://library.municode.com/wa/seattle/codes/municipal_code?nodeId=TIT25ENPRHIPR_CH25.05ENPOPR_SUBCHAPTER_IXCAEX_25.05.800CAEX).

The City is considering applying an updated housing and infill exemption under RCW 43.21C.229. This would allow the City to exempt residential development and modify thresholds for mixed-use development after the temporary residential exemption expires. Development that is not subject to SEPA would still be subject to the City’s robust development regulations and permit review process. The City may also consider raising thresholds for minor new construction per WAC 197-11-800(1)(c) which requires similar documentation regarding environmental analysis, protection, and mitigation as contained in this appendix for the infill and housing exemption under RCW 43.21c.229.

This document outlines requirements, identifies proposed infill exemption locations, and describes policies and regulations that mitigate impacts.

## 2 Housing and Infill Exemption Allowances

To accommodate infill development in urban areas not meeting the density goals of a Comprehensive Plan, the City can establish an infill exemption where development that is consistent with City regulations is not required to undergo new environmental review, provided that the probable adverse environmental impacts have been adequately addressed by local regulations and that the City’s Comprehensive Plan was previously subject to an Environmental Impact Statement (EIS). The City of Seattle is preparing a new EIS for its Comprehensive Plan periodic update due in 2025.

The provisions in RCW 43.21C.229 allows cities to exempt residential development and raise SEPA thresholds for, mixed-use development including housing, and single-purpose commercial (non-retail) development up to 65,000 square feet.

Senate Bill 5412 (2023) added new section RCW 43.21C.229(3) allowing the City to adopt a new SEPA exemption for all project actions proposing to develop housing units provided:

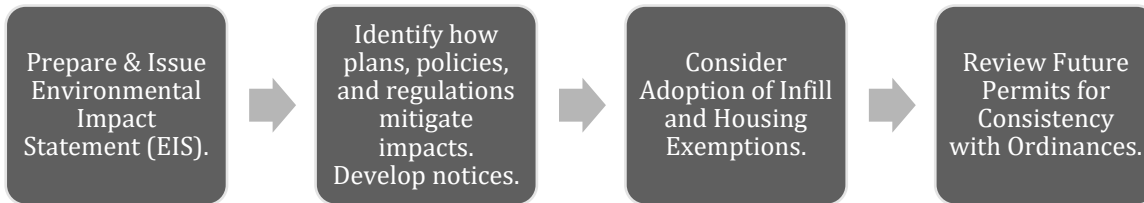
- the development is consistent with all development regulations;
- the development is consistent with the proposed use or density and intensity of use in the designated infill area;
- the EIS prepared for the exemption analyzes multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system

including documented consultation with the Washington State Department of Transportation;

- the EIS documents that the comprehensive plan, subarea plans, adopted regulations, and state and federal regulations adequately mitigates impacts; and
- there is a 60-day notice to affected tribes, state agencies, and other jurisdictions and public before the environmental analysis is completed.

The Infill Exemption process is summarized in **Exhibit 2**.

**Exhibit 2. Infill and Housing Exemption Process**



### 3 Housing & Infill Exemption Legislation

This section quotes key infill exemption provisions.

#### RCW 43.21C. 229<sup>1</sup>

##### Section 1

- RCW 43.12C. 229 aims to accommodate infill and housing developments. Any city or county planning under RCW 36.70A.040 is authorized by this section to establish categorical exemptions from the requirements of this chapter. An exemption may be adopted by a city or county under this subsection if it meets the following criteria in Sections 2 and 3.

##### Section 2

- (a) Exempt government action related to development proposed to fill in an urban growth area, designated according to RCW 36.70A.110, where current density and intensity of use in the area is roughly equal to or lower than called for in the goals and policies of the applicable comprehensive plan and the development is either:
  - Residential development;
  - Mixed-use development; or

<sup>1</sup> Infill development—Categorical exemptions from chapter: <https://app.leg.wa.gov/RCW/default.aspx?cite=43.21C.229&pdf=true> as amended <https://lawfilesexxt.leg.wa.gov/biennium/2023-24/Pdf/Bills/Session%20Laws/Senate/5412-S2.SL.pdf>

- Commercial development up to 65,000, excluding retail development;
- (b) It does not exempt government action related to development that is inconsistent with the applicable comprehensive plan or would clearly exceed the density or intensity of use called for in the goals and policies of the applicable comprehensive plan;
- (c) The local government considers the specific probable adverse environmental impacts of the proposed action and determines that these specific impacts are adequately addressed by the development regulations or other applicable requirements of the comprehensive plan, subarea plan element of the comprehensive plan, planned action ordinance, or other local, state, or federal rules or laws;
- (d)
  - The city or county's applicable comprehensive plan was previously subjected to environmental analysis through an environmental impact statement under the requirements of this chapter prior to adoption; or
  - The city or county has prepared an environmental impact statement that considers the proposed use or density and intensity of use in the area proposed for an exemption under this section.

### Section 3

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- All project actions that propose to develop one or more residential housing units within the incorporated areas in an urban growth area designated pursuant to RCW 36.70A.110 or middle housing with the incorporated areas in an urban growth area designated pursuant to RCW 36.70.110, and that meet the criteria identified in section (a) and section (b) of this subsection, are categorically exempt from the requirements of this chapter. For purposes of this section, “middle housing” has the same meaning as in RCW 36.70.030. Jurisdictions shall satisfy the following criteria prior to the adoption of the categorical exemption under this subsection:
  - (a) The city or county shall find that the proposed development is consistent with all development regulations implementing an applicable comprehensive plan adopted according to chapter 36.70A. RCW by the jurisdiction in which the development is proposed, with the exception of any development regulation that is inconsistent with applicable provisions of chapter 36.70A RCW; and
  - (b) The city or county has prepared environmental analysis that considers the proposed use or density and intensity of use in the area proposed for an exemption under this section and analyzes multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system.
    - (i) Such environmental analysis shall include documentation that requirements for environmental analysis, protection, and mitigation for impacts to elements of the environment have been adequately addressed for the development exempted. The requirements may be addressed in locally adopted comprehensive plans, subarea plans, adopted development regulation, other applicable local ordinances and

regulations, or applicable state and federal regulations. The city or county must document its consultation with the department of transportation on impacts to state-owned transportation facilities including consideration of whether mitigation is necessary for impacts to transportation facilities.

- (ii) Before finalizing the environmental analysis pursuant to (b) (i), the city or county shall provide a minimum of 60 days' notice to affected tribes, relevant state agencies, other jurisdictions that may be impacted, and the public. If a city or county identifies that mitigation measures are necessary to address specific probable adverse impacts, the city or county must address those impacts required mitigation identified in the environmental analysis pursuant to this subsection (3) (b) through locally adopted comprehensive plans, subarea plans, development regulations, or other applicable local ordinances and regulations. Mitigation measures shall be detailed in an associated environmental determination.
- The categorical exemption is effective 30 days following action by a city or county pursuant to (b) (ii) of this subsection.

## Section 4

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- Until September 30, 2025, all project actions that propose to develop one or more residential housing or middle housing units within a city west of the crest of the Cascade mountains with a population of 700,000 or more are categorically exempt from the requirements of this chapter. After September 30, 2025, project actions that propose to develop one or more residential housing or middle housing units within the city may utilize the categorical exemption in subsection (3) of this section.

## Section 5

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- Any categorical exemption adopted by a city or county under this section applies even if it differs from the categorical exemptions adopted by rule of the department under RCW 10 43.21C.110(1)(a). Nothing in this section shall invalidate categorical exemptions or environmental review procedures adopted by a city or county under a planned action pursuant to RCW 43.21C.440. However, any categorical exemption adopted by a city or county under 14 this section shall be subject to the rules of the department adopted according to RCW 43.21C.110(1)(a) that provide exceptions to the use of categorical exemptions adopted by the department.

## When Infill Exemptions Do Not Apply

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Under RCW 43.21C.229(5), the infill or housing categorical exemption adopted by a city or county is still subject to the exceptions adopted by rule by the Department of Ecology.

If any of the following exceptions apply, then a proposed project is not exempt from SEPA:

- The proposal includes other non-exempt activities, see WAC 197-11-305:(1)(b).

- The proposal is undertaken wholly or partly on lands covered by water, see WAC 197-11-800:(1)(a)(i).
- The proposal requires a non-exempt NPDES permit, including construction stormwater general permits for sites 5 acres and above, see WAC 197-11-800:(1)(a)(ii).
- The proposal requires a non-exempt license governing emissions to air, see WAC 197-11-800:(1)(a)(iii).
- The proposal requires a land use decision that is not exempt under WAC 197-11-800:(6), see WAC 197-11-800:(1)(a)(iv).
- The proposal includes demolition of structures or facilities with recognized historical significance such as listing in a historic register, see WAC 197-11-800:(2)(g).
- The proposal requires a Class IV forest practices approval, see RCW 43.21C.037.

## Effective Date

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Categorical exemptions adopted under RCW 43.21C.229 (3) become effective 30-days after the adoption of the enacting ordinance, except that the City of Seattle cannot adopt the housing exemption until the current temporary housing exemption expires on September 30, 2025. After that date the City may enact such regulations with an effective date of October 1, 2025.

## 4 Overview Housing & Infill Exemption Components

The City is considering a residential exemption and raising SEPA thresholds for, mixed-use development including housing, and single-purpose commercial (non-retail) development up to 65,000 square feet throughout the City. Final exemptions could vary by place type or other geographic location.

### Alternatives & Growth Evaluated

Six alternatives are reviewed in the Final EIS that would vary the potential locations for new and expanded mixed use centers as well as allow middle housing in more Neighborhood Residential areas.

See [Exhibit 3](#) for a comparison of housing and job growth numbers. Growth by place type is included in Appendix B of the Final EIS.

**Exhibit 3. Summary of Housing and Job Growth Share—Citywide Alternatives**

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
<b>Housing</b>	80,000	100,000	100,000	100,000	120,000	120,000
<b>Jobs</b>	158,000	158,000	158,000	158,000	158,000	158,000

Sources: City of Seattle, 2023; BERK, 2023.

### Housing Types

The alternatives allow more infill development to support a range of housing types including middle housing. The City proposes other code changes to improve environmental quality as described in the following section. The housing types that would be most commonly built are illustrated in [Exhibit 4](#).

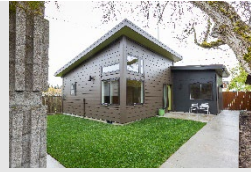


**Exhibit 4. Example Housing Types**



**Detached Homes on a Small Lot**

Existing home preserved with two new homes added behind (left), three homes on one lot (middle), and eight homes on two lots (right).



**Detached Accessory Dwelling Unit (DADU)**

A second unit added to a residential lot, usually behind the main house.

**Cottage Housing**

Detached homes of 2-3 stories arranged around a shared open space.



**Courtyard Housing**

Attached homes of 2-3 stories arranged around a shared open space.

**Duplex & Triplex (side-by-side)**

Two or three units that share walls with one another.

**Townhouse & Rowhouse**

Homes that share a wall with another home that can all be owned outright.



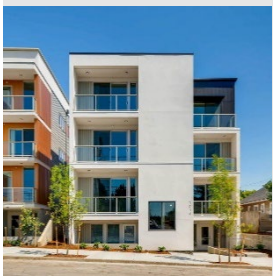
**Foursquare**

A traditional form with two units per floor in a structure that often resembles a large house.



**Sixplex**

A three-story structure with two homes per floor.



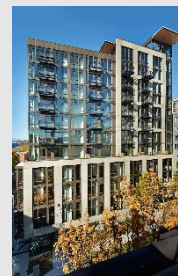
**8-plex**

A four-story structure with two homes per floor.



**Apartments & Condos of 5-8 Stories**

Midrise buildings with multiple homes per floor that can be rented as apartments or owned as condominium units.



**Highrise Apartments & Condos**

Buildings above 12 stories with multiple homes per floor that can be rented as apartments or owned as condominium units.

Source: City of Seattle, 2024.

Infill development would allow for dwellings that fit the intent of the zone, and would be subject to City zoning standards for height, setbacks, landscaping, access, etc. See the type and densities of housing by place type in [Exhibit 5](#).

**Exhibit 5. Most Common Housing Types Expected in Future Development by Place Type**

	Urban Neighborhood	Corridors	Neighborhood Centers	Urban Centers	Regional Centers
Detached home	X	X			
Duplex, triplex, and fourplex	X	X	X		
Townhouse and rowhouse	X	X	X	X	
Sixplex/3-story stacked flats	X	X	X	X	
4- to 5-story building		X	X	X	X
6- to 7-story buildings			X	X	X
8- to 12-story buildings				X	X
Highrise buildings (above 12 stories)					X

Source: City of Seattle, 2022.

## Mitigating Policies & Regulations

The State Environmental Policy Act (SEPA) was passed by the Washington State Legislature in 1971. The statute creates a review and evaluation framework centering the identification and mitigation of impacts to the natural and built environment.

Numerous state and federal laws also require that counties and cities like Seattle adopt regulations protecting water quality, wetlands, streams, fish and wildlife, floodplains, archaeological and cultural resources, air quality, noise, transportation, building, fire protection, energy, and more.

The Governor’s Office for Regulatory Innovation and Assistance provides guidebooks and flow charts to help clarify complex procedures illustrating the level of scrutiny given to development. (See: [https://www.oria.wa.gov/site/alias\\_oria/347/Permitting.aspx](https://www.oria.wa.gov/site/alias_oria/347/Permitting.aspx).)

The City of Seattle has numerous regulations that apply to development, and that have improved in specificity and quality since the passage of SEPA in 1971. The City can condition development through its permit review process.

The City applies critical area protection, tree protection, stormwater controls, archaeological resources protection, recreation, landscaping and open space standards, view protection, adequate public facilities and services, lighting, storage, solid waste and recycling, streets, sidewalks, trails, and access, design standards, and other protections.

The City’s key regulations are listed in **Exhibit 6**. Several are undergoing amendment with the One Seattle Comprehensive Plan periodic update to address critical areas regulations and best available science, new zones and housing allowances, and design standards particularly for centers and transit-oriented development. In addition, the City is updating the Seattle

Transportation Plan and Seattle Parks Master Plan. New regulations and other standards could flow from those plan updates.

**Exhibit 6. Current Zoning and Municipal Code Chapters**

Title	Subtitles and Chapters
<b>Title 22 - BUILDING AND CONSTRUCTION CODES</b>	Subtitle I - Construction Codes Subtitle IB - Grading Code Subtitle II - Housing Code Subtitle V - Plumbing Code Subtitle VI - Fire Code Subtitle VIII - Stormwater Code Subtitle IX - Permit Fees Subtitle X - Miscellaneous Rules and Regulations
<b>Title 23 - LAND USE CODE</b> <b>Subtitle I - General Provisions</b> <b>Subtitle II - Platting Requirements</b> <b>Subtitle III - Land Use Regulations</b> <b>Subtitle IV - Administration</b>	Subtitle I - General Provisions Subtitle II. - Platting Requirements Subtitle III - Land Use Regulations Division 1 - Land Use Zones Division 2 - Authorized Uses and Development Standards Chapter 23.40 - Compliance with Regulations Required—Exceptions Chapter 23.41 - Design Review Chapter 23.42 - General Use Provisions Chapter 23.44 - Neighborhood Residential Chapter 23.45 - Multifamily Chapter 23.46 - Residential—Commercial Chapter 23.47a - Commercial Chapter 23.48 - Seattle Mixed Chapter 23.49 - Downtown Zoning Chapter 23.50 - Industrial Chapter 23.50a - Industrial and Maritime Chapter 23.51a - Public Facilities in Residential Zones Chapter 23.51b - Public Schools in Residential Zones Chapter 23.52 - Transportation Concurrency, and Transportation Impact Mitigation Chapter 23.53 - Requirements For Streets, Alleys, and Easements Chapter 23.54 - Quantity and Design Standards for Access, Off-Street Parking, and Solid Waste Storage Chapter 23.55 - Signs Chapter 23.57 - Communications Regulations Chapter 23.58a - Incentive Provisions Chapter 23.58b - Affordable Housing Impact Mitigation Program for Commercial Development

Title	Subtitles and Chapters
	Chapter 23.58c - Mandatory Housing Affordability for Residential Development
	Chapter 23.58d - Green Building Standard
	Division 3 - Overlay Districts
	Chapter 23.59 - General Provisions
	Chapter 23.60a - Seattle Shoreline Master Program Regulations
	Chapter 23.61 - Station Area Overlay District
	Chapter 23.64 - Airport Height Overlay District
	Chapter 23.66 - Special Review Districts
	Chapter 23.67 - Southeast Seattle Reinvestment Area
	Chapter 23.69 - Major Institution Overlay District
	Chapter 23.70 - Mobile Home Park Overlay District
	Chapter 23.71 - Northgate Overlay District
	Chapter 23.72 - Sand Point Overlay District
	Chapter 23.73 - Pike/Pine Conservation Overlay District
	Chapter 23.74 - Stadium Transition Area Overlay District
	Division 4 - Master Planned Communities
	Chapter 23.75 - Master Planned Communities
	Subtitle IV - Administration
	Division 1 - Land Use Approval Procedures
	Chapter 23.80 - Essential Public Facilities
	Division 2 - General Terms
	Chapter 23.84A - Definitions
	Chapter 23.86 - Measurements
	Division 3 - Implementation
	Chapter 23.88 - Rules; Interpretation
	Chapter 23.90 - Enforcement of the Land Use Code
	Chapter 23.91 - Citation—Hearings—Penalties
<b>Title 25 - ENVIRONMENTAL PROTECTION AND HISTORIC PRESERVATION</b>	Chapter 25.02 - Commute Trip Reduction
	Chapter 25.05 - Environmental Policies and Procedures
	Chapter 25.06 - Floodplain Development
	Chapter 25.08 - Noise Control
	Chapter 25.09 - Regulations for Environmentally Critical Areas
	Chapter 25.10 - Radiofrequency Radiation
	Chapter 25.11 - Tree Protection
	Chapter 25.12 - Landmarks Preservation
	Chapter 25.16 - Ballard Avenue Landmark District
	Chapter 25.20 - Columbia City Landmark District
	Chapter 25.21 - Fort Lawton Landmark District
	Chapter 25.22 - Harvard-Belmont Landmark District
	Chapter 25.24 - Pike Place Market Historical District

Title	Subtitles and Chapters
	Chapter 25.28 - Pioneer Square Historical District
	Chapter 25.30 - Sand Point Naval Air Station Landmark District
	Chapter 25.32 - Table of Historical Landmarks

As part of the EIS, the ability of existing and proposed policies and regulations to serve as mitigation are included in [Section 5](#).

## 5 Current Mitigation Measures

[Exhibit 7](#) identifies current regulations, plans, and policies that serve as mitigation measures for new development. The City is anticipating new or updated regulations as part of the Proposal and action alternatives. These codes will be added to the chart such as in the Final EIS.

Key acronyms include:

- SMC: Seattle Municipal Code (City of Seattle)
- RCW: Revised Code of Washington (State)
- WAC: Washington Administrative Code (State)
- USC: United States Code (Federal)

### Exhibit 7. Current Regulations, Plans, and Policies Serving as Mitigation Measures

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
<b>Earth and Water Quality</b>			
	Coastal Zone Management Act	<a href="#">16 USC 1451 et seq.</a>	Goal is to preserve, protect, develop, and where possible, to restore or enhance the resources of the nation’s coastal zone.
	Shoreline Management Act	<ul style="list-style-type: none"> <li>▪ <a href="#">RCW 90.58</a></li> <li>▪ <a href="#">WAC 173-26</a></li> </ul>	Balance shoreline use, public access, and environmental conservation and protection.  Protect critical areas and ensure no-net-loss of shoreline ecological function.
	Shoreline Master Program	<a href="#">SMC 23.60A</a>	
	National Flood Insurance Act of 1968	<a href="#">The Federal Emergency Management Agency (FEMA)</a>	Flooding is addressed through participation in the National Flood Insurance Program (NFIP). Flood Insurance Rate Map (FIRM) or Flood Hazard Boundary Maps identify geographic areas that the FEMA has defined according to varying levels of flood risk.
	Flood Disaster Protection Act of 1973	<a href="#">42 USC 4001 et seq.</a>	
	Floodplain Management Presidential Executive Order 11988	<a href="#">FEMA</a>	Restricts building in floodways, and allows construction in floodplain provided standards for floodproofing are addressed.
	Flood Control Management Act	<a href="#">RCW 86</a>	

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Floodplain Development	<a href="#">SMC 25.06</a>	
	Critical Areas Ordinance <ul style="list-style-type: none"> <li>■ SMC 25.09.080—Landslide-Prone Areas</li> <li>■ SMC 25.09.090—Steep Slope Erosion Hazard Areas</li> <li>■ SMC 25.09.100—Liquefaction-Prone Areas</li> <li>■ SMC 25.09.110—Peat Settlement-Prone Areas</li> <li>■ SMC 25.09.160—Wetlands and Wetland Buffers</li> <li>■ SMC 25.09.200—Fish and Wildlife Habitat Conservation Areas</li> </ul> SMC 25.09.220—Abandoned Landfills	<a href="#">SMC 25.09</a>	<ul style="list-style-type: none"> <li>■ Protects functions and values of critical areas .</li> <li>■ Protects life and property from hazards.</li> <li>■ Protects water quality (erosion, wetlands, riparian regulations)</li> </ul>
	Stormwater Code and Manual	<a href="#">SMC Title 22, Subtitle VIII</a> See Sections 22.800 to 22.808	<ul style="list-style-type: none"> <li>■ Stormwater, Grading &amp; Drainage ordinances include environmental &amp; water quality protections, to meet applicable State guidance that includes Ecology’s Stormwater Management Manual.</li> </ul>
	Stormwater Management Manual for Western Washington (Ecology Manual)	<a href="#">Department of Ecology</a>	
	Washington State Department of Transportation (WSDOT) Highway Runoff Manual	<a href="#">Washington State Department of Transportation</a>	
	Water Quality Standards for Surface Waters	<a href="#">WAC 173-201A</a>	<ul style="list-style-type: none"> <li>■ Designated water uses and criteria.</li> </ul>
	Water Quality Standards for Groundwater	<a href="#">WAC 173-200</a>	<ul style="list-style-type: none"> <li>■ Maintain the highest quality of the state's groundwaters and protect existing and future beneficial uses of the groundwater.</li> </ul>
	Water Pollution Control Act	<a href="#">RCW 90.48</a>	Control and prevent the pollution of streams, lakes, rivers, ponds, inland waters, salt waters, water courses, and other surface and underground waters of the state of Washington
	<a href="#">National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit</a>	<a href="#">Department of Ecology</a>	Manage and control stormwater runoff so that it does not pollute downstream waters. Implement a stormwater program that provides equal or greater protection of receiving waters and pollutant control as compared to the Stormwater Management Manual of Western Washington in effect.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	WSDOT Hydraulics Manual	<a href="#">Hydraulics Manual</a>	<p>Policy for designing hydraulic features related to Washington State Department of Transportation (WSDOT) roadways including hydrology, culverts, open-channel flow, drainage collection and conveyance systems, water crossings, and pipe materials.</p> <p>The Hydraulics Manual makes frequent references to WSDOT’s Highway Runoff Manual, which provides WSDOT’s requirements for managing stormwater discharges to protect water quality, beneficial uses of the state’s waters, and the aquatic environment in general.</p>
	Washington State Hydraulic Code	<a href="#">WAC 220-660</a>	Minimize project-specific and cumulative impacts to fish life as a result of proposals to use, divert, obstruct, or change the natural flow or bed of any of the salt or freshwaters of the state.
	Clean Water Act See the following Sections: <ul style="list-style-type: none"> <li>■ 401—Water Quality Certification</li> <li>■ 402—National Pollutant Discharge Elimination System</li> <li>■ 404—Permits for Dredge or Fill</li> </ul>	<a href="#">USC 1251 et seq.</a>	Regulates discharges of pollutants into the waters of the U.S. and regulates quality standards for surface waters.
	Rivers and Harbors Act of 1899 See Section 408	<a href="#">33 USC 408</a>	Protects navigable waters in the development of harbors and other construction and excavation.
	Safe Drinking Water Act See Chapter 6A	<a href="#">42 USC 300f et seq.</a>	Protect the quality of drinking water in the U.S.
<b>Air Quality</b>			
	<a href="#">National Ambient Air Quality Standards (NAAQS)</a>		Requires US EPA to set National Ambient Air Quality Standards (40 CFR part 50) for six principal pollutants ("criteria" air pollutants) which can be harmful to public health and the environment.
	<a href="#">Washington State Department of Ecology Rules</a>		Ecology and the Puget Sound Clean Air Agency monitors and tracks emissions to make sure levels of outdoor air pollutants meet federal and state air quality standards. They focus on EPA's "criteria" pollutants and other chemicals broadly known as air toxics.
	<a href="#">Puget Sound Clean Air Agency Rules</a>		Regulates a range of businesses and industries and construction to meet air standards.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	<a href="#">Washington State Energy Code</a>	<a href="#">SMC Chapter 22.101 - Adoption of Construction Codes</a>	Regulates the energy-use features of new and remodeled buildings. Seattle is planning to adopt the 2021 energy code in <a href="#">2024</a> .
	<a href="#">Seattle Climate Action Plan and Strategies</a>		A set of short- and long-term actions to reduce contributors of greenhouse gases, particularly transportation and buildings.
	Seattle Energy Benchmarking Law	<a href="#">SMC 22.920</a>	Building owners of each building subject to nonresidential benchmarking requirements shall provide to the Director energy benchmarking reports and, energy performance ratings for each subject building.
	<a href="#">Seattle Transportation Electrification Blueprint</a>		Consists of a series of initial steps Seattle is committed to reducing climate pollution in the transportation sector.
<b>Plants and Animals</b>			
	Environmentally Critical Areas Ordinance	<a href="#">SMC 25.09</a>	Protects and regulates activities on or adjacent to critical areas; critical areas include geologic hazard areas, flood-prone areas, wetlands, and fish and wildlife habitat conservation areas (which include streams, riparian corridors, wildlife habitats mapped or designated by WDFW, corridors connecting priority habitats, and areas that support species of local importance)
	Shoreline Master Program	<a href="#">SMC 23.60A</a>	Regulates activities in and near major water bodies (e.g., rivers, large lakes, marine waters), establishes requirements for maintaining native vegetation.
	Tree Protection Ordinance	<a href="#">SMC 25.11</a>	Protects exceptional trees (i.e., trees or groups of trees that constitute an important community resource because of their unique historical, ecological, or aesthetic value), establishes requirements for replacing trees that are cut down, and requires a pre-construction survey to be conducted by a licensed arborist.
	Tree Planting, Green Factor, and Street Tree requirements	SMC Title 23, various sections	Requires planting of trees, landscaping, and other green infrastructure on private property and the right-of-way
	Clean Water Act	<a href="#">Section 401</a>	Requires certification for any projects that may result in a discharge into waters of the United States to ensure that the discharge complies with applicable state water quality requirements.



EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Clean Water Act	<a href="#">Section 404</a>	Requires authorization for excavating, land clearing, or discharging dredged or fill material into waters of the United States, including wetlands
	Migratory Bird Treaty Act	<a href="#">16 U.S.C. 703-712</a>	Prohibits the taking, killing, or possession of migratory birds or any parts, nests, or eggs of such birds, except as authorized by U.S. Fish and Wildlife Service (USFWS).
	Bald and Golden Eagle Protection Act	<a href="#">16 U.S.C. 668-668d</a>	Prohibits the taking (including disturbance) of eagles or their nests, except as authorized by USFWS.
	Marine Mammal Protection Act	<a href="#">16 USC Ch. 31</a>	Prohibits injury or harm (including disturbance) to marine mammals, except as authorized by National Marine Fisheries Service (NMFS).
	Endangered Species Act	<a href="#">Section 7 Consultation</a>	Requires federal agencies to ensure that actions they authorize (e.g., through issuance of a permit), fund, or carry out are not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of critical habitat for those species.
	Tree Canopy Cover Assessment		City program with goal of conducting citywide tree cover assessment every 5 years
<b>Energy and Natural Resources</b>			
	<a href="#">Washington State Energy Code</a>	<a href="#">SMC Chapter 22.101 - Adoption of Construction Codes</a>	Regulates the energy-use features of new and remodeled buildings.  Seattle is planning to adopt the 2021 energy code in <a href="#">2024</a> .
	Seattle Energy Benchmarking Law	<a href="#">SMC 22.920</a>	Building owners of each building subject to nonresidential benchmarking requirements shall provide to the Director energy benchmarking reports and, energy performance ratings for each subject building.
	The Seattle Building Tune-Ups Ordinance	<a href="#">SMC 22.930</a>	Applies to all nonresidential buildings that are (1) equal to or larger than 50,000 square feet of floor area; and (2) are subject to Energy Benchmarking requirements. Once every five years, owners of buildings subject to this Chapter 22.930 are required to conduct a tune-up of building energy and water systems and submit a report to the City of findings, outcomes, and actions taken based on the tune-up.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Building Emissions Performance Standards (BEPS)	<a href="#">Legislation</a>	After two years of extensive stakeholder engagement and development of the policy by OSE and unanimous approval by City Council, Mayor Harrell signed the Building Emissions Performance Standard (BEPS) policy for existing commercial and multifamily buildings larger than 20,000 square feet into law on December 13, 2023.
<b>Noise</b>			
	City of Seattle Noise Control Ordinance	<a href="#">SMC Chapter 25.08</a>	Sets exterior sound level limits between residential, commercial, and industrial uses.
<b>Land Use Patterns and Urban Form / Relationship to Plans, Policies, and Regulations</b>			
	<a href="#">Seattle Design Review Program</a>	<a href="#">SMC Chapter 23.41</a>	Addresses site design, access, frontage, landscaping, materials, appearance, etc.  There are three types of Design Review. SDCI Design Review staff review many smaller buildings through Streamlined Design Review and Administrative Design Review. Larger buildings may require Full Design Review, which includes both public Design Review Board meetings and review by City staff. All Design Review includes an opportunity for public comment and involvement. Pursuant to HB 1293, the City is considering updates to the program. Some of the possible changes could include limiting projects to only one public meeting, streamlining the Design Review process to be quicker and less costly for applicants, and reducing the number of projects that are required to go through Design Review.
	Design Standards and Development Regulations	<a href="#">SMC Title 23, Subtitle III</a>	Regulates land uses, scale, density, access, landscaping, signage, light and glare, views, parking and more.
	<a href="#">Streets Illustrated, Seattle’s Right-of-Way Improvements Manual</a>		The Right-of-Way Improvements Manual is intended to help property owners, developers, & architects involved with the design, permitting, & construction of Seattle’s street right-of-way.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	<a href="#">Green Building Incentives</a>	SMC Title 23	<ul style="list-style-type: none"> <li>▪ Priority Green Expedited: Available for all new construction projects. Offers faster building permit review and processing for projects that meet green building requirements with a focus on clean energy, resource conservation, indoor air quality, and lead hazard reduction.</li> <li>▪ Green Building Standard: Gives additional development capacity in specific zones in exchange for meeting green building requirements.</li> <li>▪ Living Building Pilot Program: Offers additional height, floor area ratio (FAR), and Design Review departure requests for projects that meet aggressive energy and water requirements and Living Building Petal Certification.</li> <li>▪ 2030 Challenge: Offers additional height, FAR, and Design Review departure requests for projects that meet the 2030 Challenge.</li> </ul>
	<a href="#">Sustainable Buildings and Sites Policy</a>		<p>The Policy sets the following goals for City-owned properties:</p> <ul style="list-style-type: none"> <li>▪ New construction and major renovations 5,000 ft<sup>2</sup> or greater must meet LEED Gold as well as key performance requirements for energy and water efficiency, waste diversion, and bicycle facilities.</li> <li>▪ Tenant Improvements 5,000 ft<sup>2</sup> or greater with a scope of work that includes mechanical, electrical, and plumbing must meet LEED Gold as well as water efficiency and waste diversion requirements.</li> <li>▪ Small projects—either new construction, renovations, or tenant improvements—are to utilize Capital GREEN, a green design and construction evaluation tool developed by FAS, in project planning and development.</li> <li>▪ All new and existing sites projects shall follow best management practices.</li> </ul>

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
<b>Population, Housing, and Employment</b>			
	Mandatory Housing Affordability <a href="#">(MHA) Program</a>	<a href="#">Chapter 23.58c</a>	Implement an affordable housing incentive program authorized by RCW 36.70A.540. To achieve the goal of providing affordable housing in Seattle, development subject to the MHA requirements must contribute to affordable housing as part of most commercial, residential, or live-work projects. This contribution can be provided by including affordable housing units within new development (performance option) or paying into a fund that will support the development of affordable housing (payment option).
	Multifamily Housing Property Tax Exemption <a href="#">Program</a>	<a href="#">Chapter 5.72</a>	The Multifamily Property Tax Exemption (MFTE) Program provides a tax exemption on eligible multifamily housing in exchange for income- and rent-restricted units. By supporting mixed-income residential development in the urban centers, the MFTE program ensures affordability as the community grows.
	Seattle Housing Levy (SHL)	<a href="#">SHL Program</a>	Helps fund the production and protection of affordable units. <a href="#">Voters approved the \$970 Million Housing Levy renewal in 2023.</a> <a href="#">2023 Levy Fact Sheet.</a>
	<a href="#">Rental Housing Program</a>		The Rental Housing Program funds the development of affordable rental housing in Seattle using local funds such as the <a href="#">Seattle Housing Levy</a> , federal funds, and other fund sources.
	<a href="#">Homeownership Program</a>		The Office of Housing provides downpayment assistance to first-time homebuyers at or below 80% of area median income through partnerships with local nonprofits and lending institutions.
	<a href="#">Home Repair Program</a>		The Home Repair Loan Program provides affordable loans to income-qualified homeowners to address critical health, safety, and structural issues. The program is designed for owner-occupied single family homes with low- to moderate-income households.
	<a href="#">The Weatherization Program</a>		The HomeWise Weatherization Program provides free energy efficiency improvements to qualified homes. The Office of Housing's weatherization program has different income eligibility thresholds depending on the heat source (i.e. electricity, gas, or oil) and whether the housing is renter- or owner-occupied. <a href="#">2023 Income Limits.</a>

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	<a href="#">Just Cause Eviction Ordinance</a>	<ul style="list-style-type: none"> <li>■ <a href="#">SMC 22.205</a> - Seattle Just Cause Eviction Ordinance</li> <li>■ <a href="#">RCW 59.18.200</a>; <a href="#">SMC 7.24.030</a> - Renewal of Term Leases</li> </ul>	<p>The Just Cause Eviction Ordinance, passed in 1980, prevents landlords from arbitrarily ending a rental agreement.</p> <p>As of July 2021, landlords must offer tenants in expiring term leases a renewal unless they have a just cause reason not to renew the tenancy. Notice must be issued 60 to 90 days prior to the expiration of the tenancy.</p>
	<a href="#">The Tenant Relocation Assistance Ordinance (TRAO)</a>	Tenant Relocation Assistance Ordinance, <a href="#">SMC 22.210</a> .	<p>The Tenant Relocation Assistance Ordinance has two primary benefits for renters being displaced by development:</p> <ul style="list-style-type: none"> <li>■ Provide relocation assistance to low-income households</li> <li>■ Provide all households with adequate time to search for new housing and move</li> </ul>
	<a href="#">Economic Displacement Relocation Assistance (EDRA)</a>	<a href="#">Ord 126451</a>	<p>Applies to any housing cost increase totaling 10% or more within the same 12 month period. Tenant households earning 80% or less of Seattle's average median income (AMI) that give notice to vacate after receipt of a 10% or more increase will be eligible to apply for financial assistance.</p>
	Washington State Residential Landlord-Tenant Act	RCW 59.18	Establishes rights and responsibilities for tenants and landlords
	<a href="#">Equitable Development Initiative (EDI)</a>		<p>\$9.5 million in awards to multiple Equitable Development Initiative (EDI) partners to support property ownership among Seattle's diverse communities in neighborhoods at high risk of displacement. The EDI funding is intended to support community organizations for site acquisition and major capital projects, as well as capacity-building support to organizations that are still developing their plans for permanent homes in Seattle.</p>
	King County Property Tax Relief		Provides property tax exemptions and deferrals for low-income, senior, and disabled property owners to help them remain in place.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
<b>Cultural Resources</b>			
	City of Seattle Historic Preservation Program	<a href="#">SMC 25.12 through 25.30</a>	Designates, preserves, protects, and enhances sites, improvements and objects which reflect significant elements of the City's cultural, aesthetic, social, economic, political, architectural, engineering, historic or other heritage. Protections of designated landmarks are provided by design review of proposed alterations and the issuance of a Certificate of Approval (SMC 25.12). Owners of properties that have received Seattle Landmark designation may take advantage of City incentives including a Special Tax Valuation, Zoning Code Relief, Building Code Relief, and special incentives for downtown landmarks, such as the transfer of development rights (TDR).
	<a href="#">Washington Executive 21-02</a>		Washington Executive 21-02 (formerly 05-05) requires that impacts to cultural resources must be considered as part of any state-funded project or investment and must include consultation with DAHP and with Tribal governments.
	Washington State Archaeological Sites and Resources Protection Act	<a href="#">RCW 27.53</a>	Requires a permit to excavate or remove any archaeological resource located on public or Tribal lands.
	Registration of Historic Archaeological Resources on State-Owned Aquatic Lands	<a href="#">25-46 WAC</a>	Establishes registration procedures for previously unreported historic archaeological resources discovered on, in, or under state-owned aquatic lands as provided for in chapter 27.53 RCW.
	National Historic Preservation Act (NHPA)	<a href="#">36 CFR Part 800</a>	Commonly referred to as Section 106. Has implementing regulations (36 CFR Part 800), that require federal agencies (or others who have received federal grants or funds, or a federal permit or license) to take into account the effects of their undertakings on historic properties, by identifying historic properties, assessing adverse effects, and resolving those adverse effects.
	<a href="#">Archaeological Resources Protection Act (ARPA)</a>		Protects archaeological resources.
	<a href="#">National American Graves Protection and Repatriation Act (NAGPRA)</a>		Creates protections for Native American burial sites, remains, and cultural objects.
	<a href="#">The National Environmental Protection Act</a>		Requires federal agencies to assess whether a major federal action has the potential to significantly affect the human environment prior to making decisions. This is done through the preparation of an Environmental Assessment (EA) or an EIS.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Cultural Space Agency		Program to help cultural organizations purchase space so they can remain in their communities.
<b>Transportation</b>			
	Transportation Impact Mitigation	SMC 23.52, subchapter 2	Requires impact analysis and mitigation for projects meeting certain standards.
	Transportation Concurrency	SMC 23.52, subchapter 1	Implements GMA policy that transportation improvements or strategies should be made concurrently with land development
	Commuter Benefit Ordinance	<a href="#">SMC 14.30</a>	Businesses with 20 or more employees are required to offer their employees the opportunity to make a monthly pre-tax payroll deduction for transit or vanpool expenses.
	<a href="#">Commuter Trip Reduction</a>	<a href="#">Chapter 25.02</a> - Commute Trip Reduction	<p>An employer of 100+ employees who report to work at a single site between 6 - 9 a.m. must:</p> <ul style="list-style-type: none"> <li>▪ Appoint and maintain an individual to act as an Employee Transportation Coordinator.</li> <li>▪ Submit a program report to the City for review and approval once every two years.</li> <li>▪ Exercise a good faith effort by collaborating with the City in its administration and implementation of the law.</li> <li>▪ Conduct a commuter survey once every two years to measure employees' drive alone rates.</li> </ul>
	<a href="#">Pedestrian and Bicycle System Improvements</a>		Capital list with protected bike lane projects funded through the end of the Levy to Move Seattle. Seattle is also building Neighborhood Greenways and Healthy Streets.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	<p><a href="#">Transportation systems management and operations (TSMO)</a> maximizes efficiency of the existing multimodal transportation system by implementing low-cost, near-term improvements to improve overall system performance. TSMO solutions can improve safety and provide flexibility to address changing conditions. Strategies can also prioritize movement of specific modes, including freight, transit, and active transportation. Many of these strategies would require coordination with partner agencies, such as Port of Seattle, King County Metro, and Sound Transit.</p>		<p>Seattle already utilizes some TSMO strategies to reduce traffic congestion and improve vehicle flow, including providing drivers with updated travel information and managing the flow of traffic through intersections. SDOT has an ongoing effort to improve the operations of traffic signals, including some corridors with adaptive signal control, which coordinates signal timing changes in response to real-time traffic volume data in order to reduce traffic congestion and improve vehicular flow. Additionally, Seattle’s Transit Master Plan, Freight Master Plan, and Seattle Industrial Areas Freight Access Project identify speed and reliability improvements, such as transit and/or freight lanes that could improve mobility for those modes. Expanding existing programs or implementing new TSMO strategies, in coordination with regional partners, could help mitigate impacts to corridor travel time, screenlines, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities by increasing efficiency of the existing system.</p>
	<p><a href="#">Transportation Demand Management (TDM)</a></p>		<p>Transportation demand management (TDM) strategies can help reduce congestion and travel time impacts by reducing demand for automobile travel and supporting travel by other modes. Seattle currently promotes a variety of TDM strategies to encourage travel by carpooling, vanpooling, transit, walking, and biking, as well as reducing trips by teleworking. These include the Commute Trip Reduction (CTR) Program, Transportation Management Programs (TMPs), and the Commuter Benefits Ordinance which are described above along with additional measures Seattle could consider adding to its programmatic TDM efforts.</p>
	<p><a href="#">Transportation Management Program</a></p>		<p>The City works with building managers and managers to help implement strategies that facilitate tenants' use of a full range of travel options, including transit, walking, carpooling, and bicycling. Successful Transportation Management Programs (TMPs) provide transit use incentives, promote active commutes, and include parking management strategies.</p>
	<p>Metro Connects</p>		<p>King County Metro’s vision for providing more service, more choices and one easy-to-use system over a 30 year period</p>



EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Washington State Department of Transportation Development Services		Reviews development projects for potential impacts to state transportation facilities
	Washington State Ferries		Reviews development projects for potential impacts to the state ferry system
<b>Public Services</b>			
	<a href="#">Crime Prevention Coordinators</a>		SPD has Crime Prevention Coordinators (CPCs) who are experts in crime prevention techniques. SPD also advises on natural surveillance and other techniques to provide design of development and landscaping that allows for visibility and increase safety.
	<a href="#">Micro Community Policing Plans</a>		SPD has developed Micro Community Policing Plans (MCP) with community engagement and considering crime data to help direct police services to address the individual needs of each community.
	<a href="#">Seattle Fire Protection Systems Code</a>	Seattle Building Code Section 9	Regulates Fire Protection Systems.
	Seattle Land Use Code	<a href="#">Title 23</a> <a href="#">SMC 23.60A</a>	<ul style="list-style-type: none"> <li>■ The Seattle Land Use Code contains development regulations, including standards governing the design and placement of exterior site and building illumination and recreation/open space. The LUC also provides for SPR review when subdivisions over a certain size are proposed.</li> <li>■ The Seattle Shoreline Master Program requires shoreline public access for development that creates a demand.</li> </ul>
	<a href="#">Seattle Solid Waste, Solid Waste Management Planning</a>		Seattle Solid Waste develops a Solid Waste Management Plan at consistent intervals to ensure that departmental policies align with their stated goals. The most recent draft update to this plan commits to a zero-waste vision in which Seattleites produce and use less to ensure reduced impacts to human health and the environment.
	<a href="#">Seattle Public Utilities Strategic Business Plan</a>		Seattle Public Utilities also produces strategic business plans every 5 years which include solid waste elements and ways in which SPU can support the Solid Waste Division through investments to reach its stated goals from the Solid Waste Management Plan.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
<b>Utilities<sup>2</sup></b>			
	Water Code	<a href="#">SMC Title 21, Subtitle I</a>	Water Rates and Regulations
	Building and Construction Codes	<a href="#">SMC Title 22</a>	Includes plumbing and fire codes
	City of Seattle Standards and Specifications	<a href="#">Standard Specifications for Road, Bridge, and Municipal Construction (2020)</a>	The 2020 Standard Specifications apply whenever any public or private construction is performed within the Rights-of-Way of the City of Seattle, including work performed by private parties at their own expense under authority granted by ordinance of the City Council or by permit from the Seattle Department of Transportation’s Street Use section.
	Washington State Department of Health	<a href="#">WAC Title 246</a>	Public Water Systems. See Chapters 290-296.

<sup>2</sup> Authority for requiring utility improvements and using building features that reduce demand for utilities is identified in rules, codes and policies and are applied during permitting reviews. These include construction codes including the Building Code, Electrical Code, Energy Code, Fuel Gas Code; Plumbing Code, and the Stormwater Code, and rules promulgated by City/County Planning and Public Utilities departments, including water, sewer, storm drain & electrical system improvements.

## D Air Quality & GHG Appendix

**Seattle Comprehensive Plan  
On-Road Emissions Summary**

MT=Metric Ton

**Existing**

	VOC	CO	NOX	PM10			PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
				Exhaust	PM10 BWTW	Total PM10					
Tons/Year											
Cars	276.2	1,760.4	109.8	1.6	0.0	1.7	1.4	0.0	1.5	1.4	14,761.0
Trucks	7.4	38.7	6.2	1.1	0.0	1.1	0.9	0.0	1.0	0.1	8,344.4
Buses	0.5	5.2	0.7	1.1	0.0	1.1	0.9	0.0	0.9	0.0	7,964.4
<b>Total</b>	<b>284.0</b>	<b>1,804.2</b>	<b>116.7</b>	<b>3.8</b>	<b>0.1</b>	<b>3.8</b>	<b>3.3</b>	<b>0.0</b>	<b>3.3</b>	<b>1.5</b>	<b>31,069.8</b>

**Alternative 1**

	VOC	CO	NOX	PM10			PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
				Exhaust	PM10 BWTW	Total PM10					
Tons/Year											
Cars	151.6	642.0	48.7	4.6	0.1	4.7	4.1	0.0	4.1	0.2	28,553.9
Trucks	5.3	15.3	6.7	0.1	0.0	0.1	0.1	0.0	0.1	0.0	763.0
Buses	0.4	2.3	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	91.3
<b>Total</b>	<b>157.3</b>	<b>659.6</b>	<b>56.4</b>	<b>4.7</b>	<b>0.1</b>	<b>4.8</b>	<b>4.2</b>	<b>0.0</b>	<b>4.2</b>	<b>0.2</b>	<b>29,408.2</b>

**Alternative 2**

	VOC	CO	NOX	PM10			PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
				Exhaust	PM10 BWTW	Total PM10					
Tons/Year											
Cars	156.0	660.5	50.1	4.8	0.1	4.8	4.2	0.0	4.2	0.2	29,374.1
Trucks	5.3	15.4	6.7	0.1	0.0	0.1	0.1	0.0	0.1	0.0	770.0
Buses	0.4	2.3	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	91.3
<b>Total</b>	<b>161.7</b>	<b>678.2</b>	<b>57.8</b>	<b>4.9</b>	<b>0.1</b>	<b>4.9</b>	<b>4.3</b>	<b>0.0</b>	<b>4.3</b>	<b>0.2</b>	<b>30,235.5</b>

**Alternative 3**

	VOC	CO	NOX	PM10			PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
				Exhaust	PM10 BWTW	Total PM10					
Tons/Year											
Cars	156.0	660.5	50.1	4.8	0.1	4.8	4.2	0.0	4.2	0.2	29,371.3
Trucks	5.3	15.4	6.7	0.1	0.0	0.1	0.1	0.0	0.1	0.0	772.2
Buses	0.4	2.3	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	91.3
<b>Total</b>	<b>161.7</b>	<b>678.2</b>	<b>57.8</b>	<b>4.9</b>	<b>0.1</b>	<b>4.9</b>	<b>4.3</b>	<b>0.0</b>	<b>4.3</b>	<b>0.2</b>	<b>30,234.8</b>

**Alternative 5**

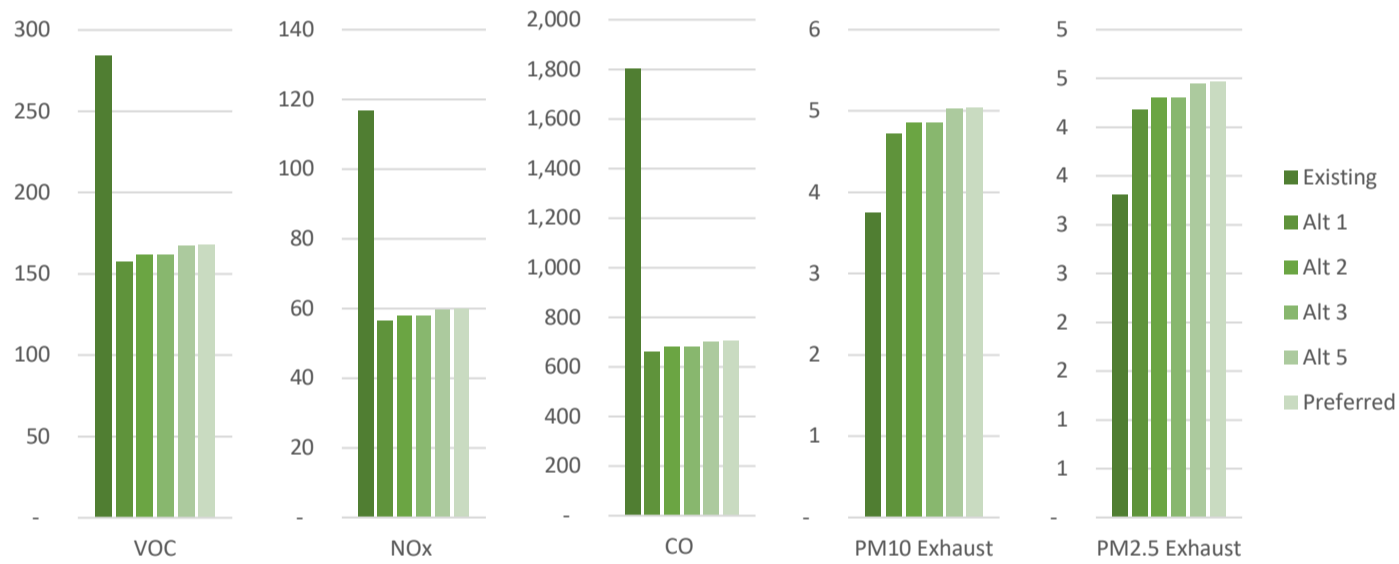
	VOC	CO	NOX	PM10			PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
				Exhaust	PM10 BWTW	Total PM10					
Tons/Year											
Cars	161.4	683.1	51.9	4.9	0.1	5.0	4.4	0.0	4.4	0.2	30,375.3
Trucks	5.4	15.6	6.8	0.1	0.0	0.1	0.1	0.0	0.1	0.0	779.3
Buses	0.4	2.3	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	91.3
<b>Total</b>	<b>167.1</b>	<b>701.0</b>	<b>59.6</b>	<b>5.0</b>	<b>0.1</b>	<b>5.1</b>	<b>4.5</b>	<b>0.0</b>	<b>4.5</b>	<b>0.2</b>	<b>31,245.9</b>

**Transportation-Related Criteria Pollutant Emissions (Tons/Year)**

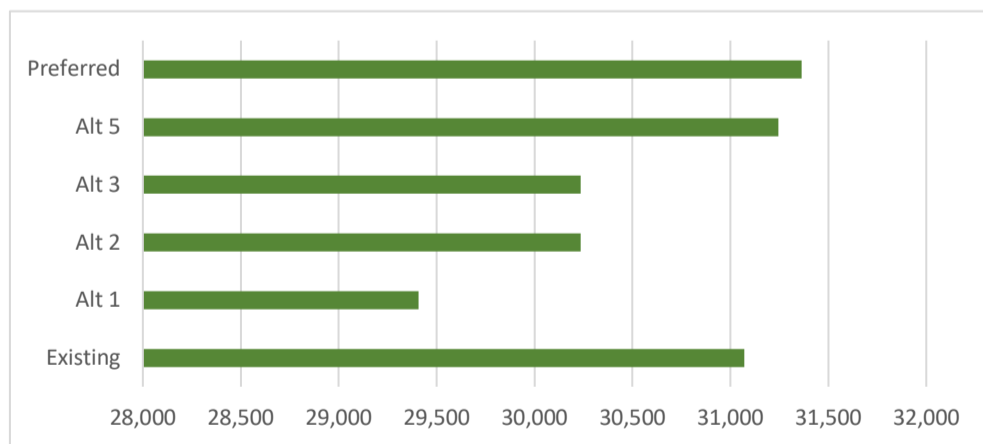
	VOC	CO	NOx	PM10 Exhaust	PM2.5 Exhaust	SO2
Existing	284	1,804	117	4	3	2
Alt 1	157	660	56	5	4	0
Alt 2	162	678	58	5	4	0
Alt 3	162	678	58	5	4	0
Alt 5	167	701	60	5	4	0
Preferred	168	704	60	5	4	0

**Road Transportation Emissions (MTCO2e)**

	Existing	Alt 1	Alt 2	Alt 3	Alt 5	Preferred
Cars	14,761	28,554	29,374	29,371	30,375	30,489
Trucks	8,344	763	770	772	779	782
Buses	7,964	91	91	91	91	92
<b>Total</b>	<b>31,070</b>	<b>29,408</b>	<b>30,235</b>	<b>30,235</b>	<b>31,246</b>	<b>31,363</b>
		(1,662)	(834)	(835)	176	294



**Transportation Exhaust Criteria Pollutant Emissions (Tons/yr)**



**Road Transportation GHG Emissions (MTCO2e/yr)**

Seattle Comprehensive Plan  
Operational GHG Emissions

Existing			
Transportation	31,070		
Alternative 1			
Transportation	29,408	(1,662)	
Building Energy**	372,474		
Waste	60,834		
	Total Emissions		431,647
	Growth (population)		164,000
	per capita MTCO <sub>2</sub> e		2.63
Alternative 2			
Transportation	30,235	(834)	
Building Energy**	388,378		
Waste	64,053		
	Total Emissions		451,597
	Growth (population)		205,000
	per capita MTCO <sub>2</sub> e		2.20
Alternative 3			
Transportation	30,235	(835.0)	
Building Energy**	391,736		
Waste	64,294		
	Total Emissions		455,196
	Growth (population)		205,000
	per capita MTCO <sub>2</sub> e		2.22
Alternative 4 *			
Transportation	30,235	(835.0)	
Building Energy**	389,644		
Waste	64,294		
	Total Emissions		453,104
	Growth (population)		205,000
	per capita MTCO <sub>2</sub> e		2.21
Alternative 5			
Transportation	31,246	176	
Building Energy**	406,041		
Waste	67,917		
	Total Emissions		474,134
	Growth (population)		246,000
	per capita MTCO <sub>2</sub> e		1.93
Preferred Alternative			
Transportation***	31,363	294	
Building Energy	415,152		
Waste	69,683		
	Total Emissions		485,128
	Growth (population)		246,000
	per capita MTCO <sub>2</sub> e		1.97

\* Traffic data is not available for Alternative 4 because the projected VMT would fall between Alternative 2 and Alternative 3. For purposes of the analysis, it has been assumed that Alternative 4 VMT is equivalent to Alternative 2, which is higher than Alternative 3.

\*\* The 2018 Seattle Energy Code requires all-electric space and water heating. GHG emissions were estimated assuming natural gas consumption for purposes other than space and water heating (13% [U.S. EIA, 2015]). Due to the passing of I-2066, natural gas bans are prohibited. Therefore, GHG emissions have been increased and adjusted to assume no restrictions on natural gas for new development

\*\*\* Growth targets under Alternative 5 and the Preferred Alternative would be the same. The difference in the allocation of growth results in differing trip patterns and VMT. VMT under the Preferred Alternative would be approximately 0.38% greater than Alternative 5. Preferred Alternative emissions have been estimated by increasing Alternative 5 emissions by 0.38%.

**Seattle Comprehensive Plan  
On-Road Transportation Fuel**

	<b>Existing</b>				
	<i>Cars</i>	<i>Trucks</i>	<i>Buses</i>	<i>Million BTU</i>	<i>trillion Btu</i>
Gasoline	345,397	1,562	125	347,084	0.3471
Diesel	8,074	5,323	752	14,149	0.0141
CNG	-	63	53	116	0.0001
Ethanol (E-85)	621	-	-	621	0.0006
<b>Total Fuel Use</b>				361,969	
Trillion BTU/Capita				0.45	

Washington State Fuel Usage in 2020

<b>Trillion Btu</b>	
gasoline	258.20
Diesel	150.00
NG	0.01
ethanol	20.30

\* US EIA, 2020

	<b>Alternative 1</b>					
	<i>Cars</i>	<i>Trucks</i>	<i>Buses</i>	<i>Million BTU</i>	<i>trillion Btu</i>	<i>% of state</i>
Gasoline	336,191	1,774	127	338,092	0.3381	0.131%
Diesel	13,508	5,938	783	20,230	0.0202	0.013%
CNG	-	111	50	161	0.0002	1.606%
Ethanol (E-85)	631	-	-	631	0.0006	0.003%
<b>Total Fuel Use</b>				359,113		
Trillion BTU/Capita				2.19		

	<b>Alternative 2</b>					
	<i>Cars</i>	<i>Trucks</i>	<i>Buses</i>	<i>Million BTU</i>	<i>trillion Btu</i>	<i>% of state</i>
Gasoline	345,844	1,791	127	347,762	0.3478	0.135%
Diesel	13,895	5,993	784	20,672	0.0207	0.014%
CNG	-	112	50	162	0.0002	1.617%
Ethanol (E-85)	649	-	-	649	0.0006	0.003%
<b>Total Fuel Use</b>				369,245		
Trillion BTU/Capita				1.80		

	<b>Alternative 3</b>					
	<i>Cars</i>	<i>Trucks</i>	<i>Buses</i>	<i>Million BTU</i>	<i>trillion Btu</i>	<i>% of state</i>
Gasoline	345,809	1,796	127	347,732	0.3477	0.135%
Diesel	13,893	6,016	784	20,692	0.0207	0.014%
CNG	-	113	50	162	0.0002	1.622%
Ethanol (E-85)	649	-	-	649	0.0006	0.003%
<b>Total Fuel Use</b>				369,235		
Trillion BTU/Capita				1.80		

	<b>Alternative 5</b>					
	<i>Cars</i>	<i>Trucks</i>	<i>Buses</i>	<i>Million BTU</i>	<i>trillion Btu</i>	<i>% of state</i>
Gasoline	357,628	1,812	127	359,567	0.3596	0.139%
Diesel	14,368	6,067	784	21,219	0.0212	0.014%
CNG	-	113	50	163	0.0002	1.631%
Ethanol (E-85)	671	-	-	671	0.0007	0.003%

	<b>Preferred Alternative</b>					
	<i>Cars</i>	<i>Trucks</i>	<i>Buses</i>	<i>Million BTU</i>	<i>trillion Btu</i>	<i>% of state</i>
Gasoline	358,972	1,819	127	360,919	0.3609	0.140%
Diesel	14,422	6,090	787	21,298	0.0213	0.014%
CNG	-	114	50	164	0.0002	1.637%
Ethanol (E-85)	673	-	-	673	0.0007	0.003%
<b>Total Fuel Use</b>				383,054		
Trillion BTU/Capita				1.56		

\* Fuel use based on MOVES model outputs.

VMT for Alternative 4 not provided. Growth and VMT assumptions consistent with Alternative 2 and 3

Net increase in fuel consumption compared to Existing

	<b>Alt 1</b>	<b>Alt 2</b>	<b>Alt 3</b>	<b>Alt 4</b>	<b>Alt 5</b>	<b>Preferred</b>
Gasoline	-0.0090	0.0007	0.0006	0.0007	0.0125	0.0138
Diesel	0.0061	0.0065	0.0065	0.0065	0.0071	0.0071
CNG	0.00004	0.00005	0.00005	0.00005	0.00005	0.00005
Ethanol (E-85)	-0.0013	-0.0013	-0.0013	-0.0013	-0.0013	-0.0013

	<b>Alt 1</b>	<b>Alt 2</b>	<b>Alt 3</b>	<b>Alt 4</b>	<b>Alt 5</b>	<b>Preferred</b>
Gasoline	-0.003%	0.000%	0.000%	0.000%	0.0048%	0.0054%
Diesel	0.004%	0.004%	0.004%	0.004%	0.0047%	0.0048%
CNG	0.448%	0.459%	0.464%	0.459%	0.4734%	0.4795%
Ethanol (E-85)	-0.006%	-0.006%	-0.006%	-0.006%	-0.0064%	-0.0064%

**Seattle Comprehensive Plan  
Electricity Consumption**

**2022 State of Washington**

Electricity 310 trillion btu  
Natural Gas 351 trillion btu

**RESIDENTIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
Single Family	1,389	698	1,111	1,111	1,111	4,132
Townhome	648	533	4,260	1,578	1,128	14,766
Multi-family Low Rise	2,593	1,977	14,247	5,522	4,056	6,675
Multi-family Mid Rise	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,080,703
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.08
percent of state	0.41%	0.51%	0.53%	0.52%	0.62%	0.67%

*Station Area*

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208			2,703	2,703
million btu	14,868	39,082			42,167	42,167
trillion btu	0.01	0.04			0.04	0.04
percent of state	0.0048%	0.0126%			0.0136%	0.0136%

**COMMERCIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Commercial Growth(SF)	33,174,904	33,174,904	33,174,904	33,174,904	33,174,845	33,174,845
Estimated Electricity Demand (kBtu)	1,562,537,978	1,562,537,978	1,562,537,978	1,562,537,978	1,562,535,200	1,562,535,200
Million Btu	1,562,538	1,562,538	1,562,538	1,562,538	1,562,535	1,562,535
Trillion Btu	1.56	1.56	1.56	1.56	1.56	1.56
percent of state	0.50%	0.50%	0.50%	0.50%	0.50%	0.50%

*Station Area*

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
SF	178,948	244,963			251,033	164,500
Estimated Electricity Demand (kBtu)	8,428,451	11,537,757			11,823,654	7,747,950
million btu	8,428	11,538			11,824	7,748
trillion btu	0.008	0.012			0.012	0.008
percent of state	0.0027%	0.0037%			0.0038%	0.0025%

**INDUSTRIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Industrial Growth(SF)	17,710,268	17,710,268	17,710,268	17,710,268	17,710,246	17,710,246
Estimated Electricity Demand (kBtu)	368,373,574	368,373,574	368,373,574	368,373,574	368,373,117	368,373,117
Million Btu	368,374	368,374	368,374	368,374	368,373	368,373
Trillion Btu	0.37	0.37	0.37	0.37	0.37	0.37
percent of state	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%

TOTAL Energy (trillion Btu)	3.22	3.51	3.58	3.54	3.84	4.01
percent of state	1.04%	1.13%	1.15%	1.14%	1.24%	1.29%

Station Area	0.02	0.05	NA	NA	0.054	0.050
	0.008%	0.016%	NA	NA	0.017%	0.016%



**Washington State Consumption Rates**

*Commercial Energy Consumption Rates*

Electricity	47.1 kBtu/SF
NG	16.6 kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking  
<https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/aeuz-gz8p/data>

*Industrial Energy Consumption Rates*

Electricity	20.8 kBtu/SF
NG	10.4 kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking  
<https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/aeuz-gz8p/data>

**Seattle Comprehensive Plan  
Residential Electricity Consumption**

**2022 State of Washington**

Electricity 310 trillion btu  
Natural Gas 351 trillion btu

**RESIDENTIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
<i>Single Family</i>	1,389	698	1,111	1,111	1,111	4,132
<i>Townhome</i>	648	533	4,260	1,578	1,128	14,766
<i>Multi-family Low Rise</i>	2,593	1,977	14,247	5,522	4,056	6,675
<i>Multi-family Mid Rise</i>	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,080,703
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.08
percent of state	0.41%	0.51%	0.53%	0.52%	0.62%	0.67%

**Station Area**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208			2,703	2,703
million btu	14,868	39,082			42,167	42,167
trillion btu	0.01	0.04			0.04	0.04
percent of state	0.0048%	0.0126%			0.0136%	0.0136%

	Electricity mbtu/unit	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Single Family	35.2	1389	698	1111	1111	1111	4132
multifamily low rise	17.7	2593	1977	14247	5522	4056	6675
Townhome	23.3	648	533	4260	1578	1128	14766
multi family mid rise	15.6	75370	96792	80382	91789	113705	94427
		80000	100000	100000	100000	120000	120000

EIA, CE4.10 Annual Household site end-use consumption by fuel in the West - averages, 2015  
<https://www.eia.gov/consumption/residential/data/2015/index.php?view=consumption#by%20End%20uses%20by%20fuel>

**Seattle Comprehensive Plan  
Natural Gas Consumption**

**2022 State of Washington**

Electricity 310 trillion btu  
Natural Gas 351 trillion btu

**RESIDENTIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
Single Family	1,389	698	1,111	1,111	1,111	4,132
Townhome	648	533	4,260	1,578	1,128	6,675
Multi-family Low Rise	2,593	1,977	14,247	5,522	4,056	14,766
Multi-family Mid Rise	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,035,393
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.04
percent of state	0.37%	0.45%	0.47%	0.46%	0.54%	0.58%

*Station Area*

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208	-	-	2,703	2,703
million btu	14,868	39,082	-	-	42,167	42,167
trillion btu	0.01	0.04	-	-	0.04	0.04
percent of state	0.0042%	0.0111%			0.0120%	0.0120%

**COMMERCIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Commercial Growth(SF)	33,174,904	33,174,904	33,174,904	33,174,904	33,174,845	33,174,845
Estimated NG Demand (kBtu)	550,703,406	550,703,406	550,703,406	550,703,406	550,702,427	550,702,427
Million Btu	550,703	550,703	550,703	550,703	550,702	550,702
Trillion Btu	0.55	0.55	0.55	0.55	0.55	0.55
	0.18%	0.18%	0.18%	0.18%	0.18%	0.18%

*Station Area*

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
SF	178,948	244,963			251,033	164,500
Estimated NG Demand (kBtu)	2,970,537	4,066,386			4,167,148	2,730,700
million btu	2,971	4,066			4,167	2,731
trillion btu	0.0030	0.0041			0.0042	0.0027
percent of state	0.0002%	0.0002%			0.0002%	0.0002%

**INDUSTRIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Industrial Growth(SF)	17,710,268	17,710,268	17,710,268	17,710,268	17,710,246	17,710,246
Estimated NG Demand (kBtu)	184,186,787	184,186,787	184,186,787	184,186,787	184,186,558	184,186,558
Million Btu	184,187	184,187	184,187	184,187	184,187	184,187
Trillion Btu	0.18	0.18	0.18	0.18	0.18	0.18
percent of state	0.06%	0.06%	0.06%	0.06%	0.06%	0.06%

TOTAL Energy (trillion Btu) 2.02 2.32 2.38 2.34 2.65 2.77  
percent of state 0.58% 0.66% 0.68% 0.67% 0.75% 0.79%

Station Area 0.018 0.043 0.046 0.045  
0.005% 0.012% 0.013% 0.013%

**Washington State Consumption Rates**

*Commercial Energy Consumption Rates*

Electricity	47.1 kBtu/SF
NG	16.6 kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking  
<https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/aez-gz8p/data>

*Industrial Energy Consumption Rates*

Electricity	20.8 kBtu/SF
NG	10.4 kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking  
<https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/aez-gz8p/data>

Seattle Comprehensive Plan  
Residential Natural Gas Consumption

2022 State of Washington

Electricity 310 trillion btu  
Natural Gas 351 trillion btu

RESIDENTIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
<i>Single Family</i>	1,389	698	1,111	1,111	1,111	4,132
<i>Townhome</i>	648	533	4,260	1,578	1,128	6,675
<i>Multi-family Low Rise</i>	2,593	1,977	14,247	5,522	4,056	14,766
<i>Multi-family Mid Rise</i>	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,035,393
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.04
percent of state	0.37%	0.45%	0.47%	0.46%	0.54%	0.58%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208			2,703	2,703
million btu	14,868	39,082			42,167	42,167
trillion btu	0.01	0.04			0.04	0.04
percent of state	0.0042%	0.0111%			0.0120%	0.0120%

	NG mbtu/unit	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred	Kbtu
Single Family	35.2	1389	698	1111	1111	1111	4132	35200
multifamily low rise	17.7	2593	1977	14247	5522	4056	6675	17700
Townhome	23.3	648	533	4260	1578	1128	14766	23300
multi family mid rise	15.6	75370	96792	80382	91789	113705	94427	15600
		80000	100000	100000	100000	120000	120000	

EIA, CE4.10 Annual Household site end-use consumption by fuel in the West - averages, 2015  
<https://www.eia.gov/consumption/residential/data/2015/index.php?view=consumption#by%20End%20uses%20by%20fuel>

**Seattle Comprehensive Plan  
Solid Waste Assumptions**

	<b>Alt 1</b>	<b>Alt 2</b>	<b>Alt 3</b>	<b>Alt 4</b>	<b>Alt 5</b>	<b>Preferred</b>
<b>Solid waste</b>						
Single Family Residential (tons/year)	2,115	1,063	1,692	1,692	1,692	6,292
MultiFamily Residential (tons/year)	28,310	35,762	35,613	35,613	42,816	41,728
jobs (tons/year)	90,542	90,542	90,542	90,542	90,542	90,542
<i>CAP</i>	<i>70 % diversion rate</i>					
Single Family (tons/year)	2,115	1,063	1,692	1,692	1,692	6,292
multifamily low rise (tons/year)	934	712	5,131	1,989	1,461	2,404
Townhome (tons/year)	233	192	1,534	568	406	5,318
multi family mid rise (tons/year)	27,143	34,858	28,948	33,056	40,949	34,006
Commercial (tons/year)	76,044	76,044	76,044	76,044	76,044	76,044
Industrial (tons/year)	14,498	14,498	14,498	14,498	14,498	14,498

*Notes:*

Employment Waste

3.14 lbs/day  
0.57305 tons/year

Residential Waste

	Total Generated Housing units		
	Tons (2020)	(2020 Census)	tons/DU/year
Single Family	232038	152380.404	1.522754855
Multi-Family	83701	232418.596	0.360130392

*Source: Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to*

**Seattle Comprehensive Plan  
Housing Type Assumptions**

<b>Unit Type</b>	<b>CalEEMod Unit Type</b>	<b>Alt 1</b>	<b>Alt 2</b>	<b>Alt 3</b>	<b>Alt 4</b>	<b>Alt 5</b>	<b>Preferred</b>
Single Family	Single Family	1389	698	1111	1111	1111	4132
Small ADU	Multifamily low rise	2593	1977	14247	5522	4056	6675
Townhome	Townhome	648	533	4260	1578	1128	14766
Multi family	Multi family mid rise	75370	96792	80382	91789	113705	94427
		80000	100000	100000	100000	120000	120000





## Potential Job Sector Split

### Notes:

Assume less SF in Downtown Office  
 Ensure 10% higher retail/service in neighborhoods  
 For MIC, match SIML EIS

### Jobs per SF in King County UGC for Seattle

	Commercial	Industrial
Low	275	500
High	300	700

<https://kingcounty.gov/-/media/depts/executive/performance-strategy-budget/regional-planning/GrowthManagement/GMPC-2021/GMPC-Meeting-062321/KC-UGC-Final-Draft-Report-June-2021.ashx?la=en>

Suggest using SIML Assumptions	
250	700

For office shows some smaller square feet which may be appropriate given change in Downtown/elsewhere due to COVID effects. For Industrial shows higher range and still similar to SIML for conservative Air Q.

### JOBs per SF: CAI, September 1, 2020: Seattle Maritime and Industrial Strategy Employment Trends and Land Use Alternatives Analysis

#### Absorption Assumptions: Required Redevelopment Land

Absorption assumptions by subarea expressed as square feet of land per job are used to determine the required land to be redeveloped to accommodate the assumed employment growth. Square feet of land per job is calculated by dividing square feet of building area per job

Exhibit 24. Absorption Assumptions by Subarea, No Action Alternative, 2035

Sources: Puget Sound Regional Council, 2020; Community Attributes Inc., 2020.

Land Use	Industry	2010	2015	2018	2035	2035/2010
Other	Hospitality & Tourism	1,400	1,400	2,200	2,200	1.57
Ind	Construction and Office	1,000	1,400	1,570	1,000	1.00
Land Use	ICT	1,000	1,400	1,570	1,000	1.00
Ind	Distribution/Commerce	1,000	1,400	1,570	1,000	1.00
Ind	Food & Beverage Production	1,000	1,400	1,570	1,000	1.00
Ind	Aerospace	1,000	1,400	1,570	1,000	1.00
Ind	Transportation/Logistics	1,000	1,400	1,570	1,000	1.00
Ind	Maritime	1,000	1,400	1,570	1,000	1.00
Ind	Other Manufacturing	1,000	1,400	1,570	1,000	1.00
Land Use	All Other Retail	1,000	1,400	1,570	1,000	1.00
Land Use	All Other Services	1,000	1,400	1,570	1,000	1.00
Gov	Government	1,000	1,400	1,570	1,000	1.00
Gov	Education	1,000	1,400	1,570	1,000	1.00

### SECTOR SPLITS: CAI, September 1, 2020: Seattle Maritime and Industrial Strategy Employment Trends and Land Use Alternatives Analysis

#### Total Historic and Projected Employment by Industry, City of Seattle, 2010-2035

Sources: Bureau of Labor Statistics, 2020; Puget Sound Regional Council, 2020; Washington State Employment Security Department, 2020; Community Attributes Inc., 2020.

	2010	2015	2018	2035	2018-2035		Estimate 2035 Share by Jobs and apply?
					CAGR	Growth	
All Other Services	209,800	232,600	249,500	280,400	0.7%	30,900	Commercial
Hospitality & Tourism	52,800	63,400	70,800	95,300	1.8%	24,500	Commercial
Distribution & E-commerce	20,500	38,700	60,400	104,400	3.3%	44,000	Industrial
Education	58,900	66,500	59,000	58,400	-0.1%	-600	Commercial
ICT	23,900	36,000	50,400	129,400	5.7%	79,000	Commercial
Government	48,700	46,600	49,400	49,000	0.0%	-400	Commercial
Construction and Utilities	23,200	27,400	34,400	52,900	2.6%	18,500	Industrial
All Other Retail	21,900	23,400	23,000	24,500	0.4%	1,500	Commercial
Food & Beverage Production	13,100	15,900	16,500	22,600	1.9%	6,100	Industrial
Maritime	16,500	15,100	15,600	15,900	0.1%	300	Industrial
Other Manufacturing	10,900	11,200	10,600	8,300	-1.4%	-2,300	Industrial
Transportation & Logistics	7,200	7,700	9,100	11,800	1.5%	2,700	Industrial
Aerospace	9,500	8,700	7,900	7,900	0.0%	0	Industrial
Suppressed	100	100	200	200	0.0%	0	
<b>Total</b>	<b>517,100</b>	<b>593,000</b>	<b>656,800</b>	<b>861,000</b>	<b>1.6%</b>	<b>204,200</b>	

SIML Emp SF	Industrial	Non-Industrial
Base Year Split		
BINMIC	6,783,129	5,375,837
Greater Duwamish	34632076	13,896,776
<b>Total</b>	<b>41,415,205</b>	<b>19,272,613</b>

Preferred Alternative - Balanced	Total Emp	% Industrial
Industrial Emp	70,853	134,045
Preferred Alternative - Balanced	16,253	35,545
<b>Net</b>		<b>45.7%</b>

Industrial	46%
Commercial	54%

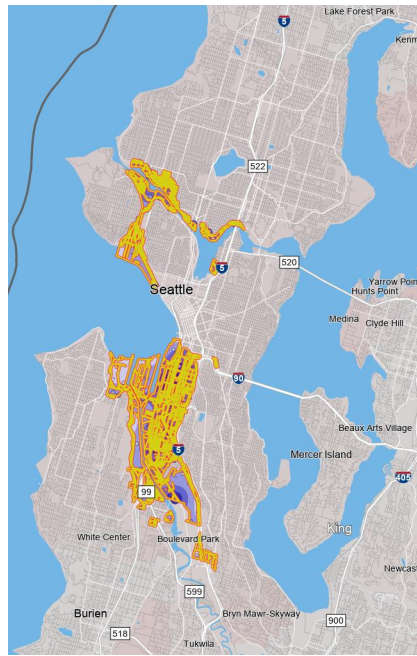
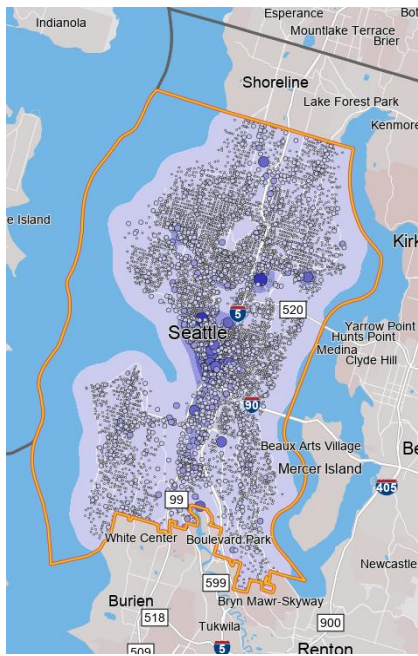
Questions  
 Assume all Commercial in neighborhoods?  
 Assume SIML breakdown in MICs? By Jobs or SF?

SECTOR SPLITS: Census on the Map, Total Jobs

Jobs by N	Citywide 2019		SIML 2019		Citywide Minus SIML 2019
	Count	Share	Count	Share	
Agriculture, Mining, Qua	1,261	0.2%	741	1.0%	520
Utilities	3,312	0.6%	168	0.2%	3,144
Construction	24,590	4.2%	6,653	8.9%	17,937
Manufacturing	27,519	4.7%	16,482	22.2%	11,037
Wholesale Trade	20,904	3.6%	7,200	9.7%	13,704
Retail Trade	40,787	7.0%	4,593	6.2%	36,194
Transportation	23,520	4.0%	6,334	8.5%	17,186
Information	36,909	6.3%	4,143	5.6%	32,766
Finance and Insurance	20,464	3.5%	397	0.5%	20,067
Real Estate	13,993	2.4%	1,373	1.8%	12,620
Professional	76,267	13.1%	4,219	5.7%	72,048
Management	18,644	3.2%	7,103	9.5%	11,541
Administrative	24,073	4.1%	2,802	3.8%	21,271
Educational	45,713	7.8%	813	1.1%	44,900
Health Care	89,138	15.3%	1,625	2.2%	87,513
Arts, Entertainment	14,268	2.4%	2,219	3.0%	12,049
Accommodation	55,410	9.5%	4,955	6.7%	50,455
Other Services	26,194	4.5%	2,357	3.2%	23,837
Public Administration	19,695	3.4%	157	0.2%	19,538

Citywide			SIML			Citywide Minus SIML		
Total	Industrial	Ind Share	Total	Industrial	Ind Share	Total	Industrial	Ind Share
582,796	101,241	17.37%	74,382	37,626	50.58%	508,414	63,615	12.51%



## MOVES Methodology and Assumptions

The Motor Vehicle Emissions Simulator (MOVES) by the US Environmental Protection Agency is a state-of-the-science emission modeling system that estimates emissions for mobile sources at the national, county, and project level for criteria air pollutants, greenhouse gases, and air toxics.

Estimating vehicle emissions for the Seattle Comprehensive Plan Environmental Impact Study relied on the county level analysis of the model. The following model inputs were taken from the 2017 Washington Comprehensive Emissions Inventory Technical Support Document (WCEI) and data provided by the City. All other MOVES inputs relied on default assumptions for Kings County, Washington.

- VMT Data
- Average Speed Distribution
- Source (vehicle) Type Populations
- Road Type Distribution

Population characteristics were pulled from the WCEI and used to transform provided City VMT data and average speed distributions to fit within MOVES source VMT, population, and speed breakdowns. MOVES assumes fuel economy compliance and average values with the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule. Adjustment ratios for energy (fuel) consumption and CO<sub>2</sub> emission factors (based on the SAFE final rule) vary by model year from 2017 through 2025.<sup>1</sup> Vehicle models after 2025 are conservatively assumed to have 2025 emissions and fuel use factors. Vehicle models before 2017, which is the implementation year of the SAFE Final Rule, assume CAFE standards.<sup>2</sup>

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<sup>1</sup> *MOVES3 technical guidance - US EPA*. (n.d.). Retrieved March 3, 2023, from <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P1010M5F.pdf>

<sup>2</sup> *MOVES3 technical guidance - US EPA*. (n.d.). Retrieved March 3, 2023, from <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P100NNUQ.pdf>

## Appendix Key

City Vehicle Category	sourceTypeID	sourceTypeName
Car	11	Motorcycle
	21	Passenger Car
	31	Passenger Truck
	32	Light Commercial Truck
Bus	41	Other Buses
	42	Transit Bus
	43	School Bus
Truck	52	Single Unit Short-haul Truck
	53	Single Unit Long-haul Truck
	61	Combination Short-haul Truck
	62	Combination Long-haul Truck

FuelTypeID	FuelTypeName
1	Gasoline
2	Diesel Fuel
3	Compressed Natural Gas (CNG)
5	Ethanol (E-85)

## Existing - MOVES Output Summary

Energy Consumption of Fuel (MMBtu)				
Fuel Type	Cars	Trucks	Buses	Total
Gasoline	345,396.9	1,561.7	125.2	<b>347,083.8</b>
Diesel	8,074.3	5,323.0	752.0	<b>14,149.2</b>
CNG	-	63.0	52.8	<b>115.8</b>
Ethanol (E-85)	620.5	-	-	<b>620.5</b>

Pollutant Emissions (tpy)							
Vehicle Type	VOC	NOX	CO	SOX	Total PM10	Total PM2.5	CO2e (Metric Tons)
Cars	276.22	109.84	1,760.37	1.43	1.67	1.45	14,761.02
Trucks	7.35	6.23	38.65	0.08	1.08	0.95	8,344.42
Buses	0.45	0.66	5.15	0.03	1.06	0.93	7,964.38
<b>Total</b>	<b>284.02</b>	<b>116.74</b>	<b>1,804.17</b>	<b>1.54</b>	<b>3.81</b>	<b>3.32</b>	<b>31,069.81</b>

Particulate Matter Emissions (tpy)				
Vehicle Type	Exhaust PM10	Exhaust PM2.5	BW & TW PM10	BW & TW PM2.5
Cars	1.63	1.44	0.04	<0.01
Trucks	1.07	0.94	0.01	<0.01
Buses	1.05	0.93	0.01	<0.01
<b>Total</b>	<b>3.74</b>	<b>3.31</b>	<b>0.06</b>	<b>0.01</b>

## Alternative 1 - MOVES Output Summary

Energy Consumption of Fuel (MMBtu)				
Fuel Type	Cars	Trucks	Buses	Total
Gasoline	336,190.6	1,774.4	127.0	<b>338,092.0</b>
Diesel	13,508.1	5,938.1	783.4	<b>20,229.6</b>
CNG	-	110.9	49.7	<b>160.6</b>
Ethanol (E-85)	630.5	-	-	<b>630.5</b>

Pollutant Emissions (tpy)							
Vehicle Type	VOC	NOX	CO	SOX	Total PM10	Total PM2.5	CO2e (Metric Tons)
Cars	151.63	48.74	641.98	0.16	4.67	4.09	28,553.89
Trucks	5.25	6.68	15.25	<0.01	0.11	0.08	763.00
Buses	0.44	0.96	2.32	<0.01	0.01	0.01	91.32
<b>Total</b>	<b>157.31</b>	<b>56.37</b>	<b>659.55</b>	<b>0.16</b>	<b>4.78</b>	<b>4.19</b>	<b>29,408.21</b>

Particulate Matter Emissions (tpy)				
Vehicle Type	Exhaust PM10	Exhaust PM2.5	BW & TW PM10	BW & TW PM2.5
Cars	4.62	4.09	0.05	<0.01
Trucks	0.09	0.08	0.01	<0.01
Buses	0.01	0.01	<0.01	<0.01
<b>Total</b>	<b>4.72</b>	<b>4.18</b>	<b>0.06</b>	<b>0.01</b>

## Alternative 2 - MOVES Output Summary

Energy Consumption of Fuel (MMBtu)				
Fuel Type	Cars	Trucks	Buses	Total
Gasoline	345,844.3	1,790.8	127.0	<b>347,762.1</b>
Diesel	13,895.2	5,993.4	783.5	<b>20,672.2</b>
CNG	-	112.0	49.7	<b>161.7</b>
Ethanol (E-85)	648.6	-	-	<b>648.6</b>

Pollutant Emissions (tpy)							
Vehicle Type	VOC	NOX	CO	SOX	Total PM10	Total PM2.5	CO2e (Metric Tons)
Cars	156.00	50.14	660.51	0.16	4.80	4.21	29,374.10
Trucks	5.29	6.74	15.38	<0.01	0.11	0.09	770.02
Buses	0.44	0.96	2.32	<0.01	0.01	0.01	91.33
<b>Total</b>	<b>161.73</b>	<b>57.84</b>	<b>678.21</b>	<b>0.16</b>	<b>4.92</b>	<b>4.31</b>	<b>30,235.44</b>

Particulate Matter Emissions (tpy)				
Vehicle Type	Exhaust PM10	Exhaust PM2.5	BW & TW PM10	BW & TW PM2.5
Cars	4.75	4.21	0.05	<0.01
Trucks	0.09	0.08	0.01	<0.01
Buses	0.01	0.01	<0.01	<0.01
<b>Total</b>	<b>4.86</b>	<b>4.30</b>	<b>0.06</b>	<b>0.01</b>

### Alternative 3 - MOVES Output Summary

Energy Consumption of Fuel (MMBtu)				
Fuel Type	Cars	Trucks	Buses	Total
Gasoline	345,808.9	1,796.4	127.0	<b>347,732.2</b>
Diesel	13,893.4	6,015.5	783.5	<b>20,692.3</b>
CNG	-	112.5	49.7	<b>162.2</b>
Ethanol (E-85)	648.5	-	-	<b>648.5</b>

Pollutant Emissions (tpy)							
Vehicle Type	VOC	NOX	CO	SOX	Total PM10	Total PM2.5	CO2e (Metric Tons)
Cars	156.00	50.14	660.50	0.16	4.75	4.21	29,371.26
Trucks	5.29	6.74	15.39	<0.01	0.09	0.08	772.21
Buses	0.44	0.96	2.32	<0.01	0.01	0.01	91.32
<b>Total</b>	<b>161.73</b>	<b>57.84</b>	<b>678.21</b>	<b>0.16</b>	<b>4.86</b>	<b>4.30</b>	<b>30,234.78</b>

Particulate Matter Emissions (tpy)				
Vehicle Type	Exhaust PM10	Exhaust PM2.5	BW & TW PM10	BW & TW PM2.5
Cars	4.75	4.21	0.05	0.01
Trucks	0.09	0.08	0.01	<0.01
Buses	0.01	0.01	<0.01	<0.01
<b>Total</b>	<b>4.86</b>	<b>4.30</b>	<b>0.06</b>	<b>0.01</b>



## Alternative 5 - MOVES Output Summary

Energy Consumption of Fuel (MMBtu)				
Fuel Type	Cars	Trucks	Buses	Total
Gasoline	357,628.0	1,812.4	127.0	<b>359,567.5</b>
Diesel	14,367.8	6,067.3	783.6	<b>21,218.7</b>
CNG	-	113.4	49.7	<b>163.1</b>
Ethanol (E-85)	670.7	-	-	<b>670.7</b>

Pollutant Emissions (tpy)							
Vehicle Type	VOC	NOX	CO	SOX	Total PM10	Total PM2.5	CO2e (Metric Tons)
Cars	161.35	51.86	683.13	0.17	4.96	4.36	30,375.28
Trucks	5.35	6.81	15.55	<0.01	0.11	0.09	779.30
Buses	0.44	0.96	2.32	<0.01	0.01	0.01	91.33
<b>Total</b>	<b>167.14</b>	<b>59.63</b>	<b>701.00</b>	<b>0.17</b>	<b>5.09</b>	<b>4.45</b>	<b>31,245.91</b>

Particulate Matter Emissions (tpy)				
Vehicle Type	Exhaust PM10	Exhaust PM2.5	BW & TW PM10	BW & TW PM2.5
Cars	4.91	4.35	0.05	<0.01
Trucks	0.10	0.09	0.01	<0.01
Buses	0.01	0.01	<0.01	<0.01
<b>Total</b>	<b>5.02</b>	<b>4.45</b>	<b>0.06</b>	<b>0.01</b>

Existing - MOVES3 Raw Data (in grams)

Fuel	Source	VOC	CO	NOx	Exhaust PM10	Exhaust PM2.5	Brake PM10	Tire PM10	Brake PM2.5	Tire PM2.5	SO2	Total Energy (in Joules)	CO2 Equiv
1	11	89651	433906	26580	857	758	607	195	76	29	99	2.06518E+11	14980114
1	21	86887960	377444576	22882190	2351674	2080336	19339	6928	2417	1039	83620	1.75152E+14	13452663808
2	21	975254	3876465	259825	30418	27985	447	160	56	24	777	3.16407E+12	249328832
5	21	68815	261573	15814	1601	1416	13	5	2	1	66	1.21108E+11	9329335
1	31	39408576	157328960	10889318	1365948	1208343	8552	2762	1069	414	43752	9.16441E+13	7105861120
2	31	1087115	3196286	3686041	27862	25633	673	237	84	36	1349	5.49143E+12	425450432
5	31	130194	458056	31672	3911	3460	25	8	3	1	148	2.7092E+11	21013776
1	32	42078020	181813312	12307787	1431811	1266607	8700	2826	1087	424	46713	9.7845E+13	7605724672
2	32	1091511	2759973	5139476	19417	17864	693	253	87	38	1475	6.00281E+12	464232256
5	32	147482	502735	34674	4275	3782	26	8	3	1	160	2.92224E+11	22671220
1	41	117659	758328	79068	5337	4721	29	4	4	1	30	62693715968	5636622
2	41	79194	289039	333168	667	613	450	52	56	8	77	3.12153E+11	24705524
3	41	503	96952	136	25	22	26	2	3	0	7	23555983360	6147819
1	42	143095	847921	88843	6010	5317	24	4	3	1	33	69638766592	6268355
2	42	88472	322076	370191	743	684	235	29	29	4	84	3.4108E+11	27036770
3	42	524	107853	116	28	25	18	2	2	0	8	25995003904	6826649
1	43	3214	15244	1441	120	107	1	0	0	0	1	1641576064	145973
2	43	48019	109391	180210	234	216	255	33	32	5	43	1.73361E+11	13797880
3	43	74	9218	26	5	4	5	1	1	0	1	2876934144	755243
1	52	2073727	10753850	1409047	79580	70398	641	181	80	27	665	1.393E+12	148764992
2	52	2173634	1734560	3865419	5774	5313	3917	862	490	129	993	4.04099E+12	349237952
3	52	2634	316183	655	71	63	95	13	12	2	22	71958577152	39192624
1	53	1083722	2588266	248346	15353	13582	669	181	84	27	240	5.02264E+11	42748404
2	53	333525	589783	1129765	1876	1726	4015	862	502	129	365	1.48533E+12	116858080
3	53	863	88204	648	27	24	96	13	12	2	10	30457241600	6500381
2	61	129721	383837	377694	900	828	855	199	107	30	103	4.17304E+11	33482108
3	61	479	57620	204	17	15	26	4	3	1	5	16308088832	5117634
2	62	34668	449106	396003	892	821	987	232	123	35	99	4.0302E+11	30305280

Alternative 1 - MOVES3 Raw Data (in grams)

Fuel	Source	VOC	CO	NOx	Exhaust PM10	Exhaust PM2.5	Brake PM10	Tire PM10	Brake PM2.5	Tire PM2.5	SO2	Total Energy (in Joules)	CO2 Equiv
1	11	89277	430798	26408	850	752	600	193	75	29	98	2.04967E+11	14867524
1	21	84448336	366858272	22239672	2285651	2021931	19105	6869	2388	1030	81293	1.70278E+14	13078079488
2	21	947869	3767896	252530	29564	27199	442	159	55	24	756	3.07621E+12	242400160
5	21	66883	254237	15370	1556	1376	13	5	2	1	64	1.17737E+11	9069535
1	31	38302108	152916592	10583562	1327596	1174417	8448	2738	1056	411	42535	8.90944E+13	6908027904
2	31	1056592	3106818	3582576	27080	24914	665	235	83	35	1312	5.3392E+12	413648768
5	31	126539	445209	30783	3802	3363	25	8	3	1	144	2.63382E+11	20428640
1	32	40896612	176713168	11962203	1391612	1231047	8595	2802	1074	420	45413	9.51227E+13	7393971200
2	32	1060864	2682723	4995211	18872	17362	685	251	86	38	1434	5.83638E+12	451353600
5	32	143341	488634	33700	4155	3676	26	8	3	1	156	2.84088E+11	22039582
1	41	117659	758327	79068	5337	4721	29	4	4	1	30	62691049472	5636430
2	41	79194	289035	333159	667	613	449	52	56	8	77	3.12139E+11	24704548
3	41	502	96947	136	25	22	26	2	3	0	7	23554007040	6147578
1	42	143095	847923	88843	6010	5317	23	4	3	1	33	69636947968	6268224
2	42	88472	322072	370184	743	683	234	29	29	4	84	3.41069E+11	27035952
3	42	524	107850	116	28	25	18	2	2	0	8	25993469952	6826469
1	43	3214	15244	1441	120	107	1	0	0	0	1	1641457024	145964
2	43	48019	109389	180205	234	216	254	33	32	5	43	1.7335E+11	13797019
3	43	74	9217	26	5	4	5	1	1	0	1	2876554240	755200
1	52	2055602	10658698	1396735	78883	69782	627	176	78	26	658	1.3775E+12	147225936
2	52	2154646	1718550	3830742	5720	5262	3833	837	479	126	981	3.99493E+12	345394368
3	52	2600	313035	638	70	62	93	13	12	2	22	71042408448	38827148
1	53	1074233	2564454	246161	15217	13461	654	176	82	26	236	4.94611E+11	42139928
2	53	330589	583780	1118975	1856	1708	3929	837	491	126	359	1.46191E+12	115067312
3	53	846	87055	631	27	24	94	13	12	2	9	29905813504	6420442
2	61	128578	380273	374034	888	817	837	193	105	29	101	4.1117E+11	33006202
3	61	471	56973	199	17	15	26	4	3	1	5	16057075712	5064491
2	62	34355	444952	392188	881	810	967	225	121	34	98	3.97034E+11	29858814

Alternative 2 - MOVES3 Raw Data (in grams)

Fuel	Source	VOC	CO	NOx	Exhaust PM10	Exhaust PM2.5	Brake PM10	Tire PM10	Brake PM2.5	Tire PM2.5	SO2	Total Energy (in	CO2 Equiv
1	11	90005	436676	26727	863	763	614	196	77	29	99	2.07891E+11	15079790
1	21	86888120	377450112	22882212	2351681	2080342	19564	6983	2445	1048	83628	1.75169E+14	13453901824
2	21	975255	3876588	259826	30418	27985	452	161	57	24	777	3.16446E+12	249357136
5	21	68816	261577	15814	1601	1416	14	5	2	1	66	1.21119E+11	9330182
1	31	39408664	157331264	10889330	1365950	1208346	8651	2784	1081	418	43757	9.16532E+13	7106513408
2	31	1087118	3196405	3686064	27862	25633	680	239	85	36	1349	5.49218E+12	425506016
5	31	130194	458062	31672	3912	3460	26	8	3	1	148	2.70947E+11	21015668
1	32	42078124	181815552	12307801	1431814	1266611	8800	2849	1100	427	46717	9.78547E+13	7606427136
2	32	1091514	2760079	5139507	19417	17864	701	255	88	38	1475	6.00362E+12	464292160
5	32	147482	502742	34674	4275	3782	26	8	3	1	160	2.92251E+11	22673136
1	41	117659	758321	79068	5337	4721	29	4	4	1	30	62695645184	5636762
2	41	79194	289045	333179	667	613	451	52	56	8	77	3.12169E+11	24706708
3	41	503	96955	137	25	22	26	2	3	0	7	23558006784	6148078
1	42	143095	847917	88843	6010	5317	24	4	3	1	33	69640691712	6268494
2	42	88472	322080	370199	743	684	235	29	29	4	84	3.41096E+11	27037942
3	42	524	107855	116	28	25	18	2	2	0	8	25996738560	6826853
1	43	3214	15244	1441	120	107	1	0	0	0	1	1641715456	145983
2	43	48019	109392	180215	234	216	255	33	32	5	43	1.73378E+11	13799094
3	43	74	9218	26	5	4	5	1	1	0	1	2877393664	755296
1	52	2073698	10752545	1409030	79578	70396	637	178	80	27	664	1.39001E+12	148549104
2	52	2173614	1733827	3864699	5771	5309	3891	847	486	127	990	4.03141E+12	348531264
3	52	2625	315839	646	71	63	94	13	12	2	22	71711801344	39172764
1	53	1083693	2587069	248330	15351	13580	664	178	83	27	238	4.99341E+11	42537976
2	53	333504	589069	1129064	1873	1723	3988	847	498	127	363	1.47609E+12	116176776
3	53	856	87869	638	27	24	95	13	12	2	9	30213101568	6480817
2	61	129711	383664	377408	897	825	850	196	106	29	102	4.15084E+11	33318466
3	61	476	57491	201	17	15	26	4	3	1	5	16212164608	5110281
2	62	34659	448920	395728	889	818	981	228	123	34	98	4.00838E+11	30144454

Alternative 3 - MOVES3 Raw Data (in grams)

Fuel	Source	VOC	CO	NOx	Exhaust PM10	Exhaust PM2.5	Brake PM10	Tire PM10	Brake PM2.5	Tire PM2.5	SO2	Total Energy (in Joules)	CO2 Equiv
1	11	89651	433906	26580	857	758	607	195	76	29	99	2.06518E+11	14980114
1	21	86887960	377444576	22882190	2351674	2080336	19339	6928	2417	1039	83620	1.75152E+14	13452663808
2	21	975254	3876465	259825	30418	27985	447	160	56	24	777	3.16407E+12	249328832
5	21	68815	261573	15814	1601	1416	13	5	2	1	66	1.21108E+11	9329335
1	31	39408576	157328960	10889318	1365948	1208343	8552	2762	1069	414	43752	9.16441E+13	7105861120
2	31	1087115	3196286	3686041	27862	25633	673	237	84	36	1349	5.49143E+12	425450432
5	31	130194	458056	31672	3911	3460	25	8	3	1	148	2.7092E+11	21013776
1	32	42078020	181813312	12307787	1431811	1266607	8700	2826	1087	424	46713	9.7845E+13	7605724672
2	32	1091511	2759973	5139476	19417	17864	693	253	87	38	1475	6.00281E+12	464232256
5	32	147482	502735	34674	4275	3782	26	8	3	1	160	2.92224E+11	22671220
1	41	117659	758328	79068	5337	4721	29	4	4	1	30	62693715968	5636622
2	41	79194	289039	333168	667	613	450	52	56	8	77	3.12153E+11	24705524
3	41	503	96952	136	25	22	26	2	3	0	7	23555983360	6147819
1	42	143095	847921	88843	6010	5317	24	4	3	1	33	69638766592	6268355
2	42	88472	322076	370191	743	684	235	29	29	4	84	3.4108E+11	27036770
3	42	524	107853	116	28	25	18	2	2	0	8	25995003904	6826649
1	43	3214	15244	1441	120	107	1	0	0	0	1	1641576064	145973
2	43	48019	109391	180210	234	216	255	33	32	5	43	1.73361E+11	13797880
3	43	74	9218	26	5	4	5	1	1	0	1	2876934144	755243
1	52	2073727	10753850	1409047	79580	70398	641	181	80	27	665	1.393E+12	148764992
2	52	2173634	1734560	3865419	5774	5313	3917	862	490	129	993	4.04099E+12	349237952
3	52	2634	316183	655	71	63	95	13	12	2	22	71958577152	39192624
1	53	1083722	2588266	248346	15353	13582	669	181	84	27	240	5.02264E+11	42748404
2	53	333525	589783	1129765	1876	1726	4015	862	502	129	365	1.48533E+12	116858080
3	53	863	88204	648	27	24	96	13	12	2	10	30457241600	6500381
2	61	129721	383837	377694	900	828	855	199	107	30	103	4.17304E+11	33482108
3	61	479	57620	204	17	15	26	4	3	1	5	16308088832	5117634
2	62	34668	449106	396003	892	821	987	232	123	35	99	4.0302E+11	30305280

Alternative 5 - MOVES3 Raw Data (in grams)

Fuel	Source	VOC	CO	NOx	Exhaust PM10	Exhaust PM2.5	Brake PM10	Tire PM10	Brake PM2.5	Tire PM2.5	SO2	Total Energy (in Joules)	CO2 Equiv
1	11	90877	443808	27118	878	777	632	200	79	30	101	2.11425E+11	15336329
1	21	89866488	390379904	23666588	2432285	2151646	20105	7123	2513	1068	86479	1.8114E+14	13912647680
2	21	1008686	4009267	268732	31461	28944	465	165	58	25	804	3.27217E+12	257848944
5	21	71174	270538	16356	1656	1465	14	5	2	1	69	1.25248E+11	9648342
1	31	40759504	162720464	11262601	1412771	1249764	8892	2839	1111	426	45248	9.47766E+13	7348794880
2	31	1124382	3305766	3812398	28817	26511	698	244	87	37	1395	5.67892E+12	439979168
5	31	134657	473753	32758	4046	3579	26	8	3	1	153	2.80181E+11	21732226
1	32	43520460	188044320	12729695	1480892	1310025	9043	2905	1130	436	48309	1.0119E+14	7865763840
2	32	1128929	2854509	5315656	20082	18476	720	260	90	39	1525	6.20776E+12	480085376
5	32	152538	519964	35862	4422	3912	27	9	3	1	166	3.02215E+11	23446494
1	41	117659	758319	79068	5337	4721	29	4	4	1	30	62699704320	5637055
2	41	79195	289053	333194	667	613	453	52	57	8	77	3.12194E+11	24708568
3	41	503	96961	137	25	22	26	2	3	0	7	23561328640	6148482
1	42	143096	847912	88843	6010	5317	24	4	3	1	33	69644083200	6268740
2	42	88472	322087	370211	743	684	236	29	30	4	84	3.4112E+11	27039696
3	42	524	107859	116	28	25	18	2	2	0	8	25999525888	6827170
1	43	3214	15244	1441	120	107	1	0	0	0	1	1641938944	145999
2	43	48019	109395	180222	234	216	256	33	32	5	43	1.73403E+11	13800921
3	43	74	9219	26	5	4	5	1	1	0	1	2878100224	755376
1	52	2096735	10872160	1424680	80462	71178	651	181	81	27	671	1.4064E+12	150267840
2	52	2197758	1753408	3908087	5837	5370	3977	862	497	129	1002	4.07931E+12	352633152
3	52	2659	319467	658	72	63	96	13	12	2	23	72606498816	39616364
1	53	1095739	2616013	251092	15523	13732	679	181	85	27	241	5.05831E+11	43078472
2	53	337218	595936	1142071	1896	1744	4076	862	510	129	367	1.49557E+12	117695192
3	53	869	88963	650	28	24	98	13	12	2	10	30646528000	6561326
2	61	131154	388015	381768	908	836	869	199	109	30	103	4.20412E+11	33741384
3	61	483	58171	205	18	16	27	4	3	1	5	16425464832	5169889
2	62	35047	454009	400299	900	828	1004	232	125	35	100	4.06027E+11	30533616

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

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**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	33,174.90	User Defined Unit	0.00	33,174,904.00	0
User Defined Industrial	17,710.27	User Defined Unit	0.00	17,710,268.00	0
Apartments Low Rise	2,593.00	Dwelling Unit	162.06	2,593,000.00	5316
Apartments Mid Rise	75,370.00	Dwelling Unit	1,983.42	75,370,000.00	154509
Condo/Townhouse	648.00	Dwelling Unit	40.50	648,000.00	1328
Single Family Housing	1,389.00	Dwelling Unit	450.97	2,500,200.00	2847

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	85
<b>Climate Zone</b>	14			<b>Operational Year</b>	2045
<b>Utility Company</b>	Seattle City Light				
<b>CO2 Intensity (lb/MWhr)</b>	31.35	<b>CH4 Intensity (lb/MWhr)</b>	0.029	<b>N2O Intensity (lb/MWhr)</b>	0.006

**1.3 User Entered Comments & Non-Default Data**

- Project Characteristics -
- Land Use - SF, 2.05 persons per DU
- Construction Phase - Ops only
- Vehicle Trips - Energy and Solid Waste Only
- Woodstoves - Energy and Solid Waste Only
- Consumer Products - Energy and Solid Waste Only
- Area Coating - Energy and Solid Waste Only

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Landscape Equipment - Energy and Solid Waste Only

Energy Use - Electricity: SCL Carbon Neutral; NG: SCL, EIA

Water And Wastewater - Energy and Solid Waste Only

Solid Waste - Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027), December 2022

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	0.00
tblConstructionPhase	PhaseEndDate	11/15/2061	7/18/2023
tblEnergyUse	LightingElect	810.36	0.00
tblEnergyUse	LightingElect	741.44	0.00
tblEnergyUse	LightingElect	1,001.10	0.00
tblEnergyUse	LightingElect	1,608.84	0.00
tblEnergyUse	NT24E	3,172.76	0.00
tblEnergyUse	NT24E	3,054.10	0.00
tblEnergyUse	NT24E	3,795.01	0.00
tblEnergyUse	NT24E	6,155.97	0.00
tblEnergyUse	NT24NG	1,599.00	2,301.00
tblEnergyUse	NT24NG	1,599.00	2,028.00
tblEnergyUse	NT24NG	1,599.00	3,029.00
tblEnergyUse	NT24NG	1,599.00	4,576.00
tblEnergyUse	NT24NG	0.00	16.60
tblEnergyUse	NT24NG	0.00	10.40
tblEnergyUse	T24E	165.27	0.00
tblEnergyUse	T24E	176.92	0.00
tblEnergyUse	T24E	204.10	0.00
tblEnergyUse	T24E	191.61	0.00
tblEnergyUse	T24NG	8,768.16	0.00
tblEnergyUse	T24NG	2,182.40	0.00
tblEnergyUse	T24NG	3,351.17	0.00



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblEnergyUse	T24NG	9,528.86	0.00
tblFireplaces	NumberGas	1,087.35	0.00
tblFireplaces	NumberGas	53,235.60	0.00
tblFireplaces	NumberGas	293.15	0.00
tblFireplaces	NumberGas	383.90	0.00
tblFireplaces	NumberWood	691.95	0.00
tblFireplaces	NumberWood	33,877.20	0.00
tblFireplaces	NumberWood	186.55	0.00
tblFireplaces	NumberWood	244.30	0.00
tblLandUse	LandUseSquareFeet	0.00	33,174,904.00
tblLandUse	LandUseSquareFeet	0.00	17,710,268.00
tblLandUse	Population	7,416.00	5,316.00
tblLandUse	Population	215,558.00	154,509.00
tblLandUse	Population	1,853.00	1,328.00
tblLandUse	Population	3,973.00	2,847.00
tblSolidWaste	SolidWasteGenerationRate	909.42	934.00
tblSolidWaste	SolidWasteGenerationRate	44,524.32	27,143.00
tblSolidWaste	SolidWasteGenerationRate	245.18	233.00
tblSolidWaste	SolidWasteGenerationRate	357.75	2,115.00
tblSolidWaste	SolidWasteGenerationRate	0.00	76,044.00
tblSolidWaste	SolidWasteGenerationRate	0.00	14,498.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	4.91	0.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	4.09	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	0.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	5.44	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	0.00
tblWater	IndoorWaterUseRate	128,809,508.65	0.00
tblWater	IndoorWaterUseRate	6,306,388,447.95	0.00
tblWater	IndoorWaterUseRate	34,727,095.66	0.00
tblWater	IndoorWaterUseRate	45,477,509.88	0.00
tblWater	OutdoorWaterUseRate	81,205,994.59	0.00
tblWater	OutdoorWaterUseRate	3,975,766,630.23	0.00
tblWater	OutdoorWaterUseRate	21,893,169.00	0.00
tblWater	OutdoorWaterUseRate	28,670,604.06	0.00
tblWoodstoves	NumberCatalytic	98.85	0.00
tblWoodstoves	NumberCatalytic	4,839.60	0.00
tblWoodstoves	NumberCatalytic	26.65	0.00
tblWoodstoves	NumberCatalytic	34.90	0.00
tblWoodstoves	NumberNoncatalytic	98.85	0.00
tblWoodstoves	NumberNoncatalytic	4,839.60	0.00
tblWoodstoves	NumberNoncatalytic	26.65	0.00
tblWoodstoves	NumberNoncatalytic	34.90	0.00

**2.0 Emissions Summary**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.1 Overall Construction**

**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Maximum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Maximum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

		Highest	
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**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	749.5106	6.8305	591.8643	0.0314		3.2957	3.2957		3.2957	3.2957	0.0000	971.2128	971.2128	0.9259	0.0000	994.3606
Energy	4.8639	43.7254	33.5374	0.2653		3.3605	3.3605		3.3605	3.3605	0.0000	48,135.5373	48,135.5373	0.9226	0.8825	48,421.5827
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	24,555.2078	0.0000	24,555.2078	1,451.1712	0.0000	60,834.4880
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>754.3745</b>	<b>50.5559</b>	<b>625.4016</b>	<b>0.2967</b>	<b>0.0000</b>	<b>6.6562</b>	<b>6.6562</b>	<b>0.0000</b>	<b>6.6562</b>	<b>6.6562</b>	<b>24,555.2078</b>	<b>49,106.7501</b>	<b>73,661.9579</b>	<b>1,453.0197</b>	<b>0.8825</b>	<b>110,250.4313</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.2 Overall Operational**

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	749.5106	6.8305	591.8643	0.0314		3.2957	3.2957		3.2957	3.2957	0.0000	971.2128	971.2128	0.9259	0.0000	994.3606
Energy	4.8639	43.7254	33.5374	0.2653		3.3605	3.3605		3.3605	3.3605	0.0000	48,135.5373	48,135.5373	0.9226	0.8825	48,421.5827
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	24,555.2078	0.0000	24,555.2078	1,451.1712	0.0000	60,834.4880
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>754.3745</b>	<b>50.5559</b>	<b>625.4016</b>	<b>0.2967</b>	<b>0.0000</b>	<b>6.6562</b>	<b>6.6562</b>	<b>0.0000</b>	<b>6.6562</b>	<b>6.6562</b>	<b>24,555.2078</b>	<b>49,106.7501</b>	<b>73,661.9579</b>	<b>1,453.0197</b>	<b>0.8825</b>	<b>110,250.4313</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/19/2023	7/18/2023	5	0	

**Acres of Grading (Site Preparation Phase): 0**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**3.2 Demolition - 2023**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**4.0 Operational Detail - Mobile**



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Apartments Mid Rise	0.00	0.00	0.00		
Condo/Townhouse	0.00	0.00	0.00		
Single Family Housing	0.00	0.00	0.00		
User Defined Commercial	0.00	0.00	0.00		
User Defined Industrial	0.00	0.00	0.00		
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Apartments Mid Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Condo/Townhouse	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
User Defined Commercial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Apartments Mid Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Condo/Townhouse	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Single Family Housing	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Commercial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Industrial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Natural Gas Mitigated	4.8639	43.7254	33.5374	0.2653		3.3605	3.3605		3.3605	3.3605	0.0000	48,135.5373	48,135.5373	0.9226	0.8825	48,421.5827
Natural Gas Unmitigated	4.8639	43.7254	33.5374	0.2653		3.3605	3.3605		3.3605	3.3605	0.0000	48,135.5373	48,135.5373	0.9226	0.8825	48,421.5827

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	5.96649e+006	0.0322	0.2749	0.1170	1.7500e-003		0.0222	0.0222		0.0222	0.0222	0.0000	318.3948	318.3948	6.1000e-003	5.8400e-003	320.2869
Apartments Mid Rise	1.5285e+008	0.8242	7.0431	2.9971	0.0450		0.5694	0.5694		0.5694	0.5694	0.0000	8,156.6773	8,156.6773	0.1563	0.1495	8,205.1484
Condo/Townhouse	1.96279e+006	0.0106	0.0904	0.0385	5.8000e-004		7.3100e-003	7.3100e-003		7.3100e-003	7.3100e-003	0.0000	104.7421	104.7421	2.0100e-003	1.9200e-003	105.3645
Single Family Housing	6.35606e+006	0.0343	0.2929	0.1246	1.8700e-003		0.0237	0.0237		0.0237	0.0237	0.0000	339.1838	339.1838	6.5000e-003	6.2200e-003	341.1994
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
<b>Total</b>		<b>4.8639</b>	<b>43.7254</b>	<b>33.5374</b>	<b>0.2653</b>		<b>3.3605</b>	<b>3.3605</b>		<b>3.3605</b>	<b>3.3605</b>	<b>0.0000</b>	<b>48,135.5373</b>	<b>48,135.5373</b>	<b>0.9226</b>	<b>0.8825</b>	<b>48,421.5827</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	5.96649e+006	0.0322	0.2749	0.1170	1.7500e-003		0.0222	0.0222		0.0222	0.0222	0.0000	318.3948	318.3948	6.1000e-003	5.8400e-003	320.2869
Apartments Mid Rise	1.5285e+008	0.8242	7.0431	2.9971	0.0450		0.5694	0.5694		0.5694	0.5694	0.0000	8,156.6773	8,156.6773	0.1563	0.1495	8,205.1484
Condo/Townhouse	1.96279e+006	0.0106	0.0904	0.0385	5.8000e-004		7.3100e-003	7.3100e-003		7.3100e-003	7.3100e-003	0.0000	104.7421	104.7421	2.0100e-003	1.9200e-003	105.3645
Single Family Housing	6.35606e+006	0.0343	0.2929	0.1246	1.8700e-003		0.0237	0.0237		0.0237	0.0237	0.0000	339.1838	339.1838	6.5000e-003	6.2200e-003	341.1994
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
<b>Total</b>		<b>4.8639</b>	<b>43.7254</b>	<b>33.5374</b>	<b>0.2653</b>		<b>3.3605</b>	<b>3.3605</b>		<b>3.3605</b>	<b>3.3605</b>	<b>0.0000</b>	<b>48,135.5373</b>	<b>48,135.5373</b>	<b>0.9226</b>	<b>0.8825</b>	<b>48,421.5827</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	749.5106	6.8305	591.8643	0.0314		3.2957	3.2957		3.2957	3.2957	0.0000	971.2128	971.2128	0.9259	0.0000	994.3606
Unmitigated	749.5106	6.8305	591.8643	0.0314		3.2957	3.2957		3.2957	3.2957	0.0000	971.2128	971.2128	0.9259	0.0000	994.3606

**6.2 Area by SubCategory**

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	515.5118					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	17.7308	6.8305	591.8643	0.0314		3.2957	3.2957		3.2957	3.2957	0.0000	971.2128	971.2128	0.9259	0.0000	994.3606
<b>Total</b>	<b>749.5106</b>	<b>6.8305</b>	<b>591.8643</b>	<b>0.0314</b>		<b>3.2957</b>	<b>3.2957</b>		<b>3.2957</b>	<b>3.2957</b>	<b>0.0000</b>	<b>971.2128</b>	<b>971.2128</b>	<b>0.9259</b>	<b>0.0000</b>	<b>994.3606</b>



Seattle Comprehensive Plan - Alt 1 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**6.2 Area by SubCategory**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	515.5118					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	17.7308	6.8305	591.8643	0.0314		3.2957	3.2957		3.2957	3.2957	0.0000	971.2128	971.2128	0.9259	0.0000	994.3606
<b>Total</b>	<b>749.5106</b>	<b>6.8305</b>	<b>591.8643</b>	<b>0.0314</b>		<b>3.2957</b>	<b>3.2957</b>		<b>3.2957</b>	<b>3.2957</b>	<b>0.0000</b>	<b>971.2128</b>	<b>971.2128</b>	<b>0.9259</b>	<b>0.0000</b>	<b>994.3606</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

Seattle Comprehensive Plan - Alt 1 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

Seattle Comprehensive Plan - Alt 1 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	24,555.20	1,451.171	0.0000	60,834.48
	78	2		80
Unmitigated	24,555.20	1,451.171	0.0000	60,834.48
	78	2		80

Seattle Comprehensive Plan - Alt 1 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	934	189.5936	11.2047	0.0000	469.7100
Apartments Mid Rise	27143	5,509.7837	325.6189	0.0000	13,650.2559
Condo/Townhouse	233	47.2969	2.7952	0.0000	117.1761
Single Family Housing	2115	429.3259	25.3724	0.0000	1,063.6367
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
<b>Total</b>		<b>24,555.2078</b>	<b>1,451.1712</b>	<b>0.0000</b>	<b>60,834.4880</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	934	189.5936	11.2047	0.0000	469.7100
Apartments Mid Rise	27143	5,509.7837	325.6189	0.0000	13,650.2559
Condo/Townhouse	233	47.2969	2.7952	0.0000	117.1761
Single Family Housing	2115	429.3259	25.3724	0.0000	1,063.6367
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
<b>Total</b>		<b>24,555.2078</b>	<b>1,451.1712</b>	<b>0.0000</b>	<b>60,834.4880</b>

**9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Seattle Comprehensive Plan - Alt 1 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Seattle Comprehensive Plan - Alt 2  
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**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	33,174.90	User Defined Unit	0.00	33,174,904.00	0
User Defined Industrial	17,710.27	User Defined Unit	0.00	17,710,268.00	0
Apartments Low Rise	1,977.00	Dwelling Unit	123.56	1,977,000.00	4053
Apartments Mid Rise	96,792.00	Dwelling Unit	2,547.16	96,792,000.00	198424
Condo/Townhouse	533.00	Dwelling Unit	33.31	533,000.00	1093
Single Family Housing	698.00	Dwelling Unit	226.62	1,256,400.00	1431

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	85
<b>Climate Zone</b>	14			<b>Operational Year</b>	2045
<b>Utility Company</b>	Seattle City Light				
<b>CO2 Intensity (lb/MWhr)</b>	31.35	<b>CH4 Intensity (lb/MWhr)</b>	0.029	<b>N2O Intensity (lb/MWhr)</b>	0.006

**1.3 User Entered Comments & Non-Default Data**

- Project Characteristics -
- Land Use - SF, 2.05 persons per DU
- Construction Phase - Ops only
- Vehicle Trips - Energy and Solid Waste Only
- Woodstoves - Energy and Solid Waste Only
- Consumer Products - Energy and Solid Waste Only
- Area Coating - Energy and Solid Waste Only

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Landscape Equipment - Energy and Solid Waste Only

Energy Use - Electricity: SCL Carbon Neutral; NG: SCL, EIA

Water And Wastewater - Energy and Solid Waste Only

Solid Waste - Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027), December 2022

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	0.00
tblConstructionPhase	PhaseEndDate	11/15/2061	7/18/2023
tblEnergyUse	LightingElect	810.36	0.00
tblEnergyUse	LightingElect	741.44	0.00
tblEnergyUse	LightingElect	1,001.10	0.00
tblEnergyUse	LightingElect	1,608.84	0.00
tblEnergyUse	NT24E	3,172.76	0.00
tblEnergyUse	NT24E	3,054.10	0.00
tblEnergyUse	NT24E	3,795.01	0.00
tblEnergyUse	NT24E	6,155.97	0.00
tblEnergyUse	NT24NG	1,599.00	2,301.00
tblEnergyUse	NT24NG	1,599.00	2,028.00
tblEnergyUse	NT24NG	1,599.00	3,029.00
tblEnergyUse	NT24NG	1,599.00	4,576.00
tblEnergyUse	NT24NG	0.00	16.60
tblEnergyUse	NT24NG	0.00	10.40
tblEnergyUse	T24E	165.27	0.00
tblEnergyUse	T24E	176.92	0.00
tblEnergyUse	T24E	204.10	0.00
tblEnergyUse	T24E	191.61	0.00
tblEnergyUse	T24NG	8,768.16	0.00
tblEnergyUse	T24NG	2,182.40	0.00
tblEnergyUse	T24NG	3,351.17	0.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblEnergyUse	T24NG	9,528.86	0.00
tblFireplaces	NumberGas	1,087.35	0.00
tblFireplaces	NumberGas	53,235.60	0.00
tblFireplaces	NumberGas	293.15	0.00
tblFireplaces	NumberGas	383.90	0.00
tblFireplaces	NumberWood	691.95	0.00
tblFireplaces	NumberWood	33,877.20	0.00
tblFireplaces	NumberWood	186.55	0.00
tblFireplaces	NumberWood	244.30	0.00
tblLandUse	LandUseSquareFeet	0.00	33,174,904.00
tblLandUse	LandUseSquareFeet	0.00	17,710,268.00
tblLandUse	Population	5,654.00	4,053.00
tblLandUse	Population	276,825.00	198,424.00
tblLandUse	Population	1,524.00	1,093.00
tblLandUse	Population	1,996.00	1,431.00
tblSolidWaste	SolidWasteGenerationRate	909.42	712.00
tblSolidWaste	SolidWasteGenerationRate	44,524.32	34,858.00
tblSolidWaste	SolidWasteGenerationRate	245.18	192.00
tblSolidWaste	SolidWasteGenerationRate	357.75	1,063.00
tblSolidWaste	SolidWasteGenerationRate	0.00	76,044.00
tblSolidWaste	SolidWasteGenerationRate	0.00	14,498.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	4.91	0.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	4.09	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	0.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	5.44	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	0.00
tblWater	IndoorWaterUseRate	128,809,508.65	0.00
tblWater	IndoorWaterUseRate	6,306,388,447.95	0.00
tblWater	IndoorWaterUseRate	34,727,095.66	0.00
tblWater	IndoorWaterUseRate	45,477,509.88	0.00
tblWater	OutdoorWaterUseRate	81,205,994.59	0.00
tblWater	OutdoorWaterUseRate	3,975,766,630.23	0.00
tblWater	OutdoorWaterUseRate	21,893,169.00	0.00
tblWater	OutdoorWaterUseRate	28,670,604.06	0.00
tblWoodstoves	NumberCatalytic	98.85	0.00
tblWoodstoves	NumberCatalytic	4,839.60	0.00
tblWoodstoves	NumberCatalytic	26.65	0.00
tblWoodstoves	NumberCatalytic	34.90	0.00
tblWoodstoves	NumberNoncatalytic	98.85	0.00
tblWoodstoves	NumberNoncatalytic	4,839.60	0.00
tblWoodstoves	NumberNoncatalytic	26.65	0.00
tblWoodstoves	NumberNoncatalytic	34.90	0.00

**2.0 Emissions Summary**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.1 Overall Construction**

**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Maximum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Maximum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

		Highest	
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**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	829.8837	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Energy	5.0716	45.5001	34.2926	0.2766		3.5040	3.5040		3.5040	3.5040	0.0000	50,190.9003	50,190.9003	0.9620	0.9202	50,489.1598
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	25,854.3500	0.0000	25,854.3500	1,527.9483	0.0000	64,053.0577
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>834.9553</b>	<b>54.0372</b>	<b>774.0068</b>	<b>0.3159</b>	<b>0.0000</b>	<b>7.6233</b>	<b>7.6233</b>	<b>0.0000</b>	<b>7.6233</b>	<b>7.6233</b>	<b>25,854.3500</b>	<b>51,404.6890</b>	<b>77,259.0390</b>	<b>1,530.0671</b>	<b>0.9202</b>	<b>115,784.9263</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.2 Overall Operational**

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	829.8837	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Energy	5.0716	45.5001	34.2926	0.2766		3.5040	3.5040		3.5040	3.5040	0.0000	50,190.9003	50,190.9003	0.9620	0.9202	50,489.1598
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	25,854.3500	0.0000	25,854.3500	1,527.9483	0.0000	64,053.0577
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>834.9553</b>	<b>54.0372</b>	<b>774.0068</b>	<b>0.3159</b>	<b>0.0000</b>	<b>7.6233</b>	<b>7.6233</b>	<b>0.0000</b>	<b>7.6233</b>	<b>7.6233</b>	<b>25,854.3500</b>	<b>51,404.6890</b>	<b>77,259.0390</b>	<b>1,530.0671</b>	<b>0.9202</b>	<b>115,784.9263</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/19/2023	7/18/2023	5	0	

**Acres of Grading (Site Preparation Phase): 0**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**





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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**3.2 Demolition - 2023**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**4.0 Operational Detail - Mobile**

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Apartments Mid Rise	0.00	0.00	0.00		
Condo/Townhouse	0.00	0.00	0.00		
Single Family Housing	0.00	0.00	0.00		
User Defined Commercial	0.00	0.00	0.00		
User Defined Industrial	0.00	0.00	0.00		
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Apartments Mid Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Condo/Townhouse	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
User Defined Commercial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Apartments Mid Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Condo/Townhouse	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Single Family Housing	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Commercial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Industrial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	5.0716	45.5001	34.2926	0.2766		3.5040	3.5040		3.5040	3.5040	0.0000	50,190.9003	50,190.9003	0.9620	0.9202	50,489.1598
NaturalGas Unmitigated	5.0716	45.5001	34.2926	0.2766		3.5040	3.5040		3.5040	3.5040	0.0000	50,190.9003	50,190.9003	0.9620	0.9202	50,489.1598

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	4.54908e+006	0.0245	0.2096	0.0892	1.3400e-003		0.0170	0.0170		0.0170	0.0170	0.0000	242.7561	242.7561	4.6500e-003	4.4500e-003	244.1987
Apartments Mid Rise	1.96294e+008	1.0585	9.0449	3.8489	0.0577		0.7313	0.7313		0.7313	0.7313	0.0000	10,475.0048	10,475.0048	0.2008	0.1920	10,537.2525
Condo/Townhouse	1.61446e+006	8.7100e-003	0.0744	0.0317	4.7000e-004		6.0100e-003	6.0100e-003		6.0100e-003	6.0100e-003	0.0000	86.1536	86.1536	1.6500e-003	1.5800e-003	86.6655
Single Family Housing	3.19405e+006	0.0172	0.1472	0.0626	9.4000e-004		0.0119	0.0119		0.0119	0.0119	0.0000	170.4466	170.4466	3.2700e-003	3.1200e-003	171.4594
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
<b>Total</b>		<b>5.0716</b>	<b>45.5001</b>	<b>34.2926</b>	<b>0.2766</b>		<b>3.5040</b>	<b>3.5040</b>		<b>3.5040</b>	<b>3.5040</b>	<b>0.0000</b>	<b>50,190.9003</b>	<b>50,190.9003</b>	<b>0.9620</b>	<b>0.9202</b>	<b>50,489.1598</b>

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	4.54908e+006	0.0245	0.2096	0.0892	1.3400e-003		0.0170	0.0170		0.0170	0.0170	0.0000	242.7561	242.7561	4.6500e-003	4.4500e-003	244.1987
Apartments Mid Rise	1.96294e+008	1.0585	9.0449	3.8489	0.0577		0.7313	0.7313		0.7313	0.7313	0.0000	10,475.0048	10,475.0048	0.2008	0.1920	10,537.2525
Condo/Townhouse	1.61446e+006	8.7100e-003	0.0744	0.0317	4.7000e-004		6.0100e-003	6.0100e-003		6.0100e-003	6.0100e-003	0.0000	86.1536	86.1536	1.6500e-003	1.5800e-003	86.6655
Single Family Housing	3.19405e+006	0.0172	0.1472	0.0626	9.4000e-004		0.0119	0.0119		0.0119	0.0119	0.0000	170.4466	170.4466	3.2700e-003	3.1200e-003	171.4594
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
<b>Total</b>		<b>5.0716</b>	<b>45.5001</b>	<b>34.2926</b>	<b>0.2766</b>		<b>3.5040</b>	<b>3.5040</b>		<b>3.5040</b>	<b>3.5040</b>	<b>0.0000</b>	<b>50,190.9003</b>	<b>50,190.9003</b>	<b>0.9620</b>	<b>0.9202</b>	<b>50,489.1598</b>

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>



Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	829.8837	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Unmitigated	829.8837	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088

**6.2 Area by SubCategory**

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	591.4629					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	22.1529	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
<b>Total</b>	<b>829.8837</b>	<b>8.5370</b>	<b>739.7142</b>	<b>0.0392</b>		<b>4.1193</b>	<b>4.1193</b>		<b>4.1193</b>	<b>4.1193</b>	<b>0.0000</b>	<b>1,213.7887</b>	<b>1,213.7887</b>	<b>1.1568</b>	<b>0.0000</b>	<b>1,242.7088</b>

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**6.2 Area by SubCategory**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	591.4629					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	22.1529	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
<b>Total</b>	<b>829.8837</b>	<b>8.5370</b>	<b>739.7142</b>	<b>0.0392</b>		<b>4.1193</b>	<b>4.1193</b>		<b>4.1193</b>	<b>4.1193</b>	<b>0.0000</b>	<b>1,213.7887</b>	<b>1,213.7887</b>	<b>1.1568</b>	<b>0.0000</b>	<b>1,242.7088</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	25,854.35 00	1,527.948 3	0.0000	64,053.05 77
Unmitigated	25,854.35 00	1,527.948 3	0.0000	64,053.05 77

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	712	144.5296	8.5415	0.0000	358.0659
Apartments Mid Rise	34858	7,075.8590	418.1713	0.0000	17,530.1411
Condo/Townhouse	192	38.9743	2.3033	0.0000	96.5571
Single Family Housing	1063	215.7794	12.7522	0.0000	534.5843
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
<b>Total</b>		<b>25,854.3500</b>	<b>1,527.9483</b>	<b>0.0000</b>	<b>64,053.0577</b>



Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	712	144.5296	8.5415	0.0000	358.0659
Apartments Mid Rise	34858	7,075.8590	418.1713	0.0000	17,530.1411
Condo/Townhouse	192	38.9743	2.3033	0.0000	96.5571
Single Family Housing	1063	215.7794	12.7522	0.0000	534.5843
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
<b>Total</b>		<b>25,854.3500</b>	<b>1,527.9483</b>	<b>0.0000</b>	<b>64,053.0577</b>

**9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Seattle Comprehensive Plan - Alt 2 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Seattle Comprehensive Plan - Alt 3  
Siskiyou County, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	33,174.90	User Defined Unit	0.00	33,174,904.00	0
User Defined Industrial	17,710.27	User Defined Unit	0.00	17,710,268.00	0
Apartments Low Rise	14,247.00	Dwelling Unit	890.44	14,247,000.00	29206
Apartments Mid Rise	80,382.00	Dwelling Unit	2,115.32	80,382,000.00	164783
Condo/Townhouse	4,260.00	Dwelling Unit	266.25	4,260,000.00	8733
Single Family Housing	1,111.00	Dwelling Unit	360.71	1,999,800.00	2278

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	85
<b>Climate Zone</b>	14			<b>Operational Year</b>	2045
<b>Utility Company</b>	Seattle City Light				
<b>CO2 Intensity (lb/MWhr)</b>	31.35	<b>CH4 Intensity (lb/MWhr)</b>	0.029	<b>N2O Intensity (lb/MWhr)</b>	0.006

**1.3 User Entered Comments & Non-Default Data**

- Project Characteristics -
- Land Use - SF, 2.05 persons per DU
- Construction Phase - Ops only
- Vehicle Trips - Energy and Solid Waste Only
- Woodstoves - Energy and Solid Waste Only
- Consumer Products - Energy and Solid Waste Only
- Area Coating - Energy and Solid Waste Only

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Landscape Equipment - Energy and Solid Waste Only

Energy Use - Electricity: SCL Carbon Neutral; NG: SCL, EIA

Water And Wastewater - Energy and Solid Waste Only

Solid Waste - Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027), December 2022

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	0.00
tblConstructionPhase	PhaseEndDate	11/15/2061	7/18/2023
tblEnergyUse	LightingElect	810.36	0.00
tblEnergyUse	LightingElect	741.44	0.00
tblEnergyUse	LightingElect	1,001.10	0.00
tblEnergyUse	LightingElect	1,608.84	0.00
tblEnergyUse	NT24E	3,172.76	0.00
tblEnergyUse	NT24E	3,054.10	0.00
tblEnergyUse	NT24E	3,795.01	0.00
tblEnergyUse	NT24E	6,155.97	0.00
tblEnergyUse	NT24NG	1,599.00	2,301.00
tblEnergyUse	NT24NG	1,599.00	2,028.00
tblEnergyUse	NT24NG	1,599.00	3,029.00
tblEnergyUse	NT24NG	1,599.00	4,576.00
tblEnergyUse	NT24NG	0.00	16.60
tblEnergyUse	NT24NG	0.00	10.40
tblEnergyUse	T24E	165.27	0.00
tblEnergyUse	T24E	176.92	0.00
tblEnergyUse	T24E	204.10	0.00
tblEnergyUse	T24E	191.61	0.00
tblEnergyUse	T24NG	8,768.16	0.00
tblEnergyUse	T24NG	2,182.40	0.00
tblEnergyUse	T24NG	3,351.17	0.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblEnergyUse	T24NG	9,528.86	0.00
tblFireplaces	NumberGas	1,087.35	0.00
tblFireplaces	NumberGas	53,235.60	0.00
tblFireplaces	NumberGas	293.15	0.00
tblFireplaces	NumberGas	383.90	0.00
tblFireplaces	NumberWood	691.95	0.00
tblFireplaces	NumberWood	33,877.20	0.00
tblFireplaces	NumberWood	186.55	0.00
tblFireplaces	NumberWood	244.30	0.00
tblLandUse	LandUseSquareFeet	0.00	33,174,904.00
tblLandUse	LandUseSquareFeet	0.00	17,710,268.00
tblLandUse	Population	40,746.00	29,206.00
tblLandUse	Population	229,893.00	164,783.00
tblLandUse	Population	12,184.00	8,733.00
tblLandUse	Population	3,177.00	2,278.00
tblSolidWaste	SolidWasteGenerationRate	909.42	5,131.00
tblSolidWaste	SolidWasteGenerationRate	44,524.32	28,948.00
tblSolidWaste	SolidWasteGenerationRate	245.18	1,534.00
tblSolidWaste	SolidWasteGenerationRate	357.75	1,692.00
tblSolidWaste	SolidWasteGenerationRate	0.00	76,044.00
tblSolidWaste	SolidWasteGenerationRate	0.00	14,498.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	4.91	0.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	4.09	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	0.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	5.44	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	0.00
tblWater	IndoorWaterUseRate	128,809,508.65	0.00
tblWater	IndoorWaterUseRate	6,306,388,447.95	0.00
tblWater	IndoorWaterUseRate	34,727,095.66	0.00
tblWater	IndoorWaterUseRate	45,477,509.88	0.00
tblWater	OutdoorWaterUseRate	81,205,994.59	0.00
tblWater	OutdoorWaterUseRate	3,975,766,630.23	0.00
tblWater	OutdoorWaterUseRate	21,893,169.00	0.00
tblWater	OutdoorWaterUseRate	28,670,604.06	0.00
tblWoodstoves	NumberCatalytic	98.85	0.00
tblWoodstoves	NumberCatalytic	4,839.60	0.00
tblWoodstoves	NumberCatalytic	26.65	0.00
tblWoodstoves	NumberCatalytic	34.90	0.00
tblWoodstoves	NumberNoncatalytic	98.85	0.00
tblWoodstoves	NumberNoncatalytic	4,839.60	0.00
tblWoodstoves	NumberNoncatalytic	26.65	0.00
tblWoodstoves	NumberNoncatalytic	34.90	0.00

**2.0 Emissions Summary**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.1 Overall Construction**

**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Maximum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Maximum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

		Highest	
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**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Energy	5.1154	45.8749	34.4520	0.2790		3.5343	3.5343		3.5343	3.5343	0.0000	50,624.8954	50,624.8954	0.9703	0.9281	50,925.7339
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	25,951.7856	0.0000	25,951.7856	1,533.7066	0.0000	64,294.4504
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>836.2895</b>	<b>54.4119</b>	<b>774.1662</b>	<b>0.3183</b>	<b>0.0000</b>	<b>7.6536</b>	<b>7.6536</b>	<b>0.0000</b>	<b>7.6536</b>	<b>7.6536</b>	<b>25,951.7856</b>	<b>51,838.6841</b>	<b>77,790.4697</b>	<b>1,535.8337</b>	<b>0.9281</b>	<b>116,462.8931</b>



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.2 Overall Operational**

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Energy	5.1154	45.8749	34.4520	0.2790		3.5343	3.5343		3.5343	3.5343	0.0000	50,624.8954	50,624.8954	0.9703	0.9281	50,925.7339
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	25,951.7856	0.0000	25,951.7856	1,533.7066	0.0000	64,294.4504
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>836.2895</b>	<b>54.4119</b>	<b>774.1662</b>	<b>0.3183</b>	<b>0.0000</b>	<b>7.6536</b>	<b>7.6536</b>	<b>0.0000</b>	<b>7.6536</b>	<b>7.6536</b>	<b>25,951.7856</b>	<b>51,838.6841</b>	<b>77,790.4697</b>	<b>1,535.8337</b>	<b>0.9281</b>	<b>116,462.8931</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/19/2023	7/18/2023	5	0	

**Acres of Grading (Site Preparation Phase): 0**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**3.2 Demolition - 2023**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**4.0 Operational Detail - Mobile**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr										MT/yr						
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Apartments Mid Rise	0.00	0.00	0.00		
Condo/Townhouse	0.00	0.00	0.00		
Single Family Housing	0.00	0.00	0.00		
User Defined Commercial	0.00	0.00	0.00		
User Defined Industrial	0.00	0.00	0.00		
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Apartments Mid Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Condo/Townhouse	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
User Defined Commercial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Apartments Mid Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Condo/Townhouse	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Single Family Housing	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Commercial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Industrial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	5.1154	45.8749	34.4520	0.2790		3.5343	3.5343		3.5343	3.5343	0.0000	50,624.8954	50,624.8954	0.9703	0.9281	50,925.7339
NaturalGas Unmitigated	5.1154	45.8749	34.4520	0.2790		3.5343	3.5343		3.5343	3.5343	0.0000	50,624.8954	50,624.8954	0.9703	0.9281	50,925.7339

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	3.27823e+007	0.1768	1.5106	0.6428	9.6400e-003		0.1221	0.1221		0.1221	0.1221	0.0000	1,749.3909	1,749.3909	0.0335	0.0321	1,759.7866
Apartments Mid Rise	1.63015e+008	0.8790	7.5115	3.1964	0.0480		0.6073	0.6073		0.6073	0.6073	0.0000	8,699.0850	8,699.0850	0.1667	0.1595	8,750.7793
Condo/Townhouse	1.29035e+007	0.0696	0.5946	0.2530	3.8000e-003		0.0481	0.0481		0.0481	0.0481	0.0000	688.5820	688.5820	0.0132	0.0126	692.6739
Single Family Housing	5.08394e+006	0.0274	0.2343	0.0997	1.5000e-003		0.0189	0.0189		0.0189	0.0189	0.0000	271.2982	271.2982	5.2000e-003	4.9700e-003	272.9104
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
<b>Total</b>		<b>5.1154</b>	<b>45.8749</b>	<b>34.4520</b>	<b>0.2790</b>		<b>3.5343</b>	<b>3.5343</b>		<b>3.5343</b>	<b>3.5343</b>	<b>0.0000</b>	<b>50,624.8954</b>	<b>50,624.8954</b>	<b>0.9703</b>	<b>0.9281</b>	<b>50,925.7339</b>



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	3.27823e+007	0.1768	1.5106	0.6428	9.6400e-003		0.1221	0.1221		0.1221	0.1221	0.0000	1,749.3909	1,749.3909	0.0335	0.0321	1,759.7866
Apartments Mid Rise	1.63015e+008	0.8790	7.5115	3.1964	0.0480		0.6073	0.6073		0.6073	0.6073	0.0000	8,699.0850	8,699.0850	0.1667	0.1595	8,750.7793
Condo/Townhouse	1.29035e+007	0.0696	0.5946	0.2530	3.8000e-003		0.0481	0.0481		0.0481	0.0481	0.0000	688.5820	688.5820	0.0132	0.0126	692.6739
Single Family Housing	5.08394e+006	0.0274	0.2343	0.0997	1.5000e-003		0.0189	0.0189		0.0189	0.0189	0.0000	271.2982	271.2982	5.2000e-003	4.9700e-003	272.9104
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
<b>Total</b>		<b>5.1154</b>	<b>45.8749</b>	<b>34.4520</b>	<b>0.2790</b>		<b>3.5343</b>	<b>3.5343</b>		<b>3.5343</b>	<b>3.5343</b>	<b>0.0000</b>	<b>50,624.8954</b>	<b>50,624.8954</b>	<b>0.9703</b>	<b>0.9281</b>	<b>50,925.7339</b>

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Unmitigated	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088

**6.2 Area by SubCategory**

**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	592.7533					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	22.1529	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
<b>Total</b>	<b>831.1741</b>	<b>8.5370</b>	<b>739.7142</b>	<b>0.0392</b>		<b>4.1193</b>	<b>4.1193</b>		<b>4.1193</b>	<b>4.1193</b>	<b>0.0000</b>	<b>1,213.7887</b>	<b>1,213.7887</b>	<b>1.1568</b>	<b>0.0000</b>	<b>1,242.7088</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**6.2 Area by SubCategory**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	592.7533					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	22.1529	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
<b>Total</b>	<b>831.1741</b>	<b>8.5370</b>	<b>739.7142</b>	<b>0.0392</b>		<b>4.1193</b>	<b>4.1193</b>		<b>4.1193</b>	<b>4.1193</b>	<b>0.0000</b>	<b>1,213.7887</b>	<b>1,213.7887</b>	<b>1.1568</b>	<b>0.0000</b>	<b>1,242.7088</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**



Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	25,951.78	1,533.706	0.0000	64,294.45
	56	6		04
Unmitigated	25,951.78	1,533.706	0.0000	64,294.45
	56	6		04

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	5131	1,041.5466	61.5536	0.0000	2,580.3877
Apartments Mid Rise	28948	5,876.1824	347.2724	0.0000	14,557.9932
Condo/Townhouse	1534	311.3881	18.4025	0.0000	771.4509
Single Family Housing	1692	343.4607	20.2980	0.0000	850.9094
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
<b>Total</b>		<b>25,951.7856</b>	<b>1,533.7066</b>	<b>0.0000</b>	<b>64,294.4505</b>

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	5131	1,041.5466	61.5536	0.0000	2,580.3877
Apartments Mid Rise	28948	5,876.1824	347.2724	0.0000	14,557.9932
Condo/Townhouse	1534	311.3881	18.4025	0.0000	771.4509
Single Family Housing	1692	343.4607	20.2980	0.0000	850.9094
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
<b>Total</b>		<b>25,951.7856</b>	<b>1,533.7066</b>	<b>0.0000</b>	<b>64,294.4505</b>

**9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Seattle Comprehensive Plan - Alt 3 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Seattle Comprehensive Plan - Alt 4  
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**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	33,174.90	User Defined Unit	0.00	33,174,904.00	0
User Defined Industrial	17,710.27	User Defined Unit	0.00	17,710,268.00	0
Apartments Low Rise	5,522.00	Dwelling Unit	345.13	5,522,000.00	11320
Apartments Mid Rise	91,789.00	Dwelling Unit	2,415.50	91,789,000.00	188167
Condo/Townhouse	1,578.00	Dwelling Unit	98.63	1,578,000.00	
Single Family Housing	1,111.00	Dwelling Unit	360.71	1,999,800.00	2278

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	85
<b>Climate Zone</b>	14			<b>Operational Year</b>	2045
<b>Utility Company</b>	Seattle City Light				
<b>CO2 Intensity (lb/MWhr)</b>	31.35	<b>CH4 Intensity (lb/MWhr)</b>	0.029	<b>N2O Intensity (lb/MWhr)</b>	0.006

**1.3 User Entered Comments & Non-Default Data**

- Project Characteristics -
- Land Use - SF, 2.05 persons per DU
- Construction Phase - Ops only
- Vehicle Trips - Energy and Solid Waste Only
- Woodstoves - Energy and Solid Waste Only
- Consumer Products - Energy and Solid Waste Only
- Area Coating - Energy and Solid Waste Only

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Landscape Equipment - Energy and Solid Waste Only

Energy Use - Electricity: SCL Carbon Neutral; NG: SCL, EIA

Water And Wastewater - Energy and Solid Waste Only

Solid Waste - Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027), December 2022

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	0.00
tblConstructionPhase	PhaseEndDate	11/15/2061	7/18/2023
tblEnergyUse	LightingElect	810.36	0.00
tblEnergyUse	LightingElect	741.44	0.00
tblEnergyUse	LightingElect	1,001.10	0.00
tblEnergyUse	LightingElect	1,608.84	0.00
tblEnergyUse	NT24E	3,172.76	0.00
tblEnergyUse	NT24E	3,054.10	0.00
tblEnergyUse	NT24E	3,795.01	0.00
tblEnergyUse	NT24E	6,155.97	0.00
tblEnergyUse	NT24NG	1,599.00	2,301.00
tblEnergyUse	NT24NG	1,599.00	2,028.00
tblEnergyUse	NT24NG	1,599.00	3,029.00
tblEnergyUse	NT24NG	1,599.00	4,576.00
tblEnergyUse	NT24NG	0.00	16.60
tblEnergyUse	NT24NG	0.00	10.40
tblEnergyUse	T24E	165.27	0.00
tblEnergyUse	T24E	176.92	0.00
tblEnergyUse	T24E	204.10	0.00
tblEnergyUse	T24E	191.61	0.00
tblEnergyUse	T24NG	8,768.16	0.00
tblEnergyUse	T24NG	2,182.40	0.00
tblEnergyUse	T24NG	3,351.17	0.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblEnergyUse	T24NG	9,528.86	0.00
tblFireplaces	NumberGas	1,087.35	0.00
tblFireplaces	NumberGas	53,235.60	0.00
tblFireplaces	NumberGas	293.15	0.00
tblFireplaces	NumberGas	383.90	0.00
tblFireplaces	NumberWood	691.95	0.00
tblFireplaces	NumberWood	33,877.20	0.00
tblFireplaces	NumberWood	186.55	0.00
tblFireplaces	NumberWood	244.30	0.00
tblLandUse	LandUseSquareFeet	0.00	33,174,904.00
tblLandUse	LandUseSquareFeet	0.00	17,710,268.00
tblLandUse	Population	15,793.00	11,320.00
tblLandUse	Population	262,517.00	188,167.00
tblLandUse	Population	3,177.00	2,278.00
tblSolidWaste	SolidWasteGenerationRate	909.42	1,989.00
tblSolidWaste	SolidWasteGenerationRate	44,524.32	33,056.00
tblSolidWaste	SolidWasteGenerationRate	245.18	568.00
tblSolidWaste	SolidWasteGenerationRate	357.75	1,692.00
tblSolidWaste	SolidWasteGenerationRate	0.00	76,044.00
tblSolidWaste	SolidWasteGenerationRate	0.00	14,498.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	4.91	0.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	4.09	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	0.00
tblVehicleTrips	WD_TR	7.32	0.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblVehicleTrips	WD_TR	5.44	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	0.00
tblWater	IndoorWaterUseRate	128,809,508.65	0.00
tblWater	IndoorWaterUseRate	6,306,388,447.95	0.00
tblWater	IndoorWaterUseRate	34,727,095.66	0.00
tblWater	IndoorWaterUseRate	45,477,509.88	0.00
tblWater	OutdoorWaterUseRate	81,205,994.59	0.00
tblWater	OutdoorWaterUseRate	3,975,766,630.23	0.00
tblWater	OutdoorWaterUseRate	21,893,169.00	0.00
tblWater	OutdoorWaterUseRate	28,670,604.06	0.00
tblWoodstoves	NumberCatalytic	98.85	0.00
tblWoodstoves	NumberCatalytic	4,839.60	0.00
tblWoodstoves	NumberCatalytic	26.65	0.00
tblWoodstoves	NumberCatalytic	34.90	0.00
tblWoodstoves	NumberNoncatalytic	98.85	0.00
tblWoodstoves	NumberNoncatalytic	4,839.60	0.00
tblWoodstoves	NumberNoncatalytic	26.65	0.00
tblWoodstoves	NumberNoncatalytic	34.90	0.00

**2.0 Emissions Summary**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.1 Overall Construction**

**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Maximum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Maximum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

		Highest	
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**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Energy	5.0881	45.6414	34.3527	0.2775		3.5154	3.5154		3.5154	3.5154	0.0000	50,354.5220	50,354.5220	0.9651	0.9232	50,653.7537
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	25,951.7856	0.0000	25,951.7856	1,533.7066	0.0000	64,294.4504
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>836.2622</b>	<b>54.1785</b>	<b>774.0669</b>	<b>0.3168</b>	<b>0.0000</b>	<b>7.6347</b>	<b>7.6347</b>	<b>0.0000</b>	<b>7.6347</b>	<b>7.6347</b>	<b>25,951.7856</b>	<b>51,568.3107</b>	<b>77,520.0963</b>	<b>1,535.8285</b>	<b>0.9232</b>	<b>116,190.9130</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.2 Overall Operational**

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Energy	5.0881	45.6414	34.3527	0.2775		3.5154	3.5154		3.5154	3.5154	0.0000	50,354.5220	50,354.5220	0.9651	0.9232	50,653.7537
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	25,951.7856	0.0000	25,951.7856	1,533.7066	0.0000	64,294.4504
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>836.2622</b>	<b>54.1785</b>	<b>774.0669</b>	<b>0.3168</b>	<b>0.0000</b>	<b>7.6347</b>	<b>7.6347</b>	<b>0.0000</b>	<b>7.6347</b>	<b>7.6347</b>	<b>25,951.7856</b>	<b>51,568.3107</b>	<b>77,520.0963</b>	<b>1,535.8285</b>	<b>0.9232</b>	<b>116,190.9130</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/19/2023	7/18/2023	5	0	

**Acres of Grading (Site Preparation Phase): 0**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**3.2 Demolition - 2023**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**4.0 Operational Detail - Mobile**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Apartments Mid Rise	0.00	0.00	0.00		
Condo/Townhouse	0.00	0.00	0.00		
Single Family Housing	0.00	0.00	0.00		
User Defined Commercial	0.00	0.00	0.00		
User Defined Industrial	0.00	0.00	0.00		
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Apartments Mid Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Condo/Townhouse	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
User Defined Commercial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Apartments Mid Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Condo/Townhouse	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Single Family Housing	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Commercial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Industrial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	5.0881	45.6414	34.3527	0.2775		3.5154	3.5154		3.5154	3.5154	0.0000	50,354.52 20	50,354.52 20	0.9651	0.9232	50,653.75 37
NaturalGas Unmitigated	5.0881	45.6414	34.3527	0.2775		3.5154	3.5154		3.5154	3.5154	0.0000	50,354.52 20	50,354.52 20	0.9651	0.9232	50,653.75 37

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	1.27061e+007	0.0685	0.5855	0.2491	3.7400e-003		0.0473	0.0473		0.0473	0.0473	0.0000	678.0471	678.0471	0.0130	0.0124	682.0764
Apartments Mid Rise	1.86148e+008	1.0037	8.5774	3.6500	0.0548		0.6935	0.6935		0.6935	0.6935	0.0000	9,933.5711	9,933.5711	0.1904	0.1821	9,992.6013
Condo/Townhouse	4.77976e+006	0.0258	0.2202	0.0937	1.4100e-003		0.0178	0.0178		0.0178	0.0178	0.0000	255.0663	255.0663	4.8900e-003	4.6800e-003	256.5820
Single Family Housing	5.08394e+006	0.0274	0.2343	0.0997	1.5000e-003		0.0189	0.0189		0.0189	0.0189	0.0000	271.2982	271.2982	5.2000e-003	4.9700e-003	272.9104
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
<b>Total</b>		<b>5.0881</b>	<b>45.6414</b>	<b>34.3527</b>	<b>0.2775</b>		<b>3.5154</b>	<b>3.5154</b>		<b>3.5154</b>	<b>3.5154</b>	<b>0.0000</b>	<b>50,354.5220</b>	<b>50,354.5220</b>	<b>0.9651</b>	<b>0.9232</b>	<b>50,653.7537</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	1.27061e+007	0.0685	0.5855	0.2491	3.7400e-003		0.0473	0.0473		0.0473	0.0473	0.0000	678.0471	678.0471	0.0130	0.0124	682.0764
Apartments Mid Rise	1.86148e+008	1.0037	8.5774	3.6500	0.0548		0.6935	0.6935		0.6935	0.6935	0.0000	9,933.5711	9,933.5711	0.1904	0.1821	9,992.6013
Condo/Townhouse	4.77976e+006	0.0258	0.2202	0.0937	1.4100e-003		0.0178	0.0178		0.0178	0.0178	0.0000	255.0663	255.0663	4.8900e-003	4.6800e-003	256.5820
Single Family Housing	5.08394e+006	0.0274	0.2343	0.0997	1.5000e-003		0.0189	0.0189		0.0189	0.0189	0.0000	271.2982	271.2982	5.2000e-003	4.9700e-003	272.9104
User Defined Commercial	5.50703e+008	2.9695	26.9953	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.6310	29,387.6310	0.5633	0.5388	29,562.2670
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.9084	9,828.9084	0.1884	0.1802	9,887.3167
<b>Total</b>		<b>5.0881</b>	<b>45.6414</b>	<b>34.3527</b>	<b>0.2775</b>		<b>3.5154</b>	<b>3.5154</b>		<b>3.5154</b>	<b>3.5154</b>	<b>0.0000</b>	<b>50,354.5220</b>	<b>50,354.5220</b>	<b>0.9651</b>	<b>0.9232</b>	<b>50,653.7537</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
Unmitigated	831.1741	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088

**6.2 Area by SubCategory**

**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	592.7533					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	22.1529	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
<b>Total</b>	<b>831.1741</b>	<b>8.5370</b>	<b>739.7142</b>	<b>0.0392</b>		<b>4.1193</b>	<b>4.1193</b>		<b>4.1193</b>	<b>4.1193</b>	<b>0.0000</b>	<b>1,213.7887</b>	<b>1,213.7887</b>	<b>1.1568</b>	<b>0.0000</b>	<b>1,242.7088</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**6.2 Area by SubCategory**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	592.7533					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	22.1529	8.5370	739.7142	0.0392		4.1193	4.1193		4.1193	4.1193	0.0000	1,213.7887	1,213.7887	1.1568	0.0000	1,242.7088
<b>Total</b>	<b>831.1741</b>	<b>8.5370</b>	<b>739.7142</b>	<b>0.0392</b>		<b>4.1193</b>	<b>4.1193</b>		<b>4.1193</b>	<b>4.1193</b>	<b>0.0000</b>	<b>1,213.7887</b>	<b>1,213.7887</b>	<b>1.1568</b>	<b>0.0000</b>	<b>1,242.7088</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

Seattle Comprehensive Plan - Alt 4 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	25,951.78 56	1,533.706 6	0.0000	64,294.45 04
Unmitigated	25,951.78 56	1,533.706 6	0.0000	64,294.45 04

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	1989	403.7490	23.8609	0.0000	1,000.2711
Apartments Mid Rise	33056	6,710.0693	396.5537	0.0000	16,623.9126
Condo/Townhouse	568	115.2989	6.8140	0.0000	285.6481
Single Family Housing	1692	343.4607	20.2980	0.0000	850.9094
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
<b>Total</b>		<b>25,951.7856</b>	<b>1,533.7066</b>	<b>0.0000</b>	<b>64,294.4505</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	1989	403.7490	23.8609	0.0000	1,000.2711
Apartments Mid Rise	33056	6,710.0693	396.5537	0.0000	16,623.9126
Condo/Townhouse	568	115.2989	6.8140	0.0000	285.6481
Single Family Housing	1692	343.4607	20.2980	0.0000	850.9094
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
<b>Total</b>		<b>25,951.7856</b>	<b>1,533.7066</b>	<b>0.0000</b>	<b>64,294.4505</b>

**9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Seattle Comprehensive Plan - Alt 4 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Seattle Comprehensive Plan - Alt 5  
Siskiyou County, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	33,174.85	User Defined Unit	0.00	33,174,845.00	0
User Defined Industrial	17,710.25	User Defined Unit	0.00	17,710,246.00	0
Apartments Low Rise	4,056.00	Dwelling Unit	253.50	4,056,000.00	8315
Apartments Mid Rise	113,705.00	Dwelling Unit	2,992.24	113,705,000.00	233095
Condo/Townhouse	1,128.00	Dwelling Unit	70.50	1,128,000.00	2312
Single Family Housing	1,111.00	Dwelling Unit	360.71	1,999,800.00	2278

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	85
<b>Climate Zone</b>	14			<b>Operational Year</b>	2045
<b>Utility Company</b>	Seattle City Light				
<b>CO2 Intensity (lb/MWhr)</b>	31.35	<b>CH4 Intensity (lb/MWhr)</b>	0.029	<b>N2O Intensity (lb/MWhr)</b>	0.006

**1.3 User Entered Comments & Non-Default Data**

- Project Characteristics -
- Land Use - SF, 2.05 persons per DU
- Construction Phase - Ops only
- Vehicle Trips - Energy and Solid Waste Only
- Woodstoves - Energy and Solid Waste Only
- Consumer Products - Energy and Solid Waste Only
- Area Coating - Energy and Solid Waste Only

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Landscape Equipment - Energy and Solid Waste Only

Energy Use - Electricity: SCL Carbon Neutral; NG: SCL, EIA

Water And Wastewater - Energy and Solid Waste Only

Solid Waste - Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027), December 2022

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10,000.00	0.00
tblConstructionPhase	PhaseEndDate	11/15/2061	7/18/2023
tblEnergyUse	LightingElect	810.36	0.00
tblEnergyUse	LightingElect	741.44	0.00
tblEnergyUse	LightingElect	1,001.10	0.00
tblEnergyUse	LightingElect	1,608.84	0.00
tblEnergyUse	NT24E	3,172.76	0.00
tblEnergyUse	NT24E	3,054.10	0.00
tblEnergyUse	NT24E	3,795.01	0.00
tblEnergyUse	NT24E	6,155.97	0.00
tblEnergyUse	NT24NG	1,599.00	2,301.00
tblEnergyUse	NT24NG	1,599.00	2,028.00
tblEnergyUse	NT24NG	1,599.00	3,029.00
tblEnergyUse	NT24NG	1,599.00	4,576.00
tblEnergyUse	NT24NG	0.00	16.60
tblEnergyUse	NT24NG	0.00	10.40
tblEnergyUse	T24E	165.27	0.00
tblEnergyUse	T24E	176.92	0.00
tblEnergyUse	T24E	204.10	0.00
tblEnergyUse	T24E	191.61	0.00
tblEnergyUse	T24NG	8,768.16	0.00
tblEnergyUse	T24NG	2,182.40	0.00
tblEnergyUse	T24NG	3,351.17	0.00



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblEnergyUse	T24NG	9,528.86	0.00
tblFireplaces	NumberGas	1,087.35	0.00
tblFireplaces	NumberGas	53,235.60	0.00
tblFireplaces	NumberGas	293.15	0.00
tblFireplaces	NumberGas	383.90	0.00
tblFireplaces	NumberWood	691.95	0.00
tblFireplaces	NumberWood	33,877.20	0.00
tblFireplaces	NumberWood	186.55	0.00
tblFireplaces	NumberWood	244.30	0.00
tblLandUse	LandUseSquareFeet	0.00	33,174,845.00
tblLandUse	LandUseSquareFeet	0.00	17,710,246.00
tblLandUse	Population	11,600.00	8,315.00
tblLandUse	Population	325,196.00	233,095.00
tblLandUse	Population	3,226.00	2,312.00
tblLandUse	Population	3,177.00	2,278.00
tblSolidWaste	SolidWasteGenerationRate	909.42	1,461.00
tblSolidWaste	SolidWasteGenerationRate	44,524.32	40,949.00
tblSolidWaste	SolidWasteGenerationRate	245.18	406.00
tblSolidWaste	SolidWasteGenerationRate	357.75	1,692.00
tblSolidWaste	SolidWasteGenerationRate	0.00	76,044.00
tblSolidWaste	SolidWasteGenerationRate	0.00	14,498.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	4.91	0.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	4.09	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	0.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	5.44	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	0.00
tblWater	IndoorWaterUseRate	128,809,508.65	0.00
tblWater	IndoorWaterUseRate	6,306,388,447.95	0.00
tblWater	IndoorWaterUseRate	34,727,095.66	0.00
tblWater	IndoorWaterUseRate	45,477,509.88	0.00
tblWater	OutdoorWaterUseRate	81,205,994.59	0.00
tblWater	OutdoorWaterUseRate	3,975,766,630.23	0.00
tblWater	OutdoorWaterUseRate	21,893,169.00	0.00
tblWater	OutdoorWaterUseRate	28,670,604.06	0.00
tblWoodstoves	NumberCatalytic	98.85	0.00
tblWoodstoves	NumberCatalytic	4,839.60	0.00
tblWoodstoves	NumberCatalytic	26.65	0.00
tblWoodstoves	NumberCatalytic	34.90	0.00
tblWoodstoves	NumberNoncatalytic	98.85	0.00
tblWoodstoves	NumberNoncatalytic	4,839.60	0.00
tblWoodstoves	NumberNoncatalytic	26.65	0.00
tblWoodstoves	NumberNoncatalytic	34.90	0.00

**2.0 Emissions Summary**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.1 Overall Construction**

**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Maximum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Maximum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

		Highest	
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**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	913.7058	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Energy	5.3022	47.4711	35.1313	0.2892		3.6633	3.6633		3.6633	3.6633	0.0000	52,473.4987	52,473.4987	1.0057	0.9620	52,785.3225
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	27,413.9295	0.0000	27,413.9295	1,620.1168	0.0000	67,916.8501
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>919.0080</b>	<b>57.7147</b>	<b>922.6954</b>	<b>0.3363</b>	<b>0.0000</b>	<b>8.6061</b>	<b>8.6061</b>	<b>0.0000</b>	<b>8.6061</b>	<b>8.6061</b>	<b>27,413.9295</b>	<b>53,929.8632</b>	<b>81,343.7928</b>	<b>1,622.5103</b>	<b>0.9620</b>	<b>122,193.2296</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.2 Overall Operational**

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	913.7058	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Energy	5.3022	47.4711	35.1313	0.2892		3.6633	3.6633		3.6633	3.6633	0.0000	52,473.4987	52,473.4987	1.0057	0.9620	52,785.3225
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	27,413.9295	0.0000	27,413.9295	1,620.1168	0.0000	67,916.8501
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>919.0080</b>	<b>57.7147</b>	<b>922.6954</b>	<b>0.3363</b>	<b>0.0000</b>	<b>8.6061</b>	<b>8.6061</b>	<b>0.0000</b>	<b>8.6061</b>	<b>8.6061</b>	<b>27,413.9295</b>	<b>53,929.8632</b>	<b>81,343.7928</b>	<b>1,622.5103</b>	<b>0.9620</b>	<b>122,193.2296</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/19/2023	7/18/2023	5	0	

**Acres of Grading (Site Preparation Phase): 0**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**3.2 Demolition - 2023**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**4.0 Operational Detail - Mobile**



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Apartments Mid Rise	0.00	0.00	0.00		
Condo/Townhouse	0.00	0.00	0.00		
Single Family Housing	0.00	0.00	0.00		
User Defined Commercial	0.00	0.00	0.00		
User Defined Industrial	0.00	0.00	0.00		
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Apartments Mid Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Condo/Townhouse	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
User Defined Commercial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Apartments Mid Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Condo/Townhouse	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Single Family Housing	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Commercial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Industrial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	5.3022	47.4711	35.1313	0.2892		3.6633	3.6633		3.6633	3.6633	0.0000	52,473.4987	52,473.4987	1.0057	0.9620	52,785.3225
NaturalGas Unmitigated	5.3022	47.4711	35.1313	0.2892		3.6633	3.6633		3.6633	3.6633	0.0000	52,473.4987	52,473.4987	1.0057	0.9620	52,785.3225

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	9.33286e+006	0.0503	0.4300	0.1830	2.7400e-003		0.0348	0.0348		0.0348	0.0348	0.0000	498.0367	498.0367	9.5500e-003	9.1300e-003	500.9963
Apartments Mid Rise	2.30594e+008	1.2434	10.6254	4.5215	0.0678		0.8591	0.8591		0.8591	0.8591	0.0000	12,305.3601	12,305.3601	0.2359	0.2256	12,378.4847
Condo/Townhouse	3.41671e+006	0.0184	0.1574	0.0670	1.0000e-003		0.0127	0.0127		0.0127	0.0127	0.0000	182.3288	182.3288	3.4900e-003	3.3400e-003	183.4123
Single Family Housing	5.08394e+006	0.0274	0.2343	0.0997	1.5000e-003		0.0189	0.0189		0.0189	0.0189	0.0000	271.2982	271.2982	5.2000e-003	4.9700e-003	272.9104
User Defined Commercial	5.50702e+008	2.9695	26.9952	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.5787	29,387.5787	0.5633	0.5388	29,562.2144
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.8962	9,828.8962	0.1884	0.1802	9,887.3044
<b>Total</b>		<b>5.3022</b>	<b>47.4711</b>	<b>35.1313</b>	<b>0.2892</b>		<b>3.6633</b>	<b>3.6633</b>		<b>3.6633</b>	<b>3.6633</b>	<b>0.0000</b>	<b>52,473.4987</b>	<b>52,473.4987</b>	<b>1.0057</b>	<b>0.9620</b>	<b>52,785.3225</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	9.33286e+006	0.0503	0.4300	0.1830	2.7400e-003		0.0348	0.0348		0.0348	0.0348	0.0000	498.0367	498.0367	9.5500e-003	9.1300e-003	500.9963
Apartments Mid Rise	2.30594e+008	1.2434	10.6254	4.5215	0.0678		0.8591	0.8591		0.8591	0.8591	0.0000	12,305.3601	12,305.3601	0.2359	0.2256	12,378.4847
Condo/Townhouse	3.41671e+006	0.0184	0.1574	0.0670	1.0000e-003		0.0127	0.0127		0.0127	0.0127	0.0000	182.3288	182.3288	3.4900e-003	3.3400e-003	183.4123
Single Family Housing	5.08394e+006	0.0274	0.2343	0.0997	1.5000e-003		0.0189	0.0189		0.0189	0.0189	0.0000	271.2982	271.2982	5.2000e-003	4.9700e-003	272.9104
User Defined Commercial	5.50702e+008	2.9695	26.9952	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.5787	29,387.5787	0.5633	0.5388	29,562.2144
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.8962	9,828.8962	0.1884	0.1802	9,887.3044
<b>Total</b>		<b>5.3022</b>	<b>47.4711</b>	<b>35.1313</b>	<b>0.2892</b>		<b>3.6633</b>	<b>3.6633</b>		<b>3.6633</b>	<b>3.6633</b>	<b>0.0000</b>	<b>52,473.4987</b>	<b>52,473.4987</b>	<b>1.0057</b>	<b>0.9620</b>	<b>52,785.3225</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	913.7058	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Unmitigated	913.7058	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570

**6.2 Area by SubCategory**

**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	670.8629					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
<b>Total</b>	<b>913.7058</b>	<b>10.2436</b>	<b>887.5641</b>	<b>0.0471</b>		<b>4.9428</b>	<b>4.9428</b>		<b>4.9428</b>	<b>4.9428</b>	<b>0.0000</b>	<b>1,456.3645</b>	<b>1,456.3645</b>	<b>1.3877</b>	<b>0.0000</b>	<b>1,491.0570</b>



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**6.2 Area by SubCategory**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	216.2680					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	670.8629					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
<b>Total</b>	<b>913.7058</b>	<b>10.2436</b>	<b>887.5641</b>	<b>0.0471</b>		<b>4.9428</b>	<b>4.9428</b>		<b>4.9428</b>	<b>4.9428</b>	<b>0.0000</b>	<b>1,456.3645</b>	<b>1,456.3645</b>	<b>1.3877</b>	<b>0.0000</b>	<b>1,491.0570</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	27,413.9295	1,620.1168	0.0000	67,916.8501
Unmitigated	27,413.9295	1,620.1168	0.0000	67,916.8501

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	1461	296.5698	17.5268	0.0000	734.7391
Apartments Mid Rise	40949	8,312.2769	491.2415	0.0000	20,593.3143
Condo/Townhouse	406	82.4143	4.8706	0.0000	204.1780
Single Family Housing	1692	343.4607	20.2980	0.0000	850.9094
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
<b>Total</b>		<b>27,413.9295</b>	<b>1,620.1168</b>	<b>0.0000</b>	<b>67,916.8501</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	1461	296.5698	17.5268	0.0000	734.7391
Apartments Mid Rise	40949	8,312.2769	491.2415	0.0000	20,593.3143
Condo/Townhouse	406	82.4143	4.8706	0.0000	204.1780
Single Family Housing	1692	343.4607	20.2980	0.0000	850.9094
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
<b>Total</b>		<b>27,413.9295</b>	<b>1,620.1168</b>	<b>0.0000</b>	<b>67,916.8501</b>

**9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Seattle Comprehensive Plan - Preferred Alt  
Siskiyou County, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	33,174.85	User Defined Unit	0.00	33,174,845.00	0
User Defined Industrial	17,710.25	User Defined Unit	0.00	17,710,246.00	0
Apartments Low Rise	6,675.00	Dwelling Unit	417.19	6,675,000.00	13684
Apartments Mid Rise	94,427.00	Dwelling Unit	2,484.92	94,427,000.00	193575
Condo/Townhouse	14,766.00	Dwelling Unit	922.88	14,766,000.00	30270
Single Family Housing	4,132.00	Dwelling Unit	1,341.56	7,437,600.00	8471

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	85
<b>Climate Zone</b>	14			<b>Operational Year</b>	2045
<b>Utility Company</b>	Seattle City Light				
<b>CO2 Intensity (lb/MWhr)</b>	31.35	<b>CH4 Intensity (lb/MWhr)</b>	0.029	<b>N2O Intensity (lb/MWhr)</b>	0.006

**1.3 User Entered Comments & Non-Default Data**

- Project Characteristics -
- Land Use - SF, 2.05 persons per DU
- Construction Phase - Ops only
- Vehicle Trips - Energy and Solid Waste Only
- Woodstoves - Energy and Solid Waste Only
- Consumer Products - Energy and Solid Waste Only
- Area Coating - Energy and Solid Waste Only



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Landscape Equipment - Energy and Solid Waste Only

Energy Use - Electricity: SCL Carbon Neutral; NG: SCL, EIA

Water And Wastewater - Energy and Solid Waste Only

Solid Waste - Seattle Public Utilities, City of Seattle 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027), December 2022

Area Mitigation - Energy and Solid Waste Only

Table Name	Column Name	Default Value	New Value
tblAreaCoating	Area_EF_Nonresidential_Exterior	250	0
tblAreaCoating	Area_EF_Nonresidential_Interior	250	0
tblAreaCoating	Area_EF_Parking	250	0
tblAreaCoating	Area_EF_Residential_Exterior	250	0
tblAreaCoating	Area_EF_Residential_Interior	250	0
tblAreaCoating	Area_Nonresidential_Exterior	25442500	0
tblAreaCoating	Area_Nonresidential_Interior	76327500	0
tblAreaCoating	Area_Residential_Exterior	83231280	0
tblAreaCoating	Area_Residential_Interior	249693840	0
tblAreaCoating	ReapplicationRatePercent	10	0
tblConstructionPhase	NumDays	10,000.00	0.00
tblConstructionPhase	PhaseEndDate	11/15/2061	7/18/2023
tblConsumerProducts	ROG_EF	2.14E-05	0
tblConsumerProducts	ROG_EF_Degreaser	3.542E-07	0
tblConsumerProducts	ROG_EF_PesticidesFertilizers	5.152E-08	0
tblEnergyUse	LightingElect	810.36	0.00
tblEnergyUse	LightingElect	741.44	0.00
tblEnergyUse	LightingElect	1,001.10	0.00
tblEnergyUse	LightingElect	1,608.84	0.00
tblEnergyUse	NT24E	3,172.76	0.00
tblEnergyUse	NT24E	3,054.10	0.00
tblEnergyUse	NT24E	3,795.01	0.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblEnergyUse	NT24E	6,155.97	0.00
tblEnergyUse	NT24NG	1,599.00	2,301.00
tblEnergyUse	NT24NG	1,599.00	2,028.00
tblEnergyUse	NT24NG	1,599.00	3,029.00
tblEnergyUse	NT24NG	1,599.00	4,576.00
tblEnergyUse	NT24NG	0.00	16.60
tblEnergyUse	NT24NG	0.00	10.40
tblEnergyUse	T24E	165.27	0.00
tblEnergyUse	T24E	176.92	0.00
tblEnergyUse	T24E	204.10	0.00
tblEnergyUse	T24E	191.61	0.00
tblEnergyUse	T24NG	8,768.16	0.00
tblEnergyUse	T24NG	2,182.40	0.00
tblEnergyUse	T24NG	3,351.17	0.00
tblEnergyUse	T24NG	9,528.86	0.00
tblFireplaces	NumberGas	3,671.25	0.00
tblFireplaces	NumberGas	51,934.85	0.00
tblFireplaces	NumberGas	8,121.30	0.00
tblFireplaces	NumberGas	2,272.60	0.00
tblFireplaces	NumberWood	2,336.25	0.00
tblFireplaces	NumberWood	33,049.45	0.00
tblFireplaces	NumberWood	5,168.10	0.00
tblFireplaces	NumberWood	1,446.20	0.00
tblLandUse	LandUseSquareFeet	0.00	33,174,845.00
tblLandUse	LandUseSquareFeet	0.00	17,710,246.00
tblLandUse	Population	19,091.00	13,684.00
tblLandUse	Population	270,061.00	193,575.00
tblLandUse	Population	42,231.00	30,270.00
tblLandUse	Population	11,818.00	8,471.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblSolidWaste	SolidWasteGenerationRate	3,070.50	2,404.00
tblSolidWaste	SolidWasteGenerationRate	43,436.42	34,006.00
tblSolidWaste	SolidWasteGenerationRate	6,792.36	5,318.00
tblSolidWaste	SolidWasteGenerationRate	2,117.75	6,292.00
tblSolidWaste	SolidWasteGenerationRate	0.00	76,044.00
tblSolidWaste	SolidWasteGenerationRate	0.00	14,498.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	4.91	0.00
tblVehicleTrips	ST_TR	8.14	0.00
tblVehicleTrips	ST_TR	9.54	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	4.09	0.00
tblVehicleTrips	SU_TR	6.28	0.00
tblVehicleTrips	SU_TR	8.55	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	5.44	0.00
tblVehicleTrips	WD_TR	7.32	0.00
tblVehicleTrips	WD_TR	9.44	0.00
tblWater	IndoorWaterUseRate	434,903,121.02	0.00
tblWater	IndoorWaterUseRate	6,152,299,177.35	0.00
tblWater	IndoorWaterUseRate	962,064,342.33	0.00
tblWater	IndoorWaterUseRate	269,216,433.87	0.00
tblWater	OutdoorWaterUseRate	274,178,054.56	0.00
tblWater	OutdoorWaterUseRate	3,878,623,394.42	0.00
tblWater	OutdoorWaterUseRate	606,518,824.51	0.00
tblWater	OutdoorWaterUseRate	169,723,403.96	0.00
tblWoodstoves	NumberCatalytic	333.75	0.00
tblWoodstoves	NumberCatalytic	4,721.35	0.00
tblWoodstoves	NumberCatalytic	738.30	0.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

tblWoodstoves	NumberCatalytic	206.60	0.00
tblWoodstoves	NumberNoncatalytic	333.75	0.00
tblWoodstoves	NumberNoncatalytic	4,721.35	0.00
tblWoodstoves	NumberNoncatalytic	738.30	0.00
tblWoodstoves	NumberNoncatalytic	206.60	0.00

**2.0 Emissions Summary**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.1 Overall Construction**

**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Maximum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Maximum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

		Highest	
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**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Energy	5.4212	48.4878	35.5639	0.2957		3.7455	3.7455		3.7455	3.7455	0.0000	53,650.9249	53,650.9249	1.0283	0.9836	53,969.7455
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	28,126.8338	0.0000	28,126.8338	1,662.2483	0.0000	69,683.0402
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>31.9961</b>	<b>58.7314</b>	<b>923.1280</b>	<b>0.3428</b>	<b>0.0000</b>	<b>8.6883</b>	<b>8.6883</b>	<b>0.0000</b>	<b>8.6883</b>	<b>8.6883</b>	<b>28,126.8338</b>	<b>55,107.2894</b>	<b>83,234.1232</b>	<b>1,664.6643</b>	<b>0.9836</b>	<b>125,143.8427</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**2.2 Overall Operational**

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Energy	5.4212	48.4878	35.5639	0.2957		3.7455	3.7455		3.7455	3.7455	0.0000	53,650.9249	53,650.9249	1.0283	0.9836	53,969.7455
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	28,126.8338	0.0000	28,126.8338	1,662.2483	0.0000	69,683.0402
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>31.9961</b>	<b>58.7314</b>	<b>923.1280</b>	<b>0.3428</b>	<b>0.0000</b>	<b>8.6883</b>	<b>8.6883</b>	<b>0.0000</b>	<b>8.6883</b>	<b>8.6883</b>	<b>28,126.8338</b>	<b>55,107.2894</b>	<b>83,234.1232</b>	<b>1,664.6643</b>	<b>0.9836</b>	<b>125,143.8427</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/19/2023	7/18/2023	5	0	

**Acres of Grading (Site Preparation Phase): 0**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**





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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**3.2 Demolition - 2023**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**4.0 Operational Detail - Mobile**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	0.00	0.00	0.00		
Apartments Mid Rise	0.00	0.00	0.00		
Condo/Townhouse	0.00	0.00	0.00		
Single Family Housing	0.00	0.00	0.00		
User Defined Commercial	0.00	0.00	0.00		
User Defined Industrial	0.00	0.00	0.00		
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Apartments Mid Rise	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
Condo/Townhouse	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	10.80	7.30	7.50	42.30	19.60	38.10	86	11	3
User Defined Commercial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Apartments Mid Rise	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Condo/Townhouse	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
Single Family Housing	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Commercial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479
User Defined Industrial	0.534542	0.059637	0.191637	0.128334	0.022737	0.006209	0.003994	0.022357	0.000379	0.000132	0.026770	0.000794	0.002479

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	5.4212	48.4878	35.5639	0.2957		3.7455	3.7455		3.7455	3.7455	0.0000	53,650.92 49	53,650.92 49	1.0283	0.9836	53,969.74 55
NaturalGas Unmitigated	5.4212	48.4878	35.5639	0.2957		3.7455	3.7455		3.7455	3.7455	0.0000	53,650.92 49	53,650.92 49	1.0283	0.9836	53,969.74 55

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	1.53592e+007	0.0828	0.7077	0.3012	4.5200e-003		0.0572	0.0572		0.0572	0.0572	0.0000	819.6241	819.6241	0.0157	0.0150	824.4947
Apartments Mid Rise	1.91498e+008	1.0326	8.8239	3.7549	0.0563		0.7134	0.7134		0.7134	0.7134	0.0000	10,219.0602	10,219.0602	0.1959	0.1874	10,279.7870
Condo/Townhouse	4.47262e+007	0.2412	2.0609	0.8770	0.0132		0.1666	0.1666		0.1666	0.1666	0.0000	2,386.7611	2,386.7611	0.0458	0.0438	2,400.9444
Single Family Housing	1.8908e+007	0.1020	0.8713	0.3708	5.5600e-003		0.0704	0.0704		0.0704	0.0704	0.0000	1,009.0046	1,009.0046	0.0193	0.0185	1,015.0006
User Defined Commercial	5.50702e+008	2.9695	26.9952	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.5787	29,387.5787	0.5633	0.5388	29,562.2144
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.8962	9,828.8962	0.1884	0.1802	9,887.3044
<b>Total</b>		<b>5.4212</b>	<b>48.4878</b>	<b>35.5639</b>	<b>0.2957</b>		<b>3.7455</b>	<b>3.7455</b>		<b>3.7455</b>	<b>3.7455</b>	<b>0.0000</b>	<b>53,650.9249</b>	<b>53,650.9249</b>	<b>1.0283</b>	<b>0.9836</b>	<b>53,969.7455</b>

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.2 Energy by Land Use - NaturalGas**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	1.53592e+007	0.0828	0.7077	0.3012	4.5200e-003		0.0572	0.0572		0.0572	0.0572	0.0000	819.6241	819.6241	0.0157	0.0150	824.4947
Apartments Mid Rise	1.91498e+008	1.0326	8.8239	3.7549	0.0563		0.7134	0.7134		0.7134	0.7134	0.0000	10,219.0602	10,219.0602	0.1959	0.1874	10,279.7870
Condo/Townhouse	4.47262e+007	0.2412	2.0609	0.8770	0.0132		0.1666	0.1666		0.1666	0.1666	0.0000	2,386.7611	2,386.7611	0.0458	0.0438	2,400.9444
Single Family Housing	1.8908e+007	0.1020	0.8713	0.3708	5.5600e-003		0.0704	0.0704		0.0704	0.0704	0.0000	1,009.0046	1,009.0046	0.0193	0.0185	1,015.0006
User Defined Commercial	5.50702e+008	2.9695	26.9952	22.6760	0.1620		2.0516	2.0516		2.0516	2.0516	0.0000	29,387.5787	29,387.5787	0.5633	0.5388	29,562.2144
User Defined Industrial	1.84187e+008	0.9932	9.0288	7.5842	0.0542		0.6862	0.6862		0.6862	0.6862	0.0000	9,828.8962	9,828.8962	0.1884	0.1802	9,887.3044
<b>Total</b>		<b>5.4212</b>	<b>48.4878</b>	<b>35.5639</b>	<b>0.2957</b>		<b>3.7455</b>	<b>3.7455</b>		<b>3.7455</b>	<b>3.7455</b>	<b>0.0000</b>	<b>53,650.9249</b>	<b>53,650.9249</b>	<b>1.0283</b>	<b>0.9836</b>	<b>53,969.7455</b>

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>



Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**5.3 Energy by Land Use - Electricity**

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
Unmitigated	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570

**6.2 Area by SubCategory**

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
<b>Total</b>	<b>26.5749</b>	<b>10.2436</b>	<b>887.5641</b>	<b>0.0471</b>		<b>4.9428</b>	<b>4.9428</b>		<b>4.9428</b>	<b>4.9428</b>	<b>0.0000</b>	<b>1,456.3645</b>	<b>1,456.3645</b>	<b>1.3877</b>	<b>0.0000</b>	<b>1,491.0570</b>

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**6.2 Area by SubCategory**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	26.5749	10.2436	887.5641	0.0471		4.9428	4.9428		4.9428	4.9428	0.0000	1,456.3645	1,456.3645	1.3877	0.0000	1,491.0570
<b>Total</b>	<b>26.5749</b>	<b>10.2436</b>	<b>887.5641</b>	<b>0.0471</b>		<b>4.9428</b>	<b>4.9428</b>		<b>4.9428</b>	<b>4.9428</b>	<b>0.0000</b>	<b>1,456.3645</b>	<b>1,456.3645</b>	<b>1.3877</b>	<b>0.0000</b>	<b>1,491.0570</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**7.2 Water by Land Use**

**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Apartments Mid Rise	0 / 0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	0 / 0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	28,126.83	1,662.248	0.0000	69,683.04
	38	3		02
Unmitigated	28,126.83	1,662.248	0.0000	69,683.04
	38	3		02

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	2404	487.9903	28.8394	0.0000	1,208.9753
Apartments Mid Rise	34006	6,902.9107	407.9503	0.0000	17,101.6690
Condo/Townhouse	5318	1,079.5059	63.7970	0.0000	2,674.4303
Single Family Housing	6292	1,277.2191	75.4815	0.0000	3,164.2564
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
<b>Total</b>		<b>28,126.8338</b>	<b>1,662.2483</b>	<b>0.0000</b>	<b>69,683.0402</b>



Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**8.2 Waste by Land Use**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	2404	487.9903	28.8394	0.0000	1,208.9753
Apartments Mid Rise	34006	6,902.9107	407.9503	0.0000	17,101.6690
Condo/Townhouse	5318	1,079.5059	63.7970	0.0000	2,674.4303
Single Family Housing	6292	1,277.2191	75.4815	0.0000	3,164.2564
User Defined Commercial	76044	15,436.2448	912.2559	0.0000	38,242.6431
User Defined Industrial	14498	2,942.9630	173.9241	0.0000	7,291.0662
<b>Total</b>		<b>28,126.8338</b>	<b>1,662.2483</b>	<b>0.0000</b>	<b>69,683.0402</b>

**9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Seattle Comprehensive Plan - Preferred Alt - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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Seattle Comprehensive Plan - Alt 5 - Siskiyou County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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## E Energy Appendix

**Seattle Comprehensive Plan  
On-Road Transportation Fuel**

	<b>Existing</b>				
	<i>Cars</i>	<i>Trucks</i>	<i>Buses</i>	<i>Million BTU</i>	<i>trillion Btu</i>
Gasoline	345,397	1,562	125	347,084	0.3471
Diesel	8,074	5,323	752	14,149	0.0141
CNG	-	63	53	116	0.0001
Ethanol (E-85)	621	-	-	621	0.0006
<b>Total Fuel Use</b>				361,969	
Trillion BTU/Capita				0.45	

Washington State Fuel Usage in 2020

<b>Trillion Btu</b>	
gasoline	258.20
Diesel	150.00
NG	0.01
ethanol	20.30

\* US EIA, 2020

	<b>Alternative 1</b>					
	<i>Cars</i>	<i>Trucks</i>	<i>Buses</i>	<i>Million BTU</i>	<i>trillion Btu</i>	<i>% of state</i>
Gasoline	336,191	1,774	127	338,092	0.3381	0.131%
Diesel	13,508	5,938	783	20,230	0.0202	0.013%
CNG	-	111	50	161	0.0002	1.606%
Ethanol (E-85)	631	-	-	631	0.0006	0.003%
<b>Total Fuel Use</b>				359,113		
Trillion BTU/Capita				2.19		

	<b>Alternative 2</b>					
	<i>Cars</i>	<i>Trucks</i>	<i>Buses</i>	<i>Million BTU</i>	<i>trillion Btu</i>	<i>% of state</i>
Gasoline	345,844	1,791	127	347,762	0.3478	0.135%
Diesel	13,895	5,993	784	20,672	0.0207	0.014%
CNG	-	112	50	162	0.0002	1.617%
Ethanol (E-85)	649	-	-	649	0.0006	0.003%
<b>Total Fuel Use</b>				369,245		
Trillion BTU/Capita				1.80		

	<b>Alternative 3</b>					
	<i>Cars</i>	<i>Trucks</i>	<i>Buses</i>	<i>Million BTU</i>	<i>trillion Btu</i>	<i>% of state</i>
Gasoline	345,809	1,796	127	347,732	0.3477	0.135%
Diesel	13,893	6,016	784	20,692	0.0207	0.014%
CNG	-	113	50	162	0.0002	1.622%
Ethanol (E-85)	649	-	-	649	0.0006	0.003%
<b>Total Fuel Use</b>				369,235		
Trillion BTU/Capita				1.80		

	<b>Alternative 5</b>					
	<i>Cars</i>	<i>Trucks</i>	<i>Buses</i>	<i>Million BTU</i>	<i>trillion Btu</i>	<i>% of state</i>
Gasoline	357,628	1,812	127	359,567	0.3596	0.139%
Diesel	14,368	6,067	784	21,219	0.0212	0.014%
CNG	-	113	50	163	0.0002	1.631%
Ethanol (E-85)	671	-	-	671	0.0007	0.003%

	<b>Preferred Alternative</b>					
	<i>Cars</i>	<i>Trucks</i>	<i>Buses</i>	<i>Million BTU</i>	<i>trillion Btu</i>	<i>% of state</i>
Gasoline	358,972	1,819	127	360,919	0.3609	0.140%
Diesel	14,422	6,090	787	21,298	0.0213	0.014%
CNG	-	114	50	164	0.0002	1.637%
Ethanol (E-85)	673	-	-	673	0.0007	0.003%
<b>Total Fuel Use</b>				383,054		
Trillion BTU/Capita				1.56		

\* Fuel use based on MOVES model outputs.

VMT for Alternative 4 not provided. Growth and VMT assumptions consistent with Alternative 2 and 3

Net increase in fuel consumption compared to Existing

	<b>Alt 1</b>	<b>Alt 2</b>	<b>Alt 3</b>	<b>Alt 4</b>	<b>Alt 5</b>	<b>Preferred</b>
Gasoline	-0.0090	0.0007	0.0006	0.0007	0.0125	0.0138
Diesel	0.0061	0.0065	0.0065	0.0065	0.0071	0.0071
CNG	0.00004	0.00005	0.00005	0.00005	0.00005	0.00005
Ethanol (E-85)	-0.0013	-0.0013	-0.0013	-0.0013	-0.0013	-0.0013

	<b>Alt 1</b>	<b>Alt 2</b>	<b>Alt 3</b>	<b>Alt 4</b>	<b>Alt 5</b>	<b>Preferred</b>
Gasoline	-0.003%	0.000%	0.000%	0.000%	0.0048%	0.0054%
Diesel	0.004%	0.004%	0.004%	0.004%	0.0047%	0.0048%
CNG	0.448%	0.459%	0.464%	0.459%	0.4734%	0.4795%
Ethanol (E-85)	-0.006%	-0.006%	-0.006%	-0.006%	-0.0064%	-0.0064%

**Seattle Comprehensive Plan  
Electricity Consumption**

**2022 State of Washington**

Electricity 310 trillion btu  
Natural Gas 351 trillion btu

**RESIDENTIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
Single Family	1,389	698	1,111	1,111	1,111	4,132
Townhome	648	533	4,260	1,578	1,128	14,766
Multi-family Low Rise	2,593	1,977	14,247	5,522	4,056	6,675
Multi-family Mid Rise	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,080,703
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.08
percent of state	0.41%	0.51%	0.53%	0.52%	0.62%	0.67%

*Station Area*

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208			2,703	2,703
million btu	14,868	39,082			42,167	42,167
trillion btu	0.01	0.04			0.04	0.04
percent of state	0.0048%	0.0126%			0.0136%	0.0136%

**COMMERCIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Commercial Growth(SF)	33,174,904	33,174,904	33,174,904	33,174,904	33,174,845	33,174,845
Estimated Electricity Demand (kBtu)	1,562,537,978	1,562,537,978	1,562,537,978	1,562,537,978	1,562,535,200	1,562,535,200
Million Btu	1,562,538	1,562,538	1,562,538	1,562,538	1,562,535	1,562,535
Trillion Btu	1.56	1.56	1.56	1.56	1.56	1.56
percent of state	0.50%	0.50%	0.50%	0.50%	0.50%	0.50%

*Station Area*

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
SF	178,948	244,963			251,033	164,500
Estimated Electricity Demand (kBtu)	8,428,451	11,537,757			11,823,654	7,747,950
million btu	8,428	11,538			11,824	7,748
trillion btu	0.008	0.012			0.012	0.008
percent of state	0.0027%	0.0037%			0.0038%	0.0025%

**INDUSTRIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Industrial Growth(SF)	17,710,268	17,710,268	17,710,268	17,710,268	17,710,246	17,710,246
Estimated Electricity Demand (kBtu)	368,373,574	368,373,574	368,373,574	368,373,574	368,373,117	368,373,117
Million Btu	368,374	368,374	368,374	368,374	368,373	368,373
Trillion Btu	0.37	0.37	0.37	0.37	0.37	0.37
percent of state	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%

TOTAL Energy (trillion Btu)	3.22	3.51	3.58	3.54	3.84	4.01
percent of state	1.04%	1.13%	1.15%	1.14%	1.24%	1.29%

Station Area	0.02	0.05	NA	NA	0.054	0.050
	0.008%	0.016%	NA	NA	0.017%	0.016%

**Washington State Consumption Rates**

*Commercial Energy Consumption Rates*

Electricity	47.1 kBtu/SF
NG	16.6 kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking  
<https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/aeuz-gz8p/data>

*Industrial Energy Consumption Rates*

Electricity	20.8 kBtu/SF
NG	10.4 kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking  
<https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/aeuz-gz8p/data>

**Seattle Comprehensive Plan  
Residential Electricity Consumption**

**2022 State of Washington**

Electricity 310 trillion btu  
Natural Gas 351 trillion btu

**RESIDENTIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
<i>Single Family</i>	1,389	698	1,111	1,111	1,111	4,132
<i>Townhome</i>	648	533	4,260	1,578	1,128	14,766
<i>Multi-family Low Rise</i>	2,593	1,977	14,247	5,522	4,056	6,675
<i>Multi-family Mid Rise</i>	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,080,703
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.08
percent of state	0.41%	0.51%	0.53%	0.52%	0.62%	0.67%

**Station Area**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208			2,703	2,703
million btu	14,868	39,082			42,167	42,167
trillion btu	0.01	0.04			0.04	0.04
percent of state	0.0048%	0.0126%			0.0136%	0.0136%

	Electricity mbtu/unit	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Single Family	35.2	1389	698	1111	1111	1111	4132
multifamily low rise	17.7	2593	1977	14247	5522	4056	6675
Townhome	23.3	648	533	4260	1578	1128	14766
multi family mid rise	15.6	75370	96792	80382	91789	113705	94427
		80000	100000	100000	100000	120000	120000

EIA, CE4.10 Annual Household site end-use consumption by fuel in the West - averages, 2015  
<https://www.eia.gov/consumption/residential/data/2015/index.php?view=consumption#by%20End%20uses%20by%20fuel>



**Seattle Comprehensive Plan  
Natural Gas Consumption**

**2022 State of Washington**

Electricity 310 trillion btu  
Natural Gas 351 trillion btu

**RESIDENTIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
Single Family	1,389	698	1,111	1,111	1,111	4,132
Townhome	648	533	4,260	1,578	1,128	6,675
Multi-family Low Rise	2,593	1,977	14,247	5,522	4,056	14,766
Multi-family Mid Rise	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,035,393
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.04
percent of state	0.37%	0.45%	0.47%	0.46%	0.54%	0.58%

*Station Area*

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208	-	-	2,703	2,703
million btu	14,868	39,082	-	-	42,167	42,167
trillion btu	0.01	0.04	-	-	0.04	0.04
percent of state	0.0042%	0.0111%			0.0120%	0.0120%

**COMMERCIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Commercial Growth(SF)	33,174,904	33,174,904	33,174,904	33,174,904	33,174,845	33,174,845
Estimated NG Demand (kBtu)	550,703,406	550,703,406	550,703,406	550,703,406	550,702,427	550,702,427
Million Btu	550,703	550,703	550,703	550,703	550,702	550,702
Trillion Btu	0.55	0.55	0.55	0.55	0.55	0.55
	0.18%	0.18%	0.18%	0.18%	0.18%	0.18%

*Station Area*

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
SF	178,948	244,963			251,033	164,500
Estimated NG Demand (kBtu)	2,970,537	4,066,386			4,167,148	2,730,700
million btu	2,971	4,066			4,167	2,731
trillion btu	0.0030	0.0041			0.0042	0.0027
percent of state	0.0002%	0.0002%			0.0002%	0.0002%

**INDUSTRIAL**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred*
Target Industrial Growth(SF)	17,710,268	17,710,268	17,710,268	17,710,268	17,710,246	17,710,246
Estimated NG Demand (kBtu)	184,186,787	184,186,787	184,186,787	184,186,787	184,186,558	184,186,558
Million Btu	184,187	184,187	184,187	184,187	184,187	184,187
Trillion Btu	0.18	0.18	0.18	0.18	0.18	0.18
percent of state	0.06%	0.06%	0.06%	0.06%	0.06%	0.06%

TOTAL Energy (trillion Btu) 2.02 2.32 2.38 2.34 2.65 2.77  
percent of state 0.58% 0.66% 0.68% 0.67% 0.75% 0.79%

Station Area 0.018 0.043 0.046 0.045  
0.005% 0.012% 0.013% 0.013%

**Washington State Consumption Rates**

*Commercial Energy Consumption Rates*

Electricity	47.1 kBtu/SF
NG	16.6 kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking  
<https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/aez-gz8p/data>

*Industrial Energy Consumption Rates*

Electricity	20.8 kBtu/SF
NG	10.4 kBtu/SF

Source: Average Energy Use Intensity: Seattle Open Data, 2020 Building Energy Benchmarking  
<https://data.seattle.gov/dataset/2020-Building-Energy-Benchmarking/aez-gz8p/data>

Seattle Comprehensive Plan  
Residential Natural Gas Consumption

2022 State of Washington

Electricity 310 trillion btu  
Natural Gas 351 trillion btu

RESIDENTIAL

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Target Housing Growth (dwelling units)						
<i>Single Family</i>	1,389	698	1,111	1,111	1,111	4,132
<i>Townhome</i>	648	533	4,260	1,578	1,128	6,675
<i>Multi-family Low Rise</i>	2,593	1,977	14,247	5,522	4,056	14,766
<i>Multi-family Mid Rise</i>	75,370	96,792	80,382	91,789	113,705	94,427
Million Btu	1,285,659	1,581,937	1,644,496	1,605,522	1,910,979	2,035,393
Trillion Btu	1.29	1.58	1.64	1.61	1.91	2.04
percent of state	0.37%	0.45%	0.47%	0.46%	0.54%	0.58%

Station Area

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
units	840	2,208			2,703	2,703
million btu	14,868	39,082			42,167	42,167
trillion btu	0.01	0.04			0.04	0.04
percent of state	0.0042%	0.0111%			0.0120%	0.0120%

	NG mbtu/unit	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred	Kbtu
Single Family	35.2	1389	698	1111	1111	1111	4132	35200
multifamily low rise	17.7	2593	1977	14247	5522	4056	6675	17700
Townhome	23.3	648	533	4260	1578	1128	14766	23300
multi family mid rise	15.6	75370	96792	80382	91789	113705	94427	15600
		80000	100000	100000	100000	120000	120000	

EIA, CE4.10 Annual Household site end-use consumption by fuel in the West - averages, 2015  
<https://www.eia.gov/consumption/residential/data/2015/index.php?view=consumption#by%20End%20uses%20by%20fuel>

**Seattle Comprehensive Plan  
Housing Type Assumptions**

<b>Unit Type</b>	<b>CalEEMod Unit Type</b>	<b>Alt 1</b>	<b>Alt 2</b>	<b>Alt 3</b>	<b>Alt 4</b>	<b>Alt 5</b>	<b>Preferred</b>
Single Family	Single Family	1389	698	1111	1111	1111	4132
Small ADU	Multifamily low rise	2593	1977	14247	5522	4056	6675
Townhome	Townhome	648	533	4260	1578	1128	14766
Multi family	Multi family mid rise	75370	96792	80382	91789	113705	94427
		80000	100000	100000	100000	120000	120000



## Potential Job Sector Split

### Notes:

Assume less SF in Downtown Office  
 Ensure 10% higher retail/service in neighborhoods  
 For MIC, match SIML EIS

### Jobs per SF in King County UGC for Seattle

	Commercial	Industrial
Low	275	500
High	300	700

<https://kingcounty.gov/-/media/depts/executive/performance-strategy-budget/regional-planning/GrowthManagement/GMPC-2021/GMPC-Meeting-062321/KC-UGC-Final-Draft-Report-June-2021.ashx?la=en>

Suggest using SIML Assumptions	
250	700

For office shows some smaller square feet which may be appropriate given change in Downtown/elsewhere due to COVID effects. For Industrial shows higher range and still similar to SIML for conservative Air Q.

### JOBs per SF: CAI, September 1, 2020: Seattle Maritime and Industrial Strategy Employment Trends and Land Use Alternatives Analysis

#### Absorption Assumptions: Required Redevelopment Land

Absorption assumptions by subarea expressed as square feet of land per job are used to determine the required land to be redeveloped to accommodate the assumed employment growth. Square feet of land per job is calculated by dividing square feet of building area per job

Exhibit 24. Absorption Assumptions by Subarea, No Action Alternative, 2035

Sources: Puget Sound Regional Council, 2020; Community Attributes Inc., 2020.

Seattle	Industry	2010	2015	2018	2035	2035/2010
Other	Hospitality & Tourism	1,400	1,600	2,200	2,000	1.43
Ind	Construction and Office	1,000	1,400	1,500	1,000	1.00
Non-Ind	ICT	400	400	500	500	1.25
Ind	Distribution/Commerce	1,000	1,400	1,500	1,000	1.00
Ind	Food & Beverage Production	1,000	1,400	1,500	1,000	1.00
Ind	Aerospace	1,000	1,400	1,500	1,000	1.00
Ind	Transportation/Logistics	1,000	1,400	1,500	1,000	1.00
Ind	Maritime	1,000	1,400	1,500	1,000	1.00
Ind	Other Manufacturing	1,000	1,400	1,500	1,000	1.00
Non-Ind	All Other Retail	400	400	500	500	1.25
Non-Ind	All Other Services	400	400	500	500	1.25
Gov	Government	1,000	2,000	2,000	400	0.40
Gov	Education	1,000	2,000	2,000	400	0.40

### SECTOR SPLITS: CAI, September 1, 2020: Seattle Maritime and Industrial Strategy Employment Trends and Land Use Alternatives Analysis

#### Total Historic and Projected Employment by Industry, City of Seattle, 2010-2035

Sources: Bureau of Labor Statistics, 2020; Puget Sound Regional Council, 2020; Washington State Employment Security Department, 2020; Community Attributes Inc., 2020.

	2010	2015	2018	2035	2018-2035		Estimate 2035 Share by Jobs and apply?
					CAGR	Growth	
All Other Services	209,800	232,600	249,500	280,400	0.7%	30,900	Commercial
Hospitality & Tourism	52,800	63,400	70,800	95,300	1.8%	24,500	Commercial
Distribution & E-commerce	20,500	38,700	60,400	104,400	3.3%	44,000	Industrial
Education	58,900	66,500	59,000	58,400	-0.1%	-600	Commercial
ICT	23,900	36,000	50,400	129,400	5.7%	79,000	Commercial
Government	48,700	46,600	49,400	49,000	0.0%	-400	Commercial
Construction and Utilities	23,200	27,400	34,400	52,900	2.6%	18,500	Industrial
All Other Retail	21,900	23,400	23,000	24,500	0.4%	1,500	Commercial
Food & Beverage Production	13,100	15,900	16,500	22,600	1.9%	6,100	Industrial
Maritime	16,500	15,100	15,600	15,900	0.1%	300	Industrial
Other Manufacturing	10,900	11,200	10,600	8,300	-1.4%	-2,300	Industrial
Transportation & Logistics	7,200	7,700	9,100	11,800	1.5%	2,700	Industrial
Aerospace	9,500	8,700	7,900	7,900	0.0%	0	Industrial
Suppressed	100	100	200	200	0.0%	0	
<b>Total</b>	<b>517,100</b>	<b>593,000</b>	<b>656,800</b>	<b>861,000</b>	<b>1.6%</b>	<b>204,200</b>	

SIML Emp SF	Industrial	Non-Industrial
Base Year Split		
BINMIC	6,783,129	5,375,837
Greater Duwamish	3,463,2076	13,896,776
<b>Total</b>	<b>41,415,205</b>	<b>19,272,613</b>

Preferred Alternative - Balanced	Total Emp	% Industrial
Industrial Emp	70,853	134,045
Preferred Alternative - Balanced	16,253	35,545
<b>Net</b>		<b>45.7%</b>

Industrial	46%
Commercial	54%

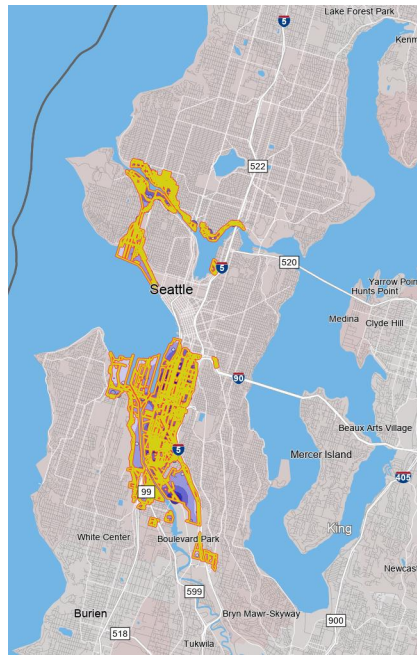
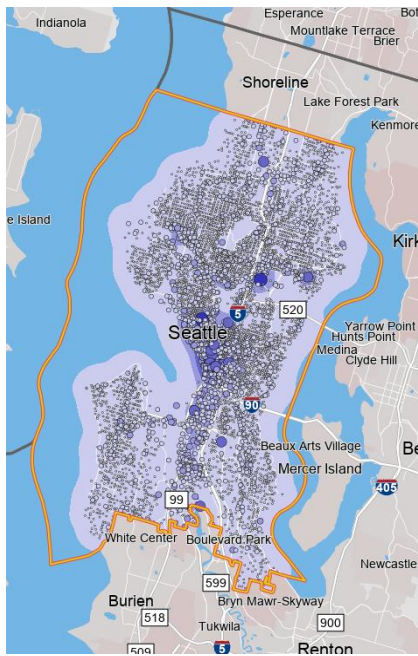
Questions  
 Assume all Commercial in neighborhoods?  
 Assume SIML breakdown in MICs? By Jobs or SF?

SECTOR SPLITS: Census on the Map, Total Jobs

Jobs by N	Citywide 2019		SIML 2019		Citywide Minus SIML 2019	
	Count	Share	Count	Share	Count	Share
Agriculture, Mining, Qua	1,261	0.2%	741	1.0%	520	
Utilities	3,312	0.6%	168	0.2%	3,144	
Construction	24,590	4.2%	6,653	8.9%	17,937	
Manufacturing	27,519	4.7%	16,482	22.2%	11,037	
Wholesale Trade	20,904	3.6%	7,200	9.7%	13,704	
Retail Trade	40,787	7.0%	4,593	6.2%	36,194	
Transportation	23,520	4.0%	6,334	8.5%	17,186	
Information	36,909	6.3%	4,143	5.6%	32,766	
Finance and Insurance	20,464	3.5%	397	0.5%	20,067	
Real Estate	13,993	2.4%	1,373	1.8%	12,620	
Professional	76,267	13.1%	4,219	5.7%	72,048	
Management	18,644	3.2%	7,103	9.5%	11,541	
Administrative	24,073	4.1%	2,802	3.8%	21,271	
Educational	45,713	7.8%	813	1.1%	44,900	
Health Care	89,138	15.3%	1,625	2.2%	87,513	
Arts, Entertainment	14,268	2.4%	2,219	3.0%	12,049	
Accommodation	55,410	9.5%	4,955	6.7%	50,455	
Other Services	26,194	4.5%	2,357	3.2%	23,837	
Public Administration	19,695	3.4%	157	0.2%	19,538	

Citywide			SIML			Citywide Minus SIML		
Total	Industrial	Ind Share	Total	Industrial	Ind Share	Total	Industrial	Ind Share
582,796	101,241	17.37%	74,382	37,626	50.58%	508,414	63,615	12.51%



## F Noise Appendix



**FHWA Highway Noise Prediction Model (FHWA-RD-77-108)**

**Project Name:** One Seattle Comprehensive Plan  
**Project Number:** 90074000  
**Scenario:** Existing  
**Ldn/CNEL:** CNEL

Assumed 24-Hour Traffic Distribution:

	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

#	Roadway	Segment	Lanes	Median Width	ADT Volume	Speed (mph)	Alpha Factor	Vehicle Mix		Distance from Centerline of Roadway Distance to Contour				
								Medium Trucks	Heavy Trucks	CNEL at 150 Feet	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	2	0	15,426	25	0	2.0%	1.0%	58.4	-	33	105	332
2	Martin Luther King Jr Way S	Between S Orcas St and S Graham St	4	28	20,000	25	0	2.0%	1.0%	59.7	-	-	139	440
3	Harbor Ave SW/Aiki Ave SW	Between SW Admiral Way and California Way SW	2	14	12,240	25	0	2.0%	1.0%	57.5	-	-	83	264
4	Beacon Ave S	Between S Spokane St and S Columbian Way	2	14	6,677	25	0	2.0%	1.0%	54.8	-	-	46	144
5	34th Ave W	Between W Barrett St and W McGraw St	2	0	5,893	25	0	2.0%	1.0%	54.3	-	-	40	127
6	Roosevelt Way NE	Between NE Northgate Way and 80th St	2	0	10,233	25	0	2.0%	1.0%	56.7	-	-	70	220
7	Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	4	0	19,461	30	0	2.0%	1.0%	60.9	-	59	186	588
8	15th Ave NE	Between NE 135th St and NE 145th St	4	14	16,860	25	0	2.0%	1.0%	58.9	-	-	116	367

<sup>1</sup> Distance is from the centerline of the roadway segment to the receptor location.  
 "-" = contour is located within the roadway right-of-way.

**FHWA Highway Noise Prediction Model (FHWA-RD-77-108)**

**Project Name:** One Seattle Comprehensive Plan  
**Project Number:** 90074000  
**Scenario:** Horizon Year Plus Project Alternative 1  
**Ldn/CNEL:** CNEL

Assumed 24-Hour Traffic Distribution:

	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

#	Roadway	Segment	Lanes	Median Width	ADT Volume	Speed (mph)	Alpha Factor	Vehicle Mix		Distance from Centerline of Roadway Distance to Contour				
								Medium Trucks	Heavy Trucks	CNEL at 59.0	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massac	2	0	19,300	25	0	2.0%	1.0%	59.4	-	42	131	415
2	Martin Luther King Jr Way S	Between S Orcas St and S Graham St	4	28	24,700	25	0	2.0%	1.0%	60.6	-	-	172	543
3	Harbor Ave SW/Alki Ave SW	Between SW Admiral Way and Califor	2	14	13,500	25	0	2.0%	1.0%	57.9	-	-	92	291
4	Beacon Ave S	Between S Spokane St and S Columb	2	14	7,300	25	0	2.0%	1.0%	55.2	-	-	50	157
5	34th Ave W	Between W Barrett St and W McGraw	2	0	6,500	25	0	2.0%	1.0%	54.7	-	-	44	140
6	90074000	Between NE Northgate Way and 80th	2	0	11,100	25	0	2.0%	1.0%	57.0	-	-	75	239
7	Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	4	0	19,900	30	0	2.0%	1.0%	61.0	-	60	190	601
8	15th Ave NE	Between NE 135th St and NE 145th S	4	14	20,700	25	0	2.0%	1.0%	59.8	-	-	143	451

<sup>1</sup> Distance is from the centerline of the roadway segment to the receptor location.  
 "-" = contour is located within the roadway right-of-way.

**FHWA Highway Noise Prediction Model (FHWA-RD-77-108)**

**Project Name:** One Seattle Comprehensive Plan  
**Project Number:** 90074000  
**Scenario:** Horizon Year Plus Project Alternative 2  
**Ldn/CNEL:** CNEL

Assumed 24-Hour Traffic Distribution:

	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

#	Roadway	Segment	Lanes	Median Width	ADT Volume	Speed (mph)	Alpha Factor	Vehicle Mix		Distance from Centerline of Roadway				
								Medium Trucks	Heavy Trucks	CNEL at 150 Feet	Distance to Contour			
										70 CNEL	65 CNEL	60 CNEL	55 CNEL	
1	Martin Luther King Jr Way S	Between S Jackson St and S Massac	2	0	19,500	25	0	2.0%	1.0%	59.5	-	42	133	419
2	Martin Luther King Jr Way S	Between S Orcas St and S Graham St	4	28	25,000	25	0	2.0%	1.0%	60.6	-	-	174	550
3	Harbor Ave SW/Alki Ave SW	Between SW Admiral Way and Califor	2	14	13,500	25	0	2.0%	1.0%	57.9	-	-	92	291
4	Beacon Ave S	Between S Spokane St and S Columb	2	14	7,600	25	0	2.0%	1.0%	55.4	-	-	52	164
5	34th Ave W	Between W Barrett St and W McGraw	2	0	7,100	25	0	2.0%	1.0%	55.1	-	-	48	153
6	Roosevelt Way NE	Between NE Northgate Way and 80th	2	0	12,000	25	0	2.0%	1.0%	57.4	-	-	82	258
7	Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	4	0	21,100	30	0	2.0%	1.0%	61.3	-	64	202	638
8	15th Ave NE	Between NE 135th St and NE 145th S	4	14	21,700	25	0	2.0%	1.0%	60.0	-	-	150	473

<sup>1</sup> Distance is from the centerline of the roadway segment to the receptor location.  
 "-" = contour is located within the roadway right-of-way.

**FHWA Highway Noise Prediction Model (FHWA-RD-77-108)**

**Project Name:** One Seattle Comprehensive Plan  
**Project Number:** 90074000  
**Scenario:** Horizon Year Plus Project Alternative 3  
**Ldn/CNEL:** CNEL

Assumed 24-Hour Traffic Distribution:

	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

#	Roadway	Segment	Lanes	Median Width	ADT Volume	Speed (mph)	Alpha Factor	Vehicle Mix		Distance from Centerline of Roadway				
								Medium Trucks	Heavy Trucks	CNEL at 150 Feet	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massac	2	0	19,300	25	0	2.0%	1.0%	59.4	-	42	131	415
2	Martin Luther King Jr Way S	Between S Orcas St and S Graham St	4	28	25,500	25	0	2.0%	1.0%	60.7	-	-	177	561
3	Harbor Ave SW/Alki Ave SW	Between SW Admiral Way and Califor	2	14	13,700	25	0	2.0%	1.0%	57.9	-	-	93	296
4	Beacon Ave S	Between S Spokane St and S Columb	2	14	8,000	25	0	2.0%	1.0%	55.6	-	-	55	173
5	34th Ave W	Between W Barrett St and W McGraw	2	0	7,000	25	0	2.0%	1.0%	55.0	-	-	48	151
6	Roosevelt Way NE	Between NE Northgate Way and 80th	2	0	12,400	25	0	2.0%	1.0%	57.5	-	-	84	267
7	Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	4	0	21,900	30	0	2.0%	1.0%	61.4	-	66	209	662
8	15th Ave NE	Between NE 135th St and NE 145th S	4	14	21,700	25	0	2.0%	1.0%	60.0	-	-	150	473

<sup>1</sup> Distance is from the centerline of the roadway segment to the receptor location.  
 "-" = contour is located within the roadway right-of-way.

**FHWA Highway Noise Prediction Model (FHWA-RD-77-108)**

**Project Name:** One Seattle Comprehensive Plan  
**Project Number:** 90074000  
**Scenario:** Horizon Year Plus Project Alternative 5  
**Ldn/CNEL:** CNEL

Assumed 24-Hour Traffic Distribution:

	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

#	Roadway	Segment	Lanes	Median Width	ADT Volume	Speed (mph)	Alpha Factor	Vehicle Mix		Distance from Centerline of Roadway				
								Medium Trucks	Heavy Trucks	CNEL at 150 Feet	Distance to Contour			
										70 CNEL	65 CNEL	60 CNEL	55 CNEL	
1	Martin Luther King Jr Way S	Between S Jackson St and S Massac	2	0	19,500	25	0	2.0%	1.0%	59.5	-	42	133	419
2	Martin Luther King Jr Way S	Between S Orcas St and S Graham St	4	28	25,900	25	0	2.0%	1.0%	60.8	-	-	180	570
3	Harbor Ave SW/Alki Ave SW	Between SW Admiral Way and Califor	2	14	13,900	25	0	2.0%	1.0%	58.0	-	-	95	300
4	Beacon Ave S	Between S Spokane St and S Columb	2	14	8,400	25	0	2.0%	1.0%	55.8	-	-	57	181
5	34th Ave W	Between W Barrett St and W McGraw	2	0	7,000	25	0	2.0%	1.0%	55.0	-	-	48	151
6	Roosevelt Way NE	Between NE Northgate Way and 80th	2	0	12,500	25	0	2.0%	1.0%	57.5	-	-	85	269
7	Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	4	0	22,200	30	0	2.0%	1.0%	61.5	-	67	212	671
8	15th Ave NE	Between NE 135th St and NE 145th S	4	14	22,600	25	0	2.0%	1.0%	60.2	-	-	156	493

<sup>1</sup> Distance is from the centerline of the roadway segment to the receptor location.  
 "-" = contour is located within the roadway right-of-way.

**FHWA Highway Noise Prediction Model (FHWA-RD-77-108)**

**Project Name:** One Seattle Comprehensive Plan  
**Project Number:** 90074000  
**Scenario:** Horizon Year Plus Project Preferred Alternataive  
**Ldn/CNEL:** CNEL

Assumed 24-Hour Traffic Distribution:

	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

#	Roadway	Segment	Lanes	Median Width	ADT Volume	Speed (mph)	Alpha Factor	Vehicle Mix		Distance from Centerline of Roadway				
								Medium Trucks	Heavy Trucks	CNEL at 150 Feet	Distance to Contour			
										70 CNEL	65 CNEL	60 CNEL	55 CNEL	
1	Martin Luther King Jr Way S	Between S Jackson St and S Massach	2	0	20,700	25	0	2.0%	1.0%	59.7	-	45	141	445
2	Martin Luther King Jr Way S	Between S Orcas St and S Graham St	4	28	26,800	25	0	2.0%	1.0%	60.9	-	59	186	590
3	Harbor Ave SW/Aiki Ave SW	Between SW Admiral Way and Califor	2	14	15,900	25	0	2.0%	1.0%	58.6	-	-	108	343
4	Beacon Ave S	Between S Spokane St and S Columbi	2	14	11,500	25	0	2.0%	1.0%	57.2	-	-	78	248
5	34th Ave W	Between W Barrett St and W McGraw	2	0	8,300	25	0	2.0%	1.0%	55.8	-	-	56	179
6	Roosevelt Way NE	Between NE Northgate Way and 80th	2	0	14,800	25	0	2.0%	1.0%	58.3	-	-	101	318
7	Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	4	0	24,300	30	0	2.0%	1.0%	61.9	-	73	232	734
8	15th Ave NE	Between NE 135th St and NE 145th S	4	14	16,000	25	0	2.0%	1.0%	58.7	-	-	110	349

<sup>1</sup> Distance is from the centerline of the roadway segment to the receptor location.  
 "-" = contour is located within the roadway right-of-way.

## G Land Use Appendices

- G.1 Land Use Existing Conditions Tables
- G.2 Updating Seattle's Neighborhood Residential Zones
- G.3 NR Tree Analysis
- G.4 Redevelopable Area per Dwelling

# G.1 Land Use Existing Conditions Tables

## App Exhibit G.1-1. Generalized Zoning Categories

Zoning Designation	Description
<b>Neighborhood Residential 1, 2, and 3</b> NR1, NR2, and NR3	Areas characterized by houses, also known as detached single-family dwelling units, on lots of a compatible scale and character. The NR1, NR2, and NR3 zone designations correspond to the minimum lot size required for each single-family dwelling unit (9,600 sf, 7,200 sf, and 5,000 sf respectively). Allowed housing types include one detached house per lot, with up to two attached ADUs within the same structure or up to one attached ADU and one detached ADU.
<b>Neighborhood Residential Small Lot</b> RSL	Areas allow for the development of one or more dwelling units in small-scale structures on lots in urban villages. RSL allows for a broader range of housing types through new development and conversion of existing single-family houses into multiple dwelling units. Allowed housing types include detached dwelling units, apartments, carriage houses, cottage housing developments, rowhouse developments, and townhouse developments. Each principal unit may have one attached or detached ADU. Lots can have attached or stacked principal dwelling units, which is not allowed in NR zones.
<b>Lowrise Multifamily</b> LR1, LR2, and LR3	<p>Lowrise 1 (LR1): Areas characterized by low-density, small-scale multi-family housing types similar in character to single family zones. Most appropriate outside of Growth Areas.<sup>1</sup></p> <p>Lowrise 2 (LR2): Areas characterized by multifamily housing types in existing small-scale multi-family neighborhoods with arterial streets. Most appropriate within Growth Areas.<sup>1</sup></p> <p>Lowrise 3 (LR3): Areas characterized by multifamily housing types in existing moderate-scale neighborhoods with good transit service along arterial street and near commercial zones. Most appropriate within Growth Areas.<sup>1</sup></p> <p>ADUs are allowed with single-family dwelling units, rowhouses, and townhouses in LR zones, subject to specific development standards per 23.45.545.I. ADUs do not count towards the density limit.</p>
<b>Midrise Multifamily</b> MR	Areas that allow denser housing up to eight stories in urban villages and urban centers. Development standards for midrise multifamily zones emphasize residential character and allow for scale and building types that differ from those in less intensive residential areas to accommodate a greater density of development to support nearby businesses. Street-level commercial uses are allowed in midrise zones to allow residents greater access to services and to promote an active street environment without detracting from the overall residential character desired for high-density neighborhoods.
<b>Highrise Multifamily</b> HR	Highrise multifamily zoning designations apply only in urban centers, where the mix of activities offers convenient access to regional transit and to a full range of residential services and amenities, as well as to jobs. Street-level commercial uses are allowed in



Zoning Designation	Description
	<p>neighborhoods to allow residents greater access to services and to promote an active street environment without detracting from the overall residential character desired for high-density neighborhoods.</p>
<p><b>Seattle Mixed SM</b></p>	<p>The Seattle Mixed zone provides for a wide range of uses to encourage mixed-use neighborhoods.</p>
<p><b>Neighborhood Commercial</b> NC1, NC2, and NC3</p>	<p>Neighborhood Commercial 1 (NC1): Small-scale shopping areas that provide convenience retail sales and services to the surrounding residential neighborhood. Characterized by an attractive pedestrian environment, small businesses and lot sizes, and limited transit service.</p> <p>Neighborhood Commercial 2 (NC2): Moderately-sized pedestrian-oriented shopping areas that provide a range of goods and services to the surrounding neighborhoods. Compatible uses include housing and offices. Characterized by an attractive pedestrian environment, medium businesses and lot sizes, and moderate transit service.</p> <p>Neighborhood Commercial 3 (NC3): Larger pedestrian-oriented shopping districts that provide a wide range of goods and services to the surrounding neighborhood and a larger community or region. Compatible uses include housing, offices, and business support services. Characterized by intense pedestrian activity, varied business and lot sizes, and good transit service.</p> <p>Pedestrian-Designated Zones (P): The P designation is a suffix applied to NC zones along pedestrian-oriented commercial streets. Areas are characterized by intense pedestrian activity, uninterrupted commercial frontage, many businesses per block, and excellent transit service. Access for pedestrians, bicyclists, and transit is favored over the automobile.</p>
<p><b>Commercial</b> C1 and C2</p>	<p>Commercial 1 (C1): Auto-oriented commercial areas that provide a range of retail and services to the surrounding neighborhoods and the larger community or region. Characterized by large parcels that favor automobile access over pedestrians and transit.</p> <p>Commercial 2 (C2): Auto-oriented commercial areas that provide a range of non-retail businesses to the larger community or region. Compatible uses include manufacturing and warehousing. Characterized by larger parcels that favor automobile access over pedestrian and transit, which may be adjacent to industrial zones.</p>
<p><b>Downtown</b> DH1, DH2, DMC, DMR, DOC1, DOC2, and DRC</p>	<p>Downtown Harborfront (DH1 and DH2): Applies to waterfront lots and adjacent harbor areas within the Urban Harborfront Shoreline Environment or partially within a shoreline environment. Allowed uses include economically viable marines uses that meet the needs of waterborne commerce and opportunities for public access and recreation.</p> <p>Downtown Mixed Commercial (DMC): Areas adjacent to the office core, office expansions areas, and retail core that provide a transition in the level of activity and scale of development. Permitted uses include office and commercial (though at a lower density than the DOC areas) and housing and other uses generating activity without substantially contributing to peak-hour traffic. The DMC encourages a diversity of development compatible with adjacent areas through a range of height limits.</p> <p>Downtown Mixed Residential (DMR): Areas outside special review districts identified for development of a predominantly residential community. Nonresidential uses are allowed that reinforce but don't detract from the primary function of the area. Multiple height, mix of use, and density classifications are allowed to promote a diversity and harmony with existing development.</p>

Zoning Designation	Description
	<p><b>Downtown Office Core (DOO1 and DOO2):</b> The most concentrated areas of office activity and areas adjacent to those core office areas where a transition to mixed-use areas is desired. These areas are intended to accommodate a large share of Downtown’s future employment growth in addition to other complementary uses (such as housing, retail, hotels, and cultural and entertainment facilities).</p> <p><b>Downtown Retail Core (DRC):</b> Area containing the major department stores and with the greatest concentration of Downtown’s retail activity. This area should be the principal center of shopping for both Downtown and the region. Other uses are allowed provided they augment but do not detract from this primary function.</p>
<b>Pike Market Mixed</b> PMM	The PMM zone applies to Pike Place Market, recognizes and preserve the unique character, scale, and function of the Market and its surroundings, and allows development of a compatible mix of uses.
<b>Pioneer Square Mixed</b> PSM	Applies to areas within the Pioneer Square Preservation District (see also Special Review Districts in <a href="#">App Exhibit G.1-2</a> ). The PSM zone recognizes the historic nature of the area and encourages mixed-use development compatible in use and scale with existing development in Pioneer Square.
<b>International District Mixed and Residential</b> IDM and IDR	Applies to areas within the International Special Review District (see also Special Review Districts in <a href="#">App Exhibit G.1-2</a> ). The IDM zone applies to areas of the Special Review District identified for mixed-use development, recognizes the area’s unique social character, mix of use, and urban design character, and encourages a wide range of uses, housing above the street-level, and the rehabilitation of existing buildings. The IDR zone applies to areas of the Special Review District identified for residential development and maintains the areas primarily for residential use with compatible supporting uses.
<b>Industrial</b> MML, II, UI, IC	<p><b>Maritime Manufacturing and Logistics (MML):</b> The MML zone is intended to provide long term predictability to landowners, business owners and investors that the area will remain an industrial area.</p> <p><b>Industry and Innovation (II):</b> The purpose of the II zone is to create a transit-oriented area characterized by modern industrial buildings that supports a mix of economic innovation and emerging industries, and commercial development with high employment density.</p> <p><b>Urban Industrial (UI):</b> The purpose of the Urban Industrial (UI) zone is to foster vibrant districts that support a mix of local manufacturing, production, arts, and a sense of place.</p> <p><b>Industrial Commercial (IC):</b> The purpose of the Industrial Commercial zone is to promote development of businesses which incorporate a mix of industrial and commercial activities including light manufacturing and research and development while accommodating a wide range of other employment activities.</p>

1 Growth Areas include urban centers, urban villages, and station area overlay districts.

Sources: Seattle 2035, as amended through 2021; [SMC Title 23](#), 2022; Seattle Industrial and Maritime Strategy Final EIS, 2022; BERK, 2023.

**App Exhibit G.1-2. Overlay Districts**

District	Purpose
<b>Shoreline Districts</b>	The Shoreline District, or Shoreline Master Program, regulates development of the shorelines in Seattle to protect the ecosystems of the shoreline areas, encourage water-dependent uses; provide for maximum public use and enjoyment of the shorelines of the city, and preserve, enhance, and increase views of the water and access to the water.
<b>Station Area Overlay District</b>	The Station Area Overlay District regulates land use and development in a manner that supports transit-oriented development near light rail stations.
<b>Airport Height Overlay District</b>	The purpose of the Airport Height Overlay District is to ensure safe and unobstructed takeoff and landing approach paths to King County International Airport (Boeing Field).
<b>Special Review Districts</b>	Council can establish by ordinance special review districts that may include use and development standards to control development. Two special review districts—the Pioneer Square Preservation District and the International Special Review District—are currently designated.
<b>Southeast Seattle Reinvestment Area</b>	The intent of this area is to promote community revitalization and investment, and to encourage development which supports business activity and provides employment opportunities and needed services to the residents of Southeast Seattle.
<b>Major Institution Overlay District</b>	Major Institution Overlay Districts regulate Seattle’s major educational and medical institutions in a way that balances the needs of the institution with the needs of adjacent communities and neighborhoods. Unique zoning rules are developed for each major institution through the adoption of a Major Institution Master Plan (MIMP) that identifies a boundary (MIOD) within which the revised rules apply and identifies the specific rules that will apply to development within this boundary. MIMPs and corresponding MIODs have been established for thirteen major medical and educational institutions in Seattle.
<b>Northgate Overlay District</b>	The purpose of this district is to create an environment in the Northgate Area that is more amenable to pedestrians and supportive of commercial development, protect the residential character of residential neighborhoods, and support the use of Northgate as a regional high-capacity transportation center.
<b>Sand Point Overlay District</b>	The purpose of this district is to integrate Sand Point into the city as a multi-purpose regional center that provides expanded opportunity for recreation, education, arts, cultural and community activities; increased public access to the shoreline and enhanced open space and natural areas; opportunities for affordable housing and community and social services with a special priority for addressing the needs of homeless families; and expanded opportunity for low-impact economic development uses which could provide employment and services for residents of the property and for the broader community.
<b>Pike/Pine Conservation Overlay District</b>	The Pike/Pine Overlay District is intended to preserve and enhance the balance of residential and commercial uses in the area by encouraging residential development and development that combines residential and non-residential uses, while also providing additional opportunities for commercial development to balance the substantial amount of residential development. The overlay is also intended to promote the conservation of Pike/Pine's existing historic character by limiting new development to a scale that is compatible with the established development pattern, accommodating arts facilities and small businesses at street level, and encouraging the retention of the existing structures and their architectural features that establish the District's architectural character.
<b>Stadium Transition Area Overlay District</b>	The STAOD centers on large sports facilities and allows uses complementary to them. It is intended to contribute to a safer pedestrian environment for those attending events and permits a mix of uses, supporting the pedestrian-oriented character of the area as well as the surrounding industrial zone, while minimizing conflicts with industrial uses. Use

District	Purpose
STAUD	provisions and development standards are designed to create a pedestrian connection with downtown; discourage encroachment on nearby industrial uses to the south; and create a pedestrian-friendly streetscape. Allowing a mix of uses, including office development, is intended to encourage redevelopment and to maintain the health and vibrancy of the area during times when the sports facilities are not in operation.
<b>Master Planned Communities</b> MPC	An MPC zone designation is intended to support highly coordinated infill development with a higher level of environmental sustainability, affordable housing, and publicly accessible open space than is typically provided through conventional lot-by-lot development by allowing greater flexibility in the application of zoning and development requirements

Sources: [SMC Title 23](#), 2022; BERK, 2023.

**App Exhibit G.1-3. Future Land Use Designations—Acres Citywide and by EIS Analysis Area**

Future Land Use Designation	EIS Analysis Area								Citywide
	1	2	3	4	5	6	7	8	
Urban Center	1 ac. (0.0%)	1,148 ac. (10.5%)	334 ac. (5.0%)	1,346 ac. (74.8%)	895 ac. (17.4%)	—	3 ac. (0.0%)	—	<b>3,726 ac. (6.4%)</b>
Hub Urban Village	1,080 ac. (10.4%)	138 ac. (1.3%)	—	—	—	269 ac. (2.9%)	—	447 ac. (5.4%)	<b>1,934 ac. (3.3%)</b>
Residential Urban Village	1,042 ac. (10.0%)	170 ac. (1.6%)	53 ac. (0.8%)	260 ac. (14.4%)	697 ac. (13.5%)	474 ac. (5.1%)	254 ac. (4.4%)	1,414 ac. (17.2%)	<b>4,362 ac. (7.5%)</b>
Manufacturing Industrial Center	1 ac. (0.0%)	—	1,243 ac. (18.7%)	1 ac. (0.1%)	—	2 ac. (0.0%)	5,130 ac. (91.5%)	—	<b>6,426 ac. (11.1%)</b>
Neighborhood Residential Areas	6,095 ac. (58.7%)	7,433 ac. (68.3%)	3,135 ac. (47.1%)	7 ac. (0.4%)	2,493 ac. (48.4%)	5,844 ac. (63.3%)	36 ac. (0.6%)	4,768 ac. (58.0%)	<b>29,810 ac. (51.5%)</b>
Multi-Family Residential Areas	456 ac. (4.4%)	423 ac. (3.9%)	579 ac. (8.7%)	49 ac. (2.7%)	358 ac. (6.9%)	859 ac. (9.3%)	26 ac. (0.5%)	194 ac. (2.4%)	<b>2,945 ac. (5.1%)</b>
Commercial / Mixed Use Areas	510 ac. (4.9%)	292 ac. (2.7%)	325 ac. (4.9%)	84 ac. (4.7%)	68 ac. (1.3%)	321 ac. (3.5%)	101 ac. (1.8%)	147 ac. (1.8%)	<b>1,849 ac. (3.2%)</b>
Industrial Areas	—	—	10 ac. (0.2%)	—	—	—	—	18 ac. (0.2%)	<b>10 ac. (0.0%)</b>
Major Institutions	75 ac. (0.7%)	396 ac. (3.6%)	66 ac. (1.0%)	—	18 ac. (0.3%)	92 ac. (1.0%)	—	37 ac. (0.4%)	<b>683 ac. (1.2%)</b>
Cemetery	156 ac. (1.5%)	46 ac. (0.4%)	28 ac. (0.4%)	—	38 ac. (0.7%)	15 ac. (0.2%)	—	—	<b>284 ac. (0.5%)</b>
City-Owned Open Space	964 ac. (9.3%)	834 ac. (7.7%)	876 ac. (13.2%)	51 ac. (2.8%)	588 ac. (11.4%)	1,352 ac. (14.6%)	55 ac. (1.0%)	1,207 ac. (14.7%)	<b>5,927 ac. (10.2%)</b>
<b>Total Acres &amp; Percent of Citywide Total</b>	<b>10,381 ac. (18%)</b>	<b>10,879 ac. (19%)</b>	<b>6,649 ac. (11%)</b>	<b>1,799 ac. (3%)</b>	<b>5,154 ac. (9%)</b>	<b>9,228 ac. (16%)</b>	<b>5,606 ac. (10%)</b>	<b>8,214 ac. (14%)</b>	<b>57,908 ac. (100%)</b>

Sources: City of Seattle, October 2023; BERK, 2023.

**App Exhibit G.1-4. Generalized Zoning—Acres Citywide and by EIS Analysis Area**

Generalized Zoning	EIS Analysis Area								Citywide
	1	2	3	4	5	6	7	8	
Neighborhood Residential	7,079 ac. (68.2%)	8,294 ac. (76.1%)	3,963 ac. (59.6%)	25 ac. (1.4%)	3,048 ac. (59.1%)	7,032 ac. (76.2%)	37 ac. (0.7%)	5,885 ac. (71.6%)	<b>35,364 ac. (61.0%)</b>
Residential Small Lot	222 ac. (2.1%)	32 ac. (0.3%)	—	—	154 ac. (3.0%)	202 ac. (2.2%)	209 ac. (3.7%)	542 ac. (6.6%)	<b>1,361 ac. (2.3%)</b>
Lowrise Multifamily	1,435 ac. (13.8%)	717 ac. (6.6%)	602 ac. (9.1%)	141 ac. (7.8%)	954 ac. (18.5%)	1,094 ac. (11.9%)	55 ac. (1.0%)	1,031 ac. (12.6%)	<b>6,030 ac. (10.4%)</b>
Midrise Multifamily	38 ac. (0.4%)	133 ac. (1.2%)	51 ac. (0.8%)	27 ac. (1.5%)	184 ac. (3.6%)	198 ac. (2.1%)	—	24 ac. (0.3%)	<b>655 ac. (1.1%)</b>
Highrise Multifamily	—	—	—	—	96 ac. (1.9%)	—	—	—	<b>96 ac. (0.2%)</b>
Seattle Mixed	—	125 ac. (1.1%)	281 ac. (4.2%)	304 ac. (16.9%)	—	—	—	76 ac. (0.9%)	<b>785 ac. (1.4%)</b>
Neighborhood Commercial	708 ac. (6.8%)	676 ac. (6.2%)	97 ac. (1.5%)	50 ac. (2.8%)	483 ac. (9.4%)	411 ac. (4.4%)	70 ac. (1.2%)	477 ac. (5.8%)	<b>2,971 ac. (5.1%)</b>
Commercial	596 ac. (5.7%)	97 ac. (0.9%)	250 ac. (3.8%)	188 ac. (10.5%)	19 ac. (0.4%)	199 ac. (2.2%)	69 ac. (1.2%)	144 ac. (1.7%)	<b>1,561 ac. (2.7%)</b>
Downtown	—	—	—	739 ac. (41.1%)	—	—	—	—	<b>739 ac. (1.3%)</b>
Pike Market	—	—	—	25 ac. (1.4%)	—	—	—	—	<b>25 ac. (0.0%)</b>
Pioneer Square	—	—	—	102 ac. (5.7%)	—	—	3 ac. (0.0%)	—	<b>105 ac. (0.2%)</b>
International District	—	—	—	102 ac. (5.7%)	—	—	—	—	<b>103 ac. (0.2%)</b>
Industrial	217 ac. (2.1%)	13 ac. (0.1%)	1,338 ac. (20.1%)	93 ac. (5.2%)	5 ac. (0.1%)	2 ac. (0.0%)	5,171 ac. (92.1%)	—	<b>6,838 ac. (11.8%)</b>
Major Institution Overlay	85 ac. (0.8%)	809 ac. (7.4%)	66 ac. (1.0%)	—	171 ac. (3.3%)	92 ac. (1.0%)	—	37 ac. (0.4%)	<b>1,259 ac. (2.2%)</b>
Master Planned Community	—	—	—	3 ac. (0.2%)	40 ac. (0.8%)	—	—	—	<b>43 ac. (0.1%)</b>
<b>Total Acres &amp; Percent of Citywide Total</b>	<b>10,379 ac. (18%)</b>	<b>10,896 ac. (19%)</b>	<b>6,649 ac. (11%)</b>	<b>1,799 ac. (3%)</b>	<b>5,153 ac. (9%)</b>	<b>9,229 ac. (16%)</b>	<b>5,613 ac. (10%)</b>	<b>8,217 ac. (14%)</b>	<b>57,934 ac. (100%)</b>

Sources: City of Seattle, October 2023; BERK, 2023.

**App Exhibit G.1-5. Shoreline Environment Designations—Acres Citywide and by EIS Analysis Area**

Shoreline Designation	EIS Analysis Area								Citywide
	1	2	3	4	5	6	7	8	
Conservancy Management	339 ac. (32.4%)	80 ac. (10.5%)	168 ac. (9.5%)	5 ac. (1.2%)	61 ac. (11.9%)	44 ac. (4.0%)	1 ac. (0.1%)	57 ac. (8.4%)	754 ac. (10.1%)
Conservancy Navigation	82 ac. (7.9%)	3 ac. (0.4%)	140 ac. (7.9%)	3 ac. (0.9%)	2 ac. (0.4%)	0.2 ac. (0.0%)	0.2 ac. (0.0%)	2 ac. (0.4%)	234 ac. (3.1%)
Conservancy Preservation	150 ac. (14.3%)	199 ac. (26.1%)	615 ac. (34.7%)	—	160 ac. (31.2%)	337 ac. (30.6%)	58 ac. (4.9%)	112 ac. (16.5%)	1,632 ac. (21.9%)
Conservancy Recreation	132 ac. (12.7%)	293 ac. (38.5%)	336 ac. (19.0%)	6 ac. (1.5%)	164 ac. (31.9%)	548 ac. (49.7%)	12 ac. (1.0%)	402 ac. (59.3%)	1,894 ac. (25.4%)
Conservancy Waterway	13 ac. (1.3%)	1 ac. (0.1%)	—	22 ac. (5.7%)	—	—	—	—	36 ac. (0.5%)
Urban Commercial	182 ac. (17.4%)	32 ac. (4.1%)	—	160 ac. (41.0%)	3 ac. (0.6%)	11 ac. (1.0%)	—	8 ac. (1.1%)	395 ac. (5.3%)
Urban General	20 ac. (1.9%)	—	21 ac. (1.2%)	0.3 ac. (0.1%)	—	—	4 ac. (0.3%)	—	44 ac. (0.6%)
Urban Harborfront	—	—	—	130 ac. (33.3%)	—	—	—	—	130 ac. (1.7%)
Urban Maritime	56 ac. (5.3%)	3 ac. (0.4%)	97 ac. (5.5%)	35 ac. (9.0%)	—	—	—	—	191 ac. (2.6%)
Urban Residential	70 ac. (6.7%)	151 ac. (19.8%)	86 ac. (4.8%)	28 ac. (7.3%)	123 ac. (23.9%)	162 ac. (14.7%)	—	97 ac. (14.3%)	716 ac. (9.6%)
Urban Industrial	2 ac. (0.2%)	—	309 ac. (17.4%)	0.2 ac. (0.1%)	—	0.1 ac. (0.0%)	1,110 ac. (93.7%)	—	1,421 ac. (19.1%)
<b>Total Acres &amp; Percent of Citywide Total</b>	<b>1,045 ac. (14%)</b>	<b>761 ac. (10%)</b>	<b>1,772 ac. (24%)</b>	<b>390 ac. (5%)</b>	<b>513 ac. (7%)</b>	<b>1,102 ac. (15%)</b>	<b>1,185 ac. (16%)</b>	<b>678 ac. (9%)</b>	<b>7,447 ac. (100%)</b>

Sources: City of Seattle, 2022; BERK, 2023.

**App Exhibit G.1-6. Current Land Use—Acres Citywide and by EIS Analysis Area**

Current Use Category	EIS Analysis Area								Citywide
	1	2	3	4	5	6	7	8	
Commercial / Mixed-Use	653 ac. (9.1%)	537 ac. (6.6%)	536 ac. (13.1%)	642 ac. (62.1%)	260 ac. (7.8%)	214 ac. (3.3%)	296 ac. (7.3%)	222 ac. (3.9%)	<b>3,360 ac. (8.4%)</b>
Industrial	107 ac. (1.5%)	33 ac. (0.4%)	203 ac. (5.0%)	35 ac. (3.4%)	15 ac. (0.4%)	22 ac. (0.3%)	1,513 ac. (37.3%)	78 ac. (1.4%)	<b>2,007 ac. (5.0%)</b>
Multi-Family	842 ac. (11.8%)	570 ac. (7.0%)	389 ac. (9.5%)	154 ac. (14.9%)	615 ac. (18.4%)	482 ac. (7.5%)	37 ac. (0.9%)	394 ac. (7.0%)	<b>3,483 ac. (8.7%)</b>
Single Family	4,099 ac. (57.3%)	4,736 ac. (58.6%)	1,440 ac. (35.3%)	33 ac. (3.2%)	1,515 ac. (45.5%)	3,788 ac. (59.1%)	148 ac. (3.7%)	3,247 ac. (57.4%)	<b>19,005 ac. (47.7%)</b>
Major Institution & Public Facilities / Utilities	338 ac. (4.7%)	1,025 ac. (12.7%)	500 ac. (12.3%)	89 ac. (8.6%)	217 ac. (6.5%)	298 ac. (4.6%)	1,436 ac. (35.4%)	335 ac. (5.9%)	<b>4,240 ac. (10.7%)</b>
Parks / Open Space / Cemeteries	765 ac. (10.7%)	1,016 ac. (12.6%)	827 ac. (20.3%)	42 ac. (4.1%)	604 ac. (18.1%)	1,206 ac. (18.8%)	51 ac. (1.2%)	960 ac. (17.0%)	<b>5,471 ac. (13.7%)</b>
Vacant	324 ac. (4.5%)	145 ac. (1.8%)	172 ac. (4.2%)	36 ac. (3.5%)	88 ac. (2.6%)	368 ac. (5.7%)	559 ac. (13.8%)	401 ac. (7.1%)	<b>2,094 ac. (5.3%)</b>
Easement / Unclassified	22 ac. (0.3%)	25 ac. (0.3%)	8 ac. (0.2%)	3 ac. (0.3%)	17 ac. (0.5%)	32 ac. (0.5%)	16 ac. (0.4%)	19 ac. (0.3%)	<b>143 ac. (0.4%)</b>
<b>Total Acres &amp; Percent of Citywide Total</b>	<b>7,151 ac. (18%)</b>	<b>8,087 ac. (20%)</b>	<b>4,075 ac. (10%)</b>	<b>1,033 ac. (3%)</b>	<b>3,332 ac. (8%)</b>	<b>6,411 ac. (16%)</b>	<b>4,056 ac. (10%)</b>	<b>5,656 ac. (14%)</b>	<b>39,802 ac. (100%)</b>

Sources: City of Seattle, 2022; BERK, 2023.

# Updating Seattle's Neighborhood Residential zoning

A proposal to increase  
housing choice and fulfill  
requirements of House Bill 1110

**UPDATED OCTOBER 2024**



City of Seattle **MAKERS**  
architecture • planning • urban design



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# Introduction

## Purpose

This report describes a revised proposal for updating Seattle's Neighborhood Residential zoning, including visualizations of potential outcomes. Neighborhood Residential currently represents Seattle's lowest-density residential zoning and consists primarily of detached homes. We published an initial proposal in March 2024. **This revised proposal includes changes that respond to feedback received during public engagement in March through May 2024.**

New Neighborhood Residential zoning is one part of the City's effort to update our Comprehensive Plan, which guides how our city grows and makes investments. The Plan guides City decisions about where we allow new housing and the forms it can take in different areas of the city. Our updated Plan, called the One Comprehensive Seattle Plan, seeks to address challenges new and old: racial disparities, rising housing costs, access to economic opportunity and education, climate change, and more. Addressing these issues requires identifying ways to increase the supply, diversity, and affordability of housing and ensuring all neighborhoods are accessible to households with a diverse range of incomes and housing needs. Updating our Neighborhood Residential zoning, which governs the amount and types of housing allowed in the majority of Seattle, is one necessary step towards realizing this vision.

Updates to Neighborhood Residential zoning are also required under new state law. Passed in 2023, House Bill 1110 (HB 1110) requires cities across the state to allow a greater quantity and variety of housing in areas currently reserved for detached homes.



# Updating Seattle's Neighborhood Residential zoning

## New state legislation on housing

In 2023, the Washington State Legislature adopted [House Bill 1110](#) (HB 1110), often referred to as the Middle Housing Bill. HB 1110 requires cities in Washington to allow **middle housing** throughout residential areas and limits how cities can regulate this housing. The bill defines middle housing as “buildings that are compatible in scale, form, and character with single-family houses and contains two or more attached, stacked, or clustered homes including duplexes, triplexes, fourplexes, fiveplexes, sixplexes, townhouses, stacked flats, courtyard apartments, and cottage housing.”

In Seattle, the bill requires zoning that allows:

- At least four units on all residential lots
- At least six units on residential lots within a quarter mile of major transit stops (such as light rail and bus rapid transit)
- At least six units on residential lots if two units are income-restricted affordable housing

The concepts described in this document are intended to comply with the requirements of HB 1110.



Example middle housing types: eight-unit courtyard housing (left) and fourplex (right)

# Zoning changes to implement HB 1110

The proposal for updated Neighborhood Residential zoning increases the number of homes allowed per lot to expand housing choices and comply with state law, while generally retaining the number of stories allowed today.

The proposed standards would vary from existing requirements in several other key ways:

- The Floor Area Ratio (FAR), which regulate the scale of development, would increase for developments maximizing density from around 1.0 to 1.2.
- Lot coverage would increase to 50 percent, compared to 35-40 percent for most lots today.
- Front and rear setbacks would be reduced to allow a wider range of layouts and more

usable open spaces for residents in the interior of a site. We would encourage porches by allowing them in the front setback.

- Unit lot subdivision would be allowed, as required by new state law. This would allow straightforward fee simple sale and ownership of homes, compared to the more complex condominium arrangements used currently when multiple homes are built and sold on one site.
- New open space requirements would result in more usable open space for residents.

Examples of potential development that could occur under these proposed rules are shown at the end of this document.

## Base standards in updated Neighborhood Residential zones

Alternative standards for stacked flats and affordable housing are shown on the following pages.

<b>Maximum density</b>	1 unit per 1,250 square feet of lot area except that, consistent with state law, at least four units are allowed on all lots, regardless of lot size, and six units within a quarter-mile walk of major transit or if two units are affordable
<b>Floor area ratio (FAR)</b>	The amount of floor area allowed is equal to the lot size times the FAR. Proposed FARs are: <ul style="list-style-type: none"> <li>• 0.6 FAR for density below 1/4,000 sq ft (e.g., one unit on a 5,000 sq ft lot)</li> <li>• 0.8 FAR for density between 1/4,000 and 1/2,200 sq ft (e.g., two units on a 5,000 sq ft lot)</li> <li>• 1.0 FAR for density between 1/2,200 and 1/1,600 sq ft (e.g., three units on a 5,000 sq ft lot)</li> <li>• 1.2 FAR for density of at least 1/1,600 sq ft (e.g., four units on a 5,000 sq ft lot)</li> </ul>
<b>Lot coverage</b>	50 percent
<b>Height limit</b>	<ul style="list-style-type: none"> <li>• 3 stories for market-rate development</li> <li>• 4 stories for development with income-restricted affordable homes</li> </ul>
<b>Minimum open space requirement</b>	<ul style="list-style-type: none"> <li>• 20 percent of lot area</li> <li>• The minimum dimension for usable open space is 8 feet or, if the open space includes a circulation pathway serving multiple buildings, 11 feet</li> <li>• Open space may be private or shared</li> <li>• At least half of the open space must be at ground level. Only half of open space not at ground level counts toward this requirement.</li> </ul>
<b>Minimum setbacks and separations</b>	<ul style="list-style-type: none"> <li>• Front: 10 feet</li> <li>• Rear: 10 feet without an alley, 5 feet for ADUs, and zero feet with an alley</li> <li>• Side: 5 feet</li> <li>• Separation between buildings within property: 6 feet</li> <li>• Covered porches may extend up to 6 feet into setback, with up to 100 sq ft per porch allowed in setback</li> <li>• Bay windows and balconies may extend up to 2 feet into setback if limited to 8 feet in width</li> </ul>
<b>Accessory dwelling units</b>	Accessory dwelling units (ADUs) would count toward the density and floor area limits shown above and be subject to the same standards as principal dwelling units except for a maximum size limit of 1,000 square feet.

# Affordable housing bonus

Neighborhood Residential zones are some of the most expensive and exclusive areas of Seattle. The updated Neighborhood Residential zones would help address this pattern by increasing housing supply overall and allowing smaller housing types in particular. But most new market-rate housing in these areas will likely remain unaffordable to low-income households due to factors like the high cost of development. Achieving more racial and economic inclusion in Neighborhood Residential areas – a central objective of the One Seattle Plan – requires proactive policies that encourage creation of housing affordable to low-income people in these neighborhoods.

One way to support this goal is with development standards that increase the feasibility of low-income housing. Today, restrictive zoning limits its feasibility

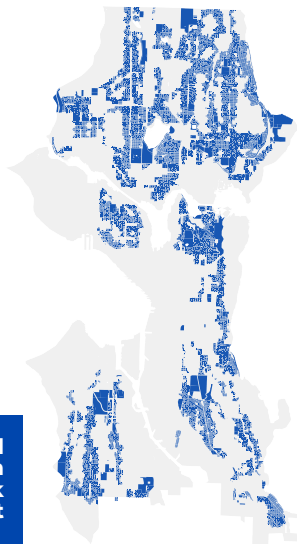
in Neighborhood Residential areas. Under House Bill 1110, cities like Seattle must allow six units per lot if at least two are affordable to low-income households. The proposed Neighborhood Residential zones would also allow additional height, floor area, and density on sites within a quarter-mile of frequent transit that provide more income-restricted homes.

Most low-income housing created with these provisions would likely be permanently affordable homeownership developments, as it is difficult to do affordable rental housing at this small scale. Recent examples of permanently affordable homeownership projects in Seattle include cottage-style development in RSL zones and stacked affordable condos in Capitol Hill.

Affordable housing development would be subject to all standards for NR zones with the following exceptions:

<b>Maximum height</b>	4 stories
<b>Maximum lot coverage</b>	60 percent
<b>Maximum density</b>	1 unit per 400 square feet of lot area
<b>Floor area ratio (FAR)</b>	1.8
<b>Affordability requirement</b>	At least half of units must be price- and income-restricted so they are affordable to households making 60% of area median income (AMI) for rental units or 80% of AMI for ownership units

**Neighborhood Residential sites within a quarter-mile walk of frequent transit**

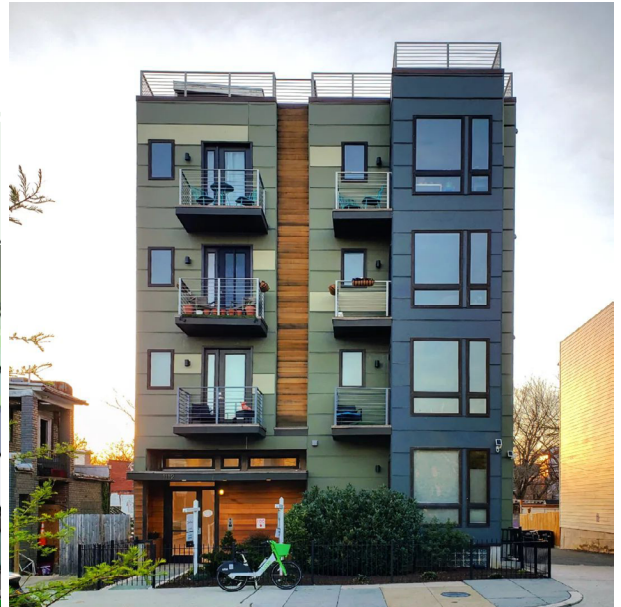


# AFFORDABLE HOUSING WITH BONUS

A small building with flats affordable to low-income households. Homes would likely be owned as permanently affordable condominium units. A single stair provides access to each floor.

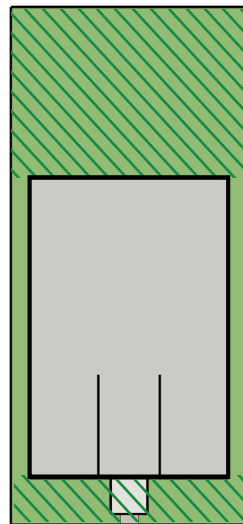


Street-level view

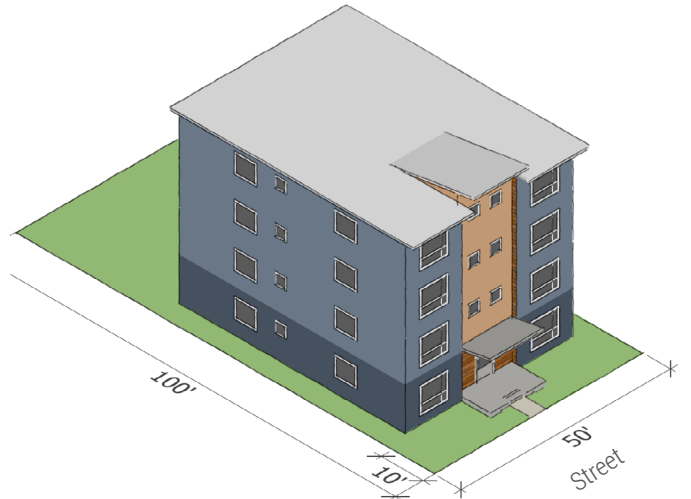


Existing precedent

Total units	8
Floor area ratio (FAR)	1.8
Average unit size	1,125
Stories	4
Lot size	5,000
Building coverage	45%
Usable open space	44%
Building plus paving	47%
Parking spaces	0



Street



# Stacked flat bonus

Stacked flats are a housing type where each unit is on one level. They can be offered as apartments for rent or created as condominiums sold to homebuyers.

During public engagement in spring 2024, we heard many comments that the City should do more to support the development of stacked flats, especially on quieter streets where rental housing and lower-cost ownership options tend to be scarce. Comments focused on the benefits of stacked flats in allowing residents to live on one floor. This type of housing can be especially helpful for older adults wishing to stay in place and for people who require accessible units. Stacked housing also supports the creation of lower-cost homes. Consequently, we are proposing to allow additional floor area and density for stacked flats in certain circumstances to encourage this type of development.

Stacked flats on lots of at least 6,000 square feet located within a quarter-mile of frequent transit would be subject to all standards for NR zones with the following exceptions:



<b>Floor area ratio (FAR)</b>	1.8
<b>Maximum density</b>	1 unit per 650 square feet of lot area



# STACKED FLATS WITH BONUS

Nine-unit apartment or condo building using the stacked flat bonus to achieve additional floor area and provide more homes.

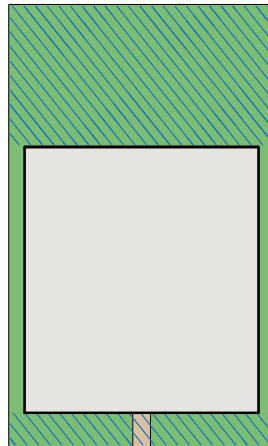


Street-level view

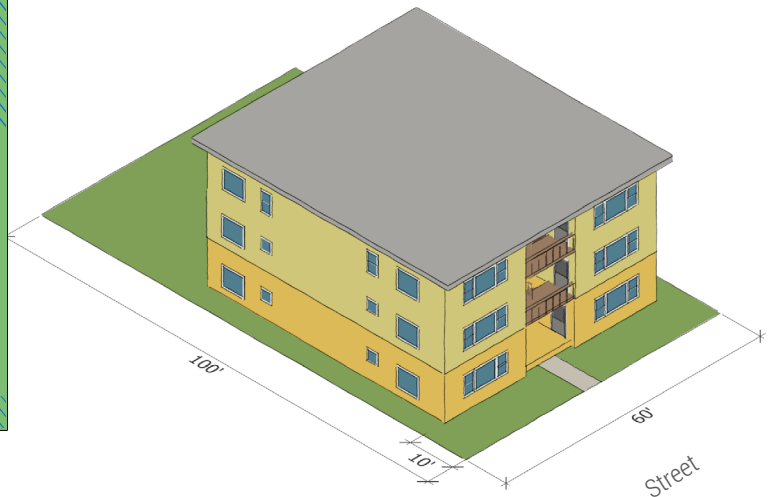


Existing precedent

Total units	9
Floor area ratio (FAR)	1.4
Average unit size	933
Stories	3
Lot size	6,000
Building coverage	47%
Usable open space	42%
Building plus paving	51%
Parking spaces	0



Street



Street



# Corner stores

One goal of the One Seattle Plan is to create neighborhoods where people can walk and bike to everyday needs. Corner stores help to achieve this goal by providing services and retail in primarily residential areas that may be far from larger business districts. Allowing small commercial uses in residential zones also allows entrepreneurs to start small businesses that contribute to neighborhood vibrancy and cohesion. Relics of the era when small corner stores were ubiquitous exist throughout Seattle’s residential areas, though most have since been converted to residential uses due to changes in zoning intended to create more separation of uses.

We propose to allow limited commercial uses, such as retail and food and beverage services, on corner lots in Neighborhood Residential zones. Commercial uses would be limited to the ground floor and basements, although ancillary uses such as storage and office spaces could be allowed on the upper floors. Rules would apply regarding hours of operation, delivery, noise, odor, and the location and screening of solid waste and other outdoor activities. No parking would be required for corner stores since commercial uses in residential areas less than 2,500 square feet in size are already exempt from parking requirements.

New corner stores would most likely result through conversion of existing residential structures, including reestablishing commercial uses in structures previously used as a business. Depending on the size and layout of the structure, residential uses could be maintained on site. For example, an existing two-story structure could be converted into a small corner store with storage and offices on the second floor, or the second story could remain in residential use for the operator’s home or as a rental unit. Alternatively, a garage in the front of a unit could be converted into a commercial use such as a cafe – common in Seattle’s Residential-Commercial (RC) zones – while maintaining the existing home behind it. Some new development with purpose-built commercial could be built on corners with heavier pedestrian and traffic volumes. However, development of this type would likely occur infrequently due to the high cost of new construction and the relatively lower value of commercial space outside business districts.

Development with commercial uses on corner lots would have to meet all Neighborhood Residential standards with the following exceptions:

<b>Setback and separations</b>	<ul style="list-style-type: none"><li>• Reduced setback of two feet from street lot lines for commercial spaces on the ground floor</li><li>• Upper floors required to set back 10 feet</li></ul>
<b>Height and noise</b>	<ul style="list-style-type: none"><li>• Two additional feet of height for the ground floor to allow for taller ceilings and additional soundproofing for residential use above</li></ul>



Credit: Samuel Kraft

# CORNER STORE

A mixed-use building with ground-floor commercial space that serves the surrounding neighborhood and four homes in the two stories above.

The ground floor would be subject to a reduced setback while the upper floors would still need to meet the 10-foot setback requirement. This type of development would be allowed only on corner lots.

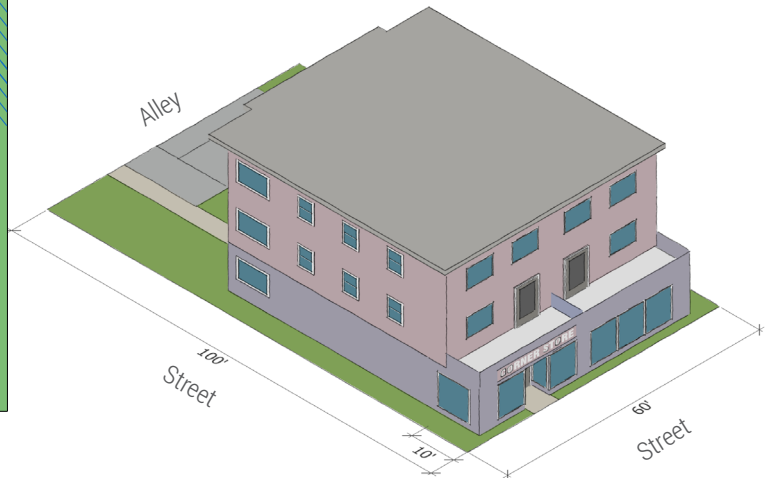
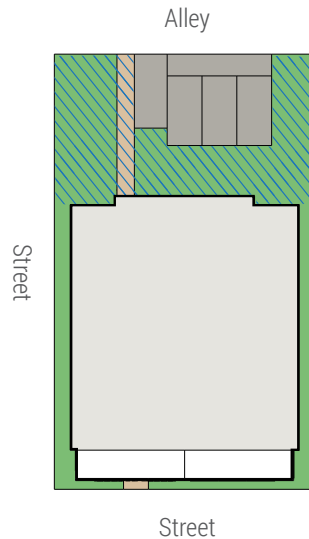


Street-level view



Existing precedent

Total units	4
Floor area ratio (FAR)	1.4
Average unit size	1,325
Commercial size	
Stories	3
Lot size	6,000
Building coverage	50%
Usable open space	25%
Building plus paving	63%
Parking spaces	3



# Additional changes to development standards

## Off-street parking

Off-street parking requirements can have significant impacts on the design and cost of housing and increase car usage and greenhouse gas emissions. While off-street parking can reduce competition for parking on the street, it also increases the cost of construction; reduces the amount of space available for housing, open space, and trees; increases hardscape and runoff; and encourages vehicle ownership and use. On small lots, driveways, maneuvering areas, and parking stalls can take up a substantial portion of the site and dictate the layout of everything else on the site. In many cases, these areas end up occupying the entire interior of a site, leaving only small areas of open space at the front and rear. However, off-street parking can also support goals like providing space for electric vehicle charging.

Currently, Neighborhood Residential zones require one off-street parking space per principal

dwelling unit, unless the lot is smaller than 3,000 square feet, less than 30 feet in width, or located in a Residential Small Lot zone near frequent transit. Given that ADUs do not require parking, Neighborhood Residential zones today effectively require one parking space per three dwelling units.

New state law also prohibits cities from requiring off-street parking within one-half mile walking distance of a stop for light rail, commuter rail, or bus rapid transit for middle housing. In our proposal, no minimum parking requirement would apply for Neighborhood Residential zones within a half-mile of a major transit stop, as required by HB 1110. Elsewhere in Neighborhood Residential, one parking space would be required per two principal dwelling units. The development examples in this document illustrate a range of parking outcomes given these possible scenarios.

## Open space

Open space on lots in Neighborhood Residential zones creates space for residents to be outside and for trees and vegetation. Our proposal is a requirement that 20 percent of the lot be set aside as open space. Open space would include areas outside building footprints, driveways, and parking stalls with a width and depth of at least 8 feet or, if they contain a pathway accessing multiple units, 11 feet. Covered porches would count towards open space, but balconies and roof decks would not. Open space may be shared between multiple units or private. At least half of the open space must be at ground level, and only half of open space not at ground level would count toward the requirement.

During past public engagement, many people supported creating more homeownership options that allow for usable green space. This proposed standard aims to ensure a reasonable amount of open space in new developments, while giving homebuilders flexibility in how they integrate it into their designs. To create the development examples in this document, we tested different approaches to open space. The 20 percent requirement was achievable under all scenarios but required careful design in many situations. Each development example in this document includes an open space calculation and identifies where the open space is located on the lot.

# Trees and vegetation

Trees in Neighborhood Residential zones are protected by multiple regulations:

- **The Tree Protection Code** limits the number, size, and type of trees that can be removed from private property and establishes requirements for replacing trees cut down.
- **Tree planting requirements** require planting of trees as part of development.
- **Street tree requirements** limit removal of street trees and require planting of new street trees as part development.
- **Environmentally critical areas (ECA) and Shoreline regulations** protect trees and vegetation around shorelines, creeks, wetlands, and steep slopes.

In May 2023, the tree protection and street tree requirements were updated, lowering size thresholds, strengthening protections, requiring mitigation for trees removed, and requiring street trees as part of development. We propose to update tree planting requirements – the only rules for Neighborhood Residential not updated in May 2023 – to help meet citywide tree canopy goals in the context of new development allowed in these areas. Our proposal applies the tree planting requirements that currently exist only in Residential Small Lot zones to encourage the planting of larger species trees.

Currently, development in NR1, NR2, and NR3 zones requires the planting of two caliper inches of tree – roughly the width of a new tree’s trunk – per 1,000 square feet of lot area. On a 5,000-square-foot lot, this requires planting five new two-caliper-inch small or large species trees or transplanting one 10-caliper-inch tree. Absent an incentive to plant larger species trees, developers generally opt for smaller species.



Credit Haeccity Studio Architecture & Sama Jim Canzion

Under the new requirements, a point system would encourage retention of existing trees and the planting of larger species trees and conifers. The number of points required would vary based on the number of homes on a lot. New development with density of 4 homes on a 5,000 square foot lot would need to achieve one point per 750 square feet lot area while a single home on the same lot would have to achieve one point per 500 square feet of lot. A table showing how tree points could be achieved is shown below.

Type of tree	Non-conifer trees	Conifer trees
Small tree planted after construction	1 point	1.25 points
Small/medium tree planted after construction	2 points	2 points
Medium large tree planted after construction	3 points	3.75 points
Large tree planted after construction	4 points	5 points
Tree 6 inches in diameter or greater preserved during construction	1 point per inch of diameter	1.25 points per inch of diameter

# ECAs and Shorelines

State law requires that changes to increase housing choice in Neighborhood Residential zones also apply to lots with environmentally critical areas (ECAs) like creeks, wetlands, and steep slopes and those along shorelines. However, cities can reduce the density allowed based on the portion of a lot outside these areas.

To implement this provision, we propose to exclude the following areas when calculating lot size for purpose of density and lot coverage requirements:

- riparian corridors (i.e., the areas around creeks)
- wetlands and their buffers
- submerged lands and areas within the Shoreline District
- designated non-disturbance areas in steep slopes

The intent of this change is to allow development *outside* ECAs, the Shoreline District, and their buffers consistent with development allowed elsewhere – while limiting development *within* ECAs, the Shoreline District, and their buffers. For example, on a 10,000-square-foot lot for which half the lot is in ECAs, shorelines, and their buffers, the lot could contain a density of units and an amount of lot coverage equal to a standard 5,000 square foot lot.

Existing lots would be allowed to have at least one dwelling unit and a lot coverage of at least 600 square feet even if the entire property is within these areas.

# Design standards

No design standards apply currently in Neighborhood Residential zones. We propose to implement the following new design standards:

- **Access.** Each unit must have a pedestrian access pathway at least 3 feet in width between the entrance and the street
- **Entries.** Each street-facing facade must have a pedestrian entry with weather protection, such as a covered porch, canopy, recessed entry, or similar feature, measuring at least 3 feet in both width and depth.
- **Windows and doors.** At least 20 percent of the area of each street-facing facade shall consist of windows and/or doors.
- **Materials.** At least 60 percent of the area of each street-facing facade shall consist of windows, doors, or materials that contain breaks every 12-16 inches. This standard aims to add visual interest through texture, details, and shadow lines and reduce the perceived scale and bulk of walls

The proposal encourages better materials, windows facing the street, and welcoming entries...



...and aims to prevent blank or monotonous street-facing facades without entries and with few windows.



# Other development standards

## Maximum height

We propose to increase the height limit from 30 feet to 32 feet to encourage more livable homes and better design outcomes within the existing three-story scale. The current height limit pushes builders to locate the first floor at grade and have minimum separation between floors to achieve reasonable floor to ceiling heights. A higher limit can allow the first floor to be raised above grade to create privacy and separation for residents, provide more acoustic separation between floors, and result in higher floor-to-ceiling heights that let in more light and create better living space.

## Pitched roof exemption

Pitched roofs are already allowed to extend up to five feet above the height limit if they meet a minimum pitch of 4:12. We propose to add a height exception for shed roofs (roofs slanted in only one direction) since they support solar panels.

## Mandatory Housing Affordability (MHA)

In zones with MHA requirements, development is required to contribute to the creation of affordable housing by reserving a portion of units as rent- and income-restricted affordable units or by paying into a fund to create affordable units off-site. MHA is generally applied in multifamily and commercial zones when a significant increase in development capacity has been provided to offset the cost of the requirements. MHA does not apply in NR zones today, and we do not propose to apply it as part of this update.

# Next steps & engagement

We are eager for feedback on this updated proposal, draft legislation to implement the proposal, and maps of proposed rezones during October through December 2024. Comments can be submitted online at [zoning.onesattleplan.com](https://zoning.onesattleplan.com).

We will also host in-person information sessions so community members can talk directly with staff. More information on the Comprehensive Plan Update and events is available at.

After this engagement period, we will transmit legislation to enact the proposed changes to the City Council for their deliberation and adoption. We anticipate that City Council will adopt the final legislation by June 2025.



# SEMI-ATTACHED HOMES WITH AUTOCOURT

A detached home and a side-by-side duplex, with two surface parking spaces and one garage space accessed from the street.

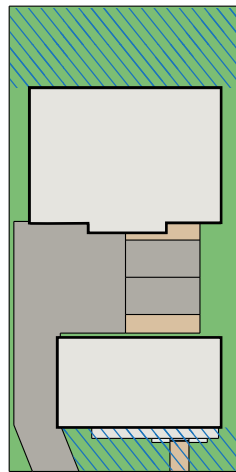


Street-level view

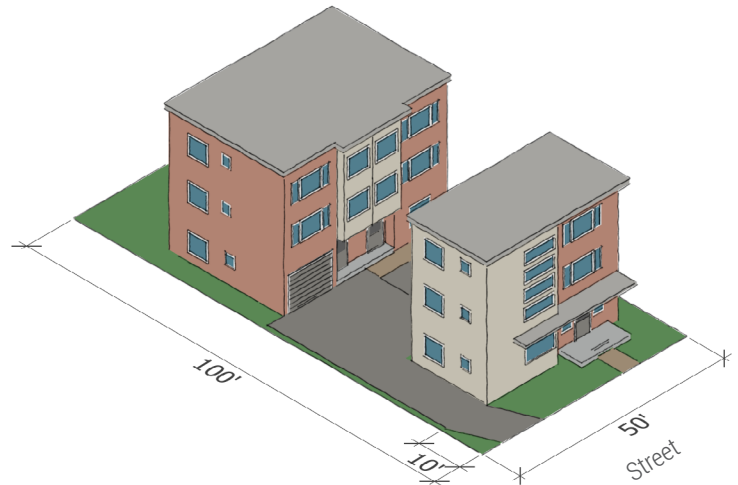


Existing precedent

Total units	3
Floor area ratio (FAR)	1.0
Average unit size	1,667
Stories	3
Lot size	5,000
Building coverage	33%
Usable open space	27%
Building plus paving	59%
Parking spaces	3



Street





# TWO DUPLEXES WITH ALLEY ACCESS

Four homes in two side-by-side duplexes with access to surface parking from an alley.

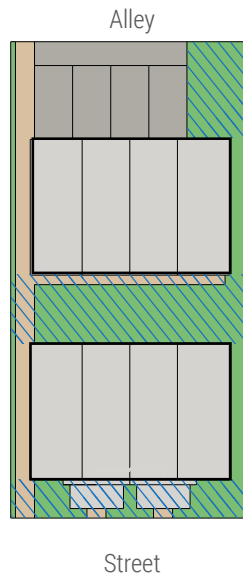


Street-level view



Existing precedent

Total units	4
Floor area ratio (FAR)	1.2
Average unit size	1,500
Stories	3
Lot size	5,000
Building coverage	40%
Usable open space	33%
Building plus paving	66%
Parking spaces	4



# TWO DUPLEXES WITHOUT ALLEY ACCESS

Four homes in two side-by-side duplexes with four parking spaces accessed from the street.

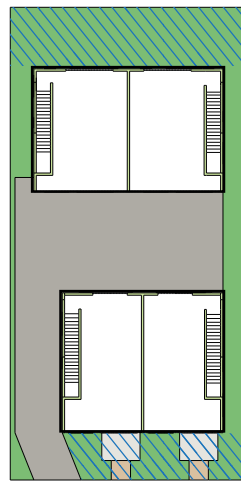


Street-level view

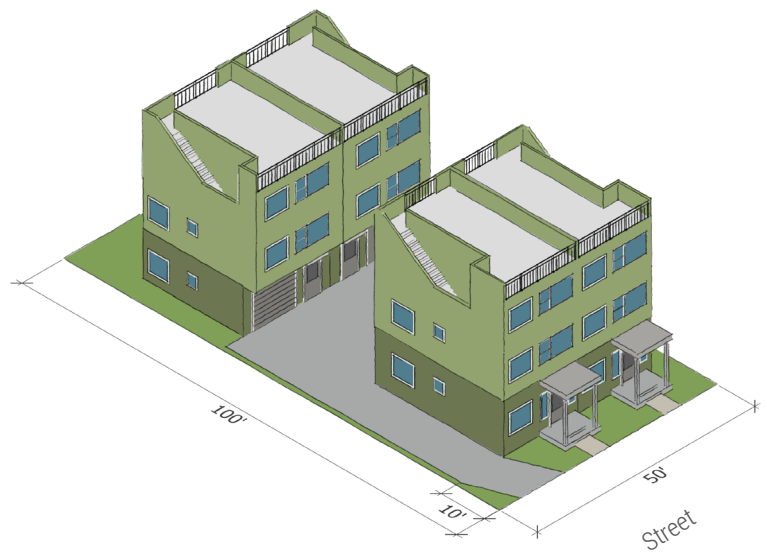


Existing precedent

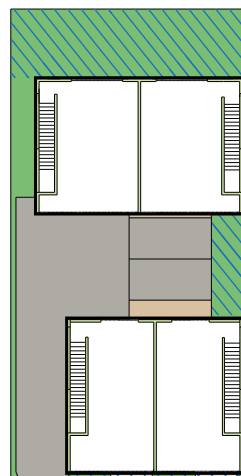
Total units	4
Floor area ratio (FAR)	1.2
Average unit size	1,500
Stories	3
Lot size	5,000
Building coverage	40%
Usable open space	20%
Building plus paving	73%
Parking spaces	4



Street



Total units	4
Floor area ratio (FAR)	1.2
Average unit size	1,500
Stories	3
Lot size	5,000
Building coverage	40%
Usable open space	21%
Building plus paving	72%
Parking spaces	4

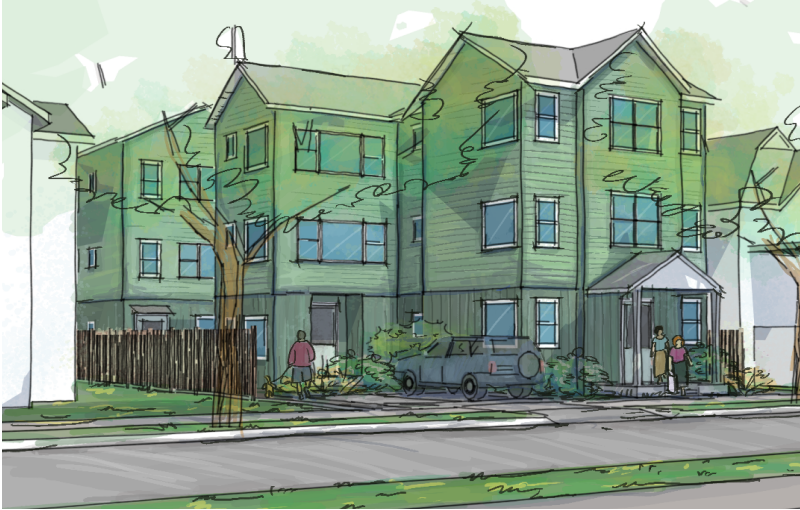


Street



# TWO DUPLEXES WITHOUT ALLEY ACCESS

Four homes in two duplexes with two surface parking spaces accessed from the street.

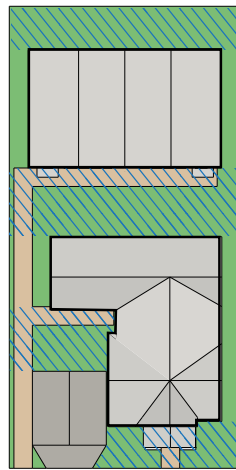


Street-level view



Existing precedent

Total units	4
Floor area ratio (FAR)	1.2
Average unit size	1,500
Stories	3
Lot size	5,000
Building coverage	40%
Usable open space	38%
Building plus paving	58%
Parking spaces	2



Street



# TWO DUPLEXES WITHOUT ALLEY ACCESS

Four homes in two side-by-side duplexes without parking.



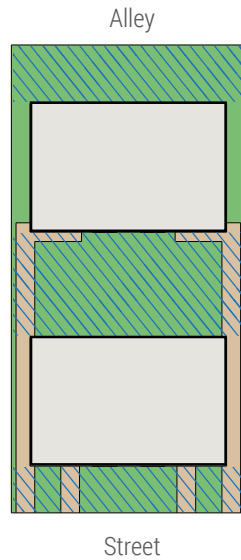
Street-level view



Existing precedent

Total units	4
Floor area ratio (FAR)	1.2
Average unit size	1,500
Stories	3
Lot size	5,000
Building coverage	40%
Usable open space	51%
Building plus paving	56%
Parking spaces <sup>1</sup>	0

<sup>1</sup> This scenario with no parking would be possible only on sites within a half-mile of a major transit stop.



## NR Tree Planting Analysis







### Assumptions

- Tree Size: Use tree canopy sizes developed by SDCI and SDOT arborist for 2016 analysis
  - Mature canopy sizes based on city street tree list
  - Tree canopy at 25 years assumed to be about half the area of mature canopy
- Number of Street trees: Use results of analysis of 11 RSL plan set which found that street trees occurred on average
  - Every 25 feet for properties without driveways
  - Every 33 feet for properties with driveways
- Lot size: use lot sizes from previous analysis
- Building placement: use prototypes in Updating Seattle's Neighborhood Residential Zones report
- Tree placement: trees were placed based on professional judgement; trees were generally placed where at 25 years:
  - they would not overlap buildings; and
  - where soil space is not significantly less than canopy volume
- Canopy measurement
  - Canopy overlapping other sites: Count as if full block is redeveloped; tree canopy on adjacent lots from trees that overhang lot line still counts
  - Don't double count area of overlapping trees
  - Don't count area of trees overlapping buildings if species is small as they tend to be 30 feet or less, but do count for larger species trees

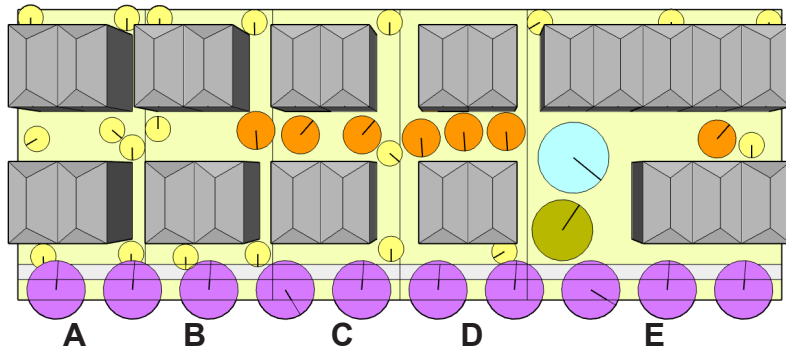
# DRAFT Neighborhood Residential (NR) Proposed Tree Requirement

## 25-Year Canopy Growth

Shown: 1 Point required per 750 sq. ft. lot area for densities at least 1 unit / 1,600 sq. ft. of lot area

1 point	2 points	3 points	4 points	1 point per inch of trunk diameter 6" or more	N/A	
						
<b>Small</b> 8-15' canopy spread* 10' shown	<b>Small-Med.</b> 16-20' canopy spread* 16' shown	<b>Med.-Large</b> 21-25' canopy spread* 24' shown	<b>Large</b> 26-30' canopy spread* 28' shown	<b>Preserved</b> Assumes 10" diameter trunk 30' shown	<b>Street Tree</b> Assumes Medium-Large* 23' shown	* Assumed canopy spread at 25 years

### 2 Duplexes No Parking (Prototype 4)



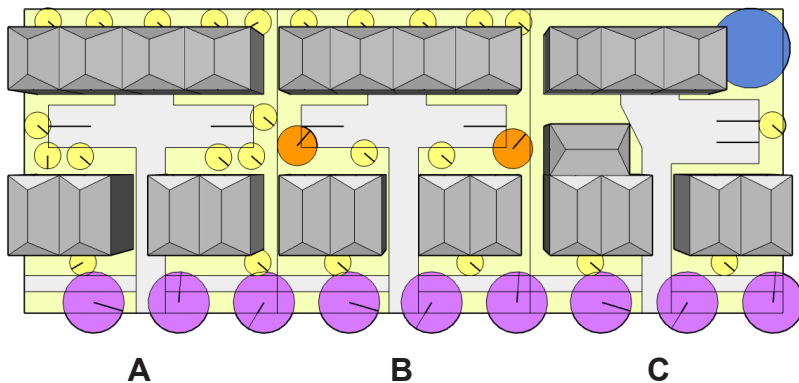
#### Calculations

- 5,000 sq. ft. lots (A - D): 7 pts. required
- 10,000 sq. ft. lot (E): 13 pts. required
- Canopy coverage half block: 23.1%

#### Findings & Observations

- Limited space for trees larger than small-medium on a single lot without modifying the prototype.
- A requirement higher than 1 pt. / 750 sq. ft. would be possible but would result in little useable open space on site.
- Combined lot (E) with siting adjustments allows for Medium-Large and Large trees.
- Absence of parking and curbcuts allow for requirement to be met comfortably.

### Duplexes / Fourplexes, Garage and Surface Parking (Prototype 2C with combined lots)



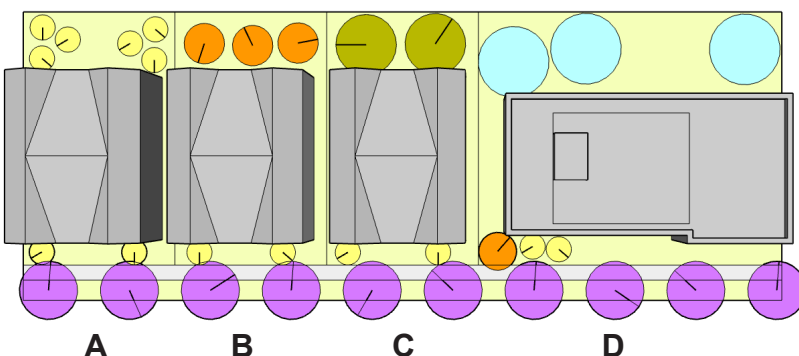
#### Calculations

- 10,000 sq. ft. lots: 13 pts. required
- Canopy coverage half block: 19.5%

#### Findings & Observations

- Limited space for trees larger than small-medium without modifying the prototype.
- A requirement higher than 1 pt. / 750 sq. ft. would be difficult to achieve under the prototype.
- Little useable open space on site.
- Siting modification (C) allows for preservation of an existing tree or large tree.
- Curbcuts reduce the number of street trees, decreasing the overall canopy coverage.

### Stacked Flats No Parking (Prototype 6)



#### Calculations

- 6,000 sq. ft. lot (A-C): 8 pts. required
- 12,000 sq. ft. lot (D): 16 pts. required
- Canopy coverage half block: 25.3%

#### Findings & Observations

- Trees up to medium-large can be located without modifying the prototype
- A requirement higher than 1 pt. / 750 sq. ft. would be possible but would result in little useable open space on site.
- Siting modification (D) allows for preservation of existing trees or multiple large trees.
- Absence of parking and curbcuts allow for requirement to be met comfortably.

# DRAFT Neighborhood Residential (NR) Proposed Tree Requirement 25-Year Canopy Growth

Tree Size Points	Small	Small-Medium	Medium-Large	Large	Preserved	Total Points
	1	2	3	4	9	

2 Duplexes No Parking (Prototpye 4)						
Model Lot						
A	7					7
B	5	1				7
C	3	2				7
D	1	3				7
E	4	1	1	1		13
-----						
Half Block Total Area	34,200	sq. ft.				
Street Trees	10					
Half Block Canopy Area	7,906					
Canopy Coverage	23.1%					







Duplexes / Fourplexes, Garage and Surface Parking (Prototype 2C with combined lots)						
Model Lot						
A	13					13
B	9	2				13
C	3				1	13
-----						
Half Block Total Area	34,200	sq. ft.				
Street Trees	6					
Half Block Canopy Area	6,668					
Canopy Coverage	19.5%					

Stacked Flats No Parking (Prototpye 6)						
Model Lot						
A	8					8
B	2	3				8
C	2		2			8
D	2	1		3		16
-----						
Half Block Total Area	34,200	sq. ft.				
Street Trees	10					
Half Block Canopy Area	8,669					
Canopy Coverage	25.3%					

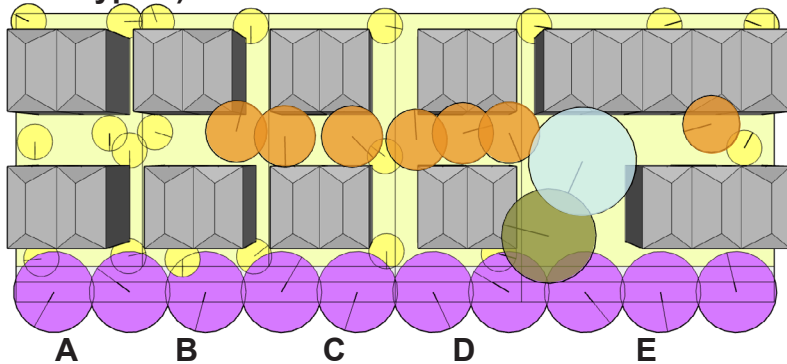
# DRAFT Neighborhood Residential (NR) Proposed Tree Requirement

## Canopy At Maturity

Shown: 1 Point required per 750 sq. ft. lot area for densities at least 1 unit / 1,600 sq. ft. of lot area

1 point	2 points	3 points	4 points	1 point per inch of trunk diameter 6" or more	N/A	
						
<b>Small</b> 8-15' canopy spread* 10' shown	<b>Small-Med.</b> 16-20' canopy spread* 16' shown	<b>Med.-Large</b> 21-25' canopy spread* 24' shown	<b>Large</b> 26-30' canopy spread* 28' shown	<b>Preserved</b> Assumes 10" diameter trunk 30' shown	<b>Street Tree</b> Assumes Medium-Large* 23' shown	* Assumed canopy spread at 25 years

### 2 Duplexes No Parking (Prototype 4)



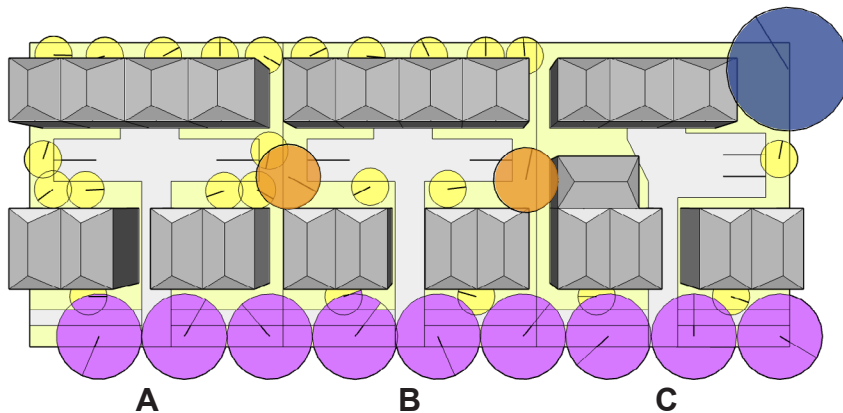
#### Calculations

- 5,000 sq. ft. lots (A - D): 7 pts. required
- 10,000 sq. ft. lot (E): 13 pts. required
- Canopy coverage half block: 43.1%

#### Findings & Observations

- At maturity tree canopy for small-medium sized trees and greater begins to overlap buildings.
- At maturity, tree canopy becomes layered.
- At maturity, tree planting requirement results in canopy exceeding the city's coverage goal.

### Duplexes / Fourplexes, Garage and Surface Parking (Prototype 2C with combined lots)



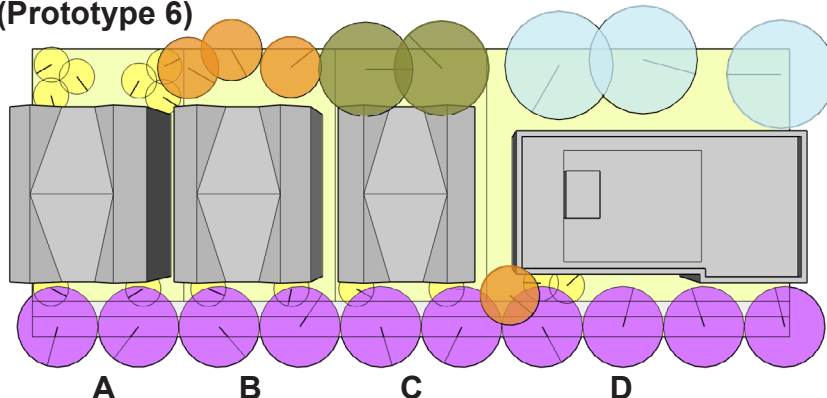
#### Calculations

- 10,000 sq. ft. lots: 13 pts. required
- Canopy coverage half block: 36%

#### Findings & Observations

- At maturity tree canopy for small-medium sized trees and greater begins to overlap buildings.
- At maturity, tree canopy becomes layered.
- At maturity, tree planting requirement results in canopy exceeding the city's coverage goal.

### Stacked Flats No Parking (Prototype 6)



#### Calculations

- 6,000 sq. ft. lot (A-C): 8 pts. required
- 12,000 sq. ft. lot (D): 16 pts. required
- Canopy coverage half block: 46.4%

#### Findings & Observations

- At maturity, tree canopy for small-medium sized trees and greater begins to overlap buildings.
- At maturity, tree canopy becomes layered.
- At maturity, tree planting requirement results in canopy exceeding the city's coverage goal.



# DRAFT Neighborhood Residential (NR) Proposed Tree Requirement Canopy At Maturity

Tree Size Points	Small 1	Small-Medium 2	Medium-Large 3	Large 4	Preserved 9	Total Points
------------------	------------	-------------------	-------------------	------------	----------------	--------------

<b>2 Duplexes No Parking (Prototpye 4)</b>						
Model Lot						
A	7					7
B	5	1				7
C	3	2				7
D	1	3				7
E	4	1	1	1		13
Half Block Total Area 34,200 sq. ft						
Street Trees 10						
Half Block Canopy Area 14,730						
Canopy Coverage 43.1%						

<b>Duplexes / Fourplexes, Garage and Surface Parking (Prototype 2C with combined lots)</b>						
Model Lot						
A	13					13
B	9	2				13
C	3				1	13
Half Block Total Area 34,200 sq. ft.						
Street Trees 6						
Half Block Canopy Area 12,327						
Canopy Coverage 36.0%						

<b>Stacked Flats No Parking (Prototpye 6)</b>						
Model Lot						
A	8					8
B	2	3				8
C	2		2			8
D	2	1		3		16
Half Block Total Area 34,200 sq. ft						
Street Trees 10						
Half Block Canopy Area 15,866						
Canopy Coverage 46.4%						

# DRAFT Neighborhood Residential (NR) Proposed Tree Requirement

## Shown:

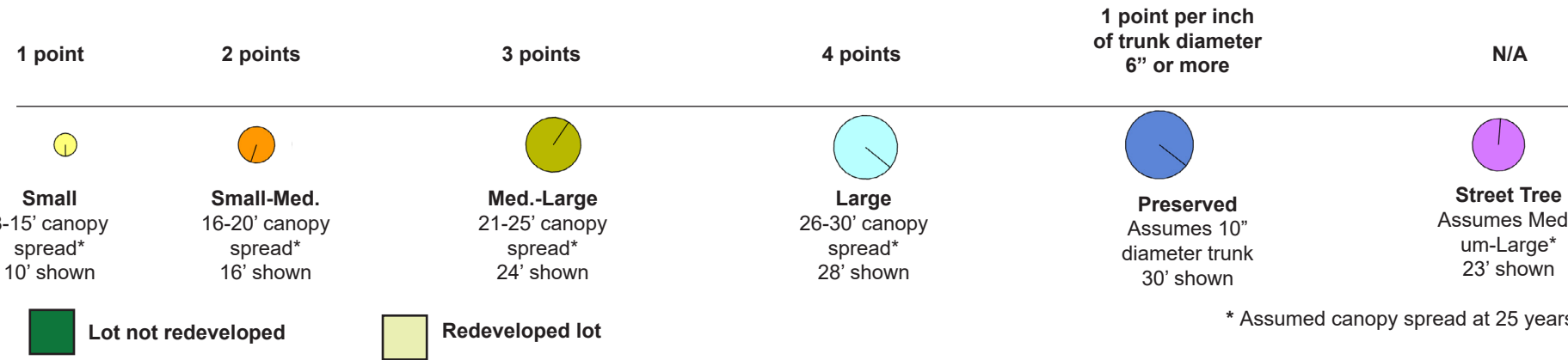
- 1 Point required per 750 sq. ft. lot area for housing densities of 1 unit : 1,601 sq. ft. or greater
- 1 Point required per 500 sq. ft. lot area for housing densities of 1 unit: 1,600 sq. ft. or less
- Tree planting requirement is higher for low density development

## Calculations & Assumptions

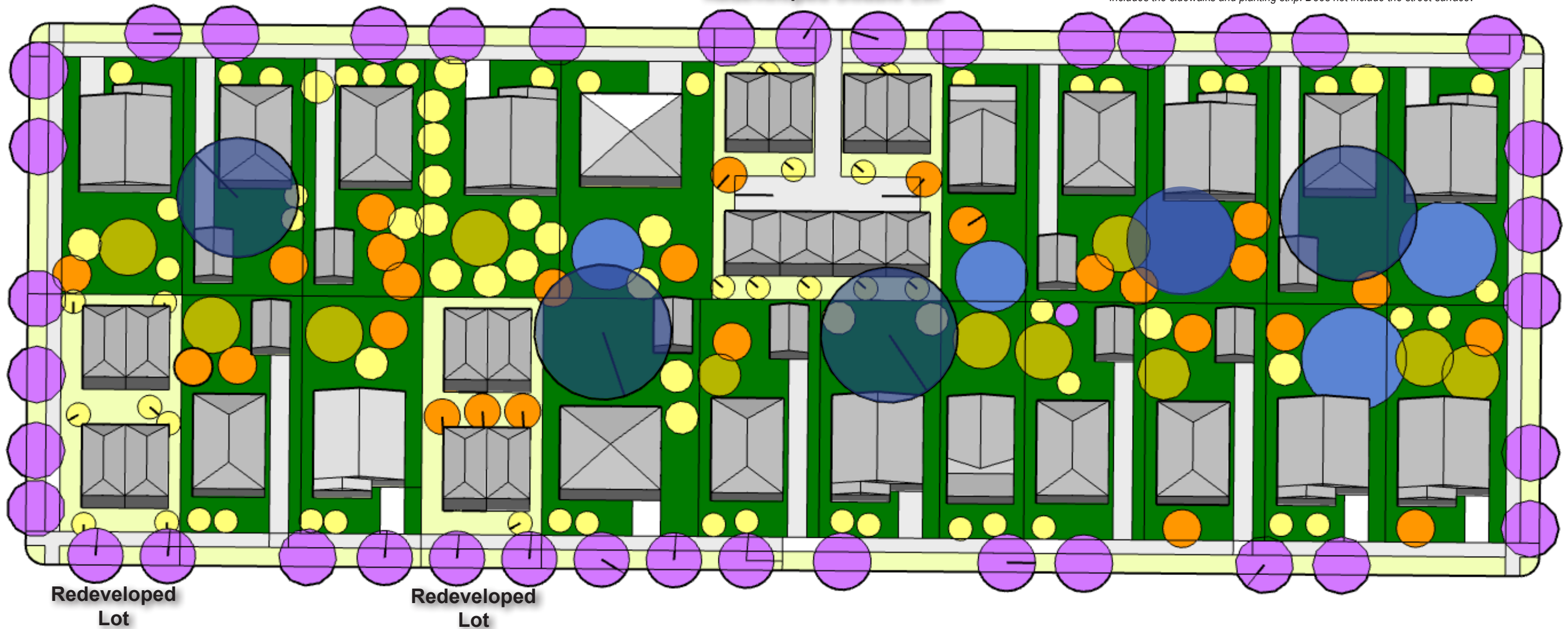
- 5,000 sq. ft. lots: 7 pts. required for high density; 10 pts. for low density
- 6,000 sq. ft. lots: 8 pts. required for high density; 12 pts. for low density
- Lots that are not redeveloped have existing canopy coverage of 12% - 46% consistent with existing conditions on blocks observed in aerial photos of North Seattle in 2024.
- 20 of 24 lots (84%) are not redeveloped.
- 4 of 24 lots (16%) are developed for the purposes of modeling a block on the high end of expected 20-year redevelopment scenarios. Analysis by EcoNW estimated that 8%-10% of NR lots might redevelop citywide over 20 years.
- Street trees are located at roughly 30' intervals on redeveloped lots.

## Findings & Observations

- Overall canopy coverage of 31% is achieved on the block as a whole including street trees.
- Canopy coverage on lots not redeveloped\* is 34%.
- Canopy coverage on redeveloped lots\* is 21%.
- A heavily-treed existing condition with mature trees in the block would be necessary to achieve the 30% canopy coverage goal in the full block area.
- Of the total canopy coverage in the block, 89% is on lots not redeveloped, 11% is on redeveloped lots, and 26% is on the right of way.



## Redeveloped Double Lot



\* Includes right of way adjacent to the lot up to the curb line.

\*\* Includes the sidewalks and planting strip. Does not include the street surface.

## G.4 Redevelopment Area Summary by Alternative

Alternative 1	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Urban Centers	36,970	642	544.59
Hub Urban Villages	12,885	642	189.80
Residential Urban Villages	14,764	642	217.48
Manufacturing Industrial Centers	1,476	642	21.74
Growth Area (Maritime Industrial)	676	642	9.96
Outside Subareas (This Alternative)	6,494	2,583	385.12
Outside Subareas (All Alternatives)	6,735	753	116.35
<b>Total</b>	<b>80,000</b>		<b>1,485.06</b>

Alternative 2	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Urban Centers	36,970	642	544.59
Hub Urban Villages	12,885	642	189.80
Residential Urban Villages	14,764	642	217.48
Manufacturing Industrial Centers	1,476	642	21.74
Growth Area (Maritime Industrial)	676	642	9.96
Neighborhood Anchor - Low Risk	20,019	753	345.85
Neighborhood Anchor - High Risk	4,148	753	71.66
Outside Subareas (This Alternative)	2,327	2,583	138.00
Outside Subareas (All Alternatives)	6,735	753	116.35
<b>Total</b>	<b>100,000</b>		<b>1,655.44</b>

Alternative 3	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Urban Centers	36,970	642	544.59
Hub Urban Villages	12,885	642	189.80
Residential Urban Villages	14,764	642	217.48
Manufacturing Industrial Centers	1,476	642	21.74
Growth Area (Maritime Industrial)	676	642	9.96
Neighborhood Residential	22,423	2,583	1,329.79
Outside Subareas (This Alternative)	4,071	642	59.97
Outside Subareas (All Alternatives)	6,735	753	116.35
<b>Total</b>	<b>100,000</b>		<b>2,489.69</b>

Alternative 4	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Urban Centers	36,970	642	545
Hub Urban Villages	12,885	642	190
Residential Urban Villages	14,764	642	217
Manufacturing Industrial Centers	1,476	642	22
Growth Area (Maritime Industrial)	676	642	10
Neighborhood Residential-Corridor	21,207	1,211	590
Outside Subareas (This Alternative)	5,287	2,583	314
Outside Subareas (All Alternatives)	6,735	753	116
<b>Total</b>	<b>100,000</b>		<b>2,003</b>

Alternative 5	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Urban Centers	43,051	642	634.17
Hub Urban Villages	7,855	642	115.71
Residential Urban Villages	22,862	642	336.77
Manufacturing Industrial Centers	1,476	642	21.74
Growth Area (Maritime Industrial)	676	642	9.96
Neighborhood Anchor - Low Risk	16,306	753	281.70
Neighborhood Anchor - High Risk	3,335	753	57.62
Neighborhood Residential	8,848	2,583	524.73
Neighborhood Residential-Corridor	8,856	1,211	246.20
Outside Subareas (This Alternative)	0	0	0.00
Outside Subareas (All Alternatives)	6,735	753	116.35
<b>Total</b>	<b>120,000</b>		<b>2,344.95</b>

Preferred Alternative	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Regional Center - Metro	34,997	642	515.53
Regional Center - Urban	8,000	642	117.84
Urban Center	28,984	642	426.96
Neighborhood Center	10,417	753	179.96
Urban Neighborhood - Frequent Transit Corridor	9,408	738	159.31
Urban Neighborhood - Neighborhood Residential	21,069	2,583	1,249.48
Urban Neighborhood - Other Multifamily	727	753	12.56
Manufacturing-Industrial Center	800	642	11.79
DEIS Outside Subareas (All Alternatives)	5,598	753	96.71
<b>Total</b>	<b>120,000</b>		<b>2,770.14</b>

# H Transportation Appendix

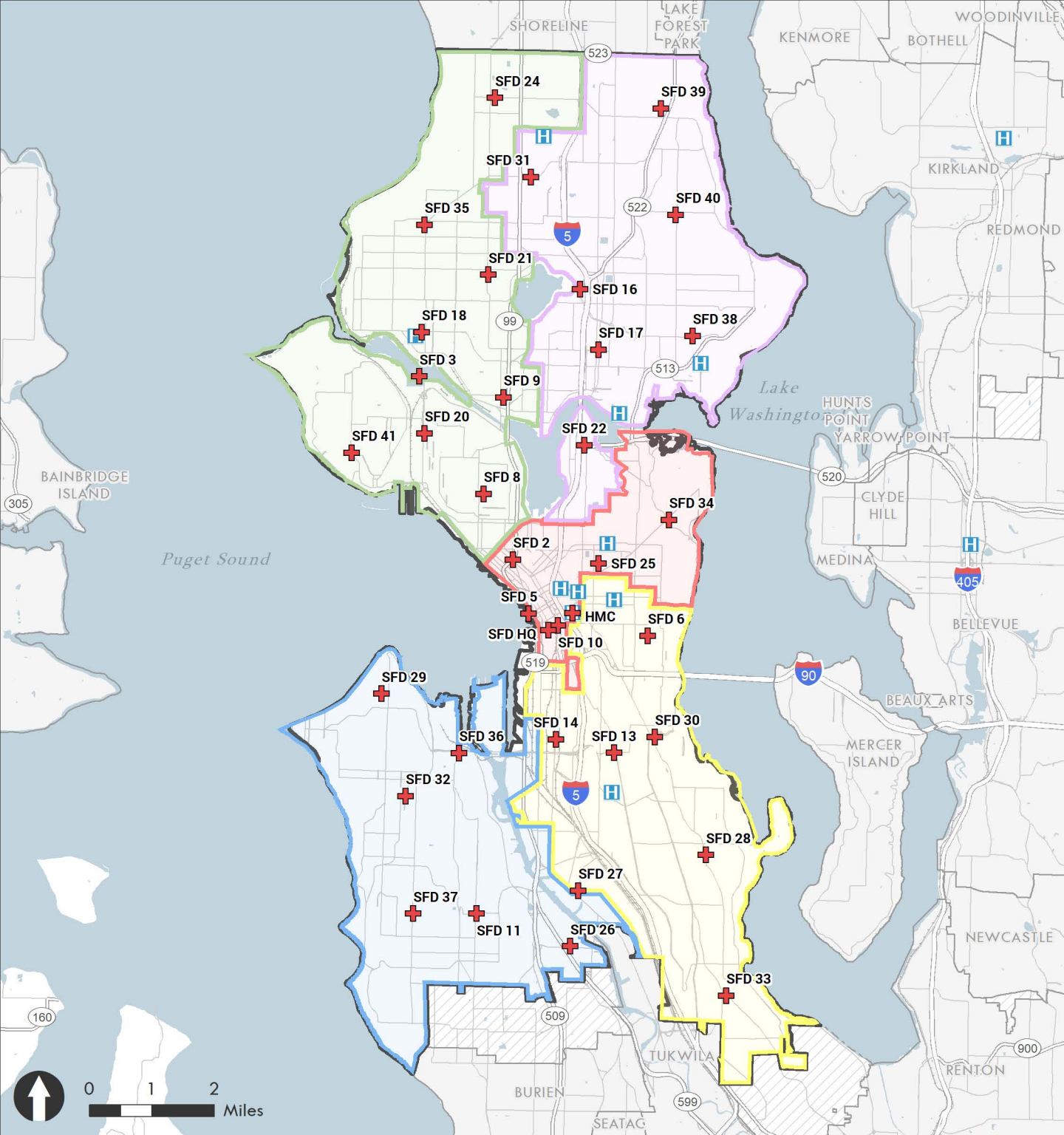
Inbound

Outbound

Route	Inbound Trips in PM Period	Average Maximum Load of PM Period Trips	Average Max Load of Most Crowded PM Period Trip	Average Crowding Threshold	Crowding Threshold Ratio of Average Max Load over PM Peak Period	Crowding Threshold Ratio of Average Max Load of Most Crowded PM Peak Period Trip	Number of Trips Over Crowding Threshold	Percent of Trips Over Crowding Threshold	Outbound Trips in PM Period	Average Maximum Load of PM Period Trips	Average Max Load of Most Crowded PM Period Trip	Average Crowding Threshold	Crowding Threshold Ratio of Average Max Load over PM Peak Period	Crowding Threshold Ratio of Average Max Load of Most Crowded PM Peak Period Trip	Number of Trips Over Crowding Threshold	Percent of Trips Over Crowding Threshold	
1	17	14	23	52	0.27	0.44	0	0%	18	27	41	52	0.53	0.79	0	0%	
2	22	25	41	52	0.48	0.79	0	0%	18	37	47	52	0.71	0.90	0	0%	
3	18	33	46	52	0.63	0.88	0	0%	15	32	44	52	0.62	0.85	0	0%	
4	11	31	44	52	0.59	0.85	0	0%	17	28	43	52	0.54	0.83	0	0%	
5	15	21	35	78	0.27	0.44	0	0%	31	46	66	77	0.60	0.94	0	0%	
7	29	22	41	74	0.29	0.55	0	0%	28	37	54	74	0.51	0.73	0	0%	
8	21	55	72	78	0.71	0.92	0	0%	19	29	44	78	0.37	0.56	0	0%	
9	5	13	17	51	0.26	0.33	0	0%	7	25	31	51	0.49	0.61	0	0%	
10	27	11	23	52	0.22	0.44	0	0%	27	22	32	52	0.42	0.62	0	0%	
11	16	21	29	79	0.27	0.37	0	0%	16	41	59	79	0.53	0.75	0	0%	
12	22	16	24	52	0.31	0.46	0	0%	21	25	39	52	0.48	0.75	0	0%	
13	16	19	25	52	0.37	0.48	0	0%	16	34	43	52	0.65	0.83	0	0%	
14	16	13	30	52	0.24	0.58	0	0%	16	37	49	52	0.71	0.94	0	0%	
15	0	-	0	-	-	0.00	0	0%	10	52	64	79	0.66	0.81	0	0%	
17	0	-	0	-	-	0.00	0	0%	9	48	68	79	0.60	0.86	0	0%	
18	0	-	0	-	-	0.00	0	0%	9	45	60	76	0.60	0.88	0	0%	
19	0	-	0	-	-	0.00	0	0%	6	25	36	60	0.42	0.71	0	0%	
21	15	23	40	78	0.29	0.51	0	0%	27	34	60	79	0.43	0.76	0	0%	
22	4	8	19	51	0.16	0.37	0	0%	4	7	11	51	0.14	0.22	0	0%	
24	8	19	29	68	0.27	0.43	0	0%	11	39	54	73	0.54	0.69	0	0%	
26	8	19	27	78	0.25	0.35	0	0%	12	43	60	78	0.55	0.77	0	0%	
27	8	12	19	68	0.17	0.25	0	0%	10	26	45	62	0.42	0.71	0	0%	
28	8	11	14	78	0.14	0.18	0	0%	15	49	65	76	0.65	0.83	0	0%	
29	0	-	0	-	-	0.00	0	0%	12	33	54	60	0.56	0.71	0	0%	
31	8	14	19	60	0.24	0.31	0	0%	10	30	37	58	0.52	0.73	0	0%	
32	11	20	29	59	0.34	0.57	0	0%	11	31	46	59	0.53	0.94	0	0%	
33	8	21	31	68	0.30	0.40	0	0%	12	35	52	69	0.50	0.96	0	0%	
36	38	15	33	58	0.27	0.58	0	0%	34	34	49	58	0.59	0.94	0	0%	
37	0	-	0	-	-	0.00	0	0%	4	14	16	58	0.24	0.31	0	0%	
40	22	30	48	77	0.39	0.62	0	0%	40	49	74	74	0.66	1.12	1	3%	
41	18	14	21	79	0.18	0.27	0	0%	37	42	60	79	0.53	0.76	0	0%	
43	4	21	29	75	0.28	0.39	0	0%	6	14	20	77	0.18	0.25	0	0%	
44	27	21	30	74	0.29	0.41	0	0%	26	50	66	74	0.68	0.89	0	0%	
45	19	16	20	77	0.22	0.37	0	0%	26	45	64	76	0.59	0.82	0	0%	
47	10	4	5	52	0.08	0.10	0	0%	10	11	16	52	0.22	0.31	0	0%	
48	25	28	47	69	0.41	0.65	0	0%	21	16	50	68	0.23	0.64	0	0%	
49	20	31	43	63	0.48	0.83	0	0%	21	30	39	64	0.47	0.73	0	0%	
50	10	17	22	37	0.46	0.59	0	0%	11	18	29	37	0.50	0.78	0	0%	
55	1	38	38	79	0.48	0.48	0	0%	11	29	42	74	0.39	0.55	0	0%	
56	0	-	0	-	-	0.00	0	0%	8	39	53	79	0.49	0.67	0	0%	
57	0	-	0	-	-	0.00	0	0%	5	41	49	79	0.52	0.62	0	0%	
60	17	21	50	51	0.42	0.98	0	0%	16	27	35	51	0.53	0.69	0	0%	
62	16	28	39	76	0.37	0.50	0	0%	22	49	68	71	0.69	1.00	1	5%	
63	0	-	0	-	-	0.00	0	0%	9	41	53	51	0.81	1.04	1	11%	
64	0	-	0	-	-	0.00	0	0%	8	42	57	68	0.62	1.00	1	13%	
65	23	12	29	61	0.20	0.59	0	0%	26	40	52	61	0.66	0.98	0	0%	
67	25	14	22	60	0.23	0.45	0	0%	24	40	54	60	0.66	0.98	0	0%	
70	25	27	46	75	0.36	0.62	0	0%	26	39	56	75	0.52	0.72	0	0%	
71	8	12	14	51	0.24	0.27	0	0%	8	28	33	51	0.54	0.65	0	0%	
74	0	-	0	-	-	0.00	0	0%	11	28	45	79	0.36	0.57	0	0%	
75	19	14	18	59	0.23	0.38	0	0%	21	30	44	60	0.51	0.90	0	0%	
76	0	-	0	-	-	0.00	0	0%	11	48	63	78	0.62	0.81	0	0%	
77	0	-	0	-	-	0.00	0	0%	10	41	63	79	0.52	0.80	0	0%	
78	6	4	4	49	0.07	0.08	0	0%	6	8	10	49	0.16	0.20	0	0%	
C Line	673	28	15	21	76	0.19	0.28	0	0%	39	48	62	76	0.63	0.82	0	0%
D Line	674	30	34	49	76	0.45	0.64	0	0%	33	54	70	76	0.71	0.92	0	0%
E Line	675	25	33	55	76	0.43	0.72	0	0%	44	52	73	76	0.68	0.96	0	0%

# I Area Specific Service Maps

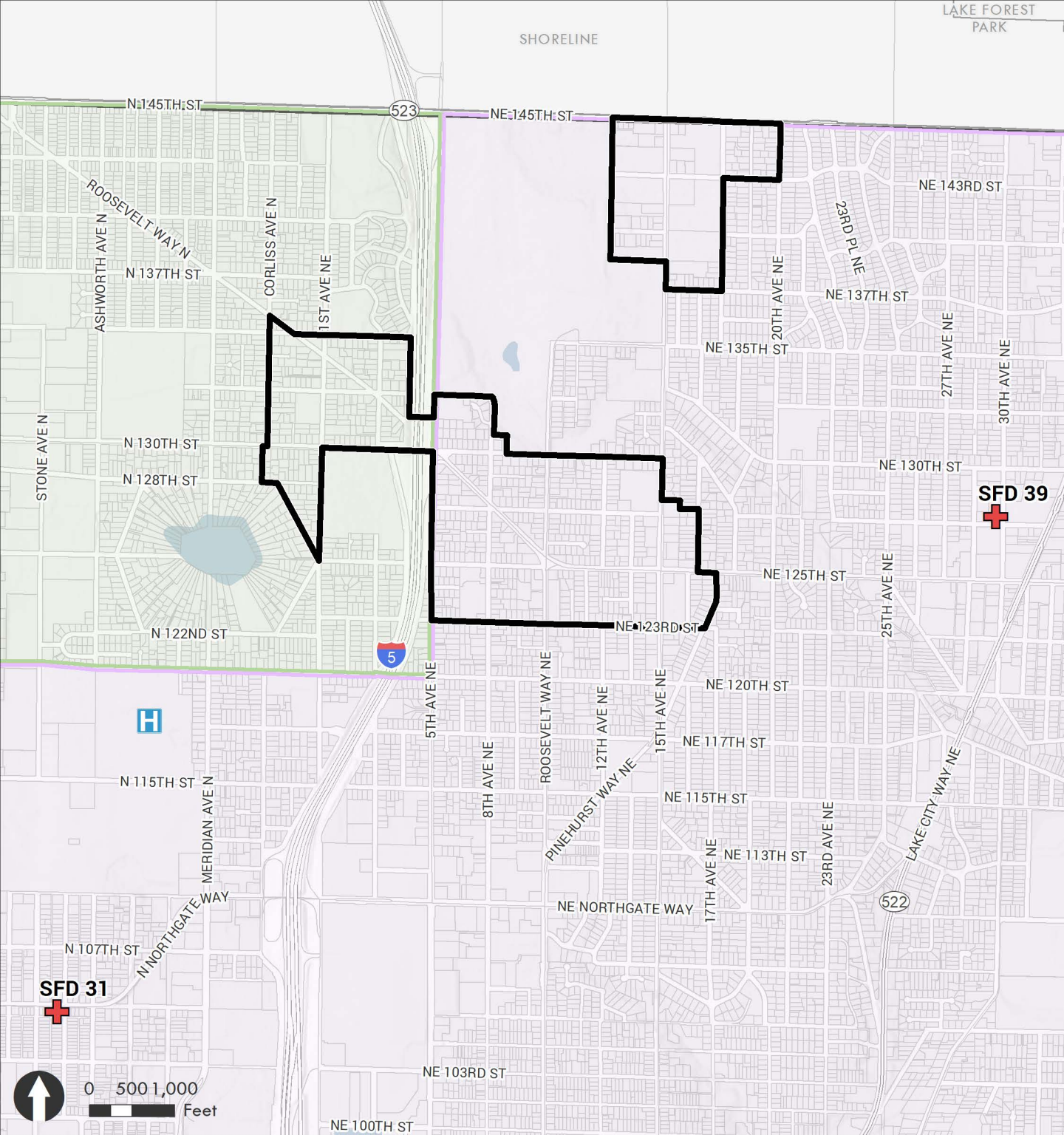










- |                    |                        |
|--------------------|------------------------|
| City of Seattle    | <b>Fire Battalions</b> |
| Urban Growth Areas | Battalion 2            |
| Other Cities       | Battalion 4            |
| Analysis Zones     | Battalion 5            |
| Fire Station       | Battalion 6            |
| Hospital           | Battalion 7            |

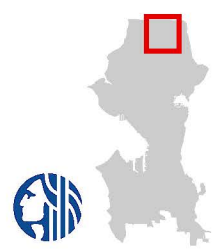


Map Date: February 2023

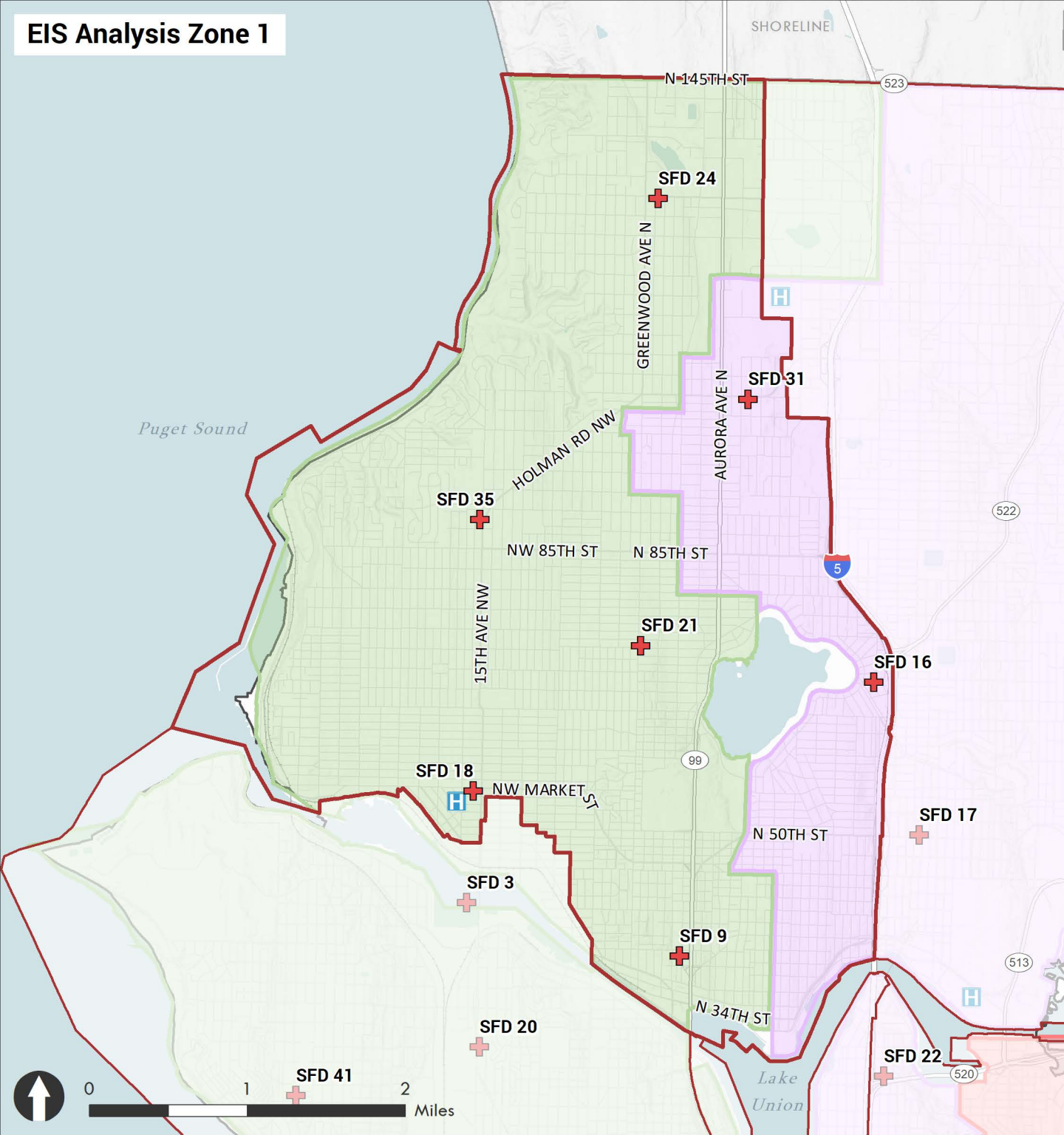


-  City of Seattle
-  Urban Growth Areas
-  Other Cities
-  130th/145th Station Areas
-  Fire Station
-  Hospital

- Fire Battalions**
-  Battalion 2
  -  Battalion 4
  -  Battalion 5
  -  Battalion 6
  -  Battalion 7



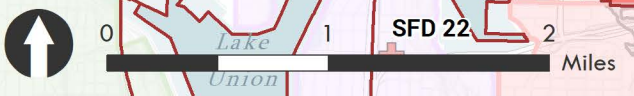
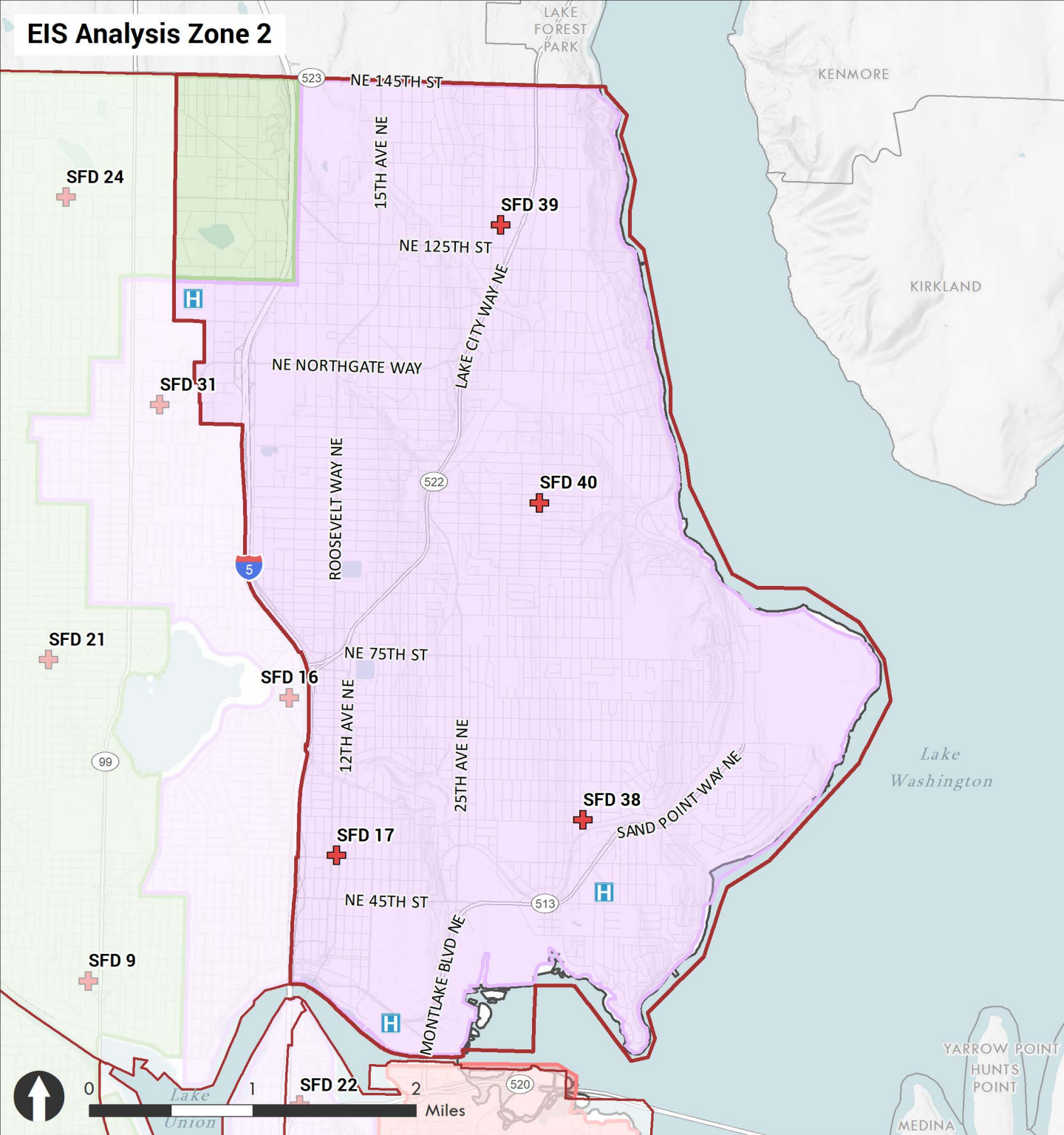
# EIS Analysis Zone 1



- |                    |                        |
|--------------------|------------------------|
| City of Seattle    | <b>Fire Battalions</b> |
| Urban Growth Areas | Battalion 2            |
| Other Cities       | Battalion 4            |
| Analysis Zones     | Battalion 5            |
| Fire Station       | Battalion 6            |
| Hospital           | Battalion 7            |

Map Date: February 2023

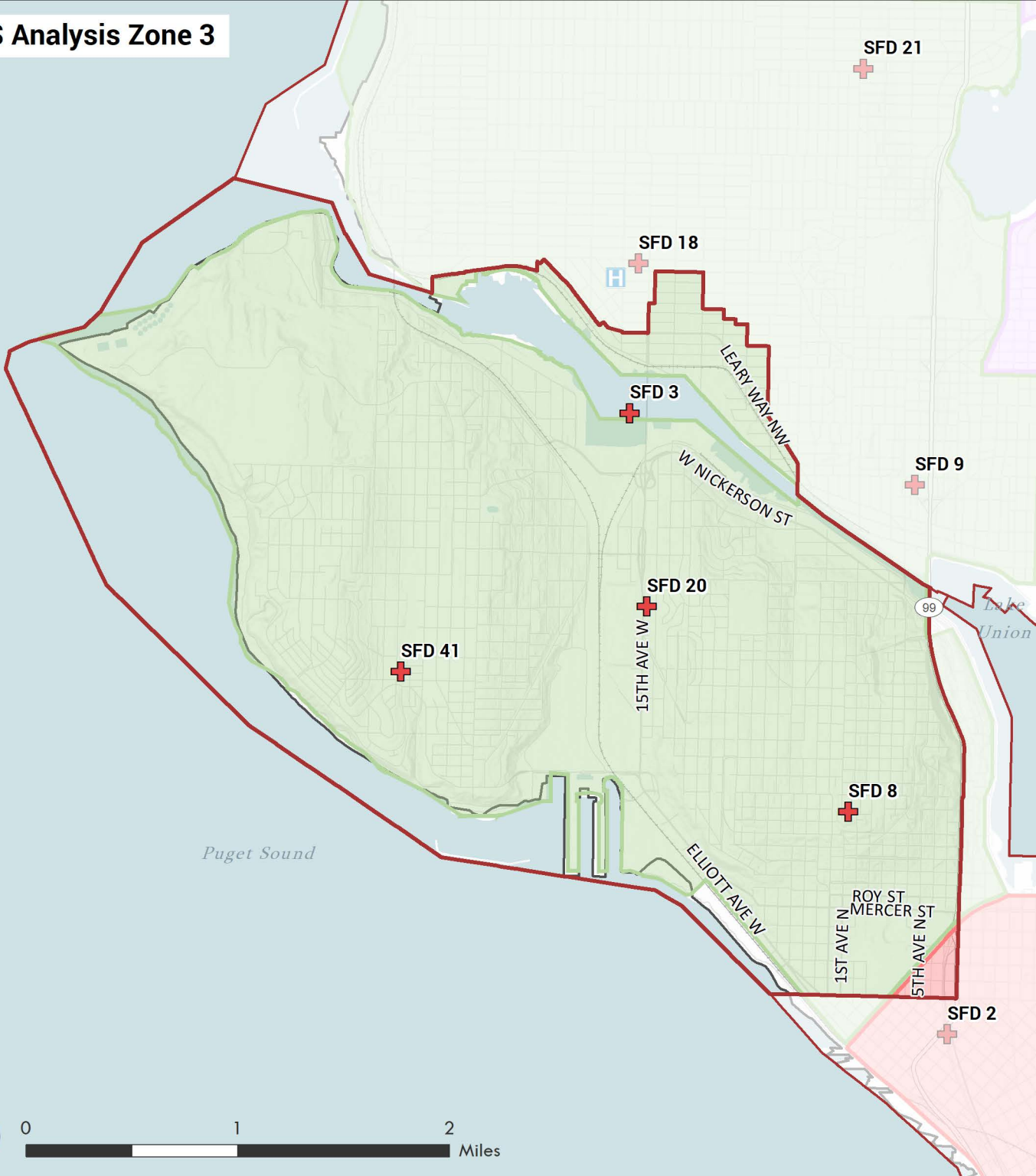
# EIS Analysis Zone 2



- |                    |                        |
|--------------------|------------------------|
| City of Seattle    | <b>Fire Battalions</b> |
| Urban Growth Areas | Battalion 2            |
| Other Cities       | Battalion 4            |
| Analysis Zones     | Battalion 5            |
| Fire Station       | Battalion 6            |
| Hospital           | Battalion 7            |



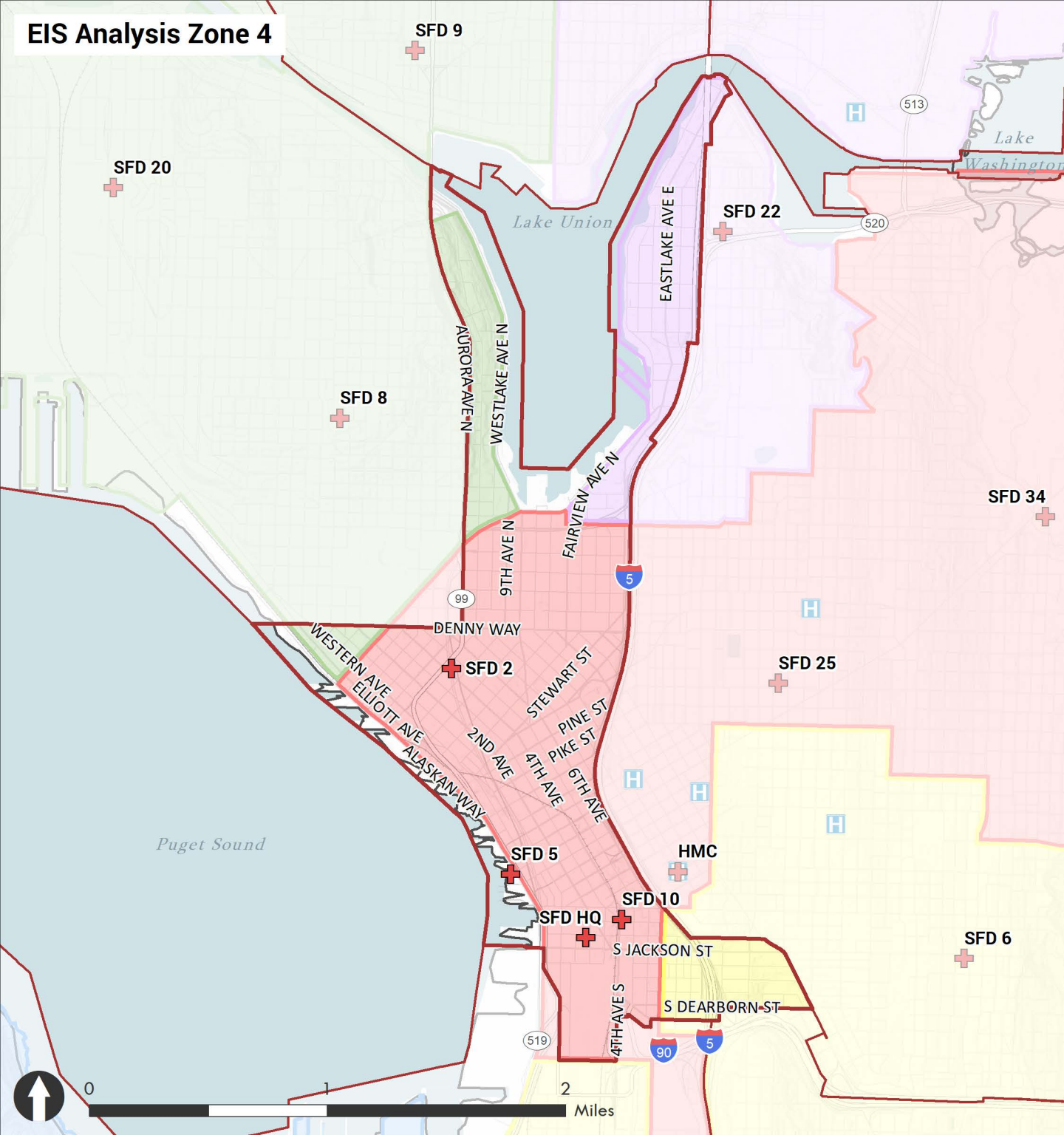
# EIS Analysis Zone 3



- |                    |                        |
|--------------------|------------------------|
| City of Seattle    | <b>Fire Battalions</b> |
| Urban Growth Areas | Battalion 2            |
| Other Cities       | Battalion 4            |
| Analysis Zones     | Battalion 5            |
| Fire Station       | Battalion 6            |
| Hospital           | Battalion 7            |

Map Date: February 2023

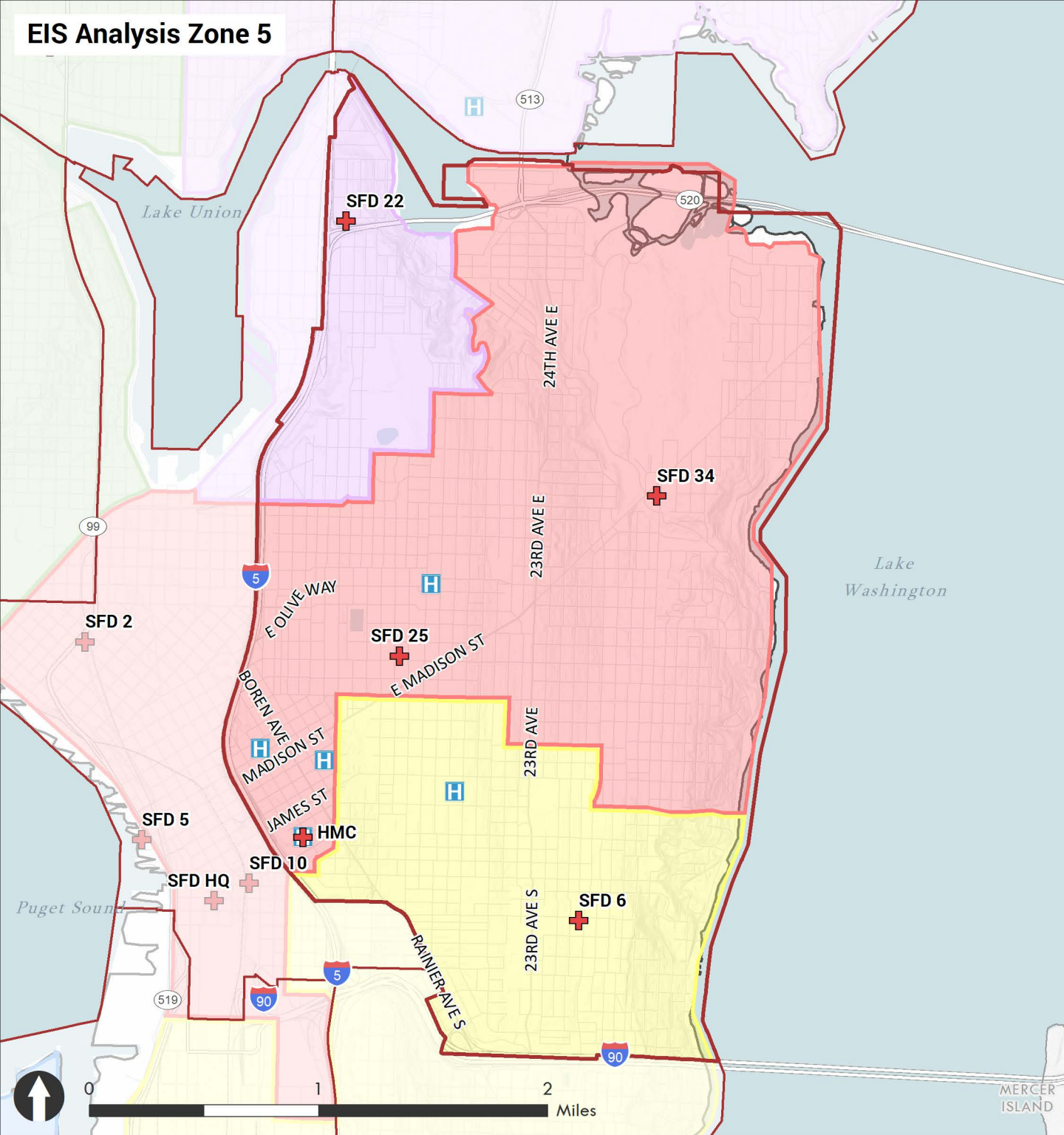
# EIS Analysis Zone 4



- |                    |                        |
|--------------------|------------------------|
| City of Seattle    | <b>Fire Battalions</b> |
| Urban Growth Areas | Battalion 2            |
| Other Cities       | Battalion 4            |
| Analysis Zones     | Battalion 5            |
| Fire Station       | Battalion 6            |
| Hospital           | Battalion 7            |

Map Date: February 2023

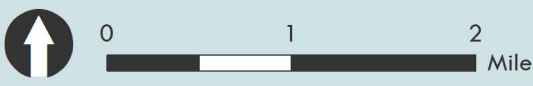
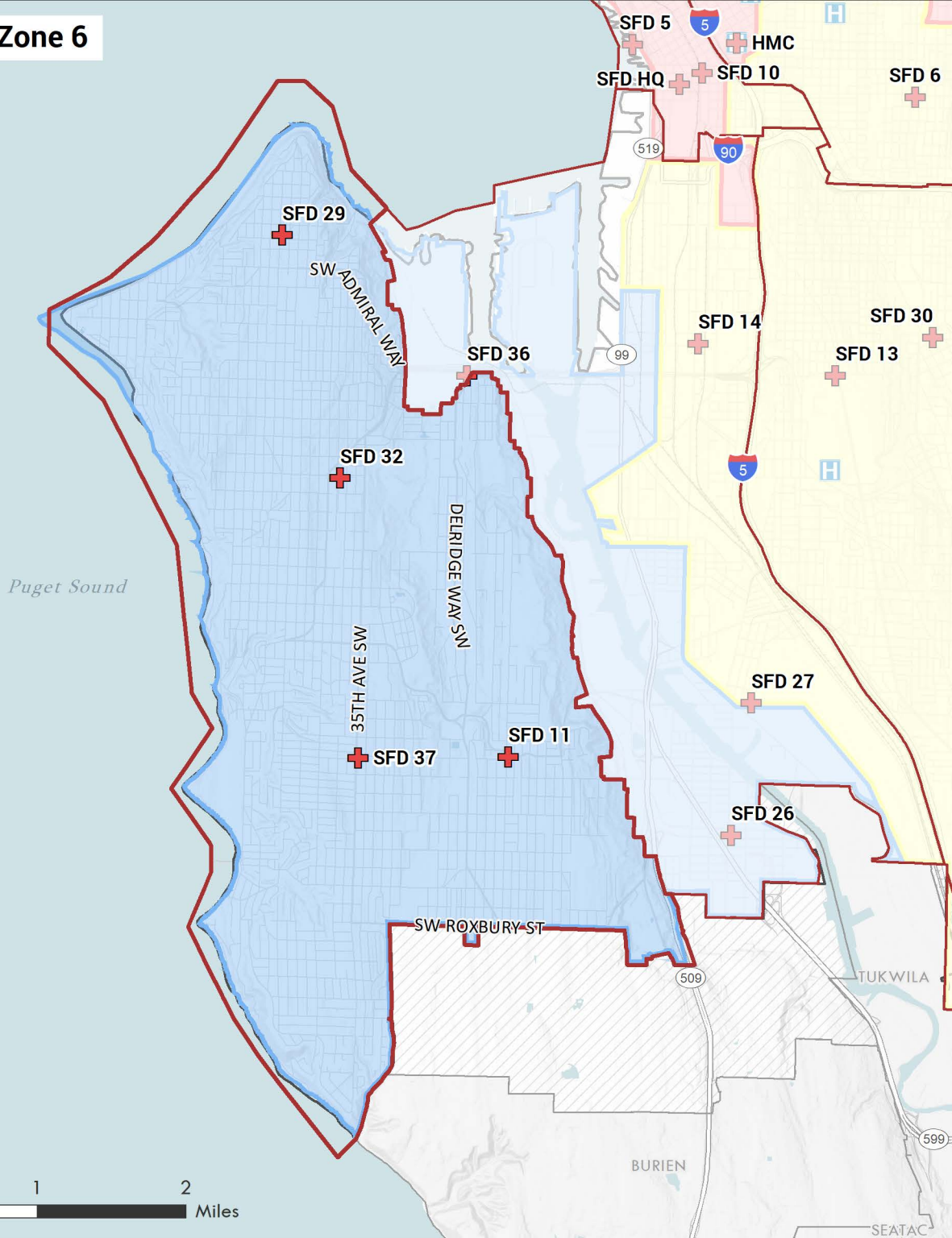
# EIS Analysis Zone 5



- |                    |                        |
|--------------------|------------------------|
| City of Seattle    | <b>Fire Battalions</b> |
| Urban Growth Areas | Battalion 2            |
| Other Cities       | Battalion 4            |
| Analysis Zones     | Battalion 5            |
| Fire Station       | Battalion 6            |
| Hospital           | Battalion 7            |

Map Date: February 2023

# EIS Analysis Zone 6

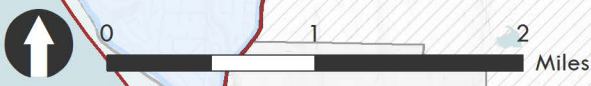
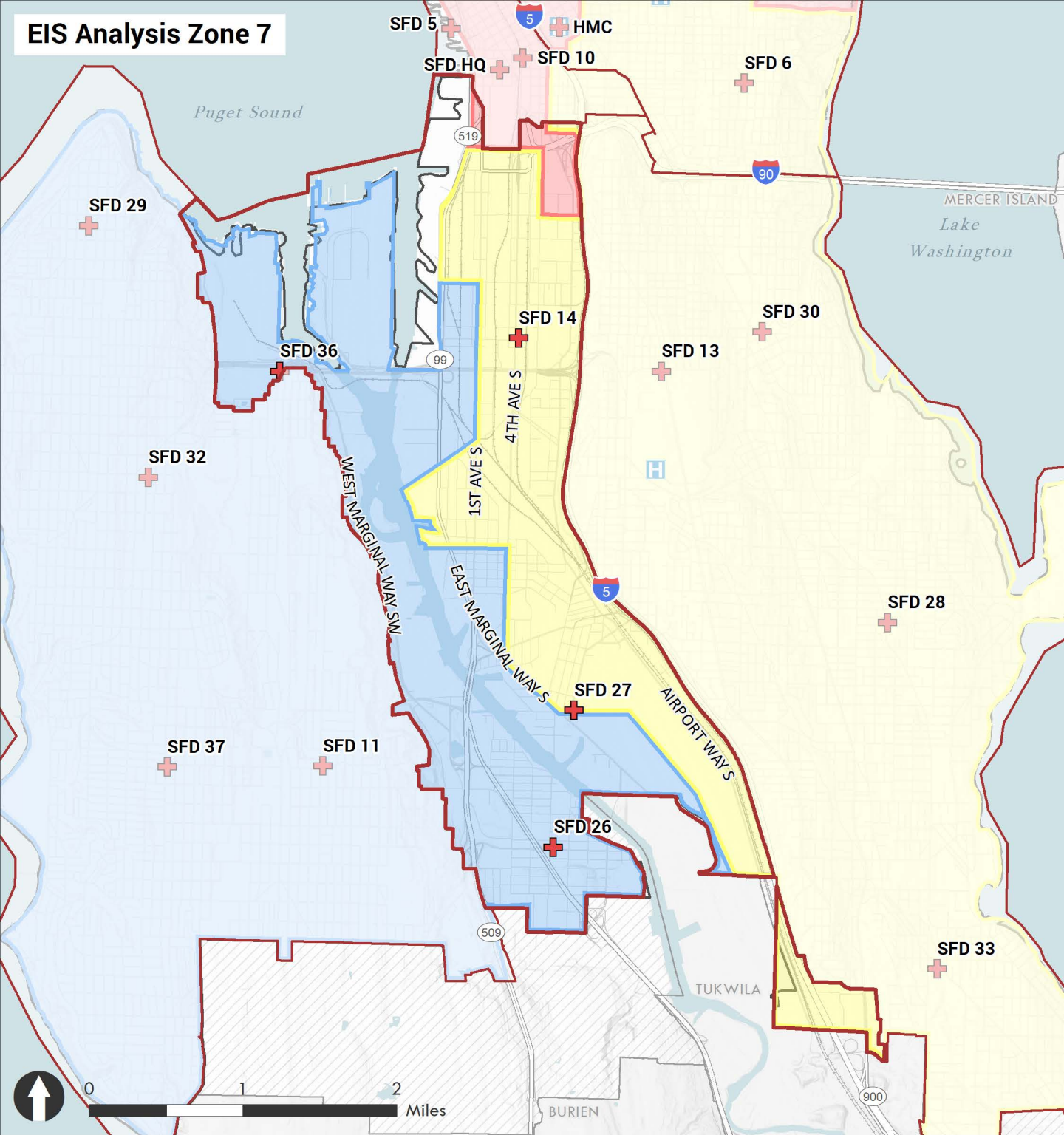


- |                    |                        |
|--------------------|------------------------|
| City of Seattle    | <b>Fire Battalions</b> |
| Urban Growth Areas | Battalion 2            |
| Other Cities       | Battalion 4            |
| Analysis Zones     | Battalion 5            |
| Fire Station       | Battalion 6            |
| Hospital           | Battalion 7            |

Map Date: February 2023



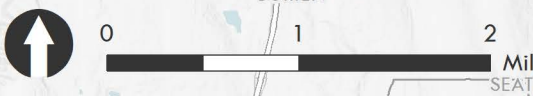
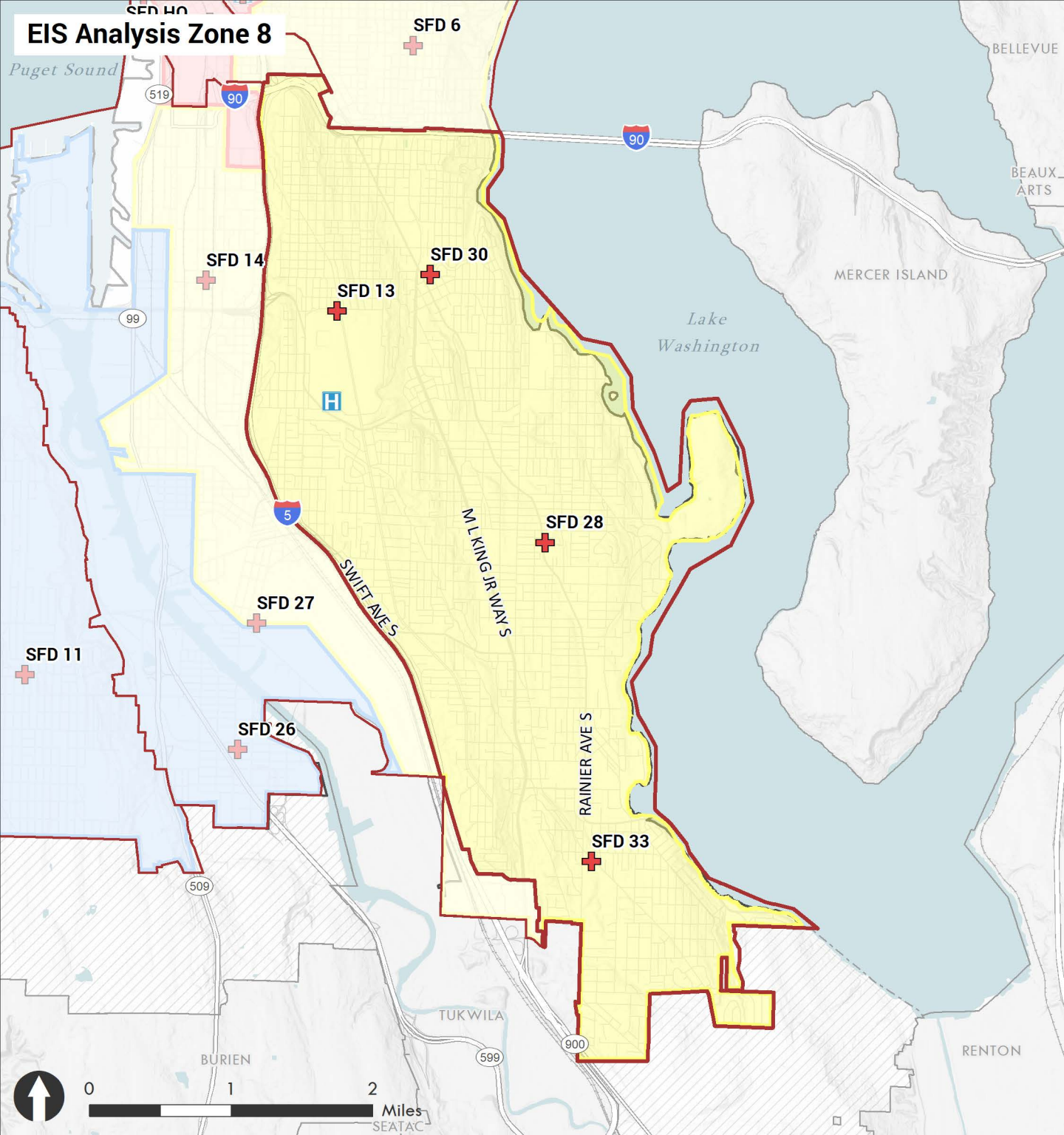
# EIS Analysis Zone 7



- |                    |                        |
|--------------------|------------------------|
| City of Seattle    | <b>Fire Battalions</b> |
| Urban Growth Areas | Battalion 2            |
| Other Cities       | Battalion 4            |
| Analysis Zones     | Battalion 5            |
| Fire Station       | Battalion 6            |
| Hospital           | Battalion 7            |

Map Date: February 2023

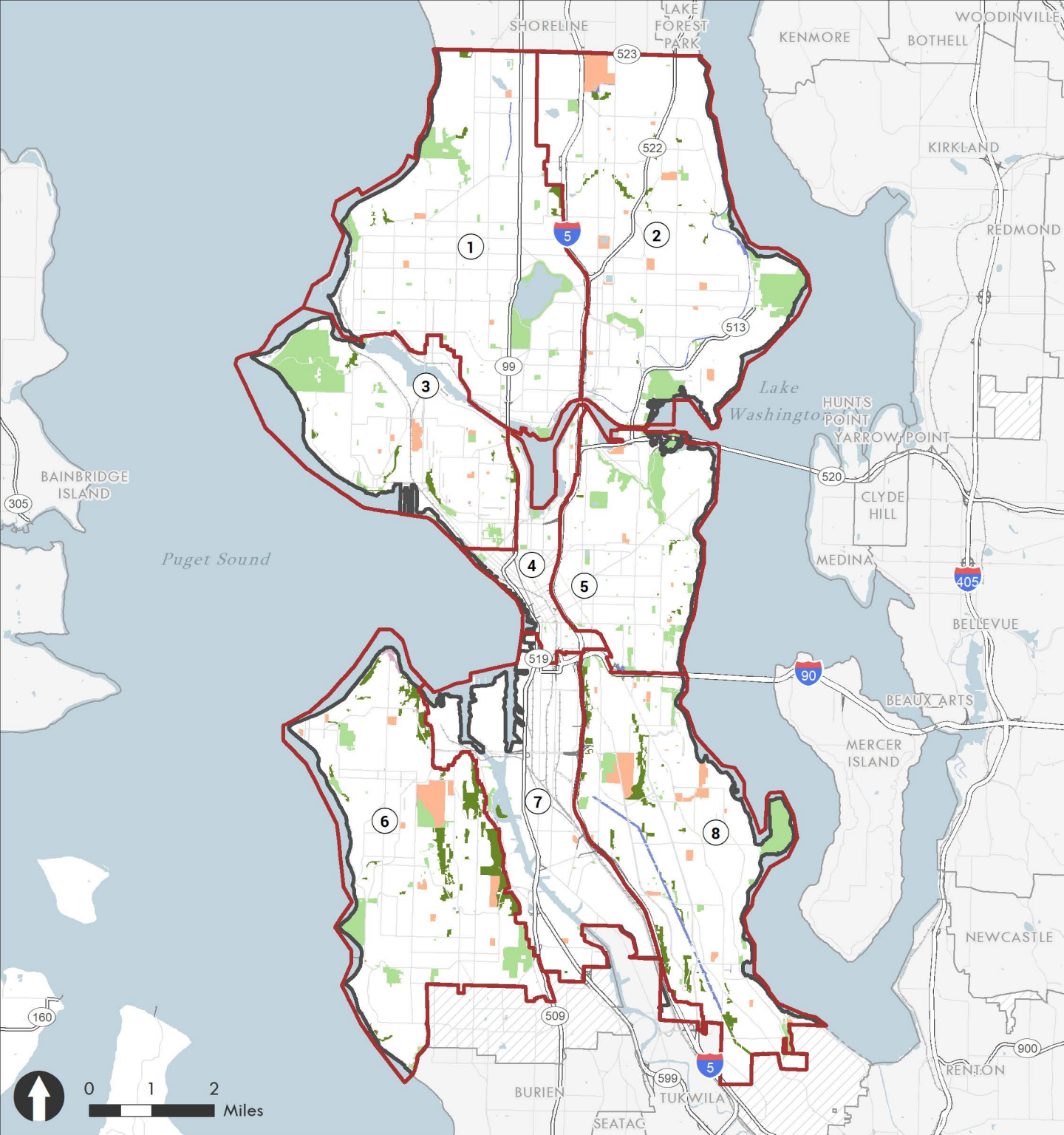
# EIS Analysis Zone 8







- |                    |                        |
|--------------------|------------------------|
| City of Seattle    | <b>Fire Battalions</b> |
| Urban Growth Areas | Battalion 2            |
| Other Cities       | Battalion 4            |
| Analysis Zones     | Battalion 5            |
| Fire Station       | Battalion 6            |
| Hospital           | Battalion 7            |



Map Date: February 2023

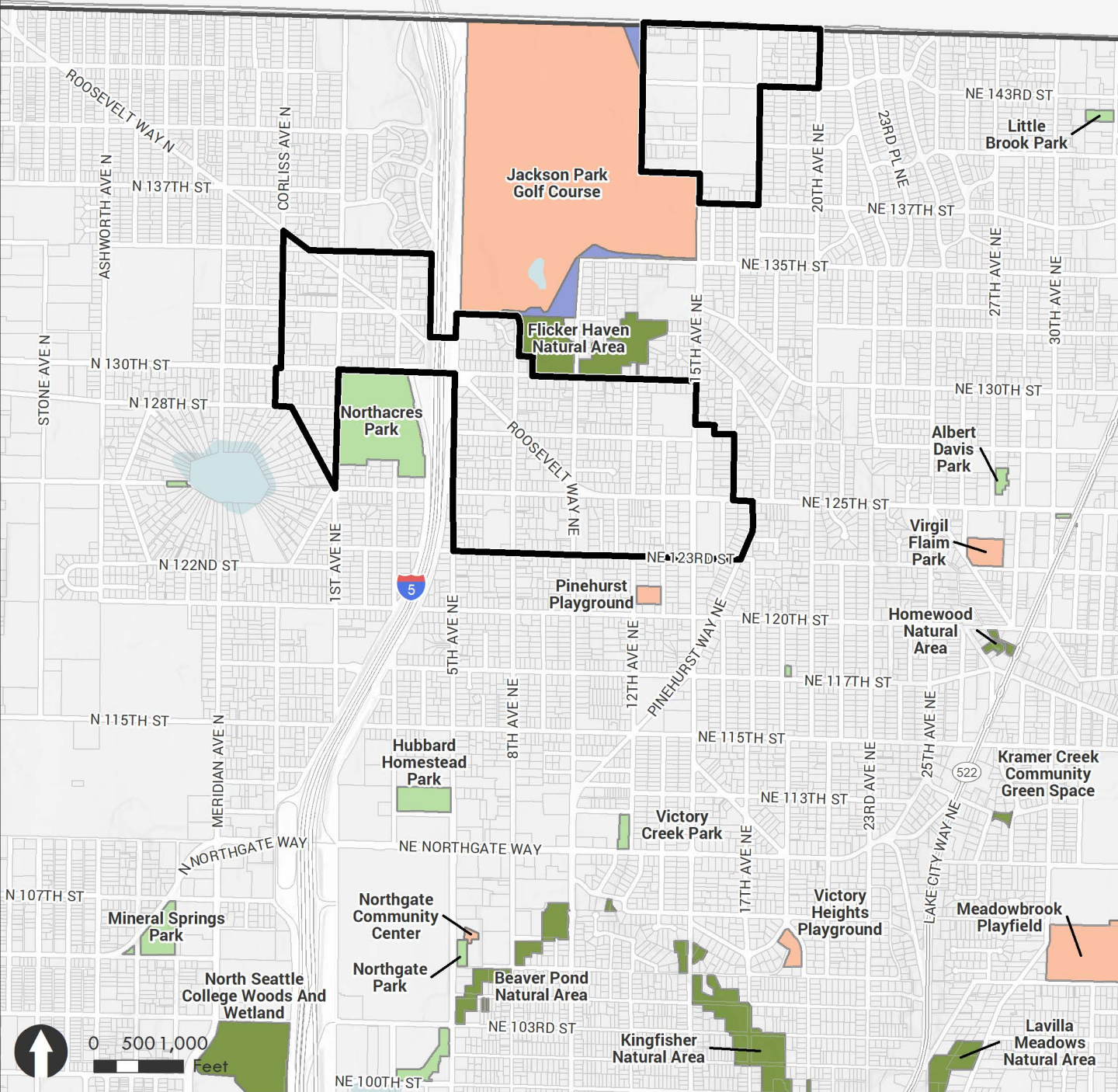


-  City of Seattle
-  Urban Growth Areas
-  Other Cities
-  Analysis Zones

- Public Parks and Open Space**
-  Parks
  -  Playfields and Golf Courses
  -  Greenbelts
  -  Trails
  -  Viewpoints



Map Date: March 2023

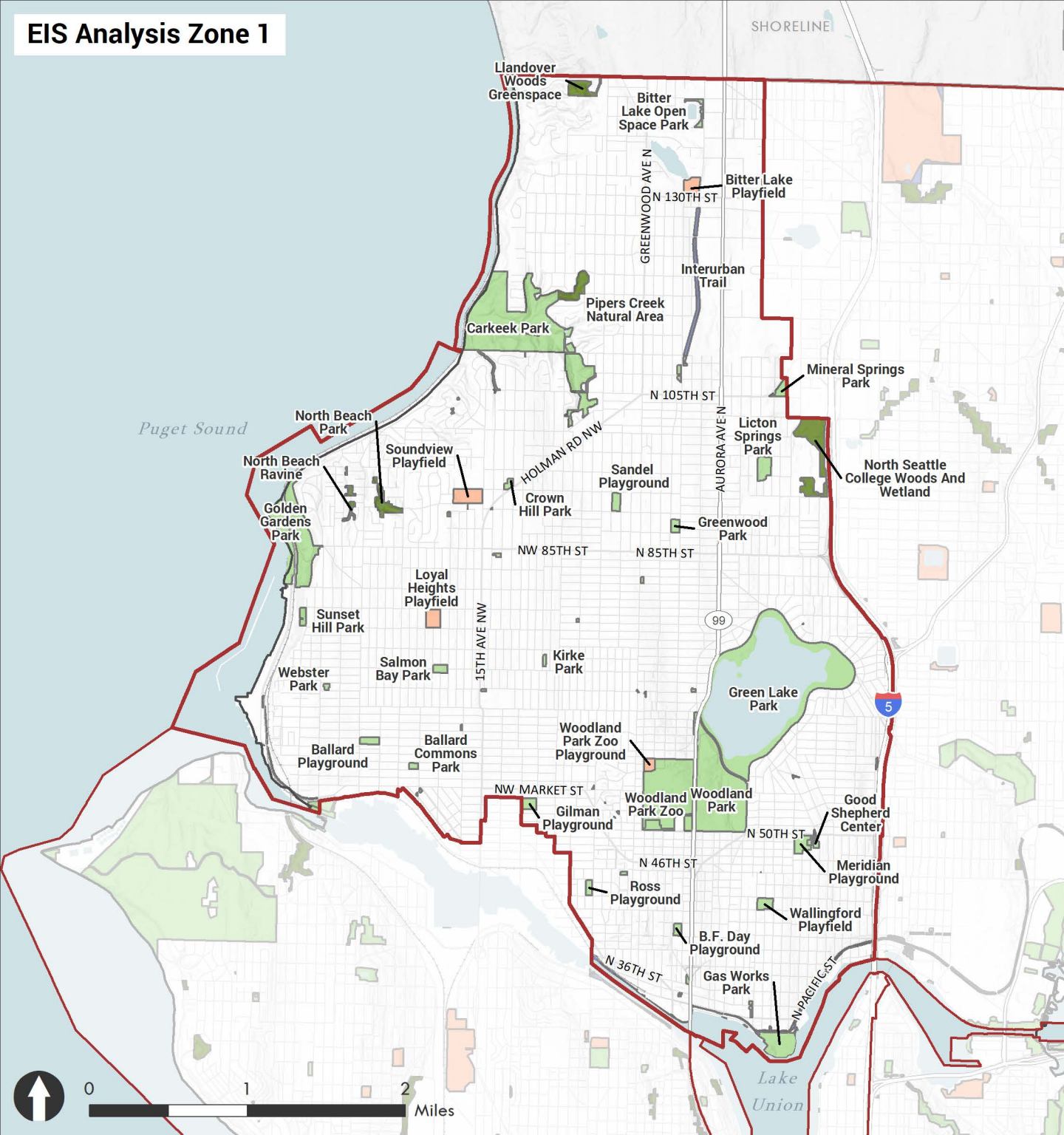


- City of Seattle
- Urban Growth Areas
- Other Cities
- 130th/145th Station Areas

- Public Parks and Open Space**
- Parks
  - Playfields and Golf Courses
  - Greenbelts
  - Trails
  - Viewpoints



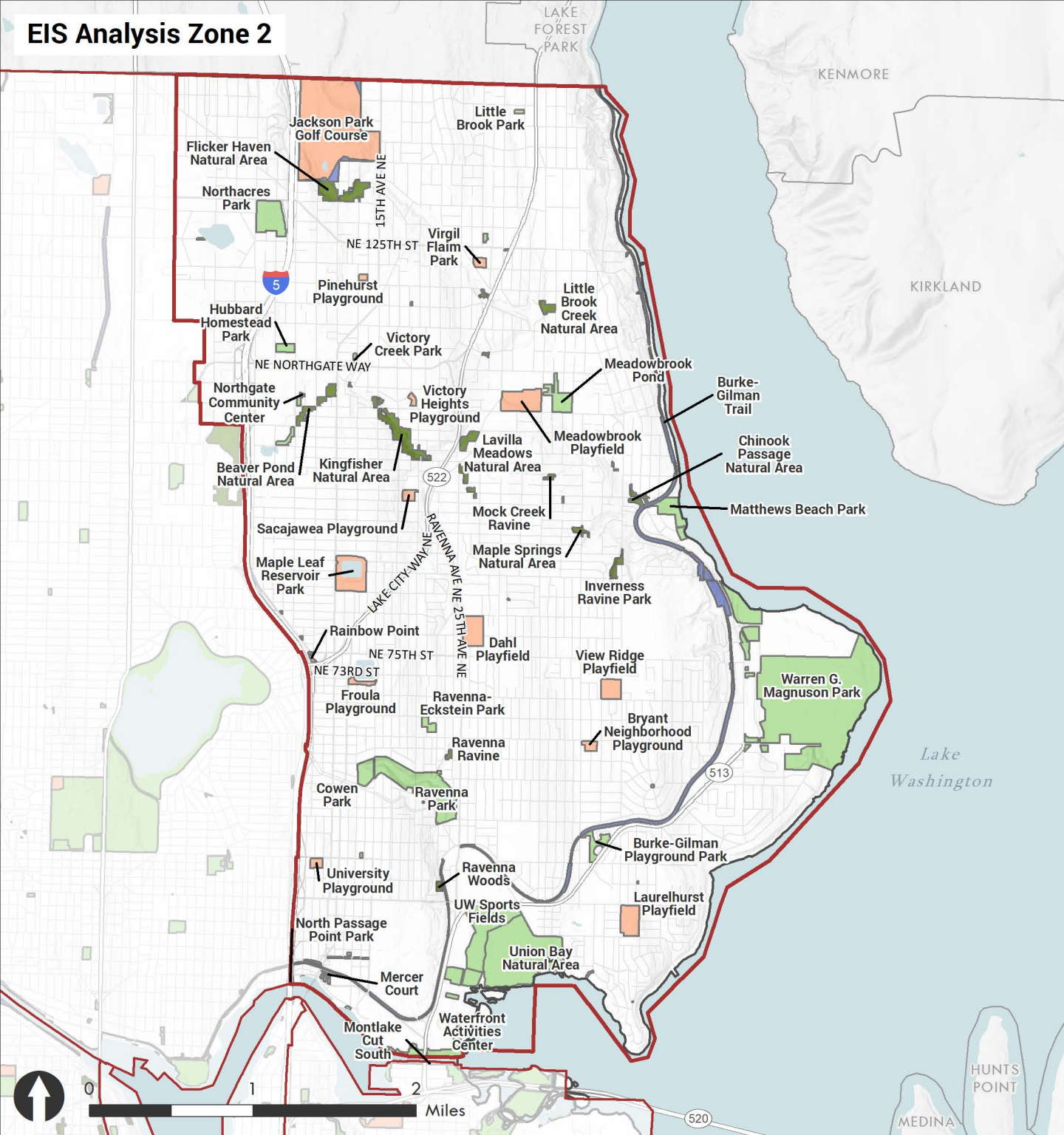
# EIS Analysis Zone 1



- |  |                    |  |                                    |
|--|--------------------|--|------------------------------------|
|  | City of Seattle    |  | <b>Public Parks and Open Space</b> |
|  | Urban Growth Areas |  | Parks                              |
|  | Other Cities       |  | Playfields and Golf Courses        |
|  | Analysis Zones     |  | Greenbelts                         |
|  |                    |  | Trails                             |
|  |                    |  | Viewpoints                         |



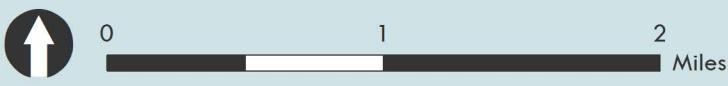
# EIS Analysis Zone 2



- |  |   |
|--|---|
|  City of Seattle    | <b>Public Parks and Open Space</b>  |
|  Urban Growth Areas |  Parks                       |
|  Other Cities       |  Playfields and Golf Courses |
|  Analysis Zones     |  Greenbelts                  |
|  |  Trails                      |
|  |  Viewpoints                  |



# EIS Analysis Zone 3

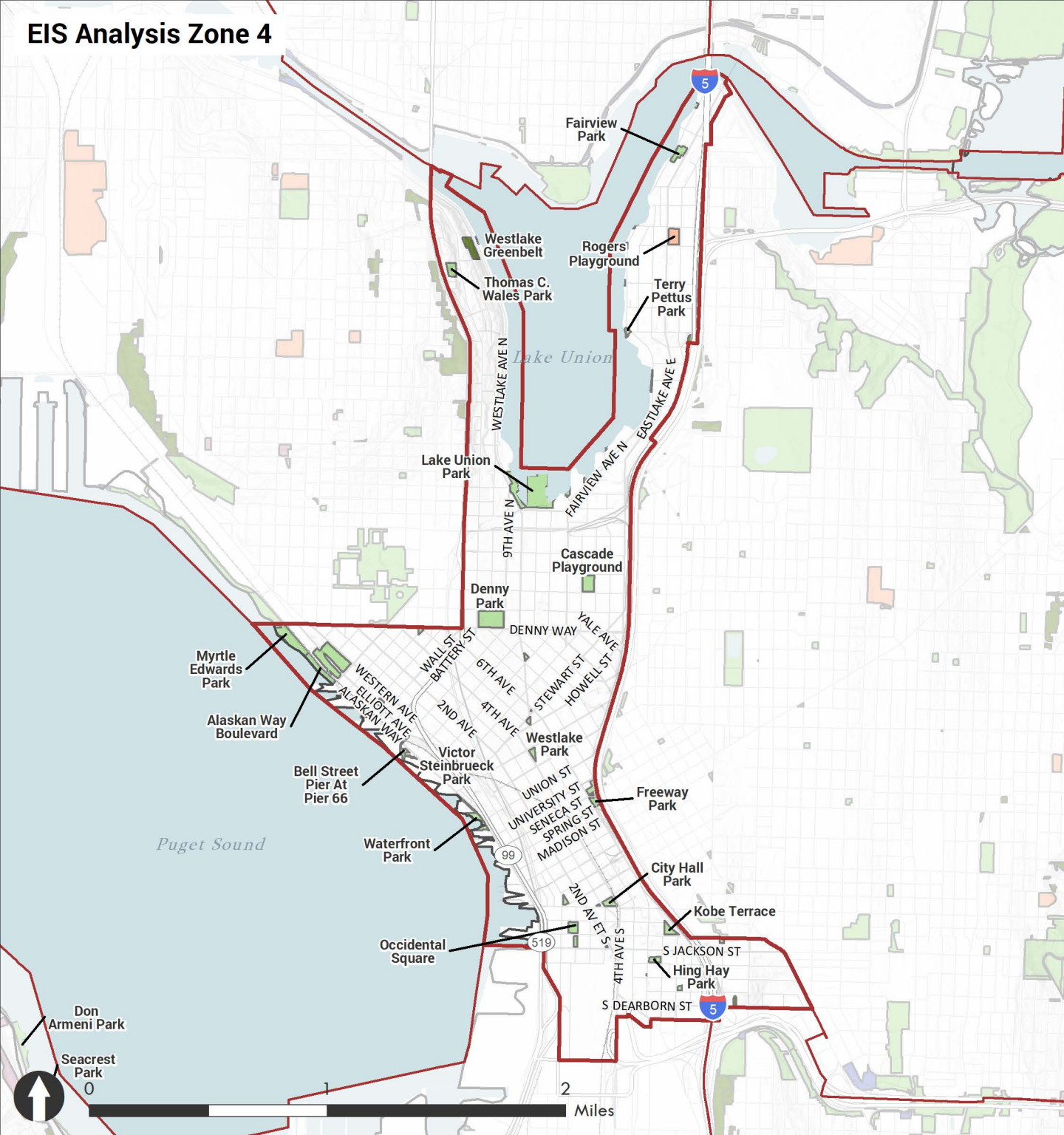


- |                    |                                    |
|--------------------|------------------------------------|
| City of Seattle    | <b>Public Parks and Open Space</b> |
| Urban Growth Areas | Parks                              |
| Other Cities       | Playfields and Golf Courses        |
| Analysis Zones     | Greenbelts                         |
|                    | Trails                             |
|                    | Viewpoints                         |



Map Date: March 2023

# EIS Analysis Zone 4



- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones

- ### Public Parks and Open Space
- Parks
  - Playfields and Golf Courses
  - Greenbelts
  - Trails
  - Viewpoints





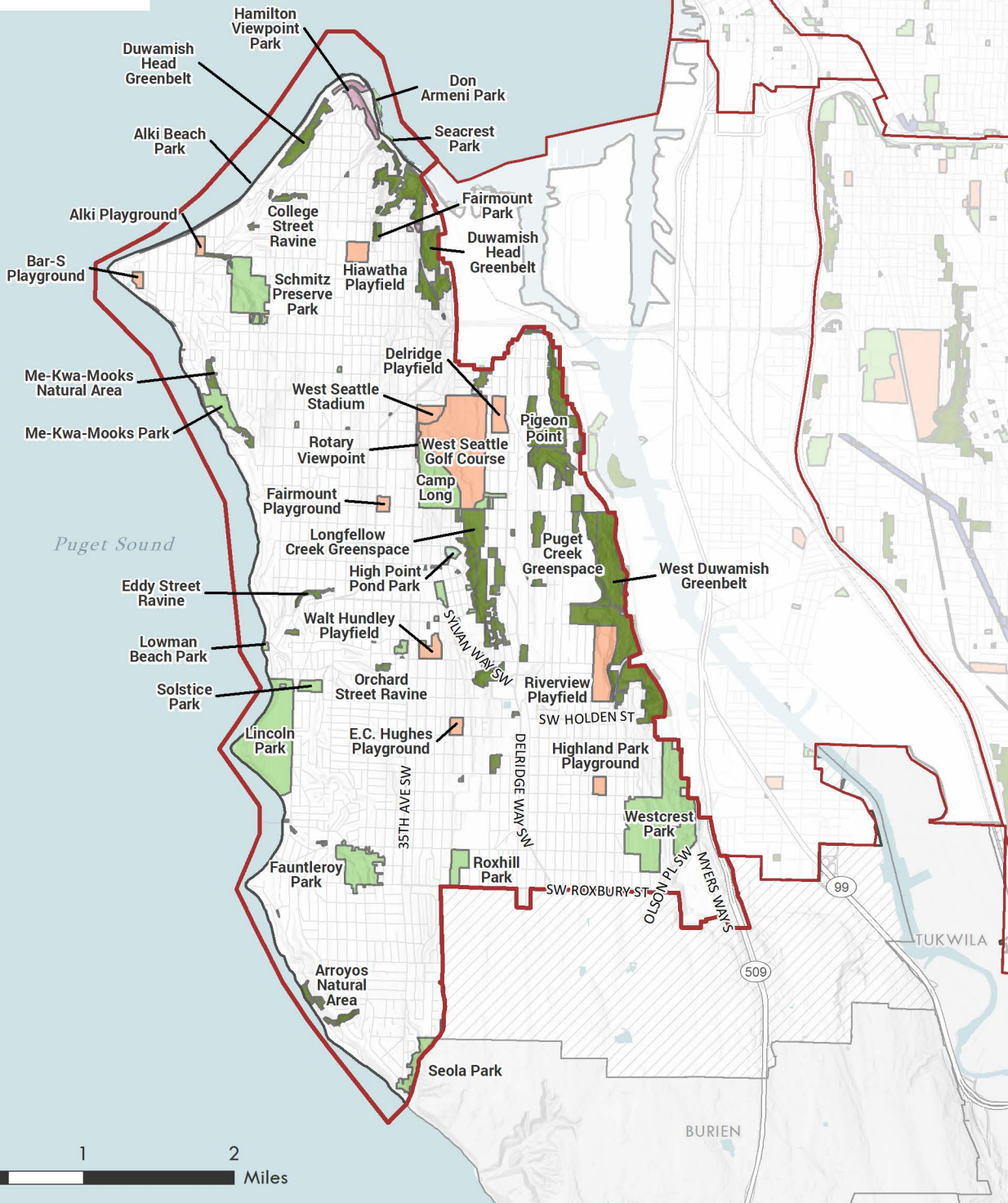
# EIS Analysis Zone 5



- |  |                    |  |                                    |
|--|--------------------|--|------------------------------------|
|  | City of Seattle    |  | <b>Public Parks and Open Space</b> |
|  | Urban Growth Areas |  | Parks                              |
|  | Other Cities       |  | Playfields and Golf Courses        |
|  | Analysis Zones     |  | Greenbelts                         |
|  |                    |  | Trails                             |
|  |                    |  | Viewpoints                         |



# EIS Analysis Zone 6

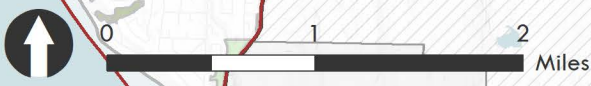
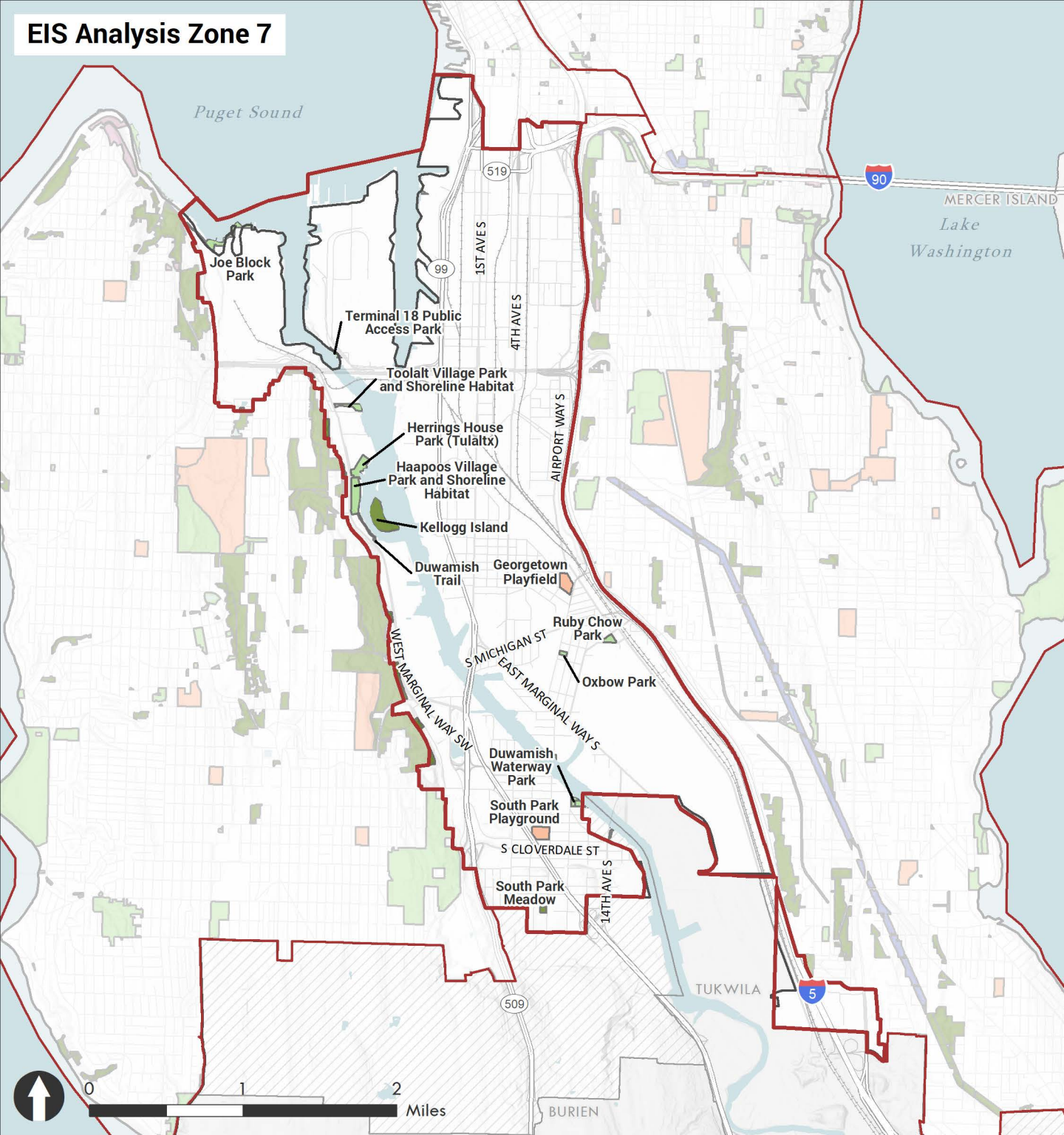


- |  |                    |  |                                    |
|--|--------------------|--|------------------------------------|
|  | City of Seattle    |  | <b>Public Parks and Open Space</b> |
|  | Urban Growth Areas |  | Parks                              |
|  | Other Cities       |  | Playfields and Golf Courses        |
|  | Analysis Zones     |  | Greenbelts                         |
|  |                    |  | Trails                             |
|  |                    |  | Viewpoints                         |



Map Date: March 2023

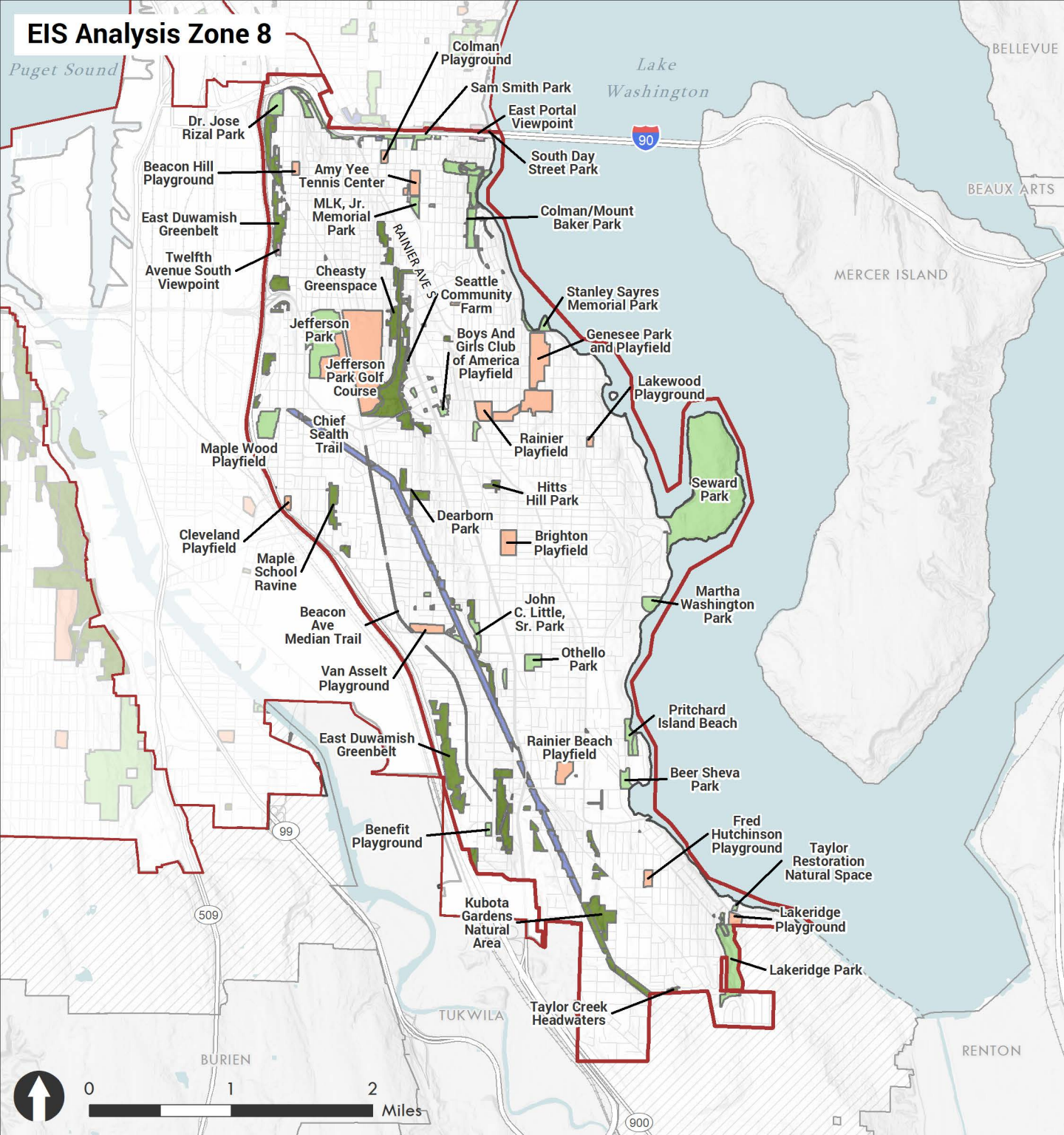
# EIS Analysis Zone 7



- |  |                    |  |                                    |
|--|--------------------|--|------------------------------------|
|  | City of Seattle    |  | <b>Public Parks and Open Space</b> |
|  | Urban Growth Areas |  | Parks                              |
|  | Other Cities       |  | Playfields and Golf Courses        |
|  | Analysis Zones     |  | Greenbelts                         |
|  |                    |  | Trails                             |
|  |                    |  | Viewpoints                         |



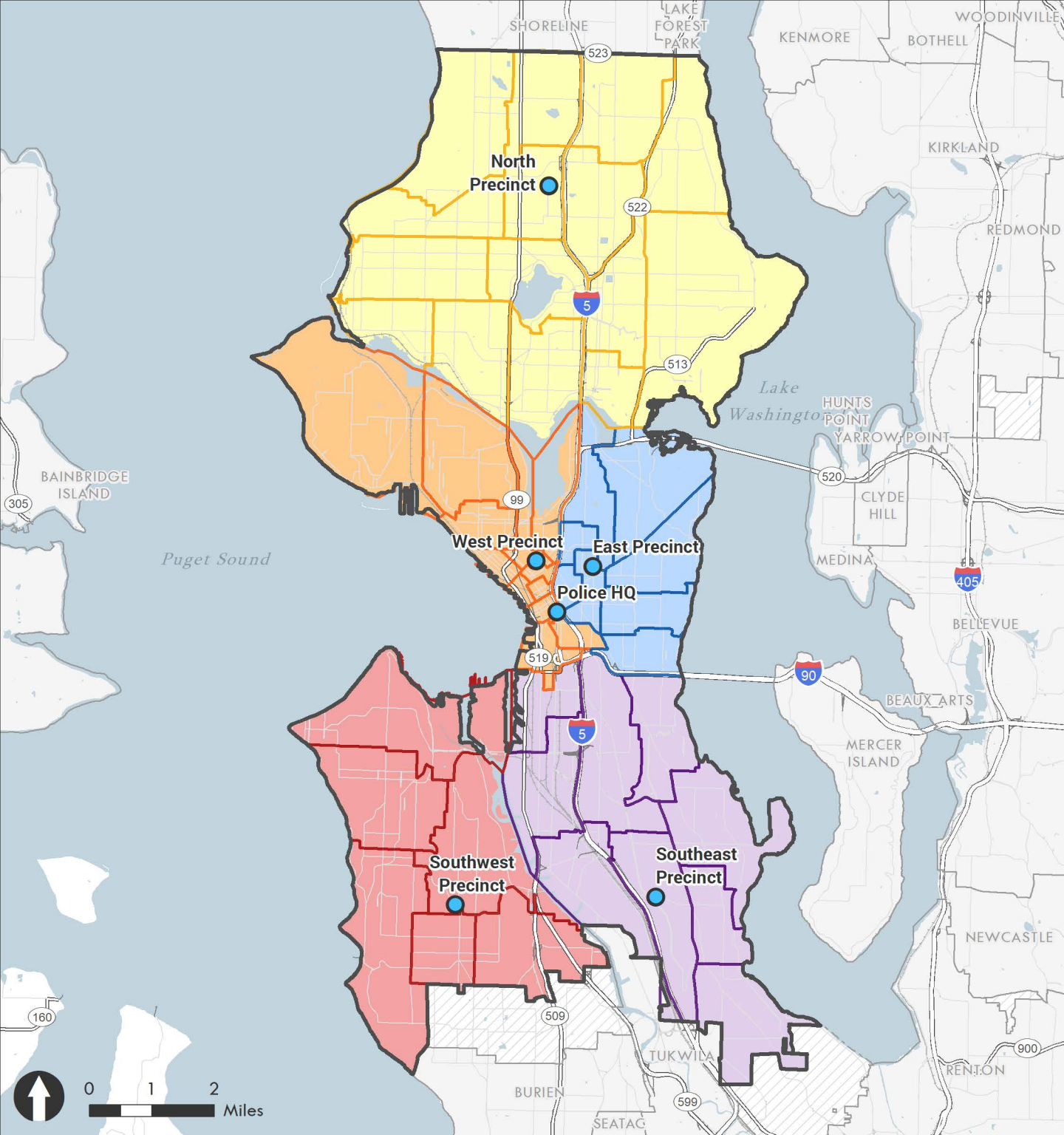
# EIS Analysis Zone 8



- |  |                    |  |                             |
|--|--------------------|--|-----------------------------|
|  | City of Seattle    |  | Parks                       |
|  | Urban Growth Areas |  | Playfields and Golf Courses |
|  | Other Cities       |  | Greenbelts                  |
|  | Analysis Zones     |  | Trails                      |
|  |                    |  | Viewpoints                  |



Map Date: March 2023

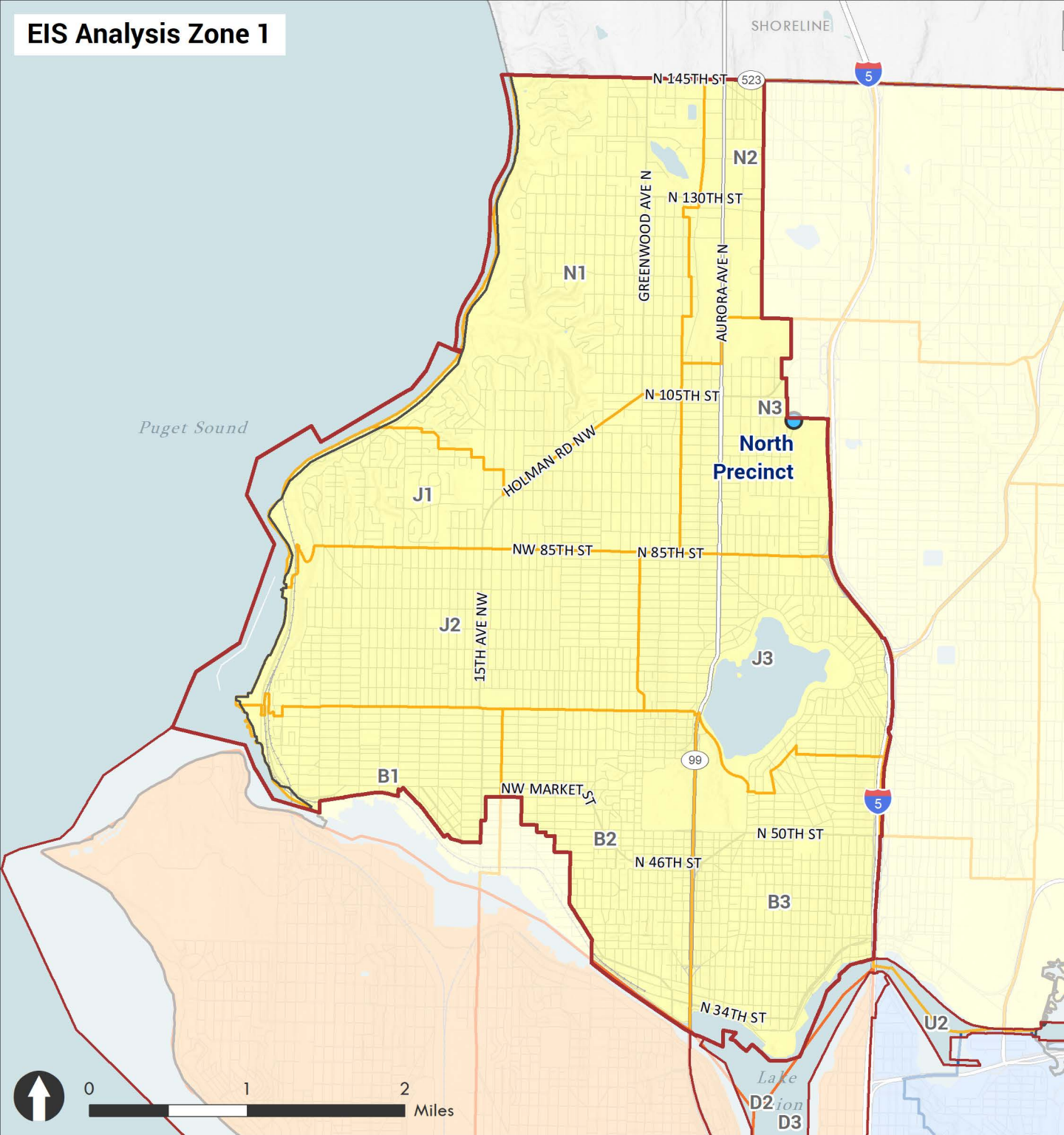


- |                    |                                    |
|--------------------|------------------------------------|
| City of Seattle    | <b>Seattle Police Patrol Areas</b> |
| Urban Growth Areas | North Precinct                     |
| Other Cities       | East Precinct                      |
| Police Stations    | West Precinct                      |
|                    | South Precinct                     |
|                    | Southwest Precinct                 |



Map Date: March 2023

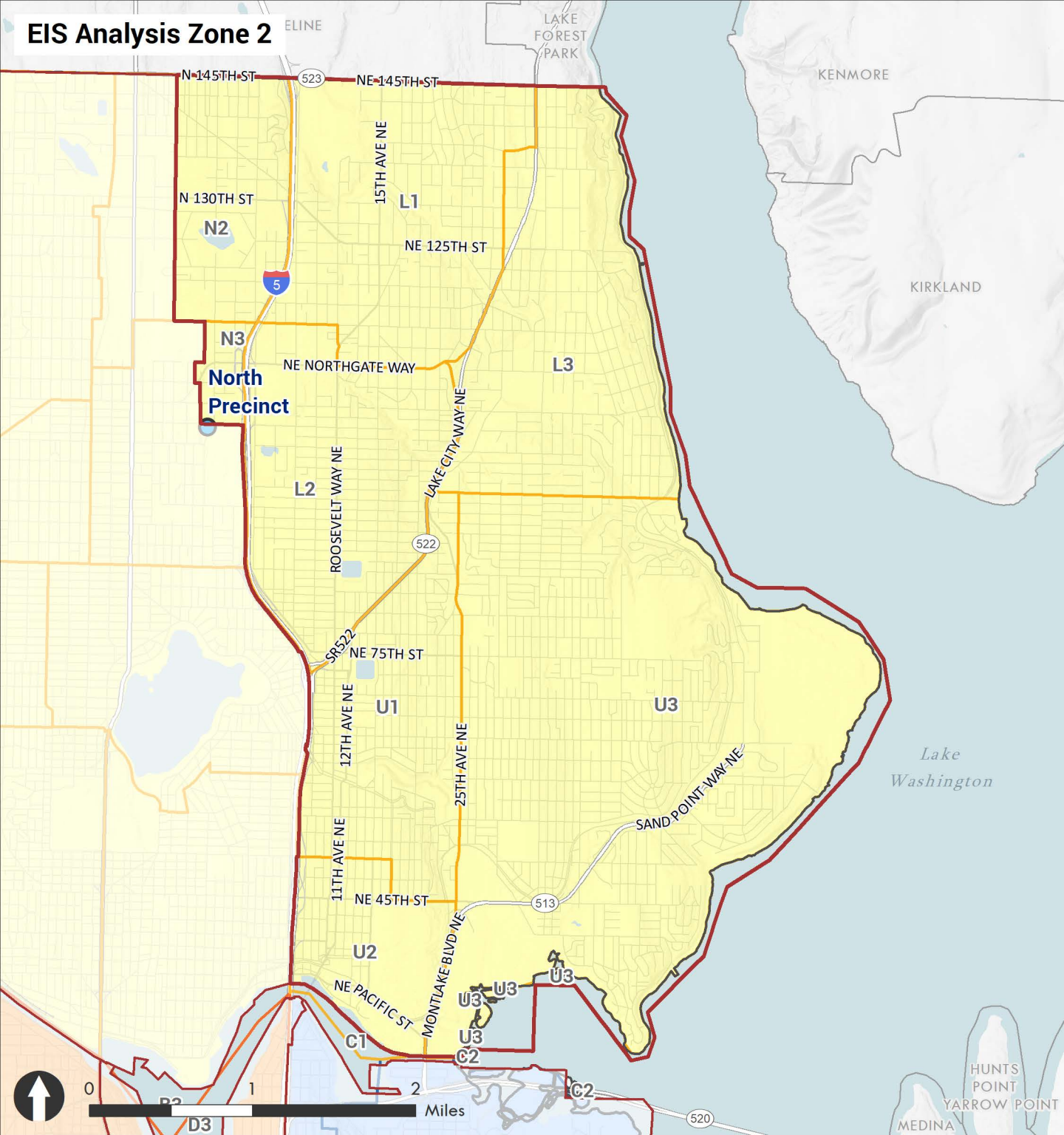
# EIS Analysis Zone 1



- |  |                    |  |                    |
|--|--------------------|--|--------------------|
|  | City of Seattle    |  | North Precinct     |
|  | Urban Growth Areas |  | East Precinct      |
|  | Other Cities       |  | West Precinct      |
|  | Analysis Zones     |  | South Precinct     |
|  | Police Stations    |  | Southwest Precinct |

Map Date: March 2023

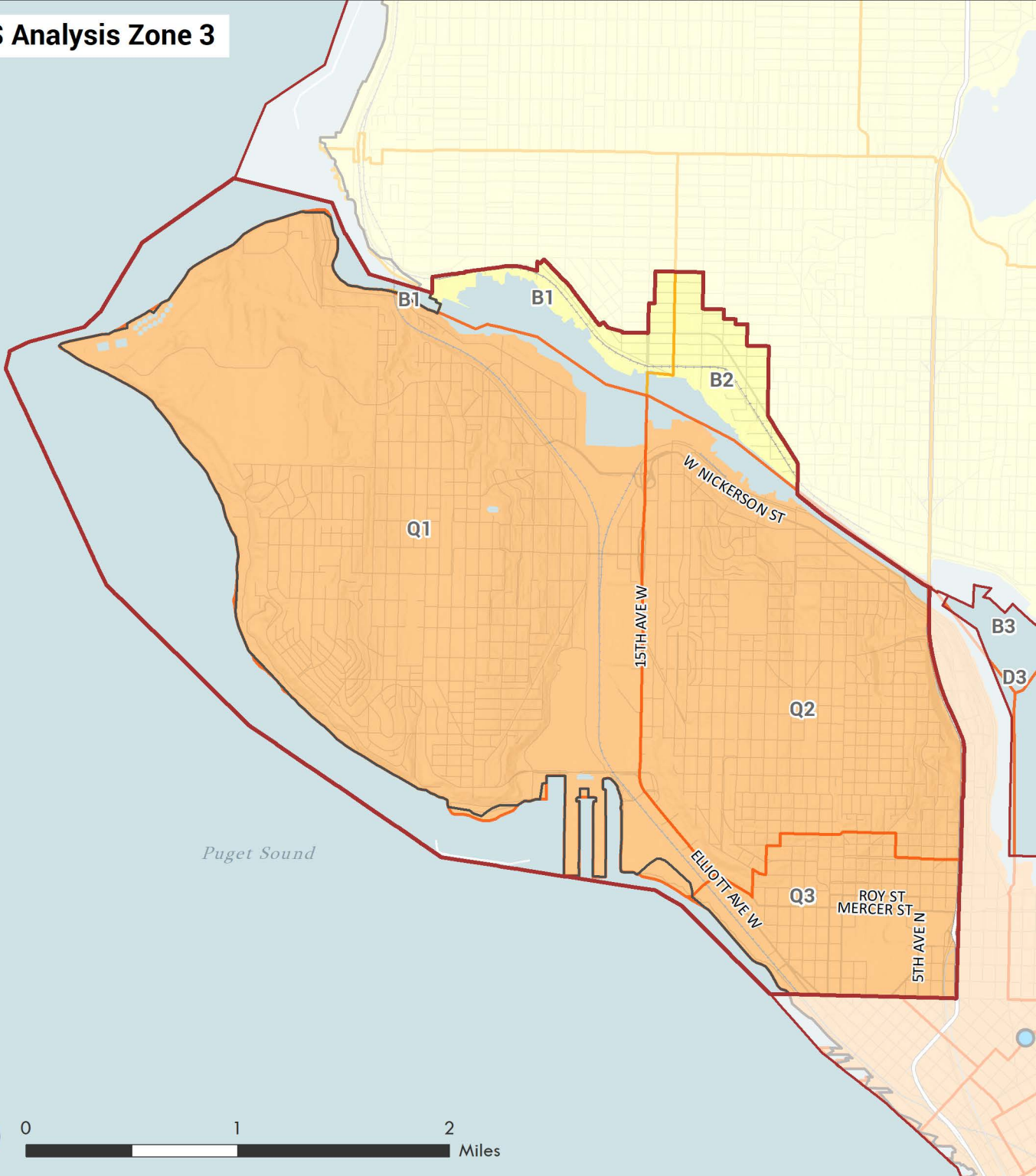
# EIS Analysis Zone 2



- |  |                    |  |                                    |
|--|--------------------|--|------------------------------------|
|  | City of Seattle    |  | <b>Seattle Police Patrol Areas</b> |
|  | Urban Growth Areas |  | North Precinct                     |
|  | Other Cities       |  | East Precinct                      |
|  | Analysis Zones     |  | West Precinct                      |
|  | Police Stations    |  | South Precinct                     |
|  |                    |  | Southwest Precinct                 |



# EIS Analysis Zone 3



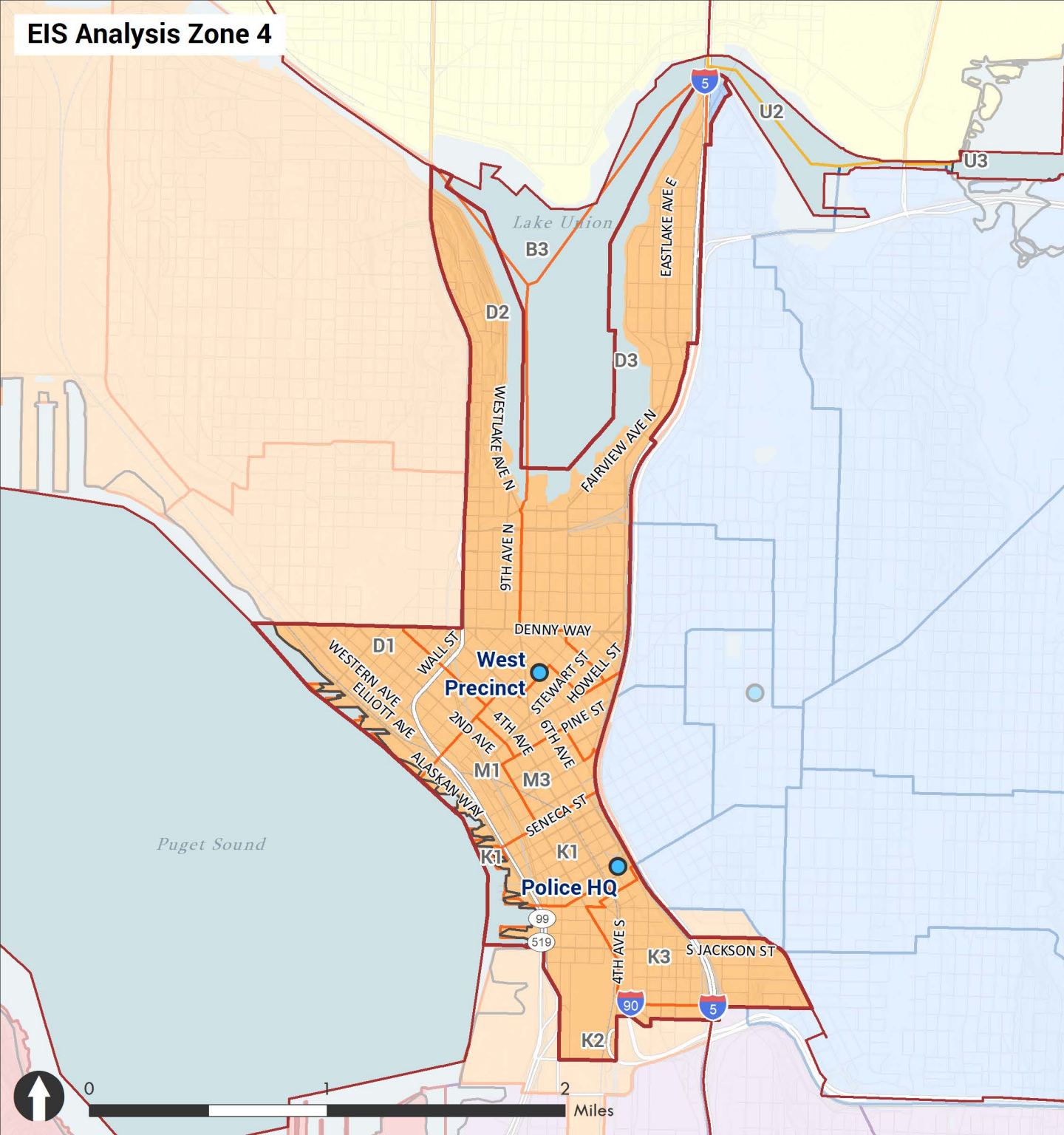
- |                    |                                    |
|--------------------|------------------------------------|
| City of Seattle    | <b>Seattle Police Patrol Areas</b> |
| Urban Growth Areas | North Precinct                     |
| Other Cities       | East Precinct                      |
| Analysis Zones     | West Precinct                      |
| Police Stations    | South Precinct                     |
|                    | Southwest Precinct                 |



Map Date: March 2023



# EIS Analysis Zone 4

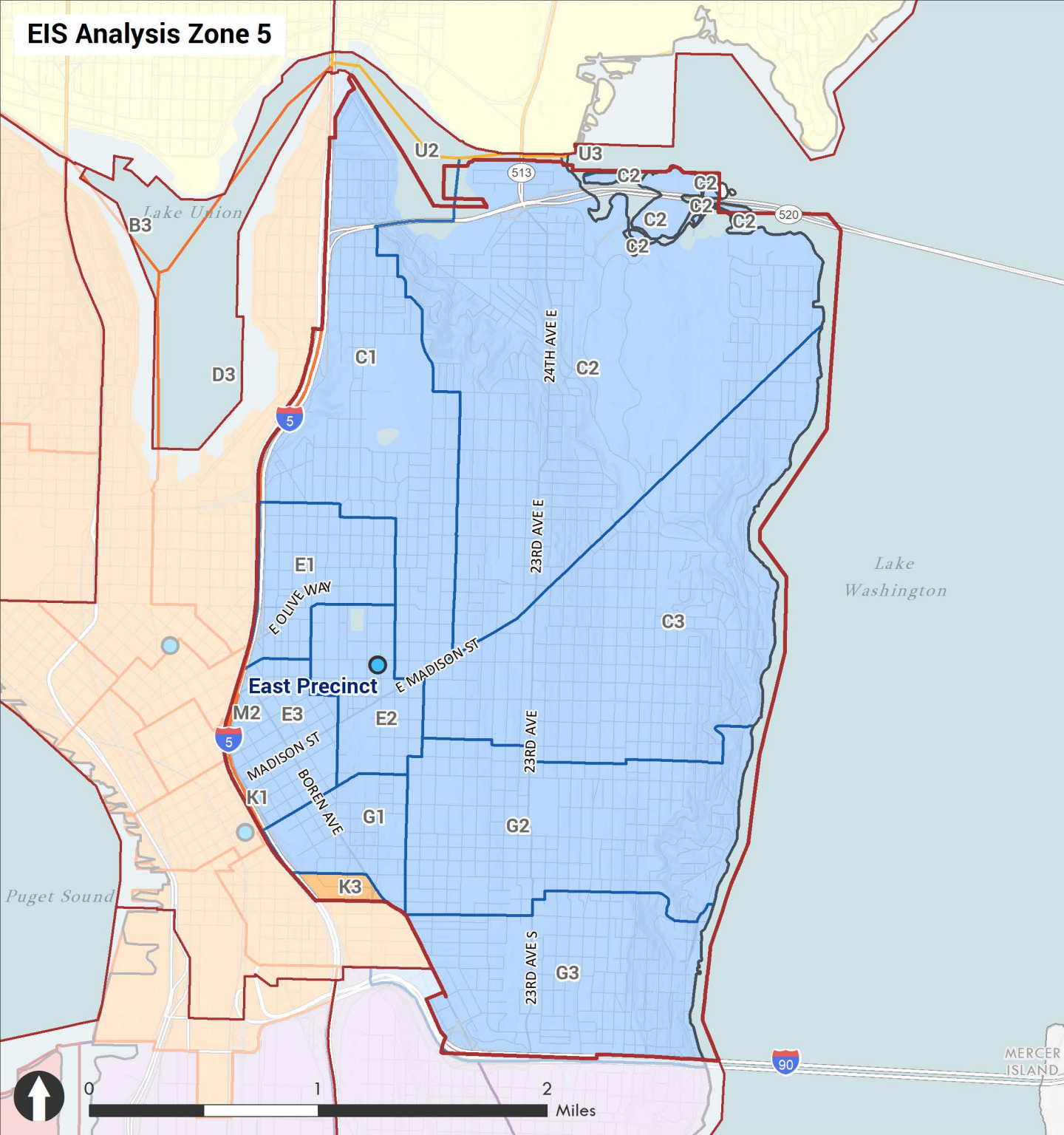


- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones
- Police Stations

- ### Seattle Police Patrol Areas
- North Precinct
  - East Precinct
  - West Precinct
  - South Precinct
  - Southwest Precinct



# EIS Analysis Zone 5



- |  |                    |  |                    |
|--|--------------------|--|--------------------|
|  | City of Seattle    |  | North Precinct     |
|  | Urban Growth Areas |  | East Precinct      |
|  | Other Cities       |  | West Precinct      |
|  | Analysis Zones     |  | South Precinct     |
|  | Police Stations    |  | Southwest Precinct |



# EIS Analysis Zone 6

Puget Sound

W1

SW ADMIRAL WAY

W2

FAUNTLEROY WAY SW

DELRIDGE WAY SW

F1

35TH AVE SW

SYLVAN WAY SW

Southwest  
Precinct

W3

F2

F3

SW ROXBURY ST

509

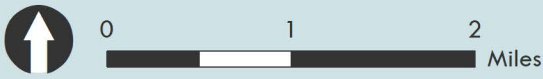
99

TUKWILA

BURIEN

SEATAC

599

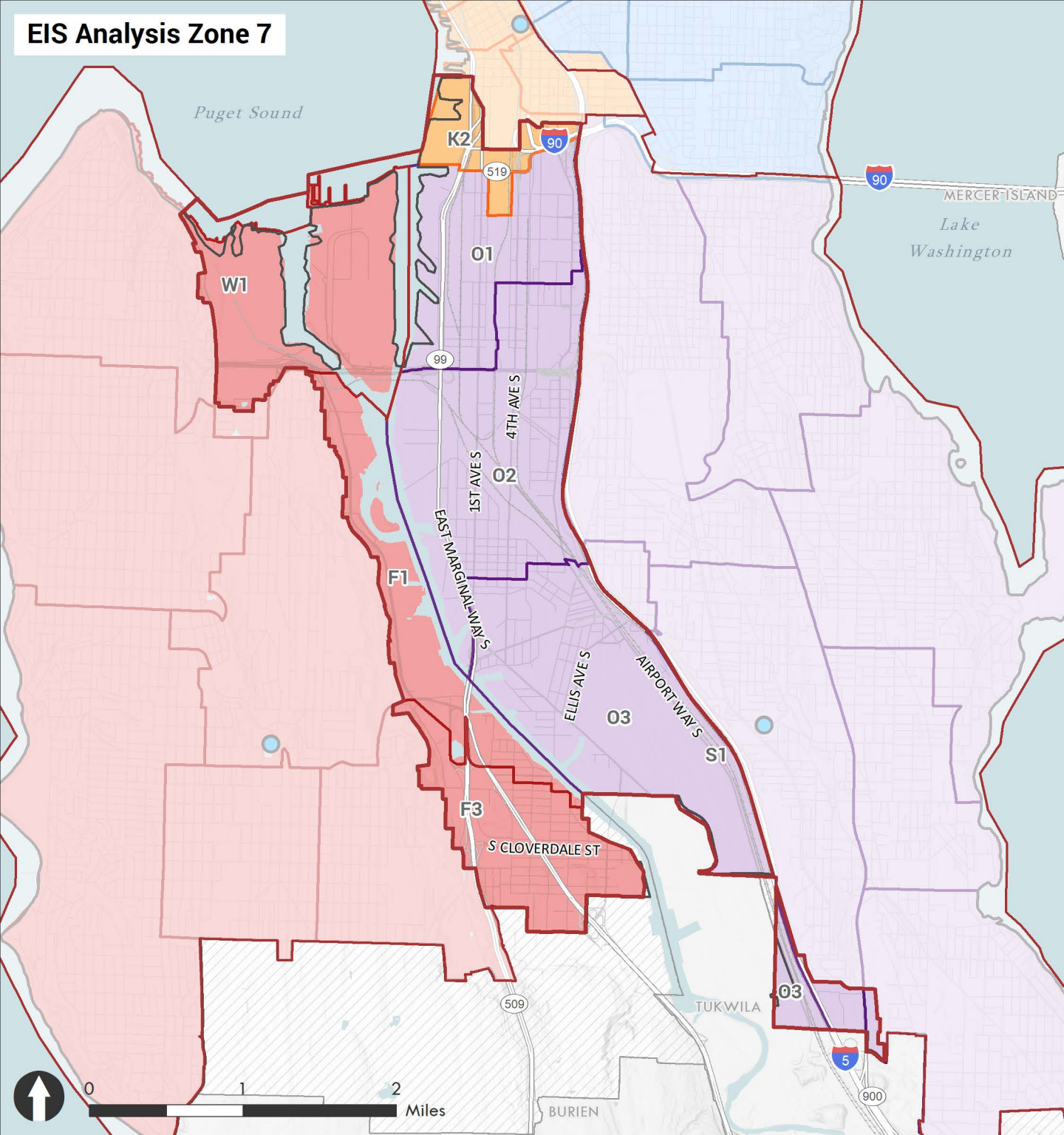


- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones
- Police Stations
- Seattle Police Patrol Areas
  - North Precinct
  - East Precinct
  - West Precinct
  - South Precinct
  - Southwest Precinct



Map Date: March 2023

# EIS Analysis Zone 7

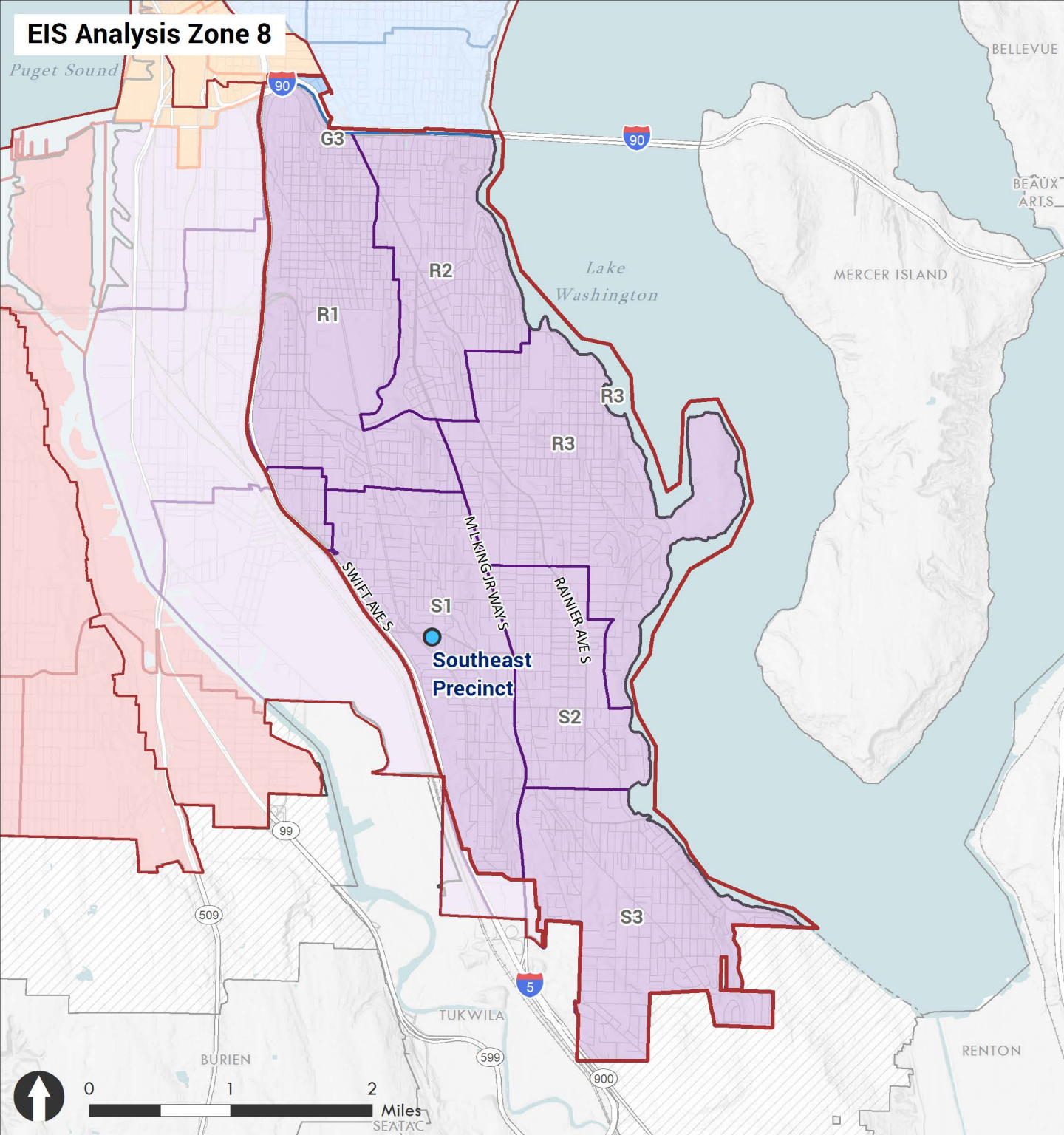


- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones
- Police Stations

- ### Seattle Police Patrol Areas
- North Precinct
  - East Precinct
  - West Precinct
  - South Precinct
  - Southwest Precinct

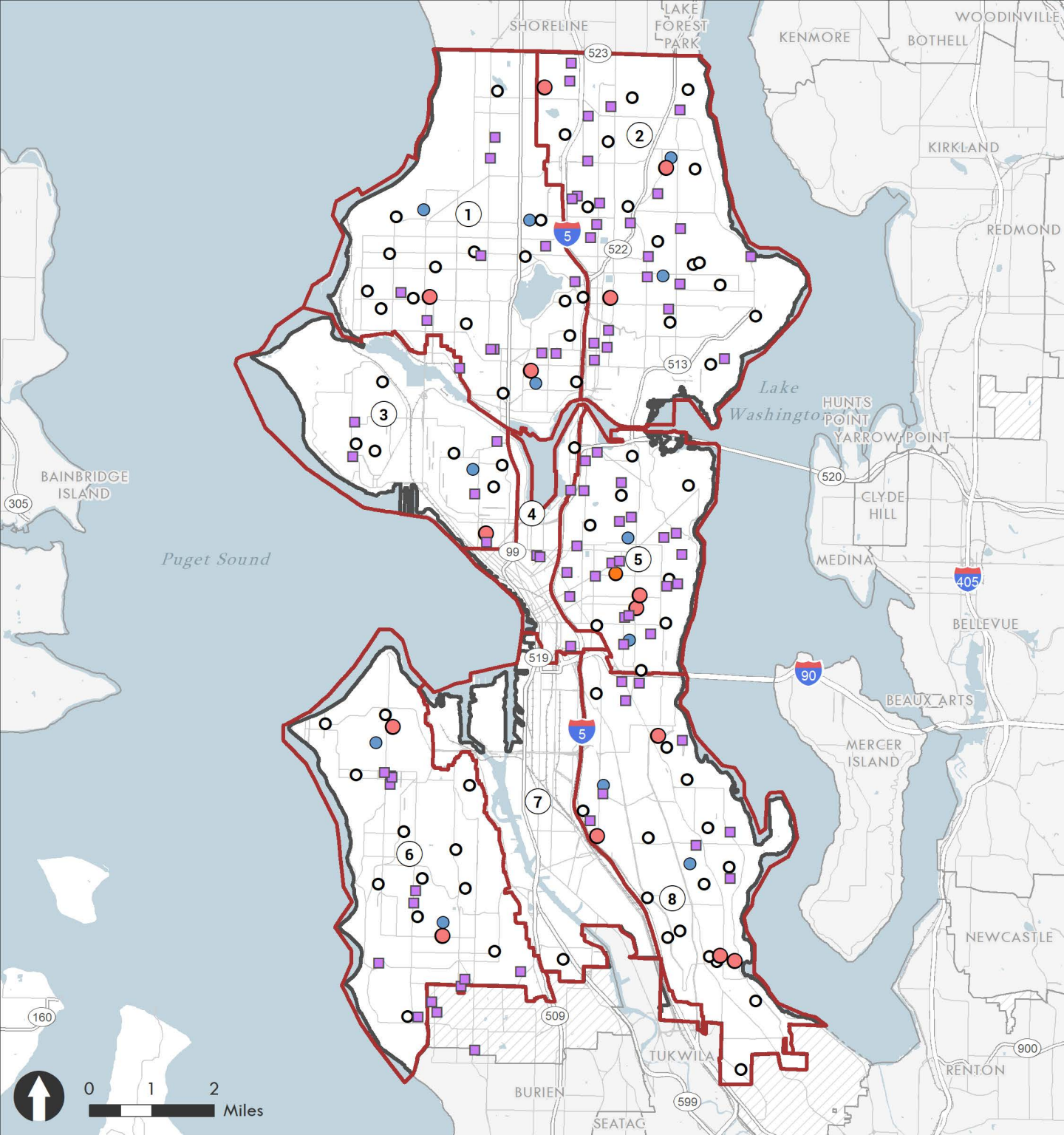


# EIS Analysis Zone 8



- |                    |                                    |
|--------------------|------------------------------------|
| City of Seattle    | <b>Seattle Police Patrol Areas</b> |
| Urban Growth Areas | North Precinct                     |
| Other Cities       | East Precinct                      |
| Analysis Zones     | West Precinct                      |
| Police Stations    | South Precinct                     |
|                    | Southwest Precinct                 |

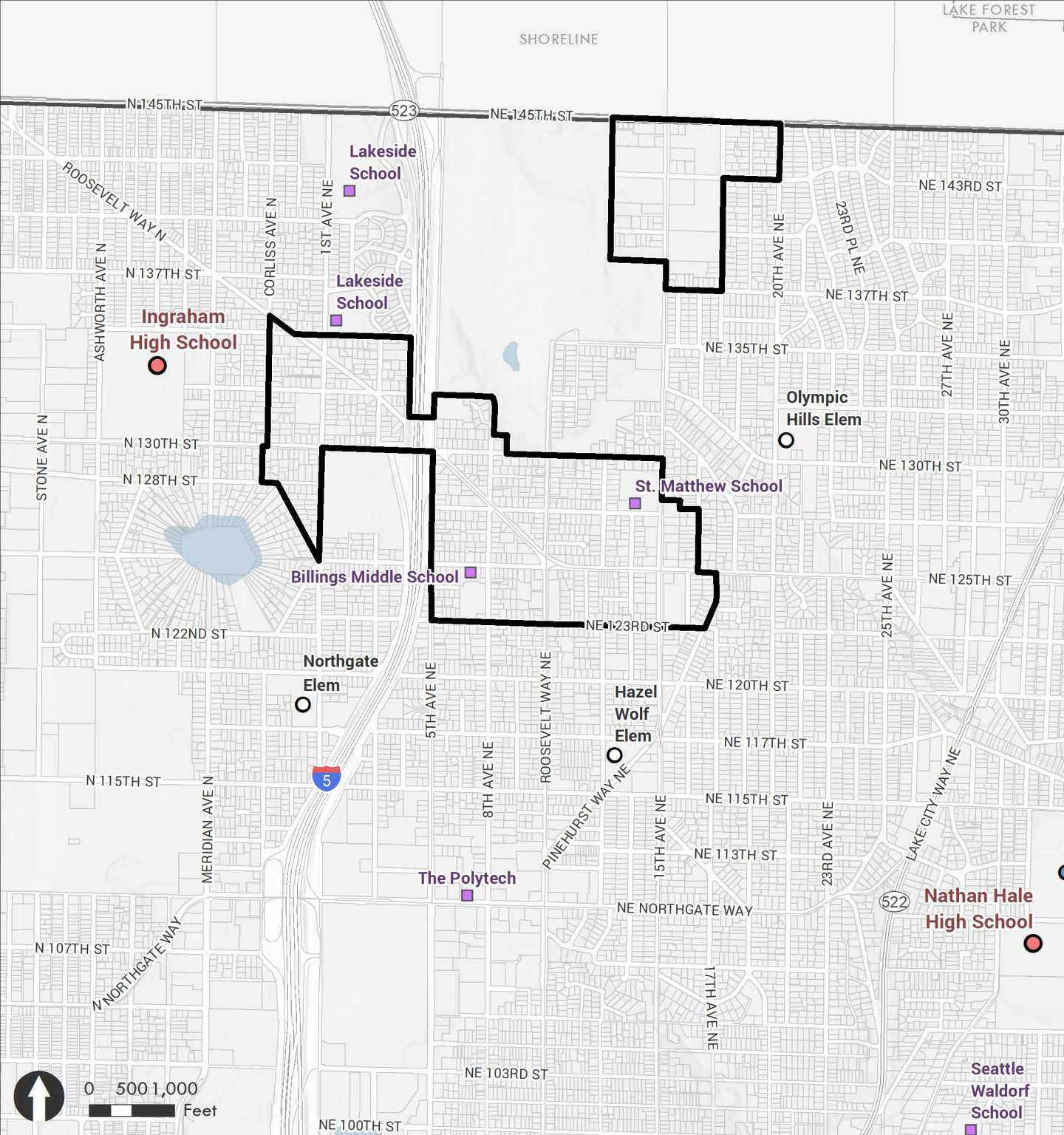




- |                    |                               |                |
|--------------------|-------------------------------|----------------|
| City of Seattle    | <b>Seattle Public Schools</b> | Private School |
| Urban Growth Areas | Elementary School             |                |
| Other Cities       | Middle School                 |                |
| Analysis Zones     | Middle/High School            |                |
|                    | High School                   |                |



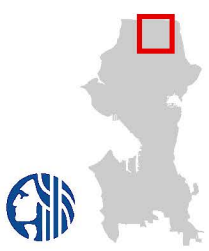
Map Date: March 2023



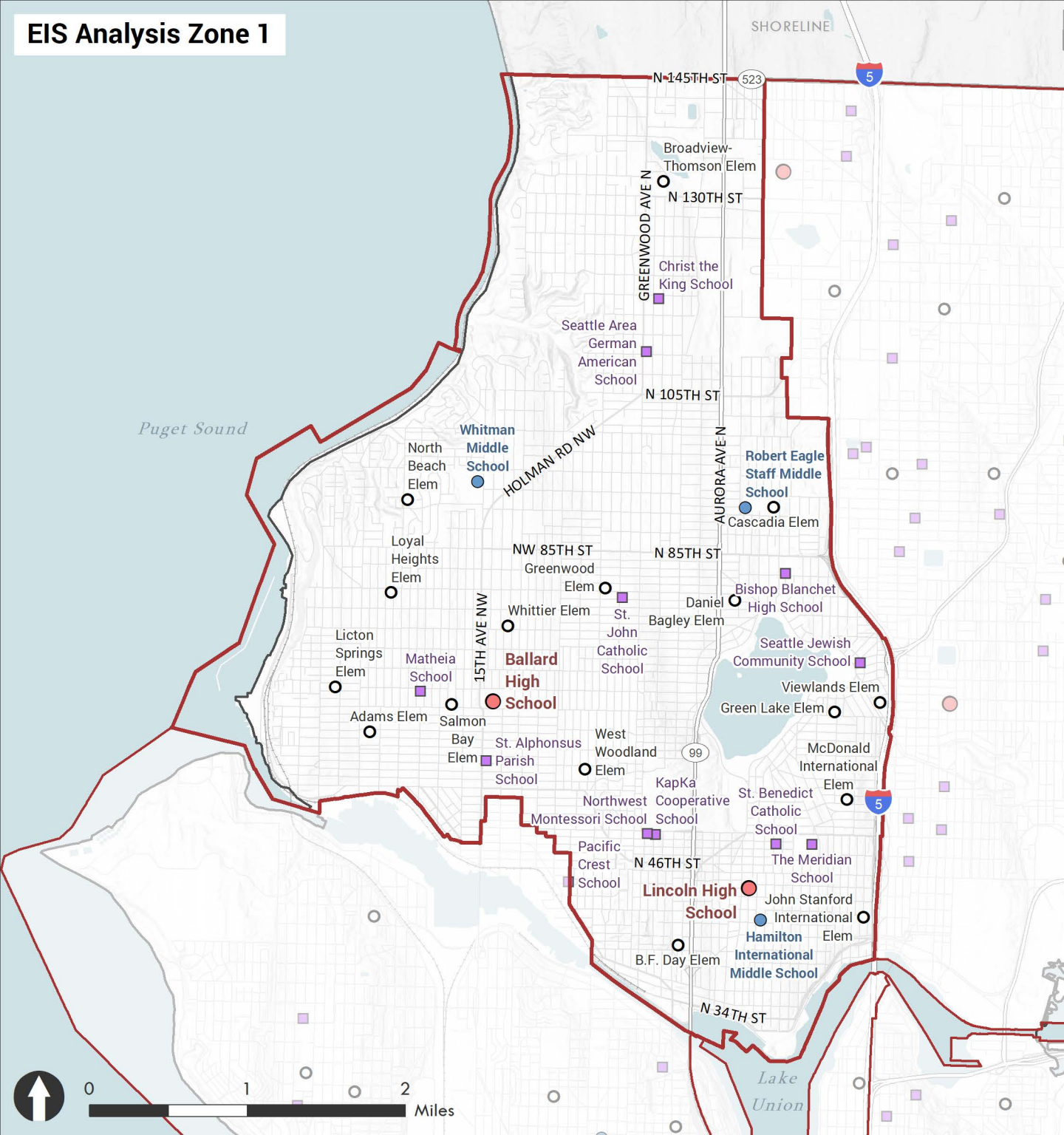
- City of Seattle
- Urban Growth Areas
- Other Cities
- 130th/145th Station Areas

- Seattle Public Schools**
- Elementary School
  - Middle School
  - Middle/High School
  - High School

- Private School



# EIS Analysis Zone 1

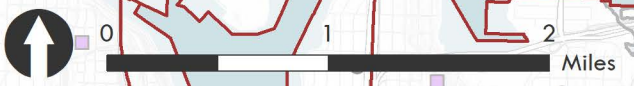
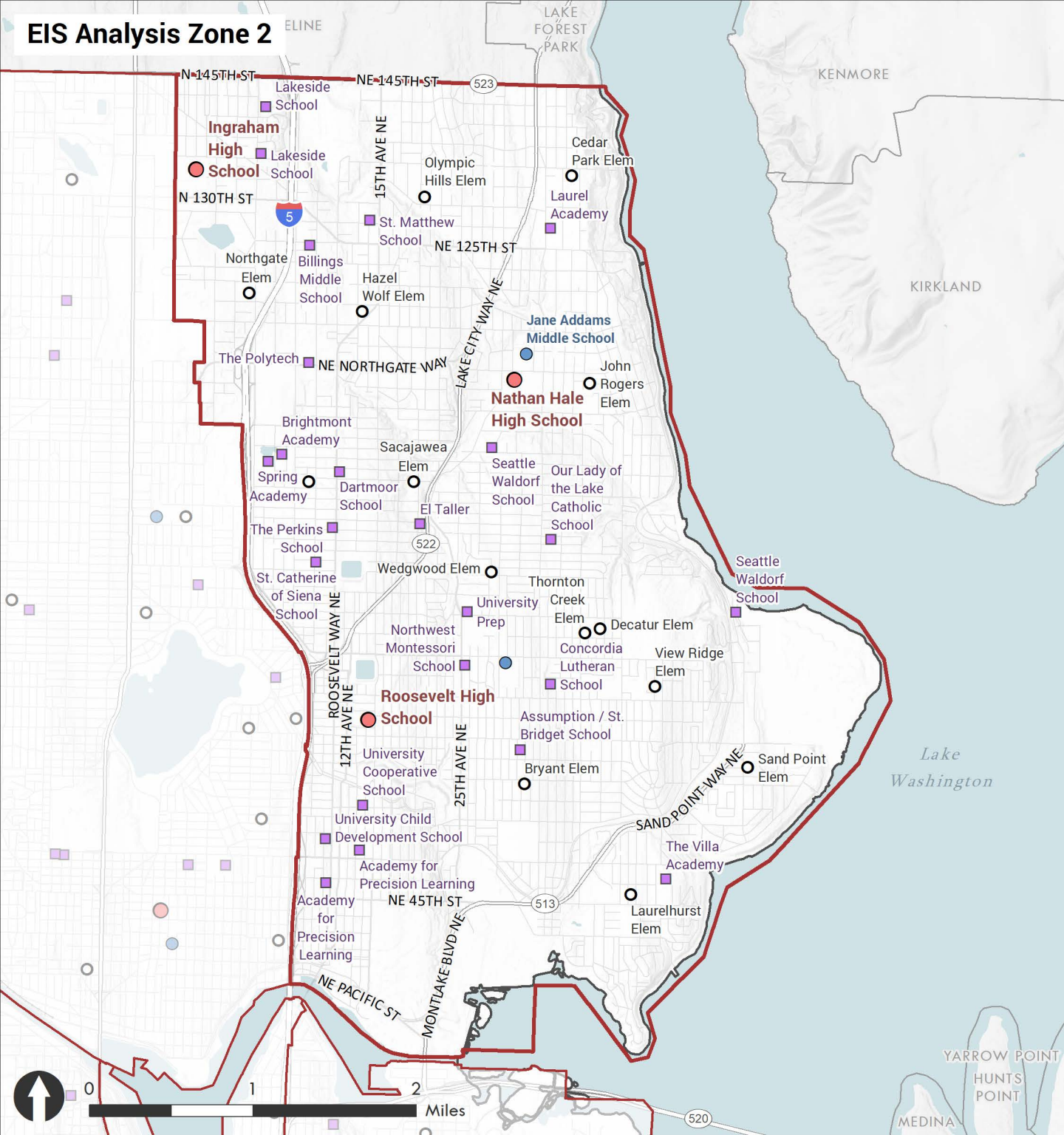


- |                    |                               |                |
|--------------------|-------------------------------|----------------|
| City of Seattle    | <b>Seattle Public Schools</b> | Private School |
| Urban Growth Areas | Elementary School             |                |
| Other Cities       | Middle School                 |                |
| Analysis Zones     | Middle/High School            |                |
|                    | High School                   |                |





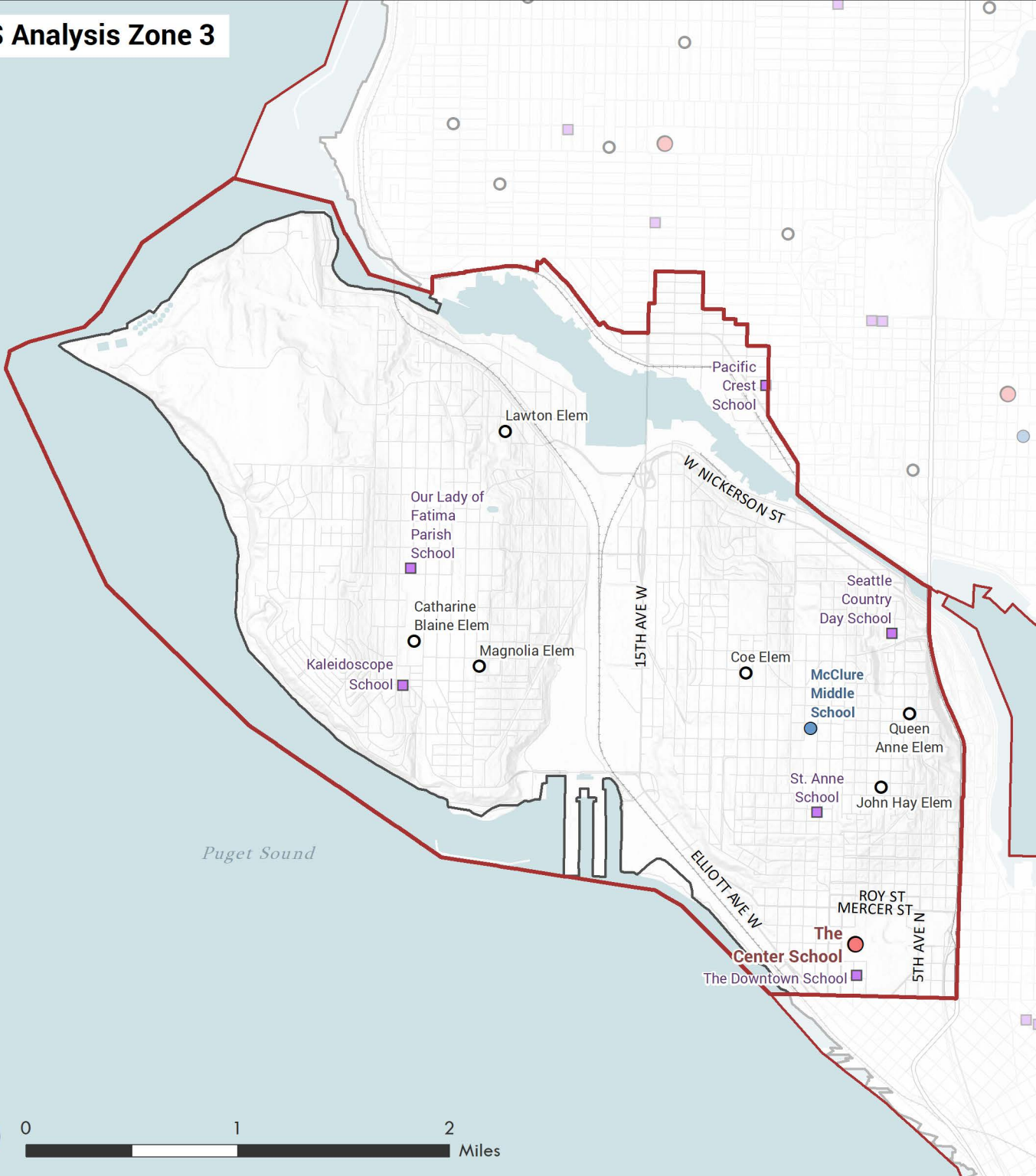
# EIS Analysis Zone 2



- |                    |                    |
|--------------------|--------------------|
| City of Seattle    | Private School     |
| Urban Growth Areas | Elementary School  |
| Other Cities       | Middle School      |
| Analysis Zones     | Middle/High School |
|                    | High School        |



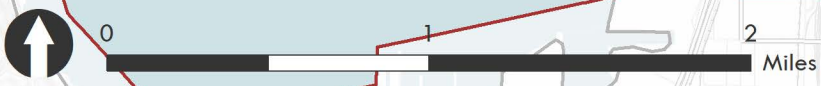
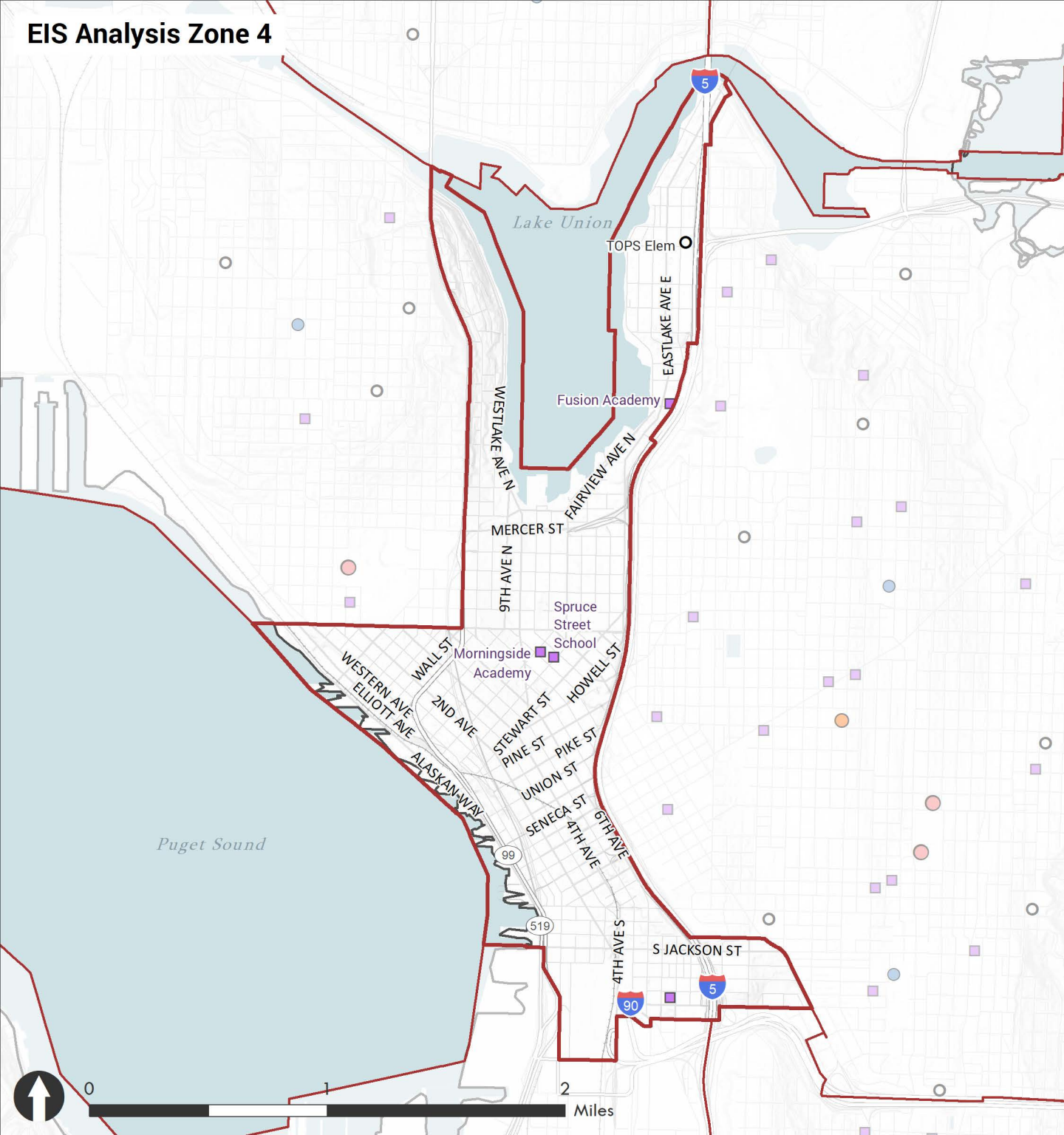
# EIS Analysis Zone 3



- |                    |                               |                |
|--------------------|-------------------------------|----------------|
| City of Seattle    | <b>Seattle Public Schools</b> | Private School |
| Urban Growth Areas | Elementary School             |                |
| Other Cities       | Middle School                 |                |
| Analysis Zones     | Middle/High School            |                |
|                    | High School                   |                |



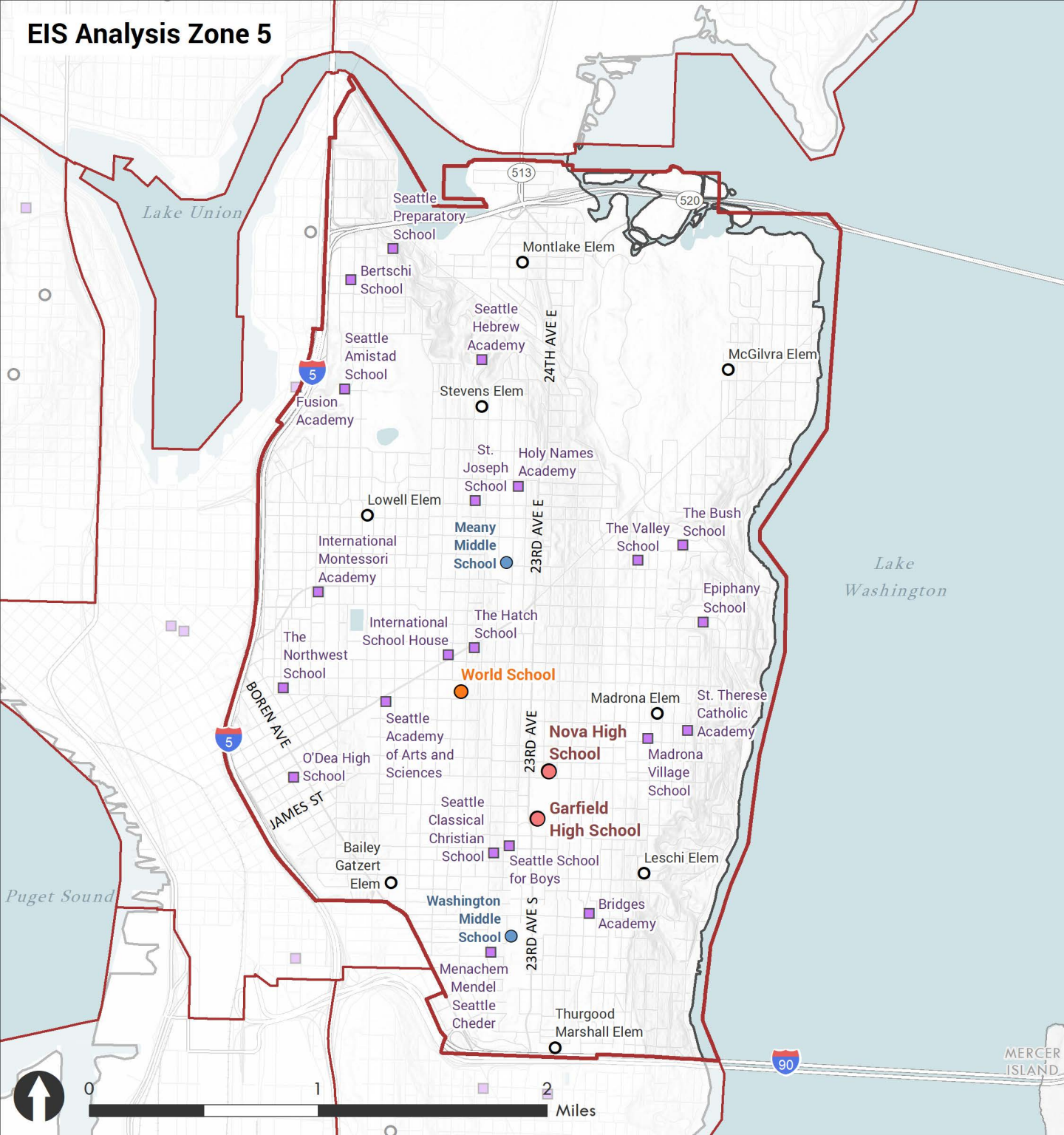
# EIS Analysis Zone 4



- |                    |                               |                |
|--------------------|-------------------------------|----------------|
| City of Seattle    | <b>Seattle Public Schools</b> | Private School |
| Urban Growth Areas | Elementary School             |                |
| Other Cities       | Middle School                 |                |
| Analysis Zones     | Middle/High School            |                |
|                    | High School                   |                |



# EIS Analysis Zone 5



- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones

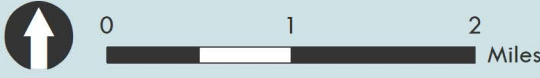
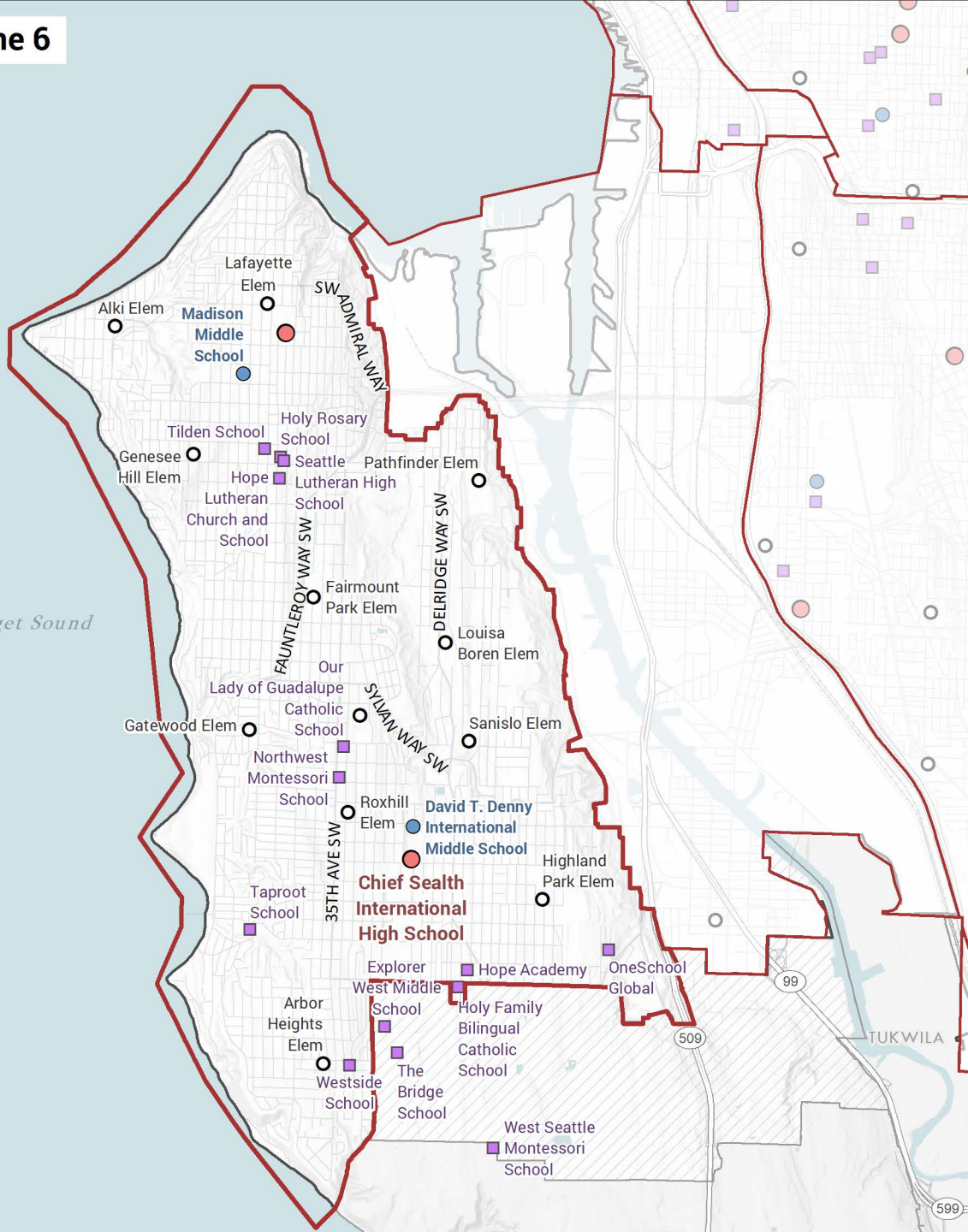
- Seattle Public Schools**
- Elementary School
  - Middle School
  - Middle/High School
  - High School

- Private School



# EIS Analysis Zone 6

Puget Sound

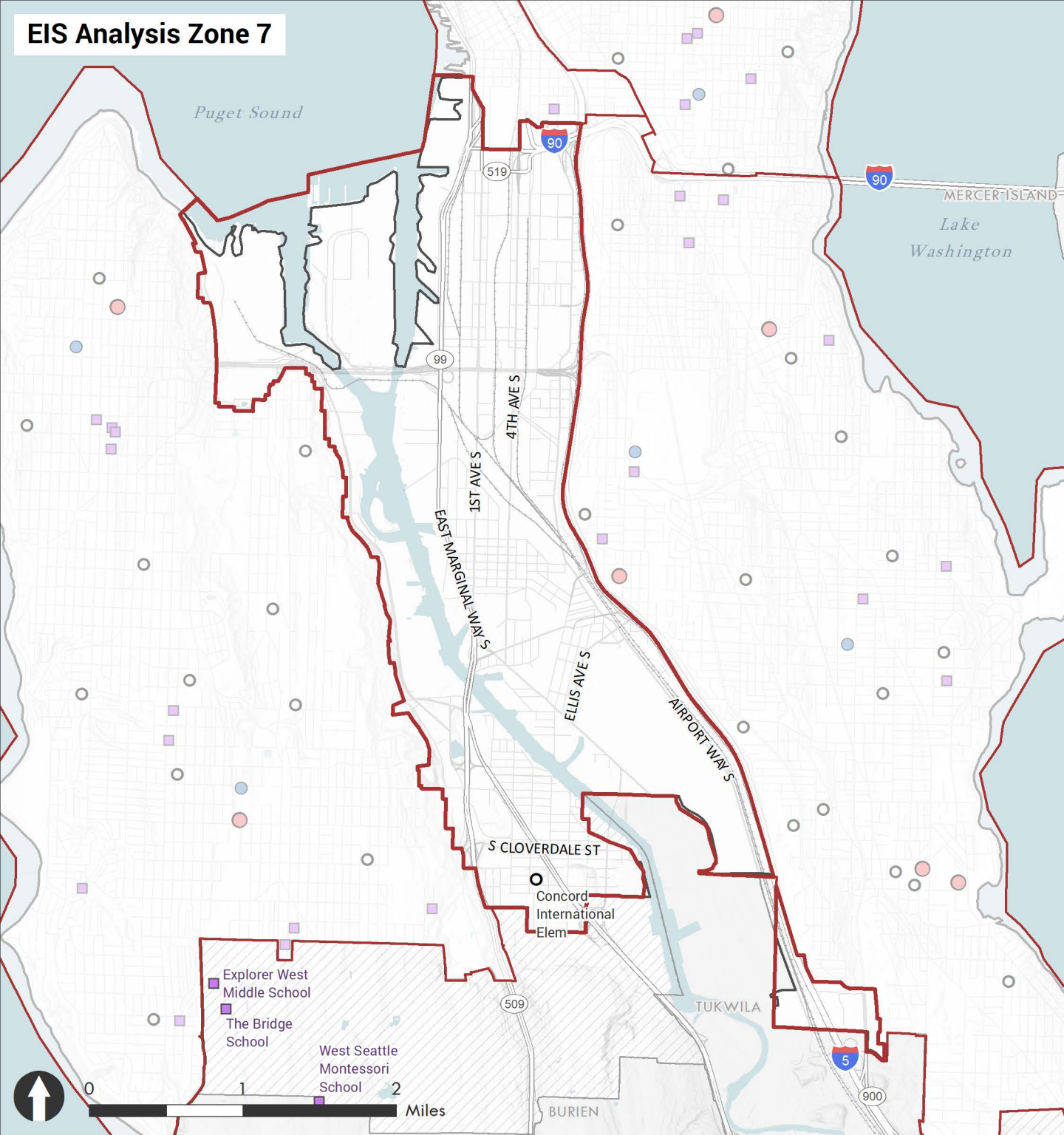


- |                    |                               |                |
|--------------------|-------------------------------|----------------|
| City of Seattle    | <b>Seattle Public Schools</b> | Private School |
| Urban Growth Areas | Elementary School             |                |
| Other Cities       | Middle School                 |                |
| Analysis Zones     | Middle/High School            |                |
|                    | High School                   |                |



Map Date: March 2023

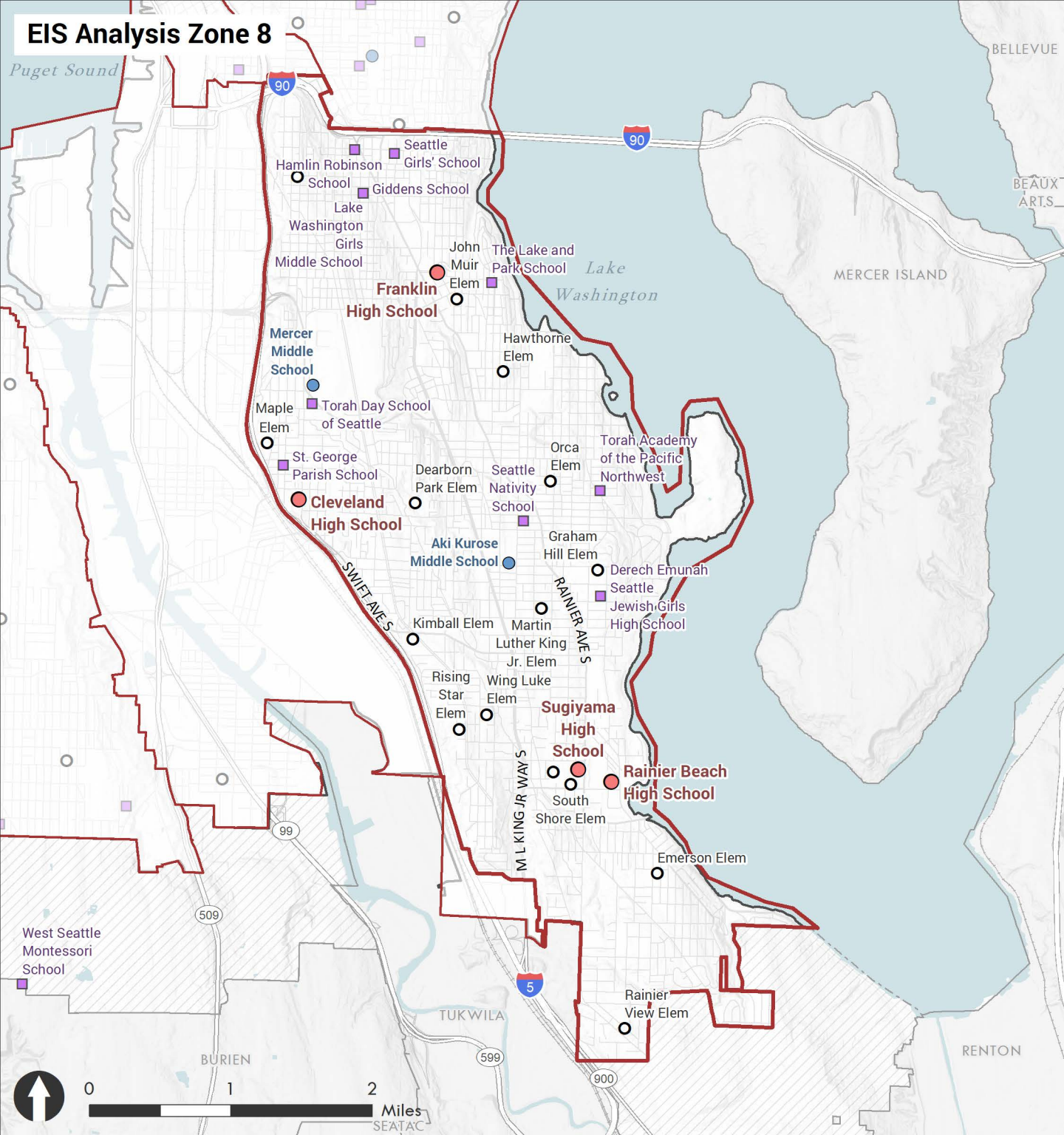
# EIS Analysis Zone 7



- |                    |                               |                |
|--------------------|-------------------------------|----------------|
| City of Seattle    | <b>Seattle Public Schools</b> | Private School |
| Urban Growth Areas | Elementary School             |                |
| Other Cities       | Middle School                 |                |
| Analysis Zones     | Middle/High School            |                |
|                    | High School                   |                |



# EIS Analysis Zone 8



- |                    |                               |                |
|--------------------|-------------------------------|----------------|
| City of Seattle    | <b>Seattle Public Schools</b> | Private School |
| Urban Growth Areas | Elementary School             |                |
| Other Cities       | Middle School                 |                |
| Analysis Zones     | Middle/High School            |                |
|                    | High School                   |                |



## J Proposed Legislation

- J.1 Summary Zoning Tables
- J.2 One Seattle Plan Zoning Update Phase 1 Ordinance Draft



# J.1 Summary Zoning Tables

## Neighborhood Residential Zone Dimensional Standards

Summary of Development Standards	
<b>Maximum density</b>	1 unit per 1,250 square feet of lot area except that, consistent with state law, at least four units are allowed on all lots, regardless of lot size, and six units within a quarter-mile walk of major transit or if two units are affordable.
<b>Floor area ratio (FAR)</b>	0.6 FAR for density below 1/4,000 sq ft (e.g., one unit on a 5,000 sq ft lot)
	0.8 FAR for density between 1/4,000 and 1/2,200 sq ft (e.g., two units on a 5,000 sq ft lot)
	1.0 FAR for density between 1/2,200 and 1/1,600 sq ft (e.g., three units on a 5,000 sq ft lot)
	For density of at least 1 unit per 1,600 sq ft (e.g., four units on a 5,000 sq ft lot):
	1.2 FAR for attached and detached dwelling units
	1.4 FAR for stacked dwelling units
<b>Lot coverage</b>	50 percent
<b>Height limit</b>	3 stories for market-rate development
	4 stories for development with income-restricted affordable homes
<b>Minimum open space requirement</b>	20 percent of lot area
	The minimum dimension for usable open space is 8 feet or, if the open space includes a circulation pathway serving multiple buildings, 11 feet
	Open space may be private or shared
	At least half of the open space must be at ground level. Only half of open space not at ground level counts toward this requirement.
<b>Minimum setbacks and separations</b>	Front: 10 feet
	Rear: 10 feet without an alley, 5 feet for ADUs, and zero feet with an alley
	Side: 5 feet
	Separation between buildings within property: 6 feet

Summary of Development Standards	
	Covered porches may extend up to 6 feet into setback, with up to 100 sq ft per porch allowed in setback
	Bay windows and balconies may extend up to 2 feet into setback if limited to 8 f

## Lowrise Zone Dimensional Standards

Low Rise Zones	Lowrise 1	Lowrise 2	Lowrise 3
<b>Height</b>	32 feet (3 stories)	40 feet (4 stories)	50 feet inside and outside centers (5 stories)
<b>Floor area ratio (FAR)</b>	1.3 for attached and detached homes 1.5 for stacked flats	1.4 for attached and detached homes 1.6-1.8 for stacked flats	2.3 inside and outside centers
<b>Density</b>	1 unit per 1,150 square feet of lot area except where state law requires higher density	none	none
<b>Front setback</b>	7 feet average, 5 feet minimum		
<b>Rear setback</b>	7 feet average, 5 feet minimum, 0 feet if there is an alley		
<b>Side setback</b>	5 feet		
<b>Amenity area</b>	20% of lot area, at least 50% must be at ground level		

## Midrise Zone Dimensional Standards

	Midrise 1 (new zone)	Midrise 2 (currently called Midrise)
<b>Height</b>	65 feet (6 stories)	85 feet (7-8 stories)
<b>Floor area ratio (FAR)</b>	3.2	4.5
<b>Density</b>	none	none
<b>Front setback</b>	7 feet average, 5 feet minimum With exemption for projects with large courtyard	
<b>Rear setback</b>	10 feet <b>or</b> 0 feet <b>with</b> an alley	
<b>Side setback</b>	5 feet	
<b>Amenity area</b>	5 percent of the total floor area	
<b>Likely outcomes</b>	6-story apartments or condos	7- or 8-story apartments or condos

**One Seattle Plan Zoning Update “Phase 1” Legislation**  
**Summary and Text**  
**Public Review Draft**

This document contains a summary of the draft phase 1 legislation as well as the full text of the draft.

## SUMMARY

### **Overview**

The One Seattle Plan Zoning Update Phase 1 legislation would make the following changes to implement Seattle’s new Comprehensive Plan, the One Seattle Plan:

- update the development standards for Neighborhood Residential zones
- implement changes to comply with various 2025 state deadlines including those related to HB 1110 (Middle Housing), HB 1337 (Accessory Dwelling Units), HB 1293 (Design Standards), and SB 6015 (Parking Reform)
- make minor changes to clarify existing rules and seek consistency between zones

### **Background**

The City of Seattle has been working since 2022 to update our Comprehensive Plan. We are calling the updated plan the One Seattle Plan. The Plan is a roadmap for where and how Seattle will grow and invest in communities over the next 20 years, toward becoming a more equitable, livable, sustainable, and resilient city.

In 2023, the Washington State legislature passed a suite of bills that were intended to increase the production of housing and address our housing affordability crisis. These bills include:

- HB 1110 (also known as the “Middle Housing bill”) which requires cities to allow 4 to 6 units on residentially-zoned lots and a wider variety of housing types such as duplex, triplexes, and stacked flats as well as placing limits on the regulation of middle housing
- HB 1337 which places limits on the regulation of accessory dwelling units
- HB 1293 which places limits on design review processes and requires that design standards be “clear and objective”

- SB 6015 which places limits on requirements for off-street parking

In March 2024, the City released a Draft One Seattle Plan, including a draft growth strategy. Following this release, the City conducted three months of public engagement, including eight open houses, and received more than 6,000 comments. In October 2024, the City released the Mayor Recommended Growth Strategy. This Growth Strategy will be transmitted to City Council in December 2024 for review and adoption as part of the Mayor’s Recommended One Seattle Plan.

The City is now working to implementing the Mayor’s Recommended growth strategy through changes to zoning and development standards. This work will also ensure Seattle complies with the new state requirements. We are looking for feedback on a draft proposal for implementing both Phase 1 and Phase 2 changes through December 20, 2024. Revised Phase 1 legislation would then be transmitted to City Council in March of 2025. Revised Phase 2 legislation would be transmitted to City Council in May of 2025 and reviewed by City Council after Phase 1 legislation is passed.

**Summary of Legislation**

This legislation would make the following changes to existing code:

**Changes to Neighborhood Residential Zones**

This legislation would repeal Seattle Municipal Code Chapter 23.44, which contains the development standards for Neighborhood Residential zones, and replace it with new Chapter 23.44. The proposed changes are described in detail in the Updating Seattle’s Neighborhood Residential Zones document, which is available at [zoning.OneSeattlePlan.com](http://zoning.OneSeattlePlan.com), and are summarized below:

- Update development standards for Neighborhood Residential zones to allow a greater diversity of housing options consistent with new state requirements in HB 1110 as follows:

Density	Implement new density requirement of 1 unit per 1,250 square feet except where higher densities are required by state law; accessory dwelling units would count toward density
Minimum lot size	Reduce from 5,000-9,600 sq ft (depending on zone) to 1,250 sq ft (consistent with 4 units on 5,000 sq ft lot)
FAR	Shift from range of 0.6-1.0 to 0.6-1.2 depending on number of units; the updated approach would be consistent with state’s suggested “model code”

Front setback	Reduce from an average of front setbacks for adjacent homes (but never more than 20 and never less than 10 feet) to 10 feet
Rear setback	Reduce from 25% of lot or 20 feet, whichever is less (measured from center of alley) to 10 feet for principal dwelling unit, 5 feet for accessory dwelling units, 0 feet if alley
Side Setback	Leave at 5 feet
Lot coverage	Increase from 35% of lot or 2,500 square feet, whichever is greater, to 50%
Accessory dwelling units (ADUs)	ADUs would count toward the density and floor area limits shown above and be subject to the same standards as principal dwelling units except for a maximum size limit of 1,000 square feet. No more than 2 ADUs would be allowed per lot.

- Increase the height limit from 30 feet to 32 feet to allow more livable floor-to-ceiling heights
- Implement a new amenity area requirement as follows:
  - 20% of lot area must be set aside as amenity area
  - Each amenity area must be at least 120 square feet in area and at least 8 feet in width and depth
  - At least 50% must be at ground level. The area of roof decks and balconies count as half the size of space as ground floor.
- Implement new design standards regulating access, entrances, windows/doors, and materials
- Update the tree planting requirements to encourage planting of larger species trees
- Allow reducing or waiving of parking requirements to protect tier 2 trees
- Allow additional floor area and density for stacked flats on lots 6,000 square feet or greater that are located within ¼ mile of frequent transit as follows:

	Stacked	Attached and Detached
FAR	1.4	1.2
Density	1 unit per 650 square feet	1 unit per 1,250 square feet

- Allow additional floor area, height, lot coverage, and density for affordable housing on lots that are located within ¼ mile of frequent transit as follows:

	Affordable Housing	Market-rate Attached and Detached
Height	4 stories	3 stories
FAR	1.8	1.2
Lot coverage	60%	50%
Density	1 unit per 400 square feet	1 unit per 1,250 square feet

Affordability Requirement	50% of units must be affordable at 60% of AMI for rental or 80% of AMI for ownership	None
---------------------------	--	------

- Exempt area of certain Environmentally Critical Areas and shorelines when calculating density and lot coverage in order to prevent significant increases in density in these areas, consistent with allowance in HB 1110 (for example, if you have a 10,000 square foot lot but half of it is in ECAs they you would only be able to develop half as many units – 4 units instead of 8 units)
- Allow corner stores throughout NR zones with following restrictions:
  - Must be located on corner lot
  - Limited to retail, restaurants, and food processing and craft work; food processing and craft work includes small-scale food preparation such as making jams or baking bread as well as sewing clothes or woodworking
  - Limited to ground floor and basements
  - Maximum size of 2,500 square feet
  - May not be open between 10pm and 7am
- Allow unit lot subdivision
- Allow two parking spaces in front setback as an alternative to autocourt on lots at least 40 feet in width to create more space for on-site open space
- Rezone all RSL zones to LR1 except for RSL zones in South Park that would be outside the updated boundaries of South Park Neighborhood Center which would be rezoned to NR

Changes to **Lowrise** zoning to meet state requirements and seek greater consistency with updated approach to NR zones

- Update density limits in LR1 zones to comply with HB 1110 requirement of at least 4 units on all lots and 6 units within ¼ mile of major transit stops
- Exempt area of certain Environmentally Critical Areas and shorelines when calculating density consistent with proposal for NR zones
- Increase height in LR1 zones from 30 feet to 32 feet similar to NR zones
- Shift from setbacks that vary by different building types into one set of setbacks that applies to all projects to comply with HB 1110 standards that development standards can't be more strict for attached and stacked housing than detached housing as summarized below:
  - Front setback: 7 feet average, 5 feet minimum
  - Rear setback: 7 feet average, 5 feet minimum, except 0 feet if alley

- Side setback: 5 feet
- Shift from maximum structure widths that vary by different building types into maximum structure width of 90 feet for LR1 and LR2 zones and 150 feet for LR3
  - Comply with HB 1110 standards that development standards can't be more strict for attached and stacked housing than detached housing
- Remove facade length requirements to address barriers to stacked flats, new units on lots where homes are preserved, and development on lots with unusual site or topography issues
- Update design standards to comply with the HB 1293 that design standards must be clear and objective and to improve design outcomes
- Allow additional 0.2 FAR of floor area for stacked flats in LR1 and LR2 zones consistent with proposed bonus in NR zones
- Update amenity area to seek greater consistency with NR zones and to reduce instances where roof decks are required as follows:
  - Amenity area reduced from 25% to 20% consistent with NR zones
  - Amenity areas be at least 60 square feet in area and a minimum width and depth of 6 feet
- Allow stormwater features in setbacks to accommodate common rain barrel sizes
- Modify provisions for separations between buildings as follows:
  - Simplify the regulations about what is allowed within separations
  - Reduce the minimum separation from 10 feet to 6 feet to provide more flexibility in site layout and to discourage outcomes where most open space is located in separations between buildings

Additional changes affecting **multiple zones**

- Create a single set of standards for accessory dwelling units standards that apply across all zones to comply with HB 1337 and to increase consistency between zones as follows:
  - ADU would be allowed in all zones where residential uses are allowed
  - No more than two ADU are allowed per lot
  - The maximum size of an ADU would be 1,000 square feet
  - Other standards applied to ADU would be the same as those applied to principal units
- Update residential parking requirements to implement new policy direction as well as parking requirements in HB 1110 and HB 1337 as follows:
  - Remove residential parking requirements within ½ mile of major transit stops (residential uses in regional centers and station area overlays and

those in urban centers within ¼ mile of frequent transit are already exempt from parking)

- Change parking requirements in other areas from 1 space per principal dwelling unit to 1 space per two principal dwelling units for all units (ADUs would continue not to have parking requirements)
- Update rezone criteria for NR and LR1 zones to reflect updated purpose of NR zoning and the difference between NR and LR1 zones
- Update definitions of residential use to reflect updated NR approach, simplify code, and address existing problems
- Clarify that adult family homes are allowed in all zones that allow residential uses as a home occupation as required by state law
- Clarify that shelters are allowed in all zones that allow residential use as required by state law
- Modify parking space size and tandem parking requirements to comply with SB 6015 as follows:
  - Reduce minimum width of largest required parking space from 8.5 feet to 8 feet
  - Allow tandem parking to count as two spaces
- Modify parking access requirements so they are based on number of units rather than type of unit to comply with HB 1110 requirement that development standards can't be more strict for attached and stacked housing than detached housing



## TEXT

AN ORDINANCE relating to land use and zoning; amending Chapter 23.32 of the Seattle Municipal Code (SMC) at pages XX, XX, XX and XX of the Official Land Use Map; amending subsection 15.32.200.F, amending Sections 23.22.062, 23.24.045, 23.30.010, 23.34.011, 23.34.014, 23.42.110, 53.45.502, 23.45.504, 23.45.508, 23.45.510, 23.45.512, 23.45.514, 23.45.518, 23.45.522, 23.45.527, 23.45.529, 23.45.545, 23.45.550, 23.47A.004, 23.53.006, 23.53.025, 23.54.015, 23.54.020, 23.54.030, 23.84A.002, 23.84A.006, 23.84A.008, 23.84A.010, 23.84A.024, 23.84A.025, 23.84A.030, 23.84A.032, 23.84A.036, 23.84A.048, 23.86.002, 23.86.006, 23.86.008, 23.86.012, 23.86.017, 23.86.026, 23.90.019, 25.09.052, 25.09.240, 25.09.260, 25.09.520, and 25.11.090; repealing Sections 23.34.010, 23.34.012, 23.34.013, 23.40.035, Chapter 23.44, Sections 23.45.531, and 23.86.010; and adding Sections 23.42.022, 23.42.024, 23.42.132, new Chapter 23.44, and Sections 23.45.519, 23.54.031, 23.54.032, 23.54.033, 23.54.034 and 23.54.037 of the Seattle Municipal Code.

## Rezone Language

Section 1. The Official Land Use Map, Chapter 23.32 of the Seattle Municipal Code, is amended to rezone properties on pages XX, XX, XX... of the Official Land Use Map as follows:

A. Properties identified for rezones in Map X through X as shown on Attachment 1 to this ordinance are rezoned as shown in those maps.

B. Except for properties identified to be rezoned in Maps X through X as shown on Attachment 1 to this ordinance, all areas designated with a zone shown in Table A for Section 1 are rezoned as shown in Table A for Section 1.

<b>Table A for Section 1</b>	
<b>Standard Zoning Changes</b>	
<b>Existing Zoning</b>	<b>New Zoning</b>
RSL	LR1 (M)

<b>Table A for Section 1</b>	
<b>Standard Zoning Changes</b>	
<b>Existing Zoning</b>	<b>New Zoning</b>
NR1	NR
NR2	NR
NR3	NR

2. Where the existing zoning includes a Major Institution Overlay, the underlying zoning shall be modified as stated in this subsection B and the Major Institution Overlay shall continue to apply.

3. The rezones in this subsection B shall not remove any existing suffixes other than height suffixes.

Section 2. Subsection 15.32.200.F of the Seattle Municipal Code, which section was last amended by Ordinance 126509, is amended as follows:

[15.32.200 At-grade communication cabinets](#)

*Notes: The section is updated to reflect new zone names.*

\* \* \*

F. The applicant for a new at-grade communication cabinet proposal that is more than 36 inches in height including footings or bases as measured from the grade of the surrounding public place, or has a maximum volume of more than 18 cubic feet, shall: (1) send notice of a Seattle Department of Transportation application by first-class mail to all business entities, property owners, and residents located within a 100-foot radius from where the communication cabinet is proposed to be located; and (2) post notice of the new application at the proposed site. The notice shall be displayed towards the nearest public place that abuts the site and is viewable by the public and shall be maintained on the site for the duration of the public notice period.

1. If the new at-grade communication cabinet proposal is more than 36 inches in height including footings or bases as measured from the grade of the surrounding public place, or has a maximum volume of more than 18 cubic feet, and is

abutting a lot zoned (~~NR1, NR2, NR3, RSL~~) NR, LR1, LR2, or LR3 as these zoning designations are defined under subsection 23.30.010.A and the abutting zoning does not have an RC classification as shown on the Official Land Use Map, Chapter 23.32 ("residentially zoned parcels"), the communication cabinet shall be fully screened from the public place and abutting private property. If it is not feasible to install mitigation screening due to physical site constraints, the applicant shall provide an alternative mitigation proposal within 200 feet of the project. If the alternative mitigation cannot be located within 200 feet of the project, the applicant shall propose an alternative location that the Director shall review and may approve. All mitigation screening shall comply with setback standards in Section 15.32.250 and remain the permittee's sole responsibility to maintain so long as the communication cabinet or accessory equipment occupies the public place. As determined by the Director, mitigation screening may include landscaping, fencing, or visual treatment to the cabinet surface. Visual treatment to the cabinet may include paint, decals, vinyl wraps, photos, or other surface treatments. A cabinet shall be considered fully screened for visual treatment purposes when the treatment is applied to all communication cabinet vertical surfaces.

2. The applicant shall send and post all required notices at least three calendar days before the start of the public notice period. The mailing and on-site notice shall be on a form provided by the Department of Transportation and shall include: a description of the proposed location and installations, comment period dates, information on how the public can submit comments to the Seattle Department of Transportation, and how to request a reconsideration of a Street Use permit decision. If the proposal is abutting a residentially zoned parcel, the mailing and on-site notice shall include a visual and narrative description of the proposed mitigation screening required in subsection 15.32.200.F.1.

3. Written comments concerning the application shall be postmarked or emailed to the Director of Transportation within ten business days after the first day of the public notice period.

4. The applicant shall provide the Director of Transportation with a mailing list containing the individuals the notice was mailed to, the recipient's mailing address, and date the notice was mailed to each recipient.

\* \* \*

Section 3. Section 23.22.062 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

## 23.22.062 Unit lot subdivisions

*Note: This section would be modified to use updated terminology and clarify that ADUs can't be located on a different lot than the principal dwelling unit.*

A. The provisions of this Section 23.22.062 apply exclusively to the unit subdivision of land for residential development including ~~((single family dwelling units, townhouse, rowhouse, and cottage housing developments,))~~ attached and detached dwelling units and existing ~~((apartment))~~ structures containing stacked dwelling units built prior to January 1, 2013, but not individual ~~((apartment))~~ stacked dwelling units, in all zones in which these uses are permitted, or any combination of the above types of residential development as permitted in the applicable zones.

B. ~~((Except for any site for which a permit has been issued pursuant to Sections 23.44.041 or 23.45.545 for a detached accessory dwelling unit, lots))~~ Lots developed or proposed to be developed with uses described in subsection 23.22.062.A may be subdivided into individual unit lots. The development as a whole shall meet development standards on the parent lot applicable at the time the permit application is vested. As a result of the subdivision, development on individual unit lots may be nonconforming as to some or all of the development standards based on analysis of the individual unit lot, except that any required private usable open space or private amenity area for each dwelling unit shall be provided on the same unit lot as the dwelling unit it serves.

C. Subsequent platting actions, additions or modifications to the structure(s) may not create or increase any nonconformity of the parent lot.

D. Access easements and joint use and maintenance agreements shall be executed for use of common garage or parking areas, common open space (such as common courtyard open spaces for cottage housing), and other similar features, as recorded with the King County Recorder. For common parking areas and garages, access easements and joint use and maintenance agreements shall include the right to use any required electric vehicle charging infrastructure and the terms of use.

E. Within the parent lot, required parking for a dwelling unit may be provided on a different unit lot than the lot with the dwelling unit, as long as the right to use that parking is formalized by an easement on the plat, as recorded with the King County Recorder.

F. The fact that the unit lot is not a separate buildable lot and that additional development of the individual unit lots may be limited as a result of the application of development standards to the parent lot shall be noted on the plat, as recorded with the King County Recorder.

G. Unit lot subdivision shall not result in an accessory dwelling unit that is located on a different unit lot than the principal unit with which the accessory dwelling unit is associated.

Section 4. Section 23.24.045 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

#### 23.24.045 Unit lot subdivisions

*Note: This section would be modified to use updated terminology and clarify that ADUs can't be located on a different lot than the principal dwelling unit.*

A. The provisions of this Section 23.24.045 apply exclusively to the unit subdivision of land for residential development including ~~((single family dwelling units, townhouse, rowhouse, and cottage housing developments,))~~ attached and detached dwelling units and existing ~~((apartment))~~ structures containing stacked dwelling units built prior to January 1, 2013, but not individual ~~((apartment))~~ stacked dwelling units, in all zones in which these uses are permitted, or any combination of the above types of residential development as permitted in the applicable zones.

B. ~~((Except for any lot for which a permit has been issued pursuant to Sections 23.44.041 or 23.45.545 for a detached accessory dwelling unit, lots))~~ Lots developed or proposed to be developed with uses described in subsection 23.24.045.A may be subdivided into individual unit lots. The development as a whole shall meet development standards on the parent lot applicable at the time the permit application is vested. As a result of the subdivision, development on individual unit lots may be nonconforming as to some or all of the development standards based on analysis of the individual unit lot, except that any required private, usable open space or private amenity area for each dwelling unit shall be provided on the same unit lot as the dwelling unit it serves.

C. Subsequent platting actions, additions, or modifications to the structure(s) may not create or increase any nonconformity of the parent lot.

D. Access easements and joint use and maintenance agreements shall be executed for use of common garage or parking areas, common open space (such as common courtyard open space for cottage housing), and other similar features, as recorded with the King County Recorder's Office. For common parking areas and garages, access easements and joint use and maintenance agreements shall include the right to use any required electric vehicle charging infrastructure and the terms of use.

E. Within the parent lot, required parking for a dwelling unit may be provided on a different unit lot than the lot with the dwelling unit, as long as the right to use that parking is formalized by an easement on the plat, as recorded with the King County Recorder's Office.

F. The facts that the unit lot is not a separate buildable lot, and that additional development of the individual unit lots may be limited as a result of the application of development standards to the parent lot, shall be noted on the plat, as recorded with the King County Recorder's Office.

G. Unit lot subdivision shall not result in an accessory dwelling unit that is located on a different unit lot than the principal unit with which the accessory dwelling unit is associated.

Section 5. Section 23.30.010 of the Seattle Municipal Code, last amended by Ordinance 126862, is amended as follows:

23.30.010 Classifications for the purpose of this Subtitle III

*Note: This section would be modified to update zone names.*

A. General zoning designations. The zoning classification of land shall include one of the designations in this subsection 23.30.010.A. Only in the case of land designated "RC," the classification shall include both "RC" and one additional multifamily zone designation in this subsection 23.30.010.A.

Zones	Abbreviated
Residential, Neighborhood ((4))	NR((4))
<del>((Residential, Neighborhood 2</del>	NR2
Residential, Neighborhood 3	NR3
Residential, Neighborhood, Small Lot	RSL))
Residential, Multifamily, Lowrise 1	LR1
Residential, Multifamily, Lowrise 2	LR2

<b>Zones</b>	<b>Abbreviated</b>
Residential, Multifamily, Lowrise 3	LR3
Residential, Multifamily, Midrise	MR
Residential, Multifamily, Highrise	HR
Residential-Commercial	RC
Neighborhood Commercial 1	NC1
Neighborhood Commercial 2	NC2
Neighborhood Commercial 3	NC3
Master Planned Community—Yesler Terrace	MPC-YT
Seattle Mixed—South Lake Union	SMU-SLU
Seattle Mixed—Dravus	SM-D
Seattle Mixed—North Rainier	SM-NR
Seattle Mixed - Rainier Beach	SM-RB
Seattle Mixed—University District	SM-U
Seattle Mixed—Uptown	SM-UP
Seattle Mixed—Northgate	SM-NG
Commercial 1	C1
Commercial 2	C2
Downtown Office Core 1	DOC1
Downtown Office Core 2	DOC2
Downtown Retail Core	DRC

<b>Zones</b>	<b>Abbreviated</b>
Downtown Mixed Commercial	DMC
Downtown Mixed Residential	DMR
Pioneer Square Mixed	PSM
International District Mixed	IDM
International District Residential	IDR
Downtown Harborfront 1	DH1
Downtown Harborfront 2	DH2
Pike Market Mixed	PMM
General Industrial 1	IG1
General Industrial 2	IG2
Industrial Buffer	IB
Industrial Commercial	IC
Maritime Manufacturing and Logistics	MML
Industry and Innovation	II
Urban Industrial	UI

B. Suffixes—Height limits, letters, and mandatory housing affordability provisions. The zoning classifications for land subject to some of the designations in subsection 23.30.010.A include one or more numerical suffixes indicating height limit(s) or a range of height limits, or one or more letter suffixes indicating certain overlay districts or designations, or numerical suffixes enclosed in parentheses indicating the application of incentive zoning provisions, or letter suffixes and letter-with-numerical suffixes enclosed in parentheses indicating the application of mandatory housing affordability provisions, or any combination of these. Mandatory housing affordability suffixes include (M), (M1),



and (M2). A letter suffix may be included only in accordance with provisions of this Title 23 expressly providing for the addition of the suffix. A zoning classification that includes a numerical or letter suffix or other combinations denotes a different zone than a zoning classification without any suffix or with additional, fewer, or different suffixes. Except where otherwise specifically stated in this Title 23 or where the context otherwise clearly requires, each reference in this Title 23 to any zoning designation in subsection 23.30.010.A without a suffix, or with fewer than the maximum possible number of suffixes, includes any zoning classifications created by the addition to that designation of one or more suffixes.

Section 6. Section 23.34.010 of the Seattle Municipal Code, last amended by Ordinance 126509, is repealed:

~~((23.34.010 - Designation of NR1, NR2, and NR3 zones~~

*Note: This section would be removed as we are proposing to allow zones other than NR in a wider variety of areas.*

~~A. Except as provided in subsection 23.34.010.B, areas zoned NR1, NR2, or NR3 may be rezoned to zones more intense than NR3 only if the City Council determines that the area does not meet the locational criteria for NR1, NR2, or NR3 zones.~~

~~B. Areas zoned NR1, NR2, or NR3 that meet the locational criteria contained in subsections 23.34.011.B.1 through 23.34.011.B.3 may only be rezoned to zones more intense than NR3 if they are located within the adopted boundaries of an urban village, and the rezone is to a zone that is subject to the provisions of Chapter 23.58B and Chapter 23.58C.)~~

Section 7. Section 23.34.011 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

~~23.34.011 ((NR1, NR2, and NR3)) NR zone(s), function, and locational criteria~~

*Note: This section is being updated to recognize the new standards in NR zones and to remove criteria that prevent rezoning NR zones except in extremely limited cases.*

A. Function. An area that provides ~~((predominantly detached single-family structures on lot sizes compatible with the existing pattern of development and the character of neighborhood residential areas))~~ for the development of detached, attached, and stacked dwelling units within a predominately three-story height limit.

B. Locational criteria. An ((NR1, NR2, or NR3)) NR zone designation is most appropriate in areas that are outside of urban centers and villages and ((meet the following criteria)) are generally characterized by the following conditions:

1. ((Areas that consist of blocks with at least 70 percent of the existing structures, not including detached accessory dwelling units, in single-family residential use; or)) The area is characterized by dwelling units of generally three stories or less;

2. ((Areas that are designated by an adopted neighborhood plan as appropriate for single-family residential use; or)) The area is currently zoned Neighborhood Residential or has significant environmentally critical area; and

3. ((Areas that consist of blocks with less than 70 percent of the existing structures, not including detached accessory dwelling units, in single-family residential use but in which an increasing trend toward single-family residential use can be demonstrated; for example)) The area is not located near major transit stops or on frequent transit routes where higher density development might be more appropriate.

((a. The construction of single-family structures, not including detached accessory dwelling units, in the last five years has been increasing proportionately to the total number of constructions for new uses in the area, or

b. The area shows an increasing number of improvements and rehabilitation efforts to single-family structures, not including detached accessory dwelling units, or

c. The number of existing single-family structures, not including detached accessory dwelling units, has been very stable or increasing in the last five years, or

d. The area's location is topographically and environmentally suitable for single-family residential developments.

C. An area that meets at least one of the locational criteria in subsection 23.34.011.B should also satisfy the following size criteria in order to be designated as a NR1, NR2, or NR3 zone:

1. The area proposed for rezone should comprise 15 contiguous acres or more, or should abut existing NR1, NR2, or NR3 zones.

~~2. If the area proposed for rezone contains less than 15 contiguous acres, and does not abut existing NR1, NR2, or NR3 zones, then it should demonstrate strong or stable single-family residential use trends or potentials such as:~~

~~a. That the construction of single-family structures, not including detached accessory dwelling units, in the last five years has been increasing proportionately to the total number of constructions for new uses in the area, or~~

~~b. That the number of existing single-family structures, not including detached accessory dwelling units, has been very stable or increasing in the last five years, or~~

~~c. That the area's location is topographically and environmentally suitable for single-family structures, or~~

~~d. That the area shows an increasing number of improvements or rehabilitation efforts to single-family structures, not including detached accessory dwelling units.~~

~~D. Half-blocks at the edges of NR1, NR2, or NR3 zones which have more than 50 percent single-family structures, not including detached accessory dwelling units, or portions of blocks on an arterial which have a majority of single-family structures, not including detached accessory dwelling units, shall generally be included. This shall be decided on a case-by-case basis, but the policy is to favor including them.))~~

Section 8. Section 23.34.012 of the Seattle Municipal Code, last amended by Ordinance 126855, is repealed:

~~((23.34.012 Neighborhood Residential Small Lot (RSL) zone, function, and locational criteria~~

*Note: We are proposing to get rid of RSL zones as part of the update of Neighborhood Residential zones.*

~~A. Function. An area within an urban village that provides for the development of homes on small lots that may be more affordable compared to detached homes on larger lots and appropriate for households with children.~~

~~B. Locational criteria. An RSL zone is most appropriate in areas generally characterized by the following:~~

~~1. The area is similar in character to neighborhood residential zones;~~

~~2. The area is located inside an urban center, urban village, or Station Area Overlay District where it would provide opportunities for a diversity of housing types within these denser environments;~~

~~3. The area is characterized by, or appropriate for, a mix of single-family dwelling units, multifamily structures that are similar in scale to single-family dwelling units, such as duplex, triplex, rowhouse, and townhouse developments, and single-family dwelling units that have been converted to multifamily residential use or are well-suited to conversion;~~

~~4. The area is characterized by local access and circulation that can accommodate low density development oriented to the ground level and the street, and/or by narrow roadways, lack of alleys, and/or irregular street patterns that make local access and circulation less suitable for higher density multifamily development;~~

~~5. The area is within a reasonable distance of frequency transit service, but is not close enough to make higher density multifamily development more appropriate.~~

~~6. The area would provide a gradual transition between neighborhood residential zoned areas and multifamily or neighborhood commercial zoned areas; and~~

~~7. The area is supported by existing or projected facilities and services used by residents, including retail sales and services, parks, and community centers.))~~

Section 9. Section 23.34.013 of the Seattle Municipal Code, last amended by Ordinance 126509, is repealed:

### ~~((23.34.013 Designation of multifamily zones~~

~~An area zoned neighborhood residential that meets the criteria of Section 23.34.011 for designation as NR1, NR2 or NR3 may not be rezoned to multifamily except as otherwise provided in Section 23.34.010.B.))~~

Section 10. Section 23.34.014 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

### 23.34.014 Lowrise 1 (LR1) zone, function and locational criteria

*Note: This section is being updated to recognize the new standards in NR and LR zones.*

A. Function. The function of the LR1 zone is to provide opportunities ~~((for low-density multifamily housing, primarily rowhouse and townhouse developments, through infill development that is compatible with single-family dwelling units, or through the conversion of existing single-family dwelling units to duplexes or triplexes))~~ for the development of detached, attached, and stacked dwelling units within a predominately three-story height limit at a higher intensity than Neighborhood Residential zones.

B. Locational Criteria. The LR1 zone is most appropriate in areas generally characterized by the following conditions:

1. The area is similar in character to ~~((neighborhood residential))~~ Neighborhood Residential zones;

2. The area is either:

a. located outside of an urban center, urban village, or Station Area Overlay District;

b. a limited area within an urban center, urban village, or Station Area Overlay District that would provide opportunities for a diversity of housing types within these denser environments; or

c. located on a collector or minor arterial;

3. The area is characterized by ~~((a mix of single-family dwelling units, multifamily structures that are similar in scale to single-family dwelling units, such as rowhouse and townhouse developments, and single-family dwelling units that have been converted to multifamily residential use or are well-suited to conversion))~~ dwelling units of generally three stories or less;

4. The area is characterized by local access and circulation that can accommodate low density multifamily development oriented to the ground level and the street, and/or by narrow roadways, lack of alleys, and/or irregular street patterns that make local access and circulation less suitable for higher density multifamily development;

5. The area would provide a gradual transition between ~~((neighborhood residential))~~ Neighborhood Residential zoned areas and multifamily or neighborhood commercial zoned areas; and

6. The area is supported by existing or projected facilities and services used by residents, including retail sales and services, parks, and community centers.

Section 11. Section 23.40.035 of the Seattle Municipal Code, enacted by Ordinance 123939, is repealed:

~~(23.40.035 Location of accessory dwelling units on through lots~~

*Note: This section is being repealed as the treatment of through lots is being clarified in the definition of "lot line, front" for all dwelling units, not just for accessory dwelling units.*

~~On a through lot, when yards cannot be determined pursuant to Section 23.40.030, the Director shall designate a rear yard for the purpose of allowing a detached accessory dwelling. In designating a rear yard, the Director shall consider factors including but not limited to the location of existing structures, vehicular and pedestrian access, platting patterns in the vicinity and topography.)~~

Section 12. A new Section 23.42.022 is added to the Seattle Municipal Code as follows:

23.42.022 Accessory dwelling units

*Note: This section is being added to clarify the standards that apply to ADUs in all zones. These standards are new for Neighborhood Residential zones, which regulate ADUs very different than other zones, but are consistent with existing standards in other zones.*

A. Accessory dwelling units are allowed as a housing use in all zones where housing uses are allowed.

B. Accessory dwelling units may not be accessory to residential uses other than housing uses.

C. No lot may have more than two accessory dwelling units.

D. Unless otherwise provided in the standards of the underlying zone, accessory dwelling units shall be subject to the same standards as principal dwelling units.

E. Accessory dwelling units must be located on same lot as the principal dwelling unit.

F. The gross floor area of an attached accessory dwelling unit may not exceed 1,000 square feet, including garage area, unless the portion of the structure in which the attached accessory dwelling unit is located existed as of December 31, 2017.

Section 13. A new Section 23.42.024 is added to the Seattle Municipal Code as follows:

#### 23.42.024 Adult family homes

*Note: This section is being added to clarify how adult family homes are currently being regulated.*

Adult family homes are allowed as a home occupation in all zones where housing uses are allowed.

Section 14. Section 23.42.110 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

#### 23.42.110 Change from one nonconforming use to another nonconforming use

A nonconforming use may be converted by an administrative conditional use authorization to another use not otherwise permitted in the zone subject to the following limitations and conditions.

A. In ~~((neighborhood residential and residential small lot))~~ Neighborhood Residential zones, a nonconforming multifamily residential use may not be converted to any nonresidential use not otherwise permitted in the zone.

\* \* \*

Section 15. A new Section 23.42.132 is added to the Seattle Municipal Code as follows:

#### 23.42.132 Columbariums, garden wall crypts, and mausoleums

*NOTE: This section is being moved from the Neighborhood Residential zones chapter to clarify that they apply in all zones.*

Columbariums, garden wall crypts, and mausoleums are permitted only as accessory to existing cemeteries, except that columbariums and garden wall crypts may also be accessory to religious facilities. In addition, no interment openings shall abut or be directly across the street from property other than cemetery property. For columbariums, garden wall crypts, and mausoleums accessory to existing cemeteries, any border between structures and the property line shall be landscaped and maintained by the owner in good condition.

## Changes to Chapter 23.44

Section 16. Chapter 23.44 of the Seattle Municipal Code, last amended by Ordinance XXXXXX is repealed as shown in Attachment 2.

Section 17. A new Chapter 23.44, Neighborhood Residential, is added to Title 23 of the Seattle Municipal Code, as follows:

### 23.44.002 Scope of provisions

A. This Chapter 23.44 establishes regulations for the Neighborhood Residential (NR) zone.

B. Some land in these zones may be regulated by Subtitle III, Division 3, Overlay Districts, of this Title 23 in addition to the standards of this Chapter 23.44.

C. Definitions are provided in Chapter 23.84A. Methods for measurements are provided in Chapter 23.86.

D. Other regulations may apply to development proposals, including but not limited to general use provisions (Chapter 23.42); transportation concurrency and transportation impact mitigation (Chapter 23.52); requirements for streets, alleys, and easements (Chapter 23.53); standards for parking quantity, access, and design (Chapter 23.54); standards for solid waste storage (Chapter 23.54); sign regulations (Chapter 23.55); communication regulations (Chapter 23.57); shoreline regulations (23.60A); and environmental protection and historic preservation (Title 25).

E. Assisted living facilities, congregate residences, and structures containing ground floor commercial uses shall meet the development standards for stacked units unless otherwise specified. Congregate residences are subject to additional requirements as specified in Section 23.42.049.

### 23.44.004 Permitted and prohibited uses

*Note: The use standards in this section have been updated to consolidate provisions for principal and accessory uses, to create a use table similar to those used for other zones, to reflect the updated definitions for residential use, and to add a provision allowing corner stores.*



A. All uses are permitted outright, prohibited, or permitted as a conditional use according to Table A for 23.44.004 and this Section 23.44.004. Uses not referred to in Table A for 23.44.004 are prohibited, unless otherwise indicated in this Chapter 23.44 or Chapters 23.51A, 23.51B, or 23.57. Communication utilities and accessory communication devices, except as exempted in Section 23.57.002, are subject to the regulations in this Chapter 23.44 and additional regulations in Chapter 23.57. Public facilities are subject to the regulations in Section 23.51A.004.

B. All permitted uses are allowed as a principal use or as an accessory use, unless otherwise indicated in this Chapter 23.44.

<b>Table A for 23.44.004 Permitted and prohibited uses</b>	
<b>Uses</b>	<b>Permitted and prohibited uses</b>
A. Residential use except as listed below	P
A.1. Assisted living facilities	X
A.2. Caretaker's quarters	X
A.3. Congregate residences	X/P <sup>1</sup>
B. Institutions except as listed below	CU
B.1. Child care centers	P
B.2. Community centers that do not provide shelter services	P
B.3. Community farms	P
B.4. Libraries	P
B.5. Public schools	P
C. Uses in existing or former public schools	

**Table A for 23.44.004  
Permitted and prohibited uses**

Uses	Permitted and prohibited uses
C.1. Preschools, public or private schools, colleges, and family support centers in existing or former public schools	P
C.2. Uses not otherwise permitted in existing or former public schools	P <sup>2</sup>
D. Parks and open space	P
E. Ground-floor commercial uses	P <sup>3</sup>
F. Human service use	P
G. Cemeteries	P/X <sup>4</sup>
H. Community gardens	P
I. Rail transit facilities and railroads;	P
J. Park and ride facilities	CU <sup>5</sup>
K. Commercially operating horse farms in existence before July 1, 2000	P <sup>6</sup>
L. Uses not otherwise permitted if located in Landmark structures	CU <sup>7</sup>
M. Uses not otherwise permitted if located in structures unsuited to permitted uses	CU <sup>8</sup>
N. All other uses	X
<p>Key to Table A for 23.44.004  P = Permitted outright  CU = Permitted as an Administrative Conditional Use  X = Prohibited</p>	

<b>Table A for 23.44.004 Permitted and prohibited uses</b>	
<b>Uses</b>	<b>Permitted and prohibited uses</b>
Footnotes to Table A for 23.44.004 <sup>1</sup> Congregate housing is allowed within a quarter mile of a major transit stop and prohibited in other areas. <sup>2</sup> Pursuant to procedures established in Chapter 23.78 <sup>3</sup> Ground-floor commercial uses are only allowed if they meet the standards of subsection 23.44.006.E <sup>4</sup> Subject to subsection 23.44.004.D <sup>5</sup> Pursuant to standards in subsection 23.44.006.F <sup>6</sup> Provided that they are located on lots greater than ten acres and conform to the limits on the number and location of farm animals and structures containing them set forth in Section 23.42.052 <sup>7</sup> Pursuant to standards in subsection 23.44.006.D <sup>8</sup> Pursuant to standards in subsection 23.44.006.E	

C. Accessory uses

1. Except as otherwise provided in this subsection 23.44.004.C, accessory uses customarily incidental to principal uses permitted outright are permitted outright.

2. All accessory uses and structures, except for urban farms and structures in urban farm use, must be located on the same lot as the principal use or structure unless otherwise specifically provided.

3. Urban farms with planting area not more than 4,000 square feet are permitted outright as an accessory use. Urban farms with more than 4,000 square feet of planting area may be permitted as an administrative conditional use accessory to any principal use permitted outright or as a conditional use, pursuant to Section 23.42.051.

4. Piers and floats are permitted provided they comply with Chapter 23.60A.

5. Bed and breakfast are permitted outright provided they meet the following conditions:

a. The bed and breakfast use has a valid business license tax certificate issued by the Department of Finance and Administrative Services;

b. All operators of bed and breakfast uses who use a short-term rental platform for listing the bed and breakfast shall have a valid short-term rental operator's license issued by the Department of Finance and Administrative Services.

c. The bed and breakfast use shall be operated by the primary resident of the dwelling unit where the bed and breakfast is located or the resident operator;

d. There shall be no evidence of the bed and breakfast use visible from the exterior of the dwelling unit except for a sign permitted by subsection 23.55.020.D.1;

e. The bed and breakfast use shall have no more than five guest rooms, provided that this limitation does not apply to bed and breakfast uses that were established on or before April 1, 1987.

6. Accessory dwelling units are allowed consistent with Section 23.42.025.

D. Existing cemeteries are permitted to continue in use. New cemeteries are prohibited and existing cemeteries are prohibited from expanding. For purposes of this Section 23.44.004, a change in a cemetery boundary is not considered an expansion in size and is permitted provided that:

1. The change does not increase the net land area occupied by the cemetery;

2. The land being added to the cemetery is contiguous to the existing cemetery and is not separated from the existing cemetery by a public street or alley whether or not improved; and

3. The use of the land being added to the cemetery will not result in the loss of housing.

E. All ground-floor commercial uses permitted pursuant to this Section 23.44.004 shall meet the following conditions:

1. The commercial use is located on a corner lot.

2. The commercial use is limited to the following:

a. Food processing and craft work;

b. General sales and services; and

c. Restaurants.

3. The gross floor area of commercial uses do not occupy more than 2,500 square feet.

4. The commercial use is permitted only on or below the ground floor of a structure. On sloping lots, the commercial use may be located at more than one level within the structure as long as the floor area in commercial use does not exceed the area of the structure's footprint.

5. Vents for venting of odors, vapors, smoke, gas and fumes, and exterior heat exchangers and other similar devices (e.g., related to ventilation, air conditioning, refrigeration) shall be at least 10 feet above finished sidewalk grade and directed away to the extent possible from residential uses within 50 feet of the vent.

6. Drive-in businesses are prohibited as a principal or accessory use.

7. Outdoor sales and/or service of food or beverages must be located at least 50 feet from adjacent lots.

8. Businesses may not be open between the hours of 10 p.m. and 7 a.m.

#### 23.44.006 Administrative conditional uses

*Note: Requirements for conditional uses that were previously in many different sections have been consolidated into this section.*

A. Uses permitted as administrative conditional uses in Section 23.44.004 may be permitted by the Director when the provisions of Section 23.42.042 and this Section 23.44.006 are met.

B. Unless otherwise specified in this Chapter 23.44, conditional uses shall meet the development standards for uses permitted outright. If an existing structure is nonconforming to development standards, no conditional use is required for any alterations that do not increase the nonconformity.

C. Institutions permitted as a conditional use shall meet the development standards in Section 23.44.007.

D. A use not otherwise permitted in a Neighborhood Residential zone within a structure designated as a Seattle landmark that is subject to controls and incentives imposed by a designating ordinance, when the owner of the landmark has executed and

recorded an agreement acceptable in form and content to the Landmarks Preservation Board providing for the restoration and maintenance of the historically significant features of the structure, may be permitted subject to the following:

1. The use is compatible with the existing design and/or construction of the structure without significant alteration;
2. Uses permitted by the zone are impractical because of structure design and/or that no permitted use can provide adequate financial support necessary to sustain the structure in reasonably good physical condition; and
3. The use shall not be detrimental to other properties in the zone or vicinity or to the public interest.

E. Uses in structures unsuited to uses permitted outright

1. A use not otherwise permitted in a Neighborhood Residential zone may be permitted as an administrative conditional use in structures unsuited to uses permitted outright in Neighborhood Residential zones. The determination that a use may be permitted shall be based on the following factors:

- a. The design of the structure is not suitable for conversion to a use permitted outright in a Neighborhood Residential zone; and
- b. The structure contains more than 4,000 square feet; and
- c. The proposed use will provide a public benefit.

2. Parking requirements for uses permitted under this subsection 23.44.006.E shall be determined by the Director.

3. The Director may require measures to mitigate impacts such as noise, odor, parking or traffic impacts. Mitigating measures may include but are not limited to landscaping, sound barriers, fences, mounding or berming, adjustments to development standards, design modifications or setting hours of operation.

4. In the case of an existing or former public school, permissible uses other than those permitted outright in the zone and their development standards including parking requirements shall be established only pursuant to procedures for establishing criteria for joint use or reuse of public schools in Chapter 23.78.

F. A park and ride facility under the management of a public agency responsible for commuter pooling efforts may be permitted if the Director determines that:

1. It is to be located on an existing parking lot;

2. That parking proposed for the park and ride facility is not needed by the principal use or its accessory uses during the hours proposed for park and ride use; and

3. The park and ride use shall not interfere or conflict with the peak-hour activities associated with the principal use and its accessory uses. The Director may control the number and location of parking spaces to be used.

G. Any use that was previously authorized by a conditional use permit but which has been discontinued shall not be re-established or re-commenced except pursuant to a new conditional use permit, provided that such permit is required for the use at the time re-establishment or re-commencement is proposed. Vacant property, except for dead storage of materials or equipment of the conditional use, shall not be considered as being devoted to the authorized conditional use. The expiration of licenses necessary for the conditional use shall be evidence that the property is not being devoted to the conditional use. A conditional use in a multifamily structure or a multitenant commercial structure shall not be considered as discontinued unless all units are either vacant or devoted to another use. The following shall constitute conclusive evidence that the conditional use has been discontinued:

1. A permit to change the use of the property has been issued and the new use has been established; or

2. The property has not been devoted to the authorized conditional use for more than 24 consecutive months.

H. Minor structural work that does not increase usable floor area or seating capacity and that does not exceed the development standards applicable to the use shall not be considered an expansion and does not require approval as a conditional use unless the work would exceed the height limit of the zone for uses permitted outright. Such work includes but is not limited to roof repair or replacement and construction of uncovered decks and porches, facilities for barrier-free access, bay windows, dormers, and eaves.

#### [23.44.007 Institutions permitted as a conditional use](#)

*Note: This section would be moved from 23.44.022, but the content remains the same.*

A. Scope of standards. The standards of this Section 23.44.007 apply only to institutions permitted as conditional uses in Neighborhood Residential zones.

## B. General provisions

1. New or expanding institutions in Neighborhood Residential zones shall meet the development standards for uses permitted outright unless modified elsewhere in this Section 23.44.007 or in a Major Institution master plan.

2. Institutions seeking to establish or expand on property that is developed with residential structures may expand their campus up to a maximum of 2.5 acres. An institution campus may be established or expanded beyond 2.5 acres if the property proposed for the expansion is vacant land.

C. Dispersion. The lot line of any proposed new or expanding institution shall be located at least 600 feet from any lot line of any other institution in a residential zone, with the following exceptions:

1. An institution may expand even though it is within 600 feet of a public school if the public school is constructed on a new site subsequent to December 12, 1985.

2. A proposed institution may be located less than 600 feet from a lot line of another institution if the Director determines that the intent of the dispersion criteria is achieved due to the presence of physical elements that provide substantial separation from other institutions, such as bodies of water, large open spaces or topographical breaks, or other elements such as arterials, freeways, or nonresidential uses.

D. Demolition of residential structures. No residential structure shall be demolished nor shall its use be changed to provide for parking. This prohibition may be waived if the demolition or change of use proposed is necessary to meet the parking requirements of Title 23 and if alternative locations would have greater noise, odor, light and glare, or traffic impacts on surrounding property in residential use. If the demolition or change of use is proposed for required parking, the Director may consider waiver of parking requirements in order to preserve the residential structure and/or use. The waiver may include, but is not limited to, a reduction in the number of required parking spaces and a waiver of parking development standards such as location or screening.

E. Reuse of existing structures. Existing structures may be converted to institution use if the setback requirements for institutions are met. Existing structures that do not meet these setback requirements may be permitted to convert to institution use, provided that the Director may require additional mitigating measures to reduce impacts of the proposed use on surrounding properties.

F. Noise and odors. For the purpose of reducing potential noise and odor impacts, the Director shall consider the location on the lot of the proposed institution, on-site



parking, outdoor recreational areas, trash and refuse storage areas, ventilating mechanisms, sports facilities and other noise-generating and odor-generating equipment, fixtures or facilities. The institution shall be designed and operated in compliance with Chapter 25.08. In order to mitigate identified noise and/or odor impacts, the Director may require measures such as landscaping, sound barriers or fences, mounding or berming, adjustments to setback or parking development standards, design modifications, or setting hours of operation for facilities.

#### G. Landscaping

1. The Director shall promulgate rules to foster the long-term health, viability, and coverage of plantings. The rules shall address, at a minimum, the type and size of plants, spacing of plants, use of drought-tolerant plants, and access to light and air for plants. All landscaping provided to meet the requirements of this Section 23.44.007 shall comply with these rules.

2. Landscaping that achieves a Green Factor score of 0.3 or greater, pursuant to Section 23.86.019, is required for any lot with:

- a. Development containing more than four new dwelling units;
- b. Development, either a new structure or an addition to an existing structure, containing more than 4,000 new square feet of non-residential uses; or
- c. Any parking lot containing more than 20 new parking spaces for automobiles.

#### H. Bulk and siting

1. Lot area. If the proposed site is larger than one acre, the Director may require the following and similar development standards:

- a. For lots with unusual configuration or uneven boundaries, the proposed principal structures be located so that changes in potential and existing development patterns on the block or blocks within which the institution is located are kept to a minimum;
- b. For lots with large street frontage in relationship to their size, the proposed institution reflect design and architectural features associated with adjacent residentially zoned block fronts in order to provide continuity of the block front and to integrate the proposed structures with residential structures and uses in the immediate area.

## 2. Setbacks

a. Setbacks of institutions shall be as required for uses permitted outright pursuant to Section 23.44.004, except that the side setback for side lot lines that do not abut an alley shall be 10 feet. All the provisions in Section 23.44.018 relating to projections and structures in setbacks shall still apply. If the Director finds that a reduced setback will not significantly increase project impacts, including but not limited to noise, odor, and the scale of the structure in relation to nearby buildings, the side setback may be reduced to 5 feet.

b. Fences and freestanding walls of utility services uses, regulated under this Section 23.44.007 pursuant to Section 23.51A.002, shall be set back from the street lot line a minimum of 10 feet, and landscaping shall be provided between the fence or wall and the right-of-way. The Director may reduce this setback after finding that the reduced setback will not significantly increase project impacts, including but not limited to noise, odor, and the scale of the fence, wall, or structure in relation to nearby buildings. Acceptable methods to reduce fence or wall impacts include changes in the height, design or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features to provide visual interest facing the street lot line. Fences and walls may obstruct or allow views to the interior of a site. Where site dimensions and conditions allow, applicants are encouraged to provide both: a landscaped setback between the fence or wall and the right-of-way; and a fence or wall that provides visual interest facing the street lot line through the height, design, or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features.

3. Institutions located on lots which include more than one zone classification. For lots that include more than one zone classification, neighborhood residential zone provisions shall apply only to the Neighborhood Residential zoned lot area involved.

4. Height limit. Institutions are subject to the height limits in Section 23.44.014 except as follows:

a. Religious symbols for religious institutions may extend an additional 25 feet above the height limit.

b. For gymnasiums and auditoriums that are accessory to an institution the maximum height shall be 35 feet if portions of the structure above 35 feet are set back at least 20 feet from all property lines. Pitched roofs on a gymnasium or auditorium that have a slope of not less than 4:12 may extend 10 feet above the 35-foot

height limit. No portion of a shed roof on a gymnasium or an auditorium shall be permitted to extend beyond the 35-foot height limit under this provision.

I. Parking and loading berth requirements. The Director may modify the parking and loading requirements of Section 23.54.015 and the requirements of Section 23.44.036 on a case-by-case basis using the information contained in the transportation plan prepared pursuant to subsection 23.44.022.M. The modification shall be based on adopted City policies and shall:

1. Provide a demonstrable public benefit such as reduction of traffic on residential streets, preservation of residential structures, and reduction of noise, odor, light and glare; and

2. Not cause undue traffic through residential streets or create a safety hazard.

J. Transportation plan. A transportation plan shall be required for proposed new institutions and for those institutions proposing expansions that are larger than 4,000 square feet of structure area and are required to provide an additional two or more parking spaces. The Director shall determine the level of detail to be disclosed in the transportation plan based on the probable impacts and/or scale of the proposed institution. Discussion of the following elements and other factors may be required:

1. Traffic. Number of staff on site during normal working hours, number of users, guests and others regularly associated with the site, level of vehicular traffic generated, traffic peaking characteristics of the institution and in the immediate area, likely vehicle use patterns, extent of traffic congestion, types and numbers of vehicles associated with the institution and mitigating measures to be taken by the applicant;

2. Parking. Number of spaces, the extent of screening from the street or abutting residentially zoned lots, direction of vehicle light glare, direction of lighting, sources of possible vibration, prevailing direction of exhaust fumes, location of parking access and curb cuts, accessibility or convenience of parking and measures to be taken by the applicant such as preference given some parking spaces for carpool and vanpool vehicles and provision of bicycle racks;

3. Parking overflow. Number of vehicles expected to park on neighboring streets, percentage of on-street parking supply to be removed or used by the proposed project, opportunities for sharing existing parking, trends in local area development and mitigating measures to be taken by the applicant;

4. Safety. Measures to be taken by the applicant to ensure safe vehicular and pedestrian travel in the vicinity;

5. Availability of public or private mass transportation systems. Route location and frequency of service and private mass transportation programs to be provided by the applicant such as carpools and vanpools.

K. Development standards for existing institutes for advanced study

1. The institute shall be located on a lot of not less than 15 acres.
2. The lot coverage for all structures shall not exceed 20 percent of the total lot area.
3. Structures shall be set back a minimum of 25 feet from any lot line.
4. Parking areas shall be set back a minimum of 10 feet from any lot line.
5. In the event of expansion, parking shall be required as provided for existing institutes for advanced study in Section 23.54.015.
6. Landscaping shall be provided between a lot line and any structure and shall be maintained for the duration of the use.

L. The establishment of a shelter for homeless youths and young adults in a legally established elementary or secondary school, is not considered a new use or an expansion of the institutional use provided that:

1. The use does not violate any condition of approval of the existing institutional use;
2. The use does not require expansion of the existing structure;
3. Any new children's play area is located at least 30 feet from any other lot in a Neighborhood Residential zone, and at least 20 feet from any lot in a multifamily zone;
4. The occupants are enrolled students of the established school.

#### 23.44.008 General provisions

*Note: General provisions that were previously in multiple sections have been consolidated into this section.*

A. An exception from one specific standard does not relieve the applicant from compliance with any other standard.

B. Any structure occupied by a permitted principal use other than residential use may be converted to residential use even if the structure does not conform to the development standards for residential uses in Neighborhood Residential zones.

C. If more than one category of residential use is located on a lot, and if different development standards apply to the different categories of use, then each category's percentage of the total limit imposed by the development standard shall be calculated based on each category's percentage of total structure footprint area, as follows:

1. Calculate the footprint, in square feet, for each category of residential use. For purposes of this calculation, "footprint" is defined as the horizontal area enclosed by the exterior walls of the structure.

2. Calculate the total square feet of footprint of all categories of residential uses on the lot.

3. Divide the square footage of the footprint for each category of residential structure in subsection 23.44.008.C.1 by the total square feet of footprints of all residential uses in subsection 23.44.008.C.2.

4. Multiply the percentage calculated in subsection 23.44.008.C.3 for each housing category by the area of the lot. The result is the area of the lot devoted to each housing category.

5. The total limit for each category of residential use is the applicable limit for that use multiplied by the percentage calculated in subsection 23.44.008.C.4.

#### 23.44.010 Floor area

*Note: The floor area ratio would be modified, but the measurement process and the exemptions would stay the same.*

A. Gross floor area. In Neighborhood Residential zones, gross floor area includes exterior corridors, breezeways, and stairways that provide building circulation and access to dwelling units or sleeping rooms. Balconies, patios, and decks that are associated with a single dwelling unit or sleeping room and that are not used for common circulation are not considered gross floor area.

B. Floor area ratio (FAR) limits. The FAR limit in Neighborhood Residential zones is as shown in Table A for 23.44.010. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

<b>Table A for 23.44.010 Floor area ratio (FAR) in NR zones</b>	
<b>Density</b>	<b>Floor area ratio</b>
Less than 1 unit / 4,000 square feet	0.6
1 unit / 4,000 sq ft to 1 unit / 2,201 sq ft	0.8
1 unit / 2,200 sq ft to 1 unit / 1,601 sq ft	1.0
1 unit / 1,600 sq ft or greater	1.4 for stacked dwelling units that do not include congregate housing; 1.2 for other dwelling units

C. The following floor area is exempt from FAR limits:

1. All stories, or portions of stories, that are underground.
2. All portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, excluding access.

#### 23.44.012 Minimum lot size and maximum density

*Note: The minimum lot size is proposed to be substantially reduced and a new density limit requirements would be added to allow a wider variety of housing types and to comply with the requirements of state legislation codified by HB 1110. The area of certain Environmentally Critical Areas is proposed to be excluded from lots size for the purpose of calculating density.*

A. Except as provided in subsection 23.44.012.D, the minimum lot size is 1,250 square feet.

B. Except as provided in subsection 23.44.012.C and 23.44.012.D, the maximum density is:

1. For stacked dwelling units on lots larger than 6,000 square feet that are located with a quarter mile of a major transit stop or a transit stop or station served by a frequent transit route on the map required by subsection 23.54.015.B.4, one dwelling unit per 650 square feet;
2. For all other dwelling units, one dwelling unit per 1,250 square feet of lot area.

C. Maximum density exceptions

1. At least one dwelling unit is allowed on all lots in existence as of June 6, 2024.

2. A lot that does not meet the minimum size necessary for four dwelling units under subsection 23.44.012.B may be developed with up to four dwelling units if the lot meets the following criteria:

a. The lot was in existence as a legal building site prior to June 6, 2024;

b. The lot has not been divided through a subdivision or short subdivision or modified by unit lot subdivision on June 6, 2024 or later; and

c. The lot does not contain any riparian corridors; wetlands and their buffers; submerged lands and areas within the shoreline setback; or steep slopes.

3. Notwithstanding subsection 23.44.012.C.2, a lot that does not meet the minimum size necessary for six units under subsection 23.44.012.B may be developed with up to six units if the lot meets the following criteria:

a. The lot is located within one-quarter mile walking distance of a major transit stop;

b. The lot was in existence as a legal building site prior to June 6, 2024;

c. The lot has not been divided through a subdivision or short subdivision or modified by unit lot subdivision since June 6, 2024; and

d. The lot does not contain any riparian corridors; wetlands and their buffers; submerged lands and areas within the shoreline setback; or steep slopes.

#### D. Measurement of maximum density

1. When calculation of the number of dwelling units allowed results in a fraction of a unit, any fraction shall be rounded down.

2. Congregate residence sleeping rooms shall be treated as one-fourth of a dwelling unit for purposes of calculating density.

3. In the case of unit lot subdivision, the density limit shall be applied to the parent lot as a whole.

4. If dedication of right-of-way is required, permitted density shall be calculated before the dedication is made.

5. Areas not counted in calculating the lot size. The following areas shall not be counted in calculating the area of lots for the purpose of calculating minimum lot size in subsection 23.44.012.A and maximum density in this subsection 23.44.012.B:

a. Riparian corridors;

- b. Wetlands and their buffers;
- c. Submerged lands and areas within the shoreline setback; and
- d. Designated non-disturbance area in steep slopes.

#### 23.44.014 Structure height

*Note: Maximum structure height is proposed to be increased from 30 feet to 32 feet to allow comfortable floor to ceiling heights for projects in which the first floor is not at grade. Shed and butterfly rooves would be allowed. The height exemptions would be simplified.*

##### A. Maximum height established

1. Subject to the exceptions allowed in this Section 23.44.014, the height limit for any structure in NR zones is 32 feet.

2. The height limit for accessory structures that are located in required setbacks or separations is 12 feet.

##### B. Standards for pitched roofs

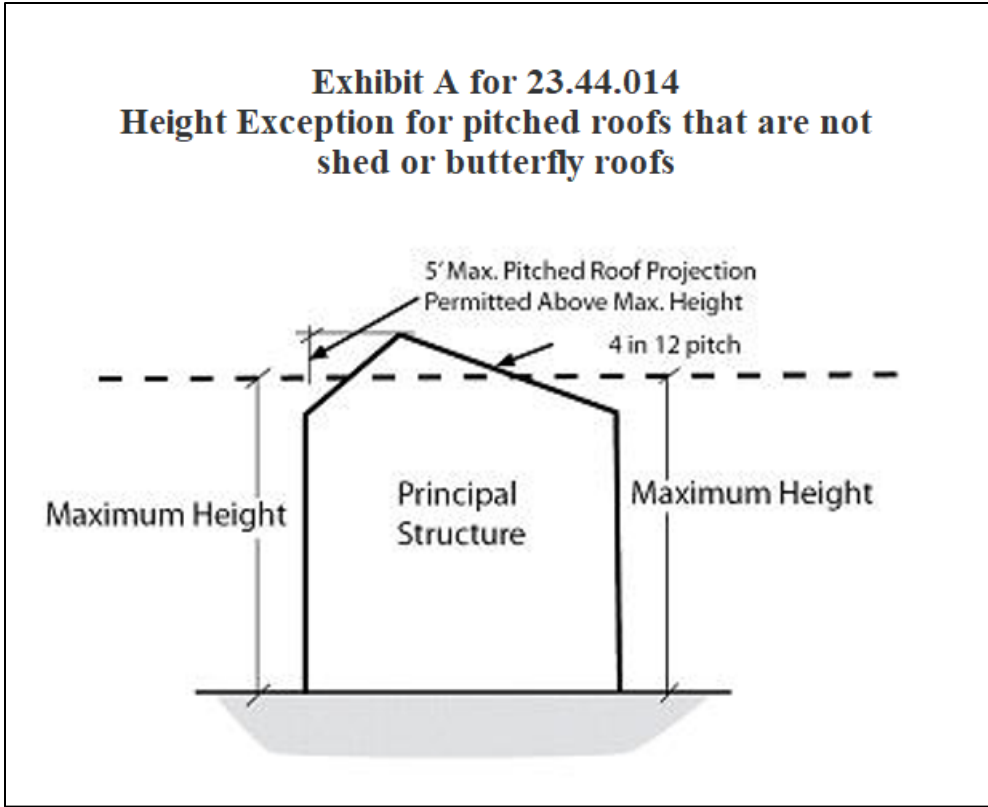
1. The ridge of a pitched roof that is not a shed or butterfly roof on a principal structure may extend up to 5 feet above the maximum height limit, as determined under subsection 23.44.014.A. All parts of the roof above the height limit must be pitched at a rate of not less than 4:12 (see Exhibit A for 23.44.014).

#### **Exhibit A for 23.44.014**

#### **Height Exception for pitched roofs that are not shed or butterfly roofs**

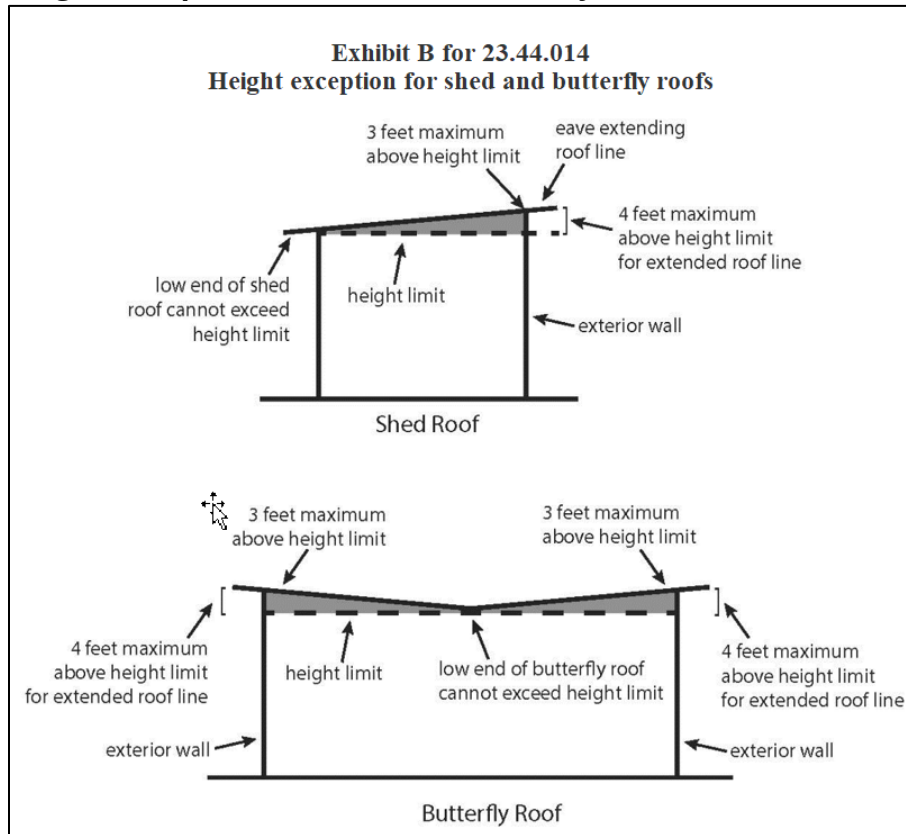


**Exhibit A for 23.44.014**  
**Height Exception for pitched roofs that are not shed or butterfly roofs**



2. The high side(s) of a shed or butterfly roof may extend 3 feet above the maximum height limit, as determined under subsection 23.44.014.A, provided that the low side(s) of the shed or butterfly roof are no higher than the height limit (see Exhibit B for 23.44.014). The roof line of a shed or butterfly roof may be extended in order to accommodate eaves, provided that the highest point of the roof extension is no more than 4 feet above the height limit.

**Exhibit B for 23.44.014**  
**Height exception for shed and butterfly roofs**



**C. Height limit exceptions**

1. Except in the Airport Height Overlay District, Chapter 23.64, flagpoles are exempt from height limits, provided that they are no closer to any adjoining lot line than 50 percent of their height above existing grade, or, if attached only to a roof, no closer than 50 percent of their height above the roof portion where attached.

2. Open railings, planters, greenhouses not dedicated to food production, parapets, and firewalls may extend 4 feet above the height limit in subsection 23.44.014.A. Planters on flat roofs shall not be located within 4 feet of more than 25 percent of the perimeter of the roof.

3. Green roofs may extend 2 feet above the height limit in subsection 23.44.014.A or above a pitched roof allowed in subsection 23.44.014.B.

4. Solar collectors may extend 4 feet above the height limit in subsection 23.44.014.A or above a pitched roof allowed in subsection 23.44.014.B.

5. For nonresidential principal uses, the following rooftop features may extend up to 10 feet above the height limit in subsection 23.44.014.A, as long as the combined total coverage of all features listed in this subsection 23.44.014.C.5 does not exceed 15 percent of the roof area or 20 percent of the roof area if the total includes screened or enclosed mechanical equipment:

- a. Stair and elevator penthouses;
- b. Mechanical equipment;
- c. Wind-driven power generators; or
- d. Chimneys.

6. Devices for generating wind power may extend up to 10 feet above the height limit in subsection 23.44.014.A, provided that the combined total coverage of all features does not exceed 15 percent of the roof area.

7. For height limits and exceptions for communication utilities and accessory communication devices, see Section 23.57.010.

8. Buildings existing prior to the date of this ordinance are permitted to extend up to 8 inches above the height limit in subsection 23.44.014.A or a pitched roof allowed in subsection 23.44.014.B solely for the purpose of adding insulation to an existing roof.

#### 23.44.016 Lot coverage

*Note: The lot coverage is proposed to be changed from a system that varies with lot size to a single 50% standard. The area of certain Environmentally Critical Areas is proposed to be excluded from lots size for the purpose of calculating density.*

A. Except as otherwise provided in this Section 23.44.016, the maximum lot coverage permitted for enclosed principal and accessory structures is 50 percent.

B. Lots abutting alleys. For purposes of computing the lot coverage only:

a. The area of a lot with an alley or alleys abutting any lot line may be increased by one-half of the width of the abutting alley or alleys.

b. The total lot area for any lot may not be increased by the provisions of this Section 23.44.016 by more than ten percent.

C. The following areas shall not be counted in calculating the area of lots for the purpose of calculating lot coverage in this Section 23.44.016:

- a. Riparian corridors;
- b. Wetlands and their buffers;
- c. Submerged lands and areas within the shoreline setback; and
- d. Designated non-disturbance area in steep slopes.

D. In calculating lot coverage, the area of enclosed structures shall not include any projections that do not provide floor area if they meet the standards for projections into setbacks in subsection 23.44.018.E. Projections that provide floor area shall be included in the calculation of lot coverage.

E. The lot coverage allowed on lots containing areas listed in subsection 23.44.016.C shall not be less than 625 square feet or an amount of lot coverage approved by the Director through an environmentally critical area reduction, waiver, or modification pursuant to Chapter 25.09, whichever is greater.

### 23.44.018 Setbacks

*Note: Setbacks are proposed to be significantly updated to improve design outcomes for developing using the higher density provisions.*

A. Required setbacks for the NR zones are shown in Table A for 23.44.018.

<b>Table A for 23.44.018 Required setbacks in Neighborhood Residential zones</b>	
Front	10 feet
Rear	5 feet for accessory dwelling units and 10 feet for other structures except that, if the rear setback abuts an alley, no rear setback is required
Side	5 feet, except that no side setback is required from a side lot line that abuts an alley

B. Through lots. In the case of a through lot, each setback abutting a street, shall be a front setback. Rear setback provisions shall not apply to the through lot, except pursuant to Section 23.40.030.

C. Other setback requirements. Additional structure setbacks may be required in order to meet the provisions of Chapter 23.53.

D. Underground structures. Underground structures, measured from existing or finished grade, whichever is lower, may be located anywhere on a lot.

E. Projections from an enclosed structure allowed in required setbacks

1. Architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other similar features may project into required setbacks a maximum of 2 feet if they are no closer than 3 feet to any lot line.

2. Garden windows and other similar features that do not provide floor area may project a maximum of 18 inches into required setbacks if they:

a. Are a minimum of 30 inches above the finished floor;

b. Are no more than 6 feet in height and 8 feet wide; and

c. Combined with bay windows and other similar features that provide floor area, make up no more than 30 percent of the area of the facade.

3. Bay windows and other similar features that provide floor area may project a maximum of 2 feet into required front and rear setbacks if they:

a. Are no closer than 5 feet to any lot line;

b. Are no more than 10 feet in width; and

c. Combined with garden windows and other projections included in subsection 23.44.018.E.2, make up no more than 30 percent of the area of the facade.

4. Unenclosed porches and steps

a. Unenclosed porches or steps no higher than 4 feet above existing grade, or the grade at the street lot line closest to the porch, whichever is lower, may extend to within 5 feet of a street lot line and 3 feet of a side lot line.

b. Allowed porches or steps may be covered, provided that:

1) No portions of the cover-structure, including any supports, are closer than 5 feet to any lot line;

2) The height of the roof over unenclosed porch or steps shall not exceed 15 feet above existing or finished grade, whichever is lower;

3) The roof over such porches or steps shall not be used as a deck; and

4) The total area of porches attached to any individual dwelling unit and located in the setback is not more than 60 square feet.

F. Exception for structures with ground-floor commercial uses, The ground floor of a structure containing a ground-floor commercial use may extend into one front setback provided it is not located closer than 2 feet from a front lot line.

#### G. Unenclosed structures allowed in setbacks

1. All structures not more than 18 inches above existing or finished grade, whichever is lower, are allowed in any required setback including but not limited to decks, swimming pools, and hot tubs.

2. Barrier-free access. Access facilities for the disabled and elderly, are allowed in any required setback.

3. Freestanding signs, bike racks, play structures, and similar unenclosed structures that are 6 feet or less in height above existing or finished grade, whichever is lower, are allowed in any required setback or separation, provided that:

a. Signs meet the provisions of Chapter 23.55;

b. Structures located in side yard allow a 2.5-foot-wide pathway through the side yard; and

c. Structures located within 5 feet of a front lot line are not more than 4 feet in height.

#### 4. Fences

a. Fences no greater than 6 feet in height are allowed in any required setback, except that fences in the required front setback extended to side lot lines or in street side setbacks extended to the front and rear lot lines may not exceed 4 feet in height. Fences located on top of a bulkhead or retaining wall are also limited to 4 feet. If a

fence is placed on top of a new bulkhead or retaining wall used to raise grade, the maximum combined height is limited to 9.5 feet.

b. Up to 2 feet of additional height for architectural features such as arbors or trellises on the top of a fence is allowed if the architectural features are predominately open.

c. Fence height may be averaged along sloping grades for each 6-foot-long segment of the fence, but in no case may any portion of the fence exceed 8 feet in height when the height allowed by subsection 23.44.018.F.5.a is 6 feet, or 6 feet in height when the height allowed by subsection 23.44.018.F.5.a is 4 feet.

#### 5. Bulkheads and retaining walls

a. Bulkheads and retaining walls used to raise grade are allowed in any required setback if they are limited to 6 feet in height, measured above existing grade.

b. Bulkheads and retaining walls used to protect a cut into existing grade may not exceed the minimum height necessary to support the cut or 6 feet measured from the finished grade on the low side, whichever is greater. Any fence shall be set back a minimum of 3 feet from such a bulkhead or retaining wall.

6. Mechanical equipment. Heat pumps, charging devices for electric vehicles, and similar mechanical equipment, not including incinerators, are allowed in required setbacks if they not located within 3 feet of any lot line.

7. Access bridges. Uncovered, unenclosed access bridges are allowed as follows:

a. Pedestrian bridges 5 feet or less in width, and of any height necessary for access, are permitted in required setbacks, except that in side setbacks an access bridge must be at least 3 feet from any side lot line.

b. A driveway access bridge is permitted in the required setback abutting the street if necessary for access to parking. The vehicular access bridge shall be no wider than 12 feet for access to one parking space or 22 feet for access to two or more parking spaces and of any height necessary for access. The driveway access bridge may not be located closer than 5 feet to an adjacent property line.

8. Unenclosed structures are allowed in the rear setback provided that the structure is:

line;

- a. Not located within 5 feet of a rear lot line that is not an alley lot

- b. Not more than 12 feet in height; and

- c. Separated from a dwelling unit by at least 3 feet, eave to eave.

9. Above-grade stormwater management features, such as bioretention planters and cisterns, are allowed in setbacks if:

- a. No feature, excluding piping, is no more than:

- 1) Twelve feet tall if located in a portion of the rear setback that is not also a side setback; or

- 2) Six and a half feet tall, if located in other setbacks

- b. No feature greater than 4.5 feet tall is located within 10 feet of the front lot line, excluding piping, unless it is integrated into a bulkhead that is allowed in subsection 23.44.018.G.6;

- c. No feature is located within 2.5 feet of the side lot line; and

- d. The total storage capacity of all above-grade cisterns is no greater than 1,250 gallons.

11. Guardrails or handrails no more than 42 inches are allowed on unenclosed stairs, decks, access bridges, bulkheads, and retaining walls.

#### H. Enclosed structures allowed in setbacks

1. Any accessory structure that is not a dwelling unit may be constructed in a side or rear setback that abuts the rear or side setback of another lot upon recording with the King County Recorder's Office an agreement to this effect between the owners of record of the abutting properties.

2. A dwelling unit may extend into one side setback if a side setback easement is provided along the side or rear lot line of the abutting lot, sufficient to leave a 10-foot separation between that structure and any dwelling unit on the abutting lot. The 10-foot separation shall be measured from the wall of the dwelling unit that is proposed to extend into a side setback to the wall of the dwelling unit on the abutting lot.

- a. No structure or portion of a structure may be built on either lot within the 10-foot separation, except as provided in this Section 23.44.018.



b. Accessory structures, other than dwelling units, and features of and projections from dwelling units, such as porches, eaves, and chimneys, are permitted to project 2 feet into the 10-foot easement area required by this subsection 23.44.018.G if otherwise allowed in side setbacks by this Section 23.44.018. For purposes of calculating the distance a structure or feature may project into the 10-foot separation, assume the property line is 5 feet from the wall of the dwelling unit proposed to extend into a side setback and consider the 5 feet between the wall and the assumed property line to be the required side setback.

c. Notwithstanding subsection 23.44.018.C.3.b, no portion of any structure, including eaves or any other projection, shall cross the actual property line.

d. The side setback easement shall be recorded with the King County Recorder's Office. This easement shall provide access for normal maintenance activities on both properties.

3. Enclosed structures that are not dwelling units are allowed in the rear setback provided that:

a. They are not located within 5 feet of a rear lot line that is not an alley lot line;

b. They are not more than 12 feet in height; and

c. They are separated from a dwelling unit by at least 3 feet.

#### 4. Garages

a. Garages may be located in a setback where parking is allowed in a setback as provided in subsections 23.44.036.C.4 and 23.44.036.C.5.

b. Garages may be located in a required side setback that abuts the rear or side setback of another lot if:

1) The garage is a detached garage and extends only into that portion of a side setback that is either within 40 feet of the centerline of an alley or within 25 feet of any rear lot line that is not an alley lot line; or

2) An agreement between the owners of record of the abutting properties, authorizing the garage in that location, is executed and recorded, pursuant to subsection 23.44.018.H.1.

c. Garages allowed in required setbacks shall comply with all of the following standards:

1) The maximum height is 12 feet, except that the ridge of a pitched roof may extend up to 3 feet above the 12-foot height limit. All parts of the roof above the height limit shall be pitched at a rate of not less than 4:12. No portion of a shed roof is permitted to extend beyond the 12-foot height limit.

2) The area of a garage in front setbacks, is limited to 300 square feet with 14-foot maximum width if one space is provided, and 600 square feet with 24-foot maximum width if two spaces are provided. Access driveway bridges permitted under subsection 23.44.018.C.8.b shall not be included in this calculation.

3) Roof eaves and gutters that project up to 2 feet are excluded from the maximum coverage and size limits.

4) The roof shall not be used as a balcony or deck in rear setbacks.

5. An addition to an existing dwelling unit may extend into a required side setback if:

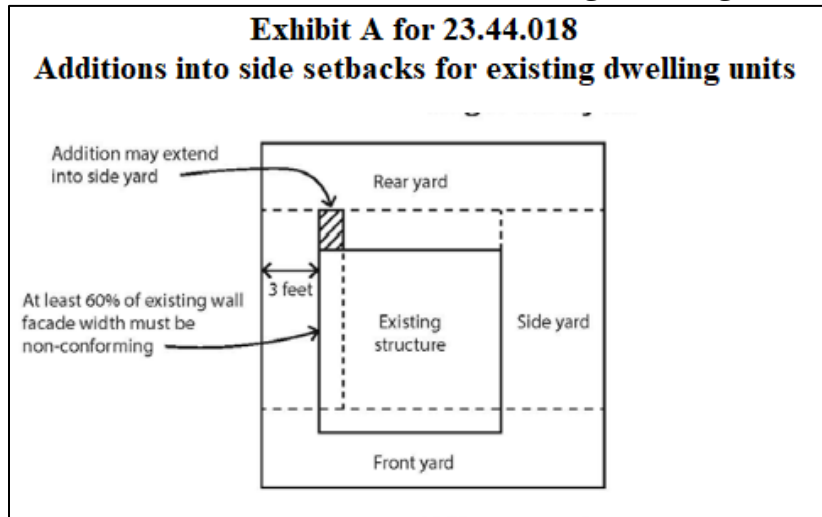
a. The existing dwelling unit is already nonconforming with respect to that setback and the presently nonconforming portion is at least 60 percent of the total width of the respective facade of the structure prior to the addition;

b. The addition would not be located within 3 feet of a side lot line;  
and

c. The addition would not be located any closer to the side lot line the closest part of the existing structure.

**Exhibit A for 23.44.018**

**Additions into side setbacks for existing dwelling units**



I. A structure may be permitted to extend into front and rear setbacks as necessary to protect Tier 1 and Tier 2 trees and trees over 2 feet in diameter pursuant to Section 25.11.070.

[23.44.020 Separations between structures](#)

*Note: The requirement in this section would be new for NR zones, but is consistent with existing rules in Lowrise zones.*

A. The minimum required separation between principal structures is 6 feet except that if the principal structures are separated by a driveway or parking aisle, the minimum required separation between the principal structures is 2 feet greater than the required width of the driveway or parking aisle, provided that the separation is not required to be any greater than 24 feet. If principal structures are separated by a driveway or parking aisle, projections that enclose floor area may extend a maximum of 3 feet into the required separation if they are at least 8 feet above finished grade.

B. Architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other forms of weather protection may project into required separations a maximum of 2 feet. Unenclosed structures allowed in side setbacks are allowed in the minimum separation. Garden windows, bay windows, covered porches and patios, balconies, and enclosed structures are not allowed in the required separation. Detached structures that are up to 10 feet in height and used exclusively for bike parking are allowed in required separations.

## 23.44.022 Amenity area

*Note: This would be a new requirement for NR zones.*

A. The required amount of amenity area in NR zones is equal to 20 percent of the lot area.

B. All units shall have access to either a common or private amenity area.

C. For attached and detached dwelling units, amenity area required at ground level may be provided as either private or common space. For stacked dwelling units, at least half of the amenity area shall be provided as common space.

D. A minimum of 50 percent of the required amenity area shall be provided at ground level or within 4 feet of existing grade. In calculating the total amount of amenity area, only half of the amenity area that is not provided at ground level or within 4 feet of existing grade shall count.

E. Amenity area shall not be enclosed within a structure.

F. Amenity areas may be covered by weather protection.

G. Each amenity area shall be at least 120 square feet in area and have a minimum width and depth of 8 feet.

H. Projections that do not provide floor area may extend into an amenity area if they meet the standards for projections into setbacks in subsection 23.44.018.E and if garden windows and other similar features are at least 8 feet above finished grade. Projections that provide floor area are not allowed in amenity areas.

I. Vehicular parking areas, vehicular access easements, and driveways do not qualify as amenity areas. Required bike parking and solid waste container storage space cannot be located in amenity areas. Enclosed structures cannot be located in amenity areas. Pathways serving multiple dwelling units cannot be located in private amenity areas.

J. Swimming pools, spas, hot tubs, and similar water features may be counted toward meeting the amenity area requirement.

K. Stormwater management features, such as bioretention planters and cisterns, are allowed in amenity areas.

L. No amenity area is required for one new dwelling unit added to a dwelling unit existing as of January 1, 1982, or for one new dwelling unit added to a multifamily residential use existing as of October 10, 2001.

**23.44.024 Tree requirements**

*Note: The tree requirement for NR zones would be updated to encourage larger species trees. This approach is similar to the approach that was used in RSL zones, which will no longer exist.*

A. Development meeting any of the following criteria must plant or retain trees to achieve the number of tree points listed in Table A of 23.44.024:

- a. Containing one or more new dwelling units;
- b. Containing more than 4,000 square feet of nonresidential uses in either a new structure or an addition to an existing structure; or
- c. Expanding surface area parking by more than 20 parking spaces for automobiles.

<b>Table A for 23.44.024</b>	
<b>Number of tree points required</b>	
<b>Density</b>	<b>Tree points required per lot area <sup>1</sup></b>
Less than 1 unit / 4,000 square feet	1 point / 500 sq ft
1 unit / 4,000 sq ft to 1 unit / 2,201 sq ft	1 point / 600 sq ft
1 unit / 2,200 sq ft to 1 unit / 1,601 sq ft	1 point / 675 sq ft
1 unit / 1,600 sq ft or greater	1 point / 750 sq ft
Footnote to Table A for 23.44.024: <sup>1</sup> For purposes of this Section 23.44.024, lot area shall not include submerged lands.	

B. Individual trees preserved during construction or planted as part of construction, excluding street trees, count toward the tree score according to Table B for 23.44.024. All required trees shall meet standards promulgated by the Director to provide for the long-term health, viability, and coverage of plantings. These standards may include, but are not limited to, the type and size of plants, spacing of plants, depth, and quality of soil, access to light and air, and protection practices during construction. Trees required under Section 25.11.090 shall count toward this standard.

<b>Table B for 23.44.024 Tree points</b>		
<b>Type of tree</b>	<b>Points for deciduous trees</b>	<b>Points for conifer trees</b>
Small tree planted as part of construction	1 point	1.25 point
Small/medium tree planted as part of construction	2 points	2.5 points
Medium/large tree planted as part of construction	3 points	3.75 points
Large tree planted as part of	4 points	5 points
Trees 6 inches in diameter or greater that are preserved during construction	1 point per inch of diameter	1.25 point per inch of diameter

C. Tree protection areas shall be designated in accordance with 25.11.060 for all trees that are proposed to be preserved to receive points under subsection 23.44.024.B, regardless of tree tier.

D. The owner of the subject lot is required to ensure that the trees planted remain healthy for at least five years after inspection by the City and the owner of the subject lot shall be responsible for replacing any trees that do not remain healthy after inspection by the City.

E. Tree measurements

1. New trees planted to meet this requirement shall meet the following size standards:

a. Deciduous trees with one trunk must be at least 1.5 inches in diameter, measured 6 inches above the ground.

b. Multi-stemmed deciduous trees must have at least 3 stems and be at least 6 feet tall.

c. Evergreen trees must be at least 4 feet tall.

2. Existing trees shall be measured 4.5 feet above the ground.

#### F. Street tree requirements

1. Street trees are required in NR zones for development that would add one or more principal dwelling units on a lot, except as provided in subsection 23.44.024.C.2 and Section 23.53.015. Existing street trees shall be retained unless the Director of Transportation approves their removal. The Director, in consultation with the Director of Transportation, shall determine the number, type, and placement of additional street trees to be provided in order to:

- a. Improve public safety;
- b. Promote compatibility with existing street trees;
- c. Match trees to the available space in the planting strip;
- d. Maintain and expand the urban forest canopy;
- e. Encourage healthy growth through appropriate spacing;
- f. Protect utilities; and
- g. Allow access to the street, buildings, and lot.

#### 2. Exceptions to street tree requirements

a. If a lot borders an unopened right-of-way, the Director may reduce or waive the street tree requirement along that right-of-way as a Type I decision if, after consultation with the Director of Transportation, the Director determines that the right-of-way is unlikely to be opened or improved.

b. If it is not feasible to plant street trees in a right-of-way planting strip, a 5-foot setback shall be planted with trees along the street lot line that abuts the required front setback, or landscaping other than trees shall be provided in the planting strip, subject to approval by the Director of the Seattle Department of Transportation. If a 5-foot setback or landscaped planting strip is not feasible, the Director may reduce or waive this requirement as a Type I decision.

#### 23.44.027 Structure width limits

*Note: Structure width limits currently vary by zone. This section represents a simplified approach to structure width limits.*

Structure width for each building in Neighborhood Residential zones may not exceed 90 feet. Measurement of structure width is provided in Section 23.86.014.

#### 23.44.029 Design standards

*Note: These standards would be a new requirement for NR zones.*

The following standards apply to development that includes the construction of new dwelling units, except for new dwelling units contained in existing structures. For the purposes of this Section 23.44.029, requirements for street-facing facades shall only apply to structures located within 40 feet of a street lot line or a vehicle access easement serving ten or more residential units. For structures located within 40 feet of a vehicle access easement serving ten or more residential units but not within 40 feet of street lot line, the street-facing facade shall be the facade that faces the vehicle access easement. If multiple facades face vehicle access easements, the applicant may decide which facade facing a vehicle access easement is considered the street-facing facade.

A. Access. Each unit shall have pedestrian access at least 3 feet in width to the sidewalk or, if no sidewalk exists, the front lot line. This access may be shared or private. This access may be over a driveway and may cross any required setbacks or interior separation. The pedestrian access may be part of a driveway.

B. Entrances. Each structure with a street-facing facade shall have a pedestrian entry on that street-facing facade meeting the following:

1. For stacked dwelling units, at least one pedestrian entry shall be required for the structure as a whole.

2. For attached and detached dwelling units, each individual dwelling with a street-facing facade within 40 feet of the street lot line shall have at least one pedestrian entry on the street-facing facade.

3. For structures or dwelling units on corner lots, a pedestrian entry is required on only one of the street-facing facades.

4. Required pedestrian entry on street-facing facades shall have weather protection, such as a covered porch, canopy, recessed entry or similar feature, measuring at least 3 feet by 3 feet in width and depth for attached and detached dwelling units and at least 6 feet in width and 4 feet in depth for stacked units.

5. For projects with multiple attached or detached dwelling units that are located on a corner lot, at least one pedestrian entry shall be located facing each street.

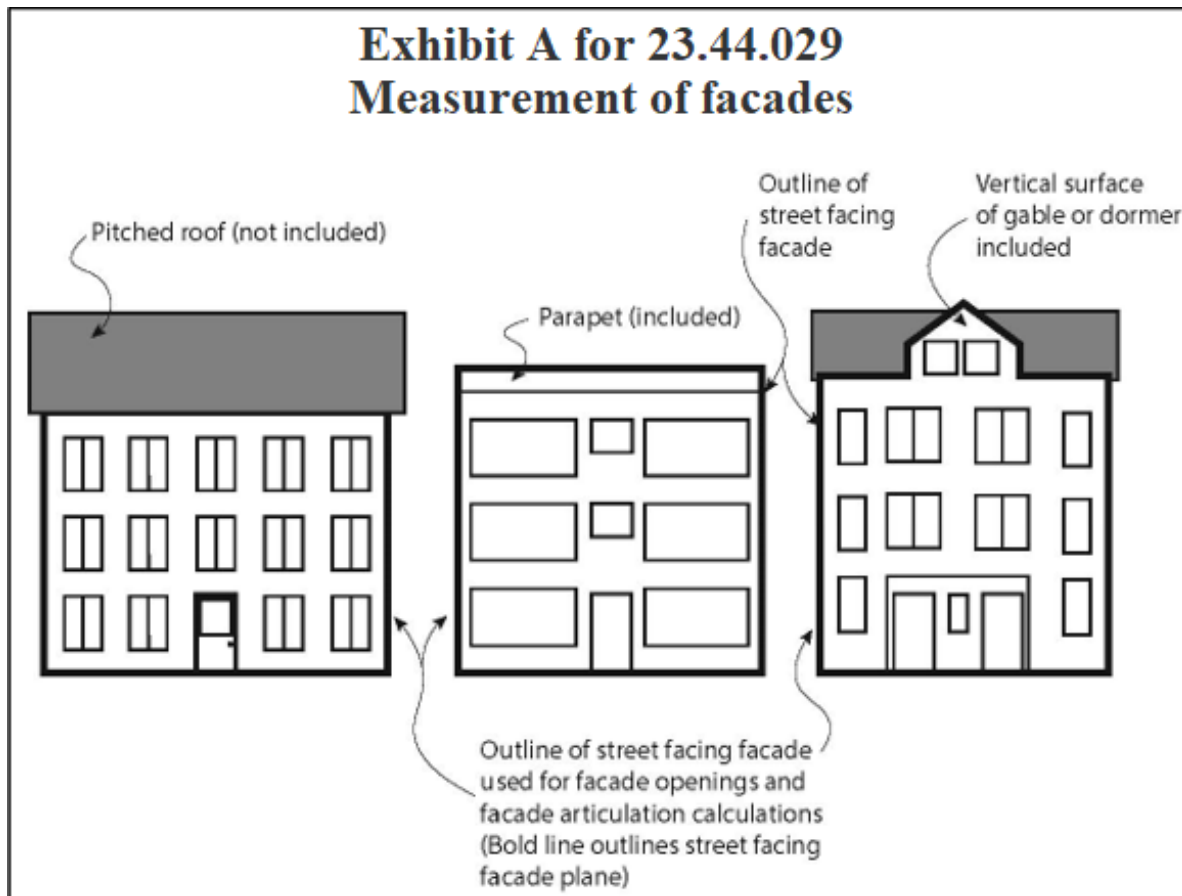


6. Exception. For attached and detached dwelling units, the pedestrian entry may be located on a wall perpendicular to the street-facing facade provided that the pedestrian entry abuts a covered porch or recessed entry that also abuts the street-facing facade.

C. Windows and doors. At least 20 percent of the area of each street-facing facade shall consist of windows and/or doors. If front and side facades are street-facing, the two facades shall be combined for the purpose of this calculation. Windows count toward the requirement for facade openings in this subsection 23.44.029.C only if they are transparent. Windows composed of garage doors and doors to utility and service areas do not count.

#### **Exhibit A for 23.44.029**

#### **Measurement of facades**



D. Materials. At least 60 percent of the area of each street-facing facade shall consist of materials that meet any combination of the following elements:

1. Windows and/or doors meeting the standards of subsection 23.44.029.C;
2. Bricks or other masonry materials that are no more than 12 inches in either height or width or brick or stone veneers that provide a similar appearance;

3. Wood slats no more than 16 inches in either height or width;
4. Overlapping boards, shingles, shakes, or similar elements that are no more than 16 inches in either height or width and a minimum of ½ inch in thickness; or
5. Contain indentations or projections with a minimum of ½ inch in depth and a minimum of ½ inch in width every 16 inches or less.

E. The Director may as a type 1 decision allow exceptions to the materials requirements in subsection 23.44.029.D if the Director determines that the design of the street-facing facade including materials, windows, and modulation will meet the intent of subsection 23.44.029.D to provide visual interest and prevent large, uninterrupted wall faces.

**Exhibit B for 23.44.029**  
**Measurements for material option**

[to be added with final legislation]

23.44.034 Light and glare standards

*Note: This section contains an existing standard on exterior lighting that was previously in the General Provisions section and adds a new subsection on screening of parking areas that currently existing in LR zones.*

A. Exterior lighting shall be shielded and directed away from adjacent properties. The Director may require that the location of the lighting be changed.

B. To prevent vehicle lights from affecting adjacent properties, driveways and parking areas for more than two vehicles shall be screened from abutting properties by a fence or wall between 5 feet and 6 feet in height, or a solid evergreen hedge or landscaped berm at least 5 feet in height. If the elevation of the lot line is different from the finished elevation of the driveway or parking surface, the difference in elevation may be measured as a portion of the required height of the screen so long as the screen itself is a minimum of 3 feet in height. The Director may waive the requirement for the screening if it is not needed due to changes in topography, agreements to maintain an existing fence, or the nature and location of adjacent uses.

23.44.036 Parking location and access

*Note: This section contains existing regulations that have been modified slightly to reflect new setback requirements. We are also proposing a new provision to allow two parking spaces within the front setback under certain circumstances.*

A. Parking quantity. Off-street parking is required pursuant to Section 23.54.015.

B. Parking on same lot. Any required parking shall be located on the same lot as the principal use, except that:

1. Parking accessory to a floating home, floating on-water residence, house barge, and vessel with a dwelling unit may be located on another lot if within 600 feet of the lot on which the floating home, floating on-water residence, house barge, and vessel with a dwelling unit is located.

2. Parking accessory to a dwelling unit existing on June 11, 1982, may be established on another lot if all the following conditions are met:

a. There is no vehicular access to permissible parking areas on the lot.

b. Any garage constructed is for no more than two two-axle, or two up to four-wheeled vehicles.

c. Parking is screened or landscaped as required by the Director, who shall consider development patterns of the block or nearby blocks.

d. The lot providing the parking is within the same block or across the alley from the principal use lot.

e. The accessory parking shall be tied to the lot of the principal use by a covenant or other document recorded with the King County Recorder's Office.

C. Location of parking. Except as provided below, parking is not allowed within 20 feet of a street lot line:

1. If access is taken directly from an alley, surface parking may be located within 20 feet of a street lot line if it is located within 28 feet of an alley lot line and is no closer than 7 feet to any street lot line.

2. For lots at least 40 feet in width, up to two surface parking spaces are allowed within 20 feet of a street lot line provided:

a. Access to parking is permitted through the required setback abutting the street by subsection 23.44.036.D;

b. The parking spaces are located perpendicular to the street lot line from which they are accessed;

c. On corner lots, the parking spaces are not located within 20 feet of the street lot line parallel to the parking spaces;

d. No other parking spaces or driveways are located on the lot;

e. The parking spaces are not located within 5 feet of a street lot line;  
and

f. The combined width of the parking spaces shall not exceed 20 feet.

3. Lots with uphill setbacks abutting streets. In NR zones, parking may be located in a required setback abutting a street provided:

a. The existing grade of the lot slopes upward from the street lot line an average of at least 6 feet above sidewalk grade at a line that is 10 feet from the street lot line; and

b. The parking area shall be at least an average of 6 feet below the existing grade prior to excavation and/or construction at a line that is 10 feet from the street lot line;

c. Access to parking is allowed through the required setback abutting the street by subsection 23.44.036.B;

d. No other parking spaces or driveways are located on the lot;

e. If no garage is provided, the combined width of the parking spaces shall not exceed 20 feet. If a garage is provided, the width of a garage structure shall not exceed 24 feet; and

f. The total width of parking spaces and garages is not more than 60 percent of the width of the lot.

4. Lots with downhill setbacks abutting streets. In NR zones, parking may be located in a required setback abutting a street if the following conditions are met:

a. The existing grade slopes downward from the street lot line that the parking faces;

b. For front setback parking, the lot has a vertical drop of at least 6 feet in the first 10 feet, measured along a line from the midpoint of the front lot line to the midpoint of the rear lot line;

c. Parking is not located in required side setbacks abutting a street;

d. Access to parking is allowed through the required setback abutting the street by subsection 23.44.036.B;

e. No other parking spaces or driveways are located on the lot;

f. If no garage is provided, the combined width of the parking spaces shall not exceed 20 feet. If a garage is provided, the width of a garage structure shall not exceed 24 feet; and

g. The total width of parking spaces and garages is not more than 60 percent of the width of the lot.

6. If access to required parking passes through a required setback, automobiles, motorcycles, and similar vehicles may be parked on the open access located in a required setback.

D. . No more than three vehicles may be parked outdoors per dwelling unit on a lot.

E. Trailers, boats, recreational vehicles, and similar equipment shall not be parked in required front and side setbacks or the first 10 feet of a rear setback measured from the rear lot line, or measured 10 feet from the centerline of an alley if there is an alley adjacent to the rear lot line, unless fully enclosed in a structure otherwise allowed in a required setback by this subsection 23.44.036.D.

#### F. Access to parking

1. Vehicular access to parking from an improved street, alley, or easement is required if parking is required pursuant to Section 23.54.015.

2. Access to parking is permitted through a required setback abutting a street only if the Director determines that one of the following conditions exists:

a. There is no alley improved to the standards of subsection 23.53.030.B, and there is no unimproved alley in common usage that currently provides access to parking on the lot or to parking on adjacent lots in the same block;

b. Existing topography does not permit alley access;

c. At least 50 percent of alley frontage abuts property in a non-residential zone; or

d. The alley is used for loading or unloading by an existing non-residential use;

e. Due to the relationship of the alley to the street system, use of the alley for parking access would create a significant safety hazard;

f. Parking access must be from the street in order to provide access to a parking space that complies with Chapter 11 of the Seattle Building Code; or

g. Providing alley access would require removal of a tree on private property that is a tier 1 or tier 2 tree and all other applicable criteria for tree protection in Chapter 25.11 are met.

G. Garage entrance width. The total combined horizontal width of all garage entrances on the lot that are located on the front facade may be up to 50 percent of the horizontal width of the front facade or 10 feet, whichever is greater. On corner lots, a garage entrance shall be allowed on only one street-facing facade of each dwelling unit.

#### 23.44.050 Alternative standards for development of affordable units

*Note: This section contains an existing affordable housing bonus that applies only to religious organizations as well as the new bonus that could be used by any developer of affordable housing.*

A. Development on a lot that meets all of the following criteria may meet the alternative development standards in subsection 23.44.050.B:

1. The lot is located within 1,320 feet of a transit stop or station served by a frequent transit route on the map required by subsection 23.54.015.B.4 at the time the development is vested pursuant to Section 23.76.026; and

2. The development is low-income housing and at least 50% of units are low-income units.

B. Proposed development on a lot meeting the criteria in subsection 23.44.050.A may elect to meet the following development standards in lieu of the standards in subsections 23.44.010.B (floor area), 23.44.012.B (density), and 23.44.014.A (structure height), and Section 23.44.016 (lot coverage):

1. The maximum FAR limit is 1.8. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

2. The maximum density limit is 1 unit per 400 square feet.

3. The maximum height limit is 42 feet.

4. The maximum lot coverage is 60 percent.

C. Development on a lot that does not meet the criteria in subsection 23.44.050.A, but meets the following criteria may meet the alternative development standards in subsection 23.44.050.D:

1. The proposed development meets the requirements of Section 23.42.055; and

2. The lot has or abuts a lot with a religious facility or other use accessory to a religious facility or is 10,000 square feet or greater.

D. Proposed development on lots meeting the criteria in subsection 23.44.050.C but not subsection 23.44.050.A may elect to meet a lot coverage of 65 percent in lieu of the standards in Section 23.44.016.

E. Development on a lot that does not meet the criteria in subsection 23.44.050.A and subsection 23.44.050.C, but meets the following criteria may meet the alternative development standards in subsection 23.44.050.F:

1. The lot was created prior to June 6, 2024; and the lot has not been divided by subdivision or short subdivision or modified by unit lot subdivision since June 6, 2024.

2. At least two dwelling units are low-income housing units.

F. Proposed development on lots meeting the criteria in subsection 23.44.050.E but not subsection 23.44.050.A and subsection 23.44.050.C may elect to build up to 6 dwelling units in lieu of the standards in subsection 23.44.012.B.

### 23.44.078 Parks and open space

*Note: This section contains existing regulations.*

A. The following accessory uses shall be permitted in any public park when within a structure or on a terrace abutting the structure, provided that when the use is within 100 feet from any lot in a residential zone the use shall be completely enclosed:

1. The sale and consumption of beer and wine during daylight hours;

2. The sale and consumption of alcoholic beverages under a Class H liquor license at municipal golf courses during established hours of operation.

B. The sale and consumption of beer and wine with meals served in a restaurant facility within the boundaries of Woodland Park shall be permitted. The use shall be permitted in only one facility located no closer than 100 feet from any lot in a residential zone and separated from other public activity areas and zoo buildings by at least 50 feet.



C. Storage structures and areas and other structures and activities customarily associated with parks and playgrounds are subject to the following development standards in addition to the general development standards for accessory uses:

1. Any active play area shall be located 30 feet or more from any lot in a Neighborhood Residential zone.

2. Garages and service or storage areas shall be located 100 feet or more from any other lot in a residential zone and obscured from view from each such lot.

### Changes to Chapter 23.45 Multifamily

Section 18. Section 23.45.502 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

#### 23.45.502 Scope of provisions

*Note: This section is being amended so that it is consistent with other scope of provision chapters and to clarify how assisted living facilities, congregate residences, and structures containing ground floor commercial uses are currently being regulated.*

A. This Chapter 23.45 establishes regulations for the following zones:

1. Lowrise 1 (LR1);
2. Lowrise 2 (LR2);
3. Lowrise 3 (LR3);
4. Midrise (MR); and
5. Highrise (HR).

B. Zones listed in subsection 23.45.502.A and having an incentive zoning suffix are subject to this Chapter 23.45 and Chapter 23.58A, Incentive Provisions.

C. Some land in these zones may be regulated by Subtitle III, Division 3, Overlay Districts, of this Title 23.

D. Definitions are provided in Chapter 23.84A. Methods for measurements are provided in Chapter 23.86.

E. Other regulations(,) may apply to development proposals including but not limited to general use provisions (Chapter 23.42); transportation concurrency and

transportation impact mitigation (Chapter 23.52); requirements for streets, alleys, and easements (Chapter 23.53); standards for parking quantity, access, and design (Chapter 23.54); standards for solid waste storage (Chapter 23.54); sign((s)) regulations (Chapter 23.55); communication regulations (Chapter 23.57); shoreline regulations (Chapter 23.60A); and environmental protection and historic preservation (Title 25) ((and methods for measurements (Chapter 23.86), may apply to development proposals)).

F. Assisted living facilities, congregate residences, and structures containing ground floor commercial uses shall meet the development standards for stacked units unless otherwise specified. Congregate residences are subject to additional requirements as specified in Section 23.42.049.

Section 19. Section 23.45.504 of the Seattle Municipal Code, last amended by Ordinance 127098, is amended as follows:

#### 23.45.504 Permitted and prohibited uses

*Note: This section is being amended to allow corner stores and to clarify existing regulations.*

A. All uses are permitted outright, prohibited, or permitted as a conditional use according to Table A for 23.45.504 and this Section 23.45.504. Uses not referred to in Table A for 23.45.504 are prohibited, unless otherwise indicated in this Chapter 23.45 or Chapters 23.51A, 23.51B, or 23.57. Communication utilities and accessory communication devices, except as exempted in Section 23.57.002, are subject to the regulations in this Chapter 23.45 and additional regulations in Chapter 23.57. Public facilities are subject to the regulations in Section 23.51A.004.

B. All permitted uses are allowed as a principal use or as an accessory use, unless otherwise indicated in this Chapter 23.45.

<b>Table A for 23.45.504 Permitted and prohibited uses</b>		
<b>Uses</b>	<b>Permitted and prohibited uses by zone</b>	
	<b>LR1, LR2, and LR3</b>	<b>MR and HR</b>
A. All residential uses	P	P
B. Institutions	P/CU <sup>1</sup>	P/CU <sup>1</sup>
C. Uses in existing or former public schools		
C.1. Child care centers, preschools, public or private schools, educational and vocational training for the disabled, adult evening education classes, nonprofit libraries, community centers, community programs for the elderly, and similar uses in existing or former public schools	P	P
C.2. Other non-school uses in existing or former public schools	Permitted pursuant to procedures established in Chapter 23.78	Permitted pursuant to procedures established in Chapter 23.78
D. Park and ride facilities		
D.1. Park and ride facilities on surface parking lots	X/CU <sup>2</sup>	X/CU <sup>2</sup>
D.2. Park and ride facilities in parking garages	X/P <sup>3</sup>	X/P <sup>3</sup>
E. Parks and <del>((playgrounds including customary))</del> <u>open space</u> uses	P	P
F. Ground-floor commercial uses	RC/P <sup>4</sup>	RC/P <sup>((4),5</sup>
G. Medical service uses other than permitted ground-floor commercial uses	P/X <sup>6</sup>	P/CU/X <sup>6</sup>

<b>Table A for 23.45.504 Permitted and prohibited uses</b>		
<b>Uses</b>	<b>Permitted and prohibited uses by zone</b>	
	<b>LR1, LR2, and LR3</b>	<b>MR and HR</b>
H. Uses not otherwise permitted in Landmark structures	CU	CU
I. Cemeteries	P/X <sup>7</sup>	P/X <sup>7</sup>
J. Community gardens	P	P
K. Parking, flexible-use	X/P <sup>8</sup>	P <sup>8</sup>
<u>L. Heat recovery incinerators</u>	<u>CU</u>	<u>CU</u>
<u>M. Human service use</u>	<u>P</u>	<u>P</u>
((L))N. All other uses	X	X
<p><u>Key to Table A for 23.45.504</u>  P = Permitted outright  <u>CU = Permitted as an Administrative Conditional Use</u>  <u>RC = Permitted in areas zoned Residential Commercial (RC), and subject to the provisions of the RC zone, Chapter 23.46</u>  X = Prohibited</p> <p>Footnotes to Table A for 23.45.504</p> <p><sup>1</sup> Institutions meeting development standards are permitted outright; all others are administrative conditional uses pursuant to Section 23.45.506. The provisions of this Chapter 23.45 shall apply to Major Institution uses as provided in Chapter 23.69.</p> <p><sup>2</sup> Prohibited in Station Area Overlay Districts (SAODs); otherwise, permitted as an administrative conditional use pursuant to Section 23.45.506 on surface parking existing as of January 1, 2017.</p> <p><sup>3</sup> Prohibited in LR1 and LR2 zones, including LR1/RC and LR2/RC. Permitted outright in LR3, MR, HR, and LR3/RC zones, except prohibited in the SAOD.</p> <p><sup>4</sup> Permitted in development that meets the requirements of Section 23.42.055 and Chapter 23.46 <u>or in development that meets the standards of subsection 23.45.504.D</u> even if it is not located in a zone that includes an RC designation</p>		

<b>Table A for 23.45.504 Permitted and prohibited uses</b>		
<b>Uses</b>	<b>Permitted and prohibited uses by zone</b>	
	<b>LR1, LR2, and LR3</b>	<b>MR and HR</b>
<p><sup>5</sup> Subject to subsection 23.45.504.E except in zones that include an RC designation.</p> <p><sup>6</sup> Subject to subsections 23.45.504.G and 23.45.506.F.</p> <p><sup>7</sup> Subject to subsection 23.45.504.F.</p> <p><sup>8</sup> Prohibited in LR1 and LR2 zones. Permitted outright in all other multifamily zones as surface parking on surface parking lots existing as of January 1, 2017; permitted outright in garages; subject to Section 23.54.026.</p> <p>((P = Permitted outright  CU = Permitted as an Administrative Conditional Use  RC = Permitted in areas zoned Residential Commercial (RC), and subject to the provisions of the RC zone, Chapter 23.46  X = Prohibited))</p>		

C. Accessory uses. The following accessory uses are permitted in all multifamily zones, subject to the standards in Section 23.45.545, if applicable:

1. Private garages and carports;
2. Private, permanent swimming pools, hot tubs, and other similar uses;
3. Solar collectors, including solar greenhouses;
4. ~~((Open wet moorage accessory to residential structures;))~~ Piers and floats, provided they comply with the requirements of Chapter 23.60A;
5. Uses accessory to parks and playgrounds, pursuant to Section 23.45.578;
6. Bed and breakfasts in a dwelling unit that is at least five years old, provided they comply with the requirements of subsection 23.45.504.I;
7. Recycling collection stations;
8. Urban farms with planting area not more than 4,000 square feet. Urban farms with greater than 4,000 square feet of planting area may be allowed as an

administrative conditional use to any use permitted outright or as a conditional use. The Director may grant, condition or deny a conditional use permit in accordance with subsection 23.42.051.B; and

9. Accessory dwelling units consistent with Section 23.42.025.

D. (~~Heat recovery incinerators may be permitted as accessory administrative conditional uses, pursuant to Section 23.45.506.~~) Ground-floor commercial use in Lowrise zones

1. The commercial use is located on a corner lot.

2. The commercial use is limited to the following:

a. Food processing and craft work;

b. General sales and services; and

c. Restaurants.

3. The commercial uses do not occupy more than 2,500 square feet.

4. The commercial use is permitted only on or below the ground floor of a structure. On sloping lots, the commercial use may be located at more than one level within the structure as long as the floor area in commercial use does not exceed the area of the structure's footprint.

5. Vents for venting of odors, vapors, smoke, gas and fumes, and exterior heat exchangers and other similar devices (e.g., related to ventilation, air conditioning, refrigeration) shall be at least 10 feet above finished sidewalk grade and directed away to the extent possible from residential uses within 50 feet of the vent.

6. Drive-in businesses are prohibited as a principal or accessory use.

7. Outdoor sales and/or service of food or beverages must be located at least 50 feet from adjacent lots.

8. Businesses may not be open between the hours of 10 p.m. and 7 a.m.

E. Ground-floor commercial use in Midrise and Highrise zones

1. Drive-in businesses are prohibited((7)) as either a principal or accessory use.

2. The following uses are permitted as ground-floor commercial uses in MR and HR zones pursuant to Section 23.45.532:

- a. Business support services;
- b. Food processing and craft work;
- c. General sales and services;
- d. Medical services;
- e. Offices;
- f. Restaurants; and

g. Live-work with one of the uses permitted in this subsection 23.45.504.E as the permitted commercial use.

F. Existing cemeteries are permitted to continue in use. New cemeteries are prohibited and existing cemeteries are prohibited from expanding. For purposes of this Section 23.45.504, a change in a cemetery boundary is not considered an expansion in size and is permitted provided that:

- 1. The change does not increase the net land area occupied by the cemetery;
- 2. The land being added to the cemetery is contiguous to the existing cemetery and is not separated from the existing cemetery by a public street or alley whether or not improved; and
- 3. The use of the land being added to the cemetery will not result in the loss of housing.

G. Except as provided in subsections 23.45.504.G.1 and 23.45.504.G.2 below, medical service uses other than permitted ground-floor commercial uses are prohibited.

- 1. Medical service uses in HR zones may be permitted as administrative conditional uses pursuant to subsection 23.45.506.F.
- 2. Medical service uses meeting the development standards for institutions are permitted outright on property conveyed by a deed from the City that, at the time of conveyance, restricted the property's use to a health care or health-related facility.

H. Fences and free-standing walls of utility services uses shall be set back from the street lot line by an average of 7 feet and be no less than 5 feet from the street lot line at any point. Landscaping shall be provided between the fence or wall and the street lot line. The Director may reduce this setback after finding that the reduced setback will not significantly increase project impacts, including but not limited to noise, odor, and the scale of the structure in relation to nearby buildings. Acceptable methods to reduce fence or wall impacts include changes in the height, design or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features to provide visual interest facing the street lot line. Fences and walls may obstruct or allow views to the interior of a site. Where site dimensions and conditions allow, applicants are encouraged to provide both a landscaped setback between the fence or wall and the right-of-way, and a fence or wall that provides visual interest facing the street lot line, through the height, design, or construction of the fence or wall, including the use of materials, architectural detailing, artwork, vegetated trellises, decorative fencing, or similar features.

I. Bed and breakfast uses. A bed and breakfast use may be operated under the following conditions:

1. The bed and breakfast use has a valid business license tax certificate issued by the Department of Finance and Administrative Services;

2. All operators of bed and breakfast uses who use a short-term rental platform for listing the bed and breakfast shall have a valid short-term rental operator's license issued by the Department of Finance and Administrative Services.

3. The bed and breakfast use shall be operated by the primary resident of the dwelling unit where the bed and breakfast is located or the resident operator;

4. There shall be no evidence of a bed and breakfast use visible from the exterior of the dwelling unit other than a sign permitted by subsection 23.55.022.D.1; and

5. A bed and breakfast use may be located in a dwelling unit or an accessory dwelling unit.

Section 20. Section 23.45.508 of the Seattle Municipal Code, last amended by Ordinance 127098, is amended as follows:



## 23.45.508 General provisions

*Note: This section is amended to move certain references to the section on scope of provisions, similar to NR zones, and to use language consistent with new definitions for building types.*

A. Except for structures related to an urban farm, a structure occupied by a permitted use other than a residential use may be partially or wholly converted to a residential use even if the structure does not conform to the development standards for residential uses in multifamily zones.

~~B. ((Off street parking shall be provided pursuant to Section 23.54.015, and as permitted by provisions of Sections 23.45.504 and 23.45.506, if applicable.~~

~~C.))~~ Expansions of nonconforming converted structures and conversions of structures occupied by nonconforming uses are regulated by Sections 23.42.108 and 23.42.110.

~~((D. Methods for measurements are provided in Chapter 23.86. Requirements for streets, alleys and easements are provided in Chapter 23.53. Standards for parking and access and design are provided in Chapter 23.54. Standards for solid waste and recyclable materials storage space are provided in Section 23.54.040. Standards for signs are provided in Chapter 23.55.))~~

~~((E))~~ C. Assisted living facilities, congregate residences, nursing homes, and structures containing ground floor commercial uses as allowed by Chapter 23.46 in RC zones shall meet the development standards for ~~((apartments))~~ stacked dwelling units unless otherwise specified.

~~((F. Single family dwelling units. In LR zones, single family dwelling units shall meet the development standards for townhouse developments, except as otherwise provided. In MR and HR zones, single family dwelling units shall meet the development standards of the zone.~~

~~G. Proposed uses in all multifamily zones are subject to the transportation concurrency level-of-service standards prescribed in Chapter 23.52.))~~

~~((H))~~ D. Lots with no street frontage. For purposes of structure width, depth, and setbacks, multifamily zoned lots that have no street frontage are subject to the following:

1. For lots that have only one alley lot line, the alley lot line shall be treated as a front lot line.

2. For lots that have more than one alley lot line, the Director shall determine which alley lot line shall be treated as the front lot line.

3. For lots that have no alley lot lines, the applicant may choose the front lot line provided that the selected front lot line length is at least 50 percent of the width of the lot.

((†)) E. Any other provision of the Seattle Municipal Code notwithstanding, an applicant is not entitled to a permit for any use or development on a lot in an LR zone that would be inconsistent with any term, condition, or restriction contained either in any recorded agreement that is in effect as to that lot and was made in connection with a rezone of the lot to LDT, L1, L2, L3, or L4, or in any City Council decision or ordinance related to a rezone of the lot to LDT, L1, L2, L3, or L4 conditioned on a recorded agreement prior to April 19, 2011.

((‡)) E. If more than one category of residential use is located on a lot, and if different development standards apply to the different categories of use, then each category's percentage of the total limit imposed by the development standard shall be calculated based on each category's percentage of total structure footprint area, as follows:

1. Calculate the footprint, in square feet, for each category of residential use. For purposes of this calculation, "footprint" is defined as the horizontal area enclosed by the exterior walls of the structure.

2. Calculate the total square feet of footprint of all categories of residential uses on the lot.

3. Divide the square footage of the footprint for each category of residential structure in subsection ((~~23.45.508.J.1~~)) 23.45.508.F.1 by the total square feet of footprints of all residential uses in subsection ((~~23.45.508.J.2~~)) 23.45.508.F.2.

4. Multiply the percentage calculated in subsection ((~~23.45.508.J.3~~)) 23.45.508.F.3 for each housing category by the area of the lot. The result is the area of the lot devoted to each housing category.

5. The total limit for each category of residential use is the applicable limit for that use multiplied by the percentage calculated in subsection ((~~23.45.508.J.4~~)) 23.45.508.F.4.

((K)) G. Unless otherwise specified, the development standards of each zone shall be applied in that zone, and may not be used in any other zone, except that if both zones have the same development standards, the development standard shall be applied to the

lot as a whole. If a lot or development site includes more than one zoning designation and a development standard is based on lot area, the lot area used in applying the development standard shall be the portion of the contiguous area with the corresponding zoning designation.

Section 21. Section 23.45.510 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

**23.45.510 Floor area**

*Note: This section is being edited to be consistent with the new residential use definitions and to implement bonuses for stacked flats in LR1 and LR2 zones, consistent with bonuses proposed for NR zones.*

A. Gross floor area. In multifamily zones, gross floor area includes exterior corridors, breezeways, and stairways that provide building circulation and access to dwelling units or sleeping rooms. Balconies, patios, and decks that are associated with a single dwelling unit or sleeping room and that are not used for common circulation(~~(, and ground-level walking paths,))~~) are not considered gross floor area.

B. Floor area ratio (FAR) limits in LR and MR zones. FAR limits apply in LR and MR zones as shown in Table A for 23.45.510, provided that if the LR zone designation includes an incentive zoning suffix, then gross floor area may exceed the base FAR as identified in the suffix designation, up to the limits shown in Table A for 23.45.510, if the applicant complies with Chapter 23.58A, Incentive Provisions. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.

<b>Table A for 23.45.510 FAR limits in LR and MR zones</b>		
<b>Zone</b>	<b>Zones with an MHA suffix</b>	<b>Zones without an MHA suffix</b>
LR1	1.3, <u>except 1.5 for stacked dwelling units</u>	1.0
LR2	1.4, <u>except 1.6 for stacked dwelling units</u> <sup>1</sup>	1.1

<b>Table A for 23.45.510 FAR limits in LR and MR zones</b>		
<b>Zone</b>	<b>Zones with an MHA suffix</b>	<b>Zones without an MHA suffix</b>
LR3 outside urban centers and urban villages	1.8	1.2, except 1.3 for <del>((apartments))</del> <u>stacked dwelling units</u>
LR3 inside urban centers and urban villages	2.3	1.2, except 1.5 for <del>((apartments))</del> <u>stacked dwelling units</u>
MR	4.5	3.2
<p>Footnote to Table A for 23.45.510</p> <p><sup>1</sup> Except that the FAR is <del>((1.6))</del> <u>1.8</u> for <del>((apartments))</del> <u>stacked dwelling units</u> that provide one or more outdoor amenity areas meeting the requirements of Section 23.45.522 and the following provisions are met:</p> <ol style="list-style-type: none"> <li>1. The total amount of, outdoor amenity area is equal to at least 35 percent of the lot area;</li> <li>2. No part of such amenity area has a width or depth of less than 20 feet; and</li> <li>3. The outdoor amenity area is located at ground level or within 4 feet of finished grade.</li> </ol>		

C. FAR limits in HR zones. FAR limits apply in HR zones as shown in Table B for 23.45.510. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot. All floor area above the base FAR, up to the maximum FAR, is considered extra floor area achievable through the provisions of Section 23.45.516 and Chapter 23.58A.

<b>Table B for 23.45.510 FAR limits in HR zones</b>	
Base FAR	7
Maximum FAR, allowed pursuant to Section 23.45.516 and Chapter 23.58A	15

D. The following floor area is exempt from FAR limits:

1. All stories, or portions of stories, that are underground.

2. The floor area in a Landmark structure subject to controls and incentives imposed by a designating ordinance, if the owner of the Landmark has executed and recorded an agreement acceptable in form and content to the Landmarks Preservation Board, providing for the restoration and maintenance of the historically significant features of the structure, except that this exemption does not apply to a lot from which a transfer of development potential (TDP) has been made under Chapter 23.58A, and does not apply for purposes of determining TDP available for transfer under Chapter 23.58A.

3. The floor area in structures built prior to January 1, 1982, as ~~((single-family))~~ detached dwelling units that will remain in residential use, regardless of the number of dwelling units within the existing structure, provided that:

a. No other principal structure is located between the existing residential structure and the street lot line along at least one street frontage. If the existing residential structure is moved on the lot, the floor area of the existing residential structure remains exempt if it continues to meet this provision; and

b. The exemption is limited to the gross floor area in the existing residential structure as of January 1, 1982.

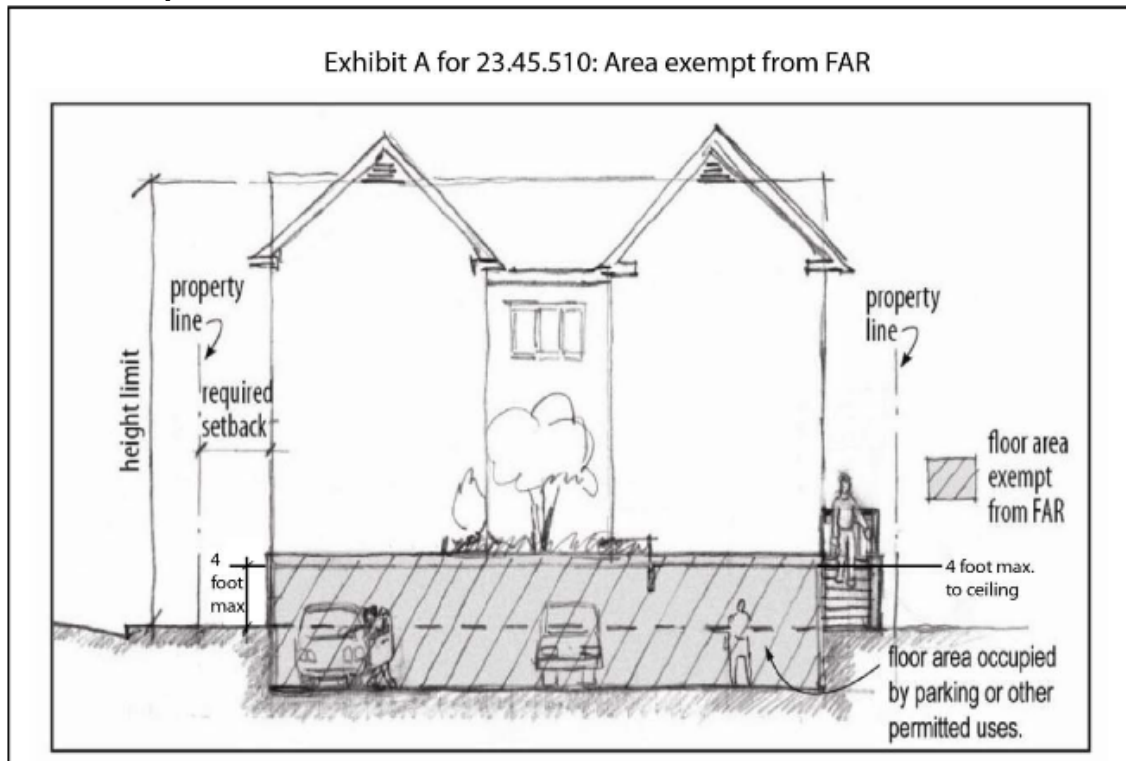
4. Portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, excluding access, (see Exhibit A for 23.45.510), in the following circumstances:

a. ~~((All residential structures))~~ Stacked dwelling units in LR zones ~~((except as provided in subsection 23.45.510.D.4.b))~~;

b. ~~((Single family, cottage housing, rowhouse, and townhouse developments))~~ Attached and detached dwelling units in LR zones, provided that all parking is located at the rear of the structure or is enclosed in structures with garage entrances located on the rear facade; and

c. All ~~((multifamily structures))~~ dwelling units in MR and HR zones.

**Exhibit A for 23.45.510**  
**Area exempt from FAR**



5. ~~((For rowhouse and townhouse developments and apartments, f))~~ Floor area within a story, or portion of a story, that is partially above grade if all of the following conditions are met:

a. The story, or portion of the story, that is partially above grade is used for parking or other accessory uses and has no additional stories above;

b. The average height of the exterior walls enclosing the floor area does not exceed one story, measured from existing or finished grade, whichever is lower;

c. The roof area above the exempt floor area is predominantly flat, is used as amenity area, and meets the standards for amenity area at ground level in Section 23.45.522; and

d. At least 25 percent of the perimeter of the amenity area on the roof above the floor area is not enclosed by the walls of the structure.

6. Enclosed common amenity area in HR zones.

7. As an allowance for mechanical equipment, in any structure more than 85 feet in height, 3.5 percent of the gross floor area that is not otherwise exempt under this subsection 23.45.510.D.

8. In HR zones, ground floor commercial uses meeting the requirements of Section 23.45.532, if the street level of the structure containing the commercial uses has a minimum floor-to-floor height of 13 feet and a minimum depth of 15 feet.

9. The floor area of required bicycle parking for small efficiency dwelling units or congregate residence sleeping rooms, if the bicycle parking is located within the structure containing the small efficiency dwelling units or congregate residence sleeping rooms. Floor area of bicycle parking that is provided beyond the required bicycle parking is not exempt from FAR limits.

10. Common walls separating individual ~~((rowhouse and townhouse))~~ attached dwelling units.

11. In the Northgate Urban Center, up to 15,000 square feet of floor area in residential use in a structure built prior to 1990 that is located on a split-zoned lot of at least 40,000 square feet in size.

12. In MR and HR zones, all gross floor area in child care centers.

13. In low-income housing, all gross floor area for accessory human service uses.

E. If TDP is transferred from a lot pursuant to Section 23.58A.042, the amount of non-exempt floor area that may be permitted is an FAR of 7, plus any net amount of TDP previously transferred to the lot, minus the sum of the existing non-exempt floor area on the lot and the amount of TDP transferred.

Section 22. Section 23.45.512 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.45.512 ~~((Density))~~ Minimum lot size and density limits ~~((and family-size unit requirements))~~ —LR zones

*Note: This section is edited to comply with the density requirement of HB 1110. The area of certain Environmentally Critical Areas is proposed to be excluded from lots size for the purpose of calculating density.*

~~((A. Density limits~~

~~1. Except according to subsection 23.45.512.A.4, the following developments must meet the density limits described in this subsection 23.45.512.A:~~

~~a. In LR1 zones, rowhouse development on interior lots and all townhouse development; and~~

~~b. All development in Lowrise zones that do not have a mandatory housing affordability suffix.~~

~~2. Development described in subsection 23.45.512.A.1))~~

~~A. Except as provided in subsection 23.44.012.E, the minimum lot size in Lowrise zones is 1,150 square feet.~~

~~B. Except as provided in subsection 23.44.012.C and 23.44.012.E, attached and detached dwelling units in LR1 zones and all units in Lowrise zones that do not have a mandatory housing affordability suffix shall not exceed a density of one dwelling unit per 1,150 square feet of lot area ((-except that apartments in LR3 zones that do not have a mandatory housing affordability suffix shall not exceed a density limit of one dwelling unit per 800 square feet)).~~

~~((3. When density calculations result in a fraction of a unit, any fraction up to and including 0.85 constitutes zero additional units, and any fraction over 0.85 constitutes one additional unit.~~

~~4. Low-income housing shall have a maximum density of one dwelling unit per 400 square feet of lot area.~~

~~B. Family-sized unit requirements in LR1 zones~~

~~1. Apartment developments in LR1 zones with four or more units shall provide at least one unit with two or more bedrooms and a minimum net unit area of 850 square feet for every four units in the structure.~~

~~2. One unit with three or more bedrooms and a minimum net unit area of 1,050 square feet may be provided in place of any two units required to include two bedrooms and a minimum net unit area of 850 square feet.))~~

~~C. Exceptions to density limit~~

~~1. At least one unit is allowed on all lots existing as of June 6, 2024.~~



~~2. Nursing homes, low income housing, congregate housing, and assisted living facilities ((, and accessory dwelling units that meet the standards of Section 23.45.545)) are exempt from the density limit ((set in subsection 23.45.512.A and the requirements)) in subsection 23.45.512.B).~~

~~((D)) 3. Dwelling unit(s) located in structures built prior to January 1, 1982, as ((single-family)) detached dwelling units that will remain in residential use are exempt from the density limit((s)) in subsection 23.45.512.B.~~

~~((E. If dedication of right-of-way is required, permitted density shall be calculated before the dedication is made.))~~

4. Attached dwelling units on corner lots that are 6,000 square feet or less are exempt from the density limit in subsection 23.45.512.B.

5. A lot that does not meet the minimum size necessary for four dwelling units under subsection 23.44.012.B may be developed with up to four dwelling units if the lot meets the following criteria:

a. The lot was in existence as a legal building site prior to June 6, 2024;

b. The lot has not been divided through a subdivision or short subdivision or modified by unit lot subdivision since June 6, 2024; and

c. The lot does not contain any riparian corridors; wetlands and their buffers; or submerged lands and areas within the shoreline setback; and steep slopes.

6. Notwithstanding subsection 23.44.012.D.1, a lot that does not meet the minimum size necessary for six units under subsection 23.44.012.B may be developed with up to six units if the lot meets the following criteria:

a. The lot is located within one-quarter mile walking distance of a major transit stop;

b. The lot was in existence as a legal building site prior to June 6, 2024;

c. The lot has not been divided through a subdivision or short subdivision or modified by unit lot subdivision since June 6, 2024; and

d. The lot does not contain any riparian corridors; wetlands and their buffers; or submerged lands and areas within the shoreline setback; and steep slopes.

~~((F)) 7. Adding units to existing structures~~

~~1. One additional dwelling unit may be added to an existing residential structure regardless of the density restrictions in subsection 23.45.512.A ((and~~

~~the requirements in subsection 23.45.512.B~~). An additional unit is allowed only if the proposed additional unit is to be located entirely within an existing structure, and no additional floor area to accommodate the new unit is proposed to be added to the existing structure.

2. For the purposes of this subsection (~~23.45.512.F~~) 23.45.512.C.7, "existing residential structures" are those that were established under permit as of October 31, 2001, or for which a permit has been granted and the permit has not expired as of October 31, 2001.

8. Accessory dwelling units are exempt from the density limit if they meet the following criteria:

a. The accessory dwelling units are accessory to an attached dwelling unit.

b. There is not more than one accessory dwelling unit per principal dwelling unit.

c. The gross floor area of each accessory dwelling unit is 650 square feet or less.

d. The accessory dwelling unit is located completely within the ground floor of the same structure as the principal unit.

#### D. Measurement of maximum density

1. When calculation of the number of dwelling units allowed results in a fraction of a unit, any fraction shall be rounded down.

2. If dedication of right-of-way is required, permitted density shall be calculated before the dedication is made.

3. In the case of unit lot subdivision, the density limit shall be applied to the parent lot as a whole.

#### 4. Areas not counted in calculating the lot size

a. The following areas shall not be counted in calculating the area of lots for the purpose of calculating minimum lot size in subsection 23.45.512.A and maximum density in this subsection 23.45.512.B:

1) Riparian corridors;

2) Wetlands and their buffers;

- and
- 3) Submerged lands and areas within the shoreline setback;
  - 4) Designated non-disturbance area in steep slopes.

Section 23. Section 23.45.514 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

**23.45.514 Structure height**

*Note: This section is being updated to reflect updated definitions for housing types, remove structure height limits for ADUs, and increase height limit for attached and detached dwelling units from 30 to 32 feet consistent with NR zones.*

A. Subject to the additions and exceptions allowed as set forth in this Section 23.45.514, the height limits for structures in LR zones are as shown on Table A for 23.45.514.

<b>Table A for 23.45.514 Structure height for LR zones (in feet)</b>				
<b>((Housing)) Dwelling Unit type</b>	<b>LR1</b>	<b>LR2</b>	<b>LR3 outside urban centers, urban villages, and Station Area Overlay Districts</b>	<b>LR3 in urban centers, urban villages, and Station Area Overlay Districts</b>
((Cottage housing developments))	22	22	22	22))
((Rowhouse and townhouse developments)) <u>Attached and detached dwelling units</u>	((30)) 32	40 <sup>1</sup>	40 <sup>1</sup>	50 <sup>1</sup>
((Apartments)) <u>Stacked dwelling units</u>	((30)) 32	40 <sup>1</sup>	40 <sup>1</sup>	50 <sup>2</sup>
Footnotes for Table A for 23.45.514 <sup>1</sup> Except that the height limit is ((30)) 32 feet in zones without a mandatory housing affordability suffix.				

<b>Table A for 23.45.514 Structure height for LR zones (in feet)</b>				
<b>((Housing)) Dwelling Unit type</b>	<b>LR1</b>	<b>LR2</b>	<b>LR3 outside urban centers, urban villages, and Station Area Overlay Districts</b>	<b>LR3 in urban centers, urban villages, and Station Area Overlay Districts</b>
<sup>2</sup> Except that the height limit is 40 feet in zones without a mandatory housing affordability suffix.				

\* \* \*

Section 24. Section 23.45.518 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

**23.45.518 Setbacks ((and separations))**

*Note: This section is proposed to be updated to implement the requirements of HB1110 that standards for middle housing can't be more restrictive than for detached homes and to simplify the code.*

A. LR zones

1. Required setbacks for the LR zones are as shown in Table A for 23.45.518 and subsection 23.45.518.A.2.

<b>((Table A for 23.45.518 Required setbacks in LR zones measured in feet</b>				
<b>All LR zones</b>	<b>Category of residential use</b>			
<b>Setback</b>	<b>Cottage housing developments and single-family dwelling units</b>	<b>Rowhouse developments</b>	<b>Townhouse developments</b>	<b>Apartments</b>

**((Table A for 23.45.518  
Required setbacks in LR zones measured in feet**

All LR zones	Category of residential use			
Front	7 average; 5 minimum	5 minimum	7 average; 5 minimum	5 minimum
Rear	0 with alley; 7 if no alley	0 with alley; With no alley: 7 average; 5 minimum	7 average; 5 minimum	10 minimum with alley; 15 minimum if no alley
Side setback for facades 40 feet or less in length <sup>1</sup>	5	0 where abutting another rowhouse development <sup>2</sup> , otherwise 3.5, except that on side lot lines that abut a neighborhood residential zone, the setback is 5	5	5
Side setback for facades greater than 40 feet in length <sup>3</sup>	5 minimum	0 where abutting another rowhouse development <sup>2</sup> , otherwise 3.5, except that on side lot lines that abut a neighborhood residential zone, the setback is 7 average; 5 minimum	7 average; 5 minimum	7 average; 5 minimum

Footnotes to Table A for 23.45.518

<sup>1</sup> ~~Additions to existing nonconforming structures built prior to April 11, 2011, shall be set back a sufficient distance so that the addition complies with setback standards. For any portion of a structure built before April 11, 2011, the average setback applies only to~~

**((Table A for 23.45.518  
Required setbacks in LR zones measured in feet**

All LR zones	Category of residential use
<p>a new addition built after that date. If an addition is to a side wall extended vertically, the existing side wall line may be continued by the addition, provided that the average setback of 7 feet or the 5-foot minimum setback is met.</p> <p><sup>2</sup> <del>If the side facades of rowhouse developments on abutting lots are not joined, then a 3.5-foot setback is required, except the side setback may be reduced to zero if the abutting lot contains a rowhouse development and an easement is provided along the shared lot line of the abutting lot sufficient to leave a 3.5-foot separation between the principal structures of the abutting rowhouse developments.</del></p> <p><sup>3</sup> <del>Portions of structures that qualify for the FAR exemption in subsection 23.45.510.D.5 are not considered part of the facade length for the purposes of determining the side setback requirement.)</del></p>	

**Table A for 23.45.518  
Required setbacks in Lowrise zones**

<u>Front</u>	<u>7 feet average, 5 feet minimum</u>
<u>Rear</u>	<u>If rear setback abuts an alley, 0 feet Otherwise, 7 feet average, 5 feet minimum</u>
<u>Side</u>	<u>5 feet</u>

2. Upper-level setbacks in LR2 and LR3 zones

a. An upper-level setback of 12 feet from the front lot line is required for all portions of a structure above the following height:

- 1) Forty-four feet for zones with a height limit of 40 feet; and
- 2) Fifty-four feet for zones with a height limit of 50 feet.

b. An upper-level setback of 12 feet from each side or rear lot line that abuts a lot zoned ~~((single-family))~~ Neighborhood Residential is required for all portions of the structure above 34 feet in height.

c. Projections allowed in subsection 23.45.518.H are allowed in upper-level setbacks.

d. Structures allowed in subsection 23.45.518.I are not allowed in upper-level setbacks.

e. Rooftop features are not allowed in upper-level setback except as follows:

1) A pitched roof, other than a shed roof or butterfly roof, is allowed in the upper-level setback if all parts of the roof are pitched at a rate of not less than 6:12 and not more than 12:12.

2) Open railings may extend up to 4 feet above the height at which the setback begins.

3) Parapets may extend up to 2 feet above the height at which the setback begins.

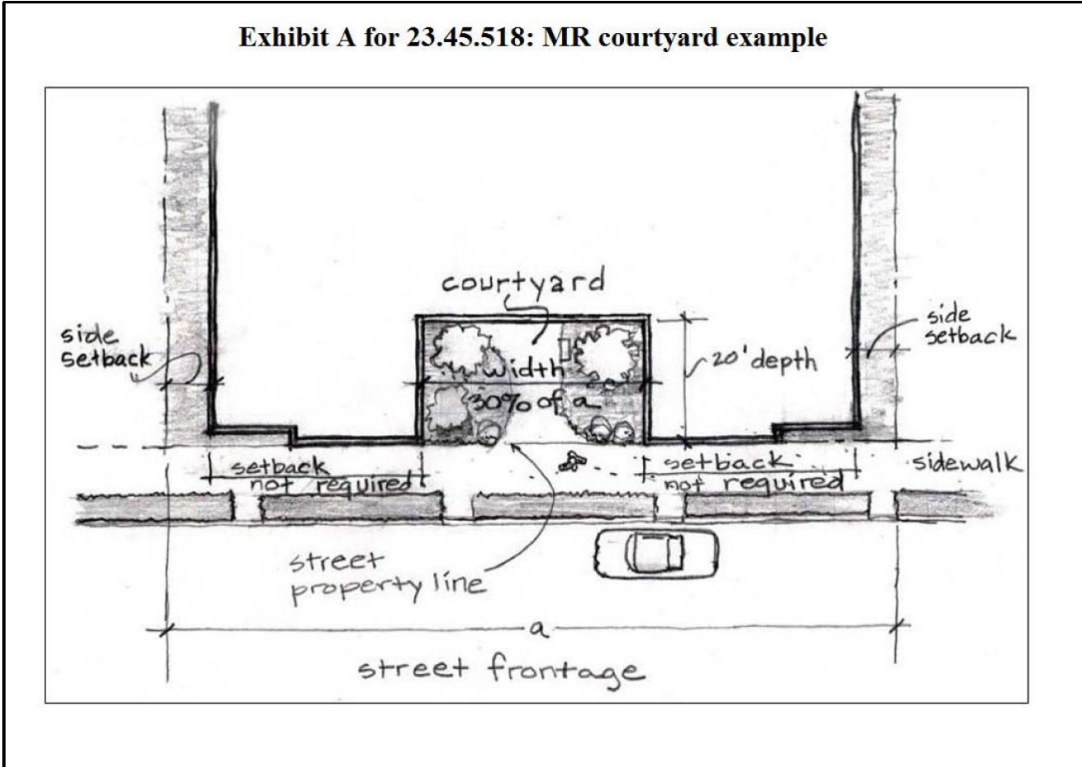
#### B. MR zones

1. Minimum setbacks for the MR zone are shown in Table B for 23.45.518 and subsection 23.45.518.B.2.

<b>Table B for 23.45.518 MR setbacks measured in feet</b>	
<b>Setback location</b>	<b>Required setback amount</b>
Front and side setback from street lot lines	7 average; 5 minimum No setback is required if a courtyard is provided that is at grade and abuts the street (see Exhibit A for 23.45.518), and the courtyard has: <ul style="list-style-type: none"><li>• a minimum width equal to 30 percent of the width of the abutting street frontage or 20 feet, whichever is greater; and</li><li>• a minimum depth of 20 feet measured from the abutting street lot line.</li></ul>

Table B for 23.45.518 MR setbacks measured in feet	
Setback location	Required setback amount
Rear setback	15 from a rear lot line that does not abut an alley; or 10 from a rear lot line abutting an alley.
Side setback from interior lot line	For portions of a structure: <ul style="list-style-type: none"> <li>• 42 feet or less in height: 7 average; 5 minimum</li> <li>• Above 42 feet in height: 10 average; 7 minimum</li> </ul>

**Exhibit A for 23.45.518  
MR courtyard example**



2. Upper-level setbacks in MR zones

a. For lots abutting a street that is less than 56 feet in width, all portions of the structure above 70 feet in height must be set back 15 feet from the front lot line abutting that street.



b. Projections allowed in subsection 23.45.518.H are allowed in upper-level setbacks.

c. Structures allowed in subsection 23.45.518.I are not allowed in upper-level setbacks.

d. Rooftop features are not allowed in upper-level setback except as follows:

1) Open railings may extend up to 4 feet above the height at which the setback begins.

2) Parapets may extend up to 2 feet above the height at which the setback begins.

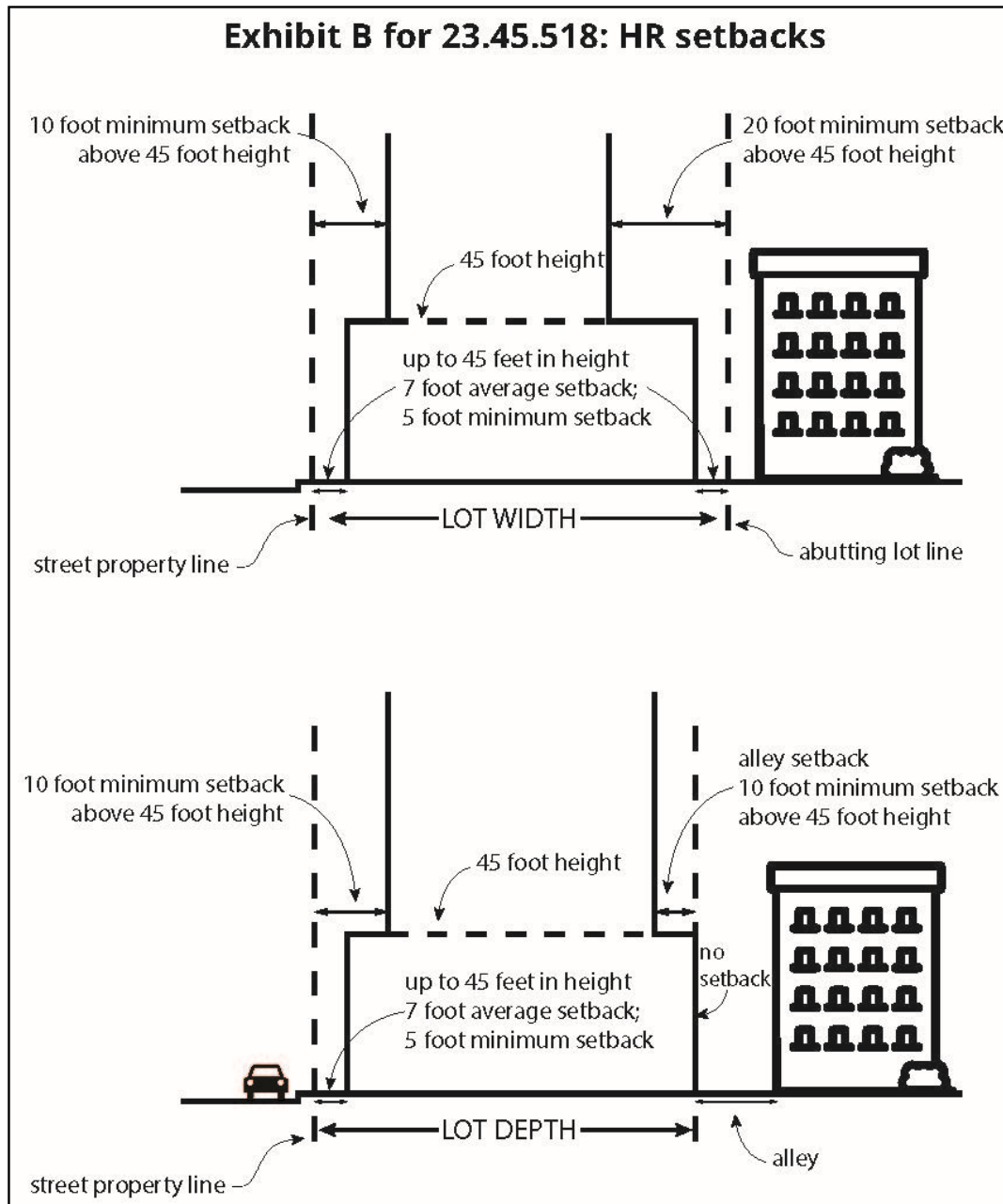
C. HR zones. Minimum setbacks for HR zones are shown in Table C for 23.45.518.

<b>Table C for 23.45.518 HR setbacks measured in feet (see also Exhibit B for 23.45.518)</b>	
<b>Setbacks for structures 85 feet in height or less</b>	
Structures 85 feet in height or less are subject to the setback provisions of the MR zone in subsection 23.45.518.B.	
<b>Setbacks for structures greater than 85 feet in height</b>	
Lot line abutting a street	For portions of a structure: <ul style="list-style-type: none"><li>• 45 feet or less in height: 7 average; 5 minimum, except that no setback is required for frontages occupied by street-level uses or dwelling units with a direct entry from the street;</li><li>• Greater than 45 feet in height: 10 minimum</li></ul>

**Table C for 23.45.518 HR setbacks measured in feet (see also Exhibit B for 23.45.518)**

Lot line abutting an alley	For portions of a structure: <ul style="list-style-type: none"><li>• 45 feet or less in height: no setback required;</li><li>• Greater than 45 feet in height: 10 minimum</li></ul>
Lot line that abuts neither a street nor alley	For portions of a structure: <ul style="list-style-type: none"><li>• 45 feet or less in height: 7 average; 5 minimum, except that no setback is required for portions abutting an existing structure built to the abutting lot line;</li><li>• Greater than 45 feet in height: 20 minimum</li></ul>

**Exhibit B for 23.45.518**  
**HR setbacks**



D. Through lots. In the case of a through lot, each setback abutting a street ((~~except a side setback~~)) shall be a front setback. Rear setback requirements shall not apply to the through lot.

E. Other setback requirements. Additional structure setbacks may be required in order to meet the provisions of Chapter 23.53, Requirements for Streets, Alleys, and Easements.

F. ~~((Separations between multiple structures~~

~~1. In LR and MR zones, the minimum required separation between principal structures at any two points on different interior facades is 10 feet, except for cottage housing developments, and principal structures separated by a driveway or parking aisle.~~

~~2. In LR and MR zones, if principal structures are separated by a driveway or parking aisle, the minimum required separation between the principal structures is 2 feet greater than the required width of the driveway or parking aisle, provided that the separation is not required to be any greater than 24 feet. If principal structures are separated by a driveway or parking aisle, projections that enclose floor area may extend a maximum of 3 feet into the required separation if they are at least 8 feet above finished grade.~~

~~3. Cottage housing developments in LR and MR zones:~~

~~a. The minimum required separation between principal structures at any two points on different interior facades is 6 feet, unless there is a principal entrance on an interior facade, in which case the minimum separation required from that facade is 10 feet.~~

~~b. Facades of principal structures shall be separated from facades of accessory structures by a minimum of 3 feet.~~

~~G.)) Front and rear setbacks ((and all separations)) on lots containing certain environmentally critical areas or buffers may be reduced pursuant to Sections 25.09.280 and 25.09.300.~~

~~((H)) G. Projections permitted in required setbacks ((or separation))~~

~~1. ((Cornices)) Architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other ((forms of weather protection)) similar features may project into required setbacks ((and separations)) a maximum of 4 feet if they are no closer than 3 feet to any lot line.~~

~~2. Garden windows and other similar features that do not provide floor area may project a maximum of 18 inches into required setbacks ((and separations)) if they:~~

~~a. Are a minimum of 30 inches above the finished floor;~~

~~b. Are no more than 6 feet in height and 8 feet wide; and~~

~~c. Combined with bay windows and other similar features with floor area, make up no more than 30 percent of the area of the facade.~~

3. Bay windows and other similar features that provide floor area may project a maximum of 2 feet into required setbacks (~~and separations~~) if they:

a. Are no closer than 5 feet to any lot line;

b. Are no more than 10 feet in width; and

c. Combined with garden windows and other (~~features~~) projections included in subsection (~~(23.45.518.H.2)~~) 23.45.518.G.2, make up no more than 30 percent of the area of the facade.

4. Unenclosed decks up to 18 inches above existing or finished grade, whichever is lower, may project into required setbacks (~~or separations~~).

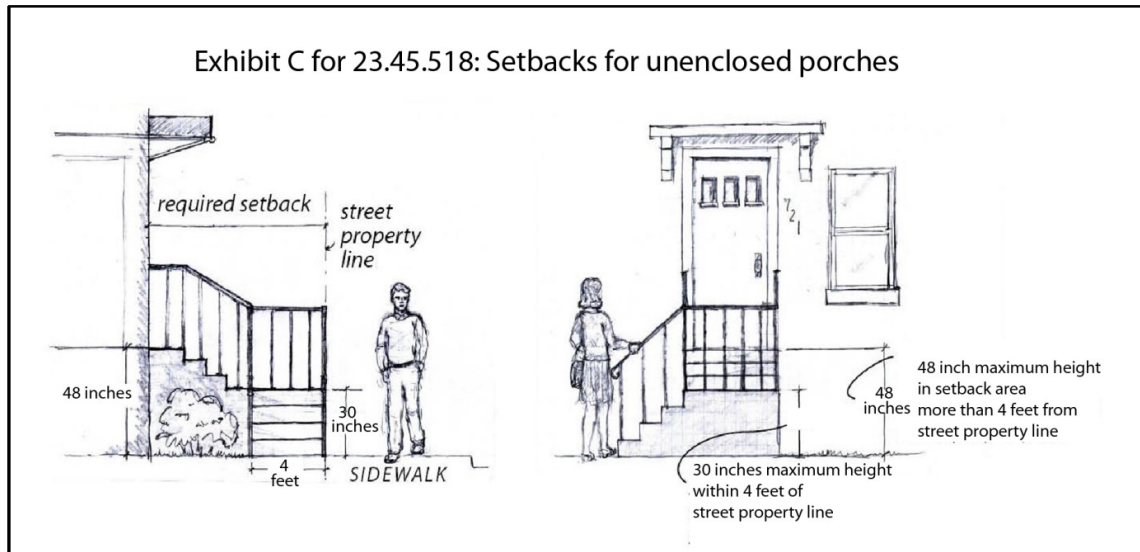
5. Unenclosed porches or steps

a. Unenclosed porches or steps no higher than 4 feet above existing grade, or the grade at the street lot line closest to the porch, whichever is lower, may extend to within 4 feet of a street lot line, except that portions of entry stairs or stoops not more than 2.5 feet in height from existing or finished grade, whichever is lower, (~~excluding guard rails or hand rails,~~) may extend to a street lot line. See Exhibit C for 23.45.518.

b. Unenclosed porches or steps no higher than 4 feet above existing grade may project into the required rear setback (~~or required separation~~) between structures a maximum of 4 feet provided they are a minimum of 5 feet from a rear lot line.

c. Unenclosed porches or steps permitted in required setbacks (~~and separations~~) shall be limited to a combined maximum width of 20 feet.

**Exhibit C for 23.45.518**  
**Setbacks for unenclosed porches**



d. Permitted porches or steps may be covered, provided that no portions of the cover-structure, including any supports, are closer than 3 feet to any lot line.

6. Fireplaces and chimneys may project up to 18 inches into required setbacks ((or separations)).

7. Unenclosed decks and balconies may project a maximum of 4 feet into required setbacks if each one is:

a. No closer than 5 feet to any lot line;

b. No more than 20 feet wide; and

c. Separated from other decks and balconies on the same facade of the structure by a distance equal to at least 1/2 the width of the projection.

8. Mechanical equipment. Heat pumps and similar mechanical equipment, not including incinerators, are permitted in required setbacks if they comply with the requirements of Chapter 25.08. Any heat pump or similar equipment shall not be located within 3 feet of any lot line. Charging devices for electric cars are considered mechanical equipment and are permitted in required setbacks if not located within 3 feet of any lot line.

((†)) H. Structures in required setbacks ((or separations)), except upper-level setbacks

1. Detached garages, carports, or other accessory structures are allowed in ~~((required setbacks and))~~ required rear or side setbacks, subject to the following requirements:

a. Any accessory structure located between a principal structure and a side lot line shall provide the setback required for the principal structure;

b. Any portion of an accessory structure located more than 25 feet from a rear lot line shall be set back at least 5 feet from the side lot line;

c. Accessory structures shall be set back at least 7 feet from any lot line that abuts a street; and

d. Accessory structures shall be separated by at least 3 feet from all principal structures, including the eaves, gutters, and other projecting features of the principal structure.

2. Ramps or other devices necessary for access for the disabled and elderly that meet the Seattle Residential Code, Chapter 3, or Seattle Building Code, Chapter 11, Accessibility, are allowed in any required setback ~~((or separation))~~.

3. Uncovered, unenclosed pedestrian bridges, necessary for access and 5 feet or less in width, are allowed in any required setback ~~((or separation))~~.

4. Underground structures are allowed in any required setback ~~((or separation))~~.

5. Solar collectors are allowed in any required setback ~~((or separation))~~, pursuant to the provisions of Section 23.45.545.

6. Freestanding signs, bike racks, and similar unenclosed structures that are 6 feet or less in height above existing or finished grade, whichever is lower, are allowed in any required setback ~~((or separation))~~, provided that signs meet the provisions of Chapter 23.55, Signs.

#### 7. Fences

a. Fences no greater than 6 feet in height are allowed in any required setback ~~((or separation))~~, except that fences in the required front setback extended to side lot lines or in street side setbacks extended to the front and rear lot lines may not exceed 4 feet in height. Fences located on top of a bulkhead or retaining wall are also limited to 4 feet. If a fence is placed on top of a new bulkhead or retaining wall used to raise grade, the maximum combined height is limited to 9.5 feet.

b. Up to 2 feet of additional height for architectural features such as arbors or trellises on the top of a fence is allowed((,)) if the architectural features are predominately open.

c. Fence height may be averaged along sloping grades for each 6-foot-long segment of the fence, but in no case may any portion of the fence exceed 8 feet in height when the height allowed by subsection ((23.45.518.1.7.a)) 23.45.518.H.7.a is 6 feet, or 6 feet in height when the height allowed by subsection ((23.45.518.1.7.a)) 23.45.518.H.7.a is 4 feet.

#### 8. Bulkheads and retaining walls

a. Bulkheads and retaining walls used to raise grade are allowed in any required setback if they are limited to 6 feet in height, measured above existing grade. ((A guardrail no higher than 42 inches may be placed on top of a bulkhead or retaining wall existing as of January 3, 1997.))

b. Bulkheads and retaining walls used to protect a cut into existing grade may not exceed the minimum height necessary to support the cut or 6 feet measured from the finished grade on the low side, whichever is greater. ((If the bulkhead is measured from the low side and it exceeds 6 feet, an open guardrail of no more than 42 inches meeting Seattle Residential Code or Seattle Building Code requirements may be placed on top of the bulkhead or retaining wall.)) Any fence shall be set back a minimum of 3 feet from such a bulkhead or retaining wall.

~~((9. Arbors are allowed in any required setback or separation under the following conditions:~~

~~a. In each required setback or separation, an arbor may be erected with no more than a 40-square-foot footprint, measured on a horizontal roof plane inclusive of eaves, to a maximum height of 8 feet. At least 50 percent of both the sides and the roof of the arbor shall be open, or, if latticework is used, there shall be a minimum opening of 2 inches between crosspieces.~~

~~b. In each required setback abutting a street, an arbor over a private pedestrian walkway with no more than a 30-square-foot footprint, measured on the horizontal roof plane and inclusive of eaves, may be erected to a maximum height of 8 feet. At least 50 percent of the sides of the arbor shall be open, or, if latticework is used, there shall be a minimum opening of 2 inches between crosspieces.~~

~~10. Above-grade green stormwater infrastructure (GSI) features are allowed in any required setback or separation if:~~



- excluding piping;
- a. ~~Each above-grade GSI feature is no more than 4.5 feet tall,~~
  - b. ~~Each above-grade GSI feature is no more than 4 feet wide; and~~
  - c. ~~The total storage capacity of all above-grade GSI features is no greater than 600 gallons.~~

~~11. Above-grade GSI features larger than what is allowed in subsection 23.45.518.I.10 are allowed in any required setback or separation if:~~

- a. ~~Above-grade GSI features do not exceed ten percent coverage of any one setback or separation area;~~
- b. ~~No portion of an above-grade GSI feature is located closer than 2.5 feet from a side lot line; and~~
- c. ~~No portion of an above-grade GSI feature projects more than 5 feet into a front or rear setback area.)~~

9. Above-grade stormwater management features, such as bioretention planters and cisterns, are allowed in setbacks if:

- a. No feature, excluding piping, is no more than:
  - 1) 12 feet tall if located in a portion of the rear setback that is not also a side setback; or
  - 2) 6.5 feet tall, if located in other setbacks
- b. No feature greater than 4.5 feet tall is located within 10 feet of the front lot line, excluding piping, unless it is integrated into a bulkhead that is allowed in subsection 23.44.018.H.8;
- c. No feature is located within 2.5 feet of the side lot line; and
- d. The total storage capacity of all above-grade cisterns is no greater than 1,250 gallons.

((12)) 10. Mechanical equipment. Heat pumps and similar mechanical equipment, not including incinerators, are allowed in any required setback if they comply with the requirements of Chapter 25.08. No heat pump or similar equipment shall be located within 3 feet of any lot line. Charging devices for electric cars are considered

mechanical equipment and are allowed in any required setbacks if not located within 3 feet of any lot line.

~~((13))~~ 11. Detached, unenclosed structures accessory to ((townhouses)) attached or detached dwelling units that are up to 8 feet in height and used exclusively for bike parking are allowed in any required setback ((or separation)).

~~((14. Detached structures accessory to townhouses that are up to 10 feet in height and used exclusively for bike parking are allowed in required separations.))~~

12. Private, permanent swimming pools, hot tubs and other similar uses are permitted in any required setback, provided that:

a. No part of any swimming pools, hot tubs and other similar uses shall project more than 18 inches above existing grade in a required front setback; and

b. No swimming pool shall be placed closer than 5 feet to any front or side lot line.

13. Guardrails or handrails no more than 42 inches are allowed on unenclosed stairs, decks, access bridges, bulkheads, and retaining walls.

\* \* \*

Section 25. A new Section 23.45.519 is added to the Seattle Municipal Code as follows:

#### [23.45.519 Separations between structures](#)

*Note: This section would contain standards that are currently scattered throughout the existing Setbacks and Separations section. The new standards would be simpler than the existing standards and the base separation requirement would be reduced from 10 feet to 6 feet. This lower standard is being proposed as the 10-foot requirement was inadvertently pushing new housing to locate more open space between buildings rather than in front and rear of buildings where it might be more suitable for trees and gathering spaces.*

A. In LR and MR zones, the minimum required separation between principal structures is 6 feet except that if the principal structures are separated by a driveway or parking aisle, the minimum required separation between the principal structures is 2 feet greater than the required width of the driveway or parking aisle, provided that the separation is not required to be any greater than 24 feet. If principal structures are separated by a driveway or parking aisle, projections that enclose floor area may extend

a maximum of 3 feet into the required separation if they are at least 8 feet above finished grade.

B. Architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other forms of weather protection may project into required separations a maximum of 2 feet. Unenclosed structures allowed in side setbacks are allowed in the minimum separation. Garden windows, bay windows, covered porches and patios, balconies, and enclosed structures are not allowed in the required separation. Detached structures that are up to 10 feet in height and used exclusively for bike parking are allowed in required separations.

Section 26. Section 23.45.522 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

#### 23.45.522 Amenity area

*Note: This section is proposed to be updated to implement the requirements of HB1110 that standards for middle housing can't be more restrictive than for detached homes and to make them more consistent with requirements for Neighborhood Residential zones.*

A. Amount of amenity area (~~required for rowhouse and townhouse developments and apartments in LR zones~~)

1. ~~The required amount of amenity area ((for rowhouse and townhouse developments and apartments))~~ in LR zones is equal to ~~((25))~~ 20 percent of the lot area.

2. ~~((A minimum of 50 percent of the required amenity area shall be provided at ground level, except that amenity area provided on the roof of a structure that meets the provisions of subsection 23.45.510.D.5 may be counted as amenity area provided at ground level.~~

3. ~~For rowhouse and townhouse developments, amenity area required at ground level may be provided as either private or common space.~~

4. ~~For apartments, amenity area required at ground level shall be provided as common space.~~

B. ~~Amenity area requirements for cottage housing developments in all multi-family zones~~

~~1. A minimum of 300 square feet of amenity area is required for each cottage.~~

~~2. A minimum of 150 square feet of amenity area is required for each carriage house.~~

~~3. The required quantity shall be allocated as follows:~~

~~a. Half of the amenity area required for each cottage, and all of the amenity area required for each carriage house, shall be provided as common amenity area; and~~

~~b. Half of the amenity area required for each cottage shall be provided as private amenity area for that unit.~~

~~4. The required common amenity area may be divided into no more than two separate areas and shall:~~

~~a. have cottages or carriage houses abutting on at least two sides;~~

~~b. be in a location central to the cottage housing development; and~~

~~c. have no horizontal dimension of less than 10 feet.~~

~~5. Carriage houses shall have stairs that provide access to the common amenity area.~~

~~C. Amount of amenity area required in MR and HR zones.) The required amount of amenity area in MR and HR zones is equal to ((5)) five percent of the total gross floor area of a structure in residential use(, except that cottage housing developments shall meet the standards in subsection 23.45.522.B.~~

~~D. General requirements. Required amenity areas shall meet the following conditions:~~

~~1.) B. All units shall have access to either a common or private amenity area. Common amenity areas provided for stacked dwelling units shall be accessible to all stacked dwelling units.~~

~~C. In Lowrise zones, a minimum of 50 percent of the required amenity area shall be provided at ground level or within 4 feet of existing grade.~~

~~((2)) D. Enclosed amenity areas~~

~~((a)) 1. In LR zones, an amenity area shall not be enclosed within a structure.~~

~~((b)) 2. In MR and HR zones, ((except for cottage housing)) no more than 50 percent of the amenity area may be enclosed, and this enclosed area shall be provided as common amenity area.~~

~~((3. Projections into amenity areas. Structural projections that do not provide floor area, such as garden windows, may extend up to 2 feet into an amenity area if they are at least 8 feet above finished grade.))~~

#### E. Size

~~((4)) 1. Private amenity areas. ((a. There is no minimum dimension for private amenity areas, except that if a private amenity area is located between the structure and a side lot line that is not a side street lot line, the minimum horizontal dimension shall be measured from the side lot line and is required to be a minimum of 10 feet.)) Each private amenity area shall be at least 60 square feet in area and have a minimum width and depth of 6 feet.~~

~~((b. An unenclosed porch that is a minimum of 60 square feet in size and that faces a street or a common amenity area may be counted as part of the private amenity area for the rowhouse, townhouse, or cottage to which it is attached.~~

~~5.) 2. Common amenity areas. ((for rowhouse and townhouse developments and apartments shall meet the following conditions: a. No)) Each common amenity area shall be ((less than)) at least 250 square feet in area ((, and common amenity areas shall)) and have a minimum ((horizontal dimension)) width and depth of 10 feet.~~

~~((b. Common amenity areas shall be improved as follows:~~

~~1) At least 50 percent of a common amenity area provided at ground level shall be landscaped with grass, ground cover, bushes, bioretention facilities, and/or trees.~~

~~2) Elements that enhance the usability and livability of the space for residents, such as seating, outdoor lighting, weather protection, art, or other similar features, shall be provided.~~

~~c. The common amenity area required at ground level for apartments shall be accessible to all apartment units.))~~

3. Projections that do not provide floor area may extend into an amenity area if they meet the standards for projections into setbacks in subsection 23.45.518.G

and if garden windows and other similar features are at least 8 feet above finished grade. Projections that provide floor area are not allowed in amenity areas.

4. Amenity areas may be covered by weather protection.

~~((6))~~ 5. ((Parking)) Vehicular parking areas, vehicular access easements, and driveways do not qualify as amenity areas (, except that a woonerf may provide a maximum of 50 percent of the amenity area if the design of the woonerf is approved through a design review process pursuant to Chapter 23.41)). Required bike parking and solid waste container storage space cannot be located in amenity areas. Enclosed structures cannot be located in amenity areas. Pathways serving multiple dwelling units cannot be located in private amenity areas.

~~((7))~~ 6. Swimming pools, spas, ((and)) hot tubs, and similar water features may be counted toward meeting the amenity area requirement.

7. Stormwater management features, such as bioretention planters and cisterns, are allowed in amenity areas.

~~((8))~~ 9. Rooftop areas ((excluded because they are near)) located within 8 feet of minor communication utilities and accessory communication devices(, pursuant to subsection 23.57.011.C.1,) do not qualify as amenity areas: the area

F. Common amenity areas shall be improved as follows:

1. At least 50 percent of a common amenity area provided at ground level shall be landscaped with grass, ground cover, bushes, bioretention facilities, and/or trees.

2. Elements that enhance the usability and livability of the space for residents, such as seating, outdoor lighting, weather protection, art, or other similar features, shall be provided.

~~((E))~~ G. No amenity area is required for ((a)) one dwelling unit added to ((to a single-family dwelling unit)) with residential structure existing as of January 1, 1982(, or for one new dwelling unit added to a multifamily residential use existing as of October 10, 2001), provided that no dwelling units have been added since that date.

Section 27. Section 23.45.527 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.45.527 Structure width ~~((and façade length limits))~~ in LR zones

*This section is proposed to be updated to implement the requirements of HB1110 that standards for middle housing can't be more restrictive than for detached homes. The new approach would have a consistent set of structure width requirements for each zone. The facade length would be removed as it has been a major barrier to the development of stacked flats and new units on lots where homes are preserved as well as for development on lots with unusual site or topography issues.*

~~((A.)) Structure width ((in LR zones)) may not exceed ((the width indicated on Table A for 23.45.527)) 90 feet in LR1 and LR2 zones and 150 feet in LR3 zones.~~

**~~((Table A for 23.45.527: Maximum Structure Width in LR zones in feet~~**

Zone	Width in feet by Category of Residential Use		
	Cottage Housing and Rowhouse Developments	Townhouse Developments	Apartments
LR1	No limit	60	45
LR2	No limit	90	90
LR3 outside Urban Villages, Urban Centers or Station Area Overlay Districts	No limit	120	120
LR3 inside Urban Villages, Urban Centers or Station Area Overlay Districts	No limit	150	150))

~~((B. Maximum façade length in Lowrise zones.~~

~~1. The maximum combined length of all portions of façades within 15 feet of a lot line that is neither a rear lot line nor a street or alley lot line shall not exceed 65 percent of the length of that lot line, except as specified in subsection 23.45.527.B.2.~~

~~2. For a rowhouse development on a lot that abuts the side lot line of a lot in a neighborhood residential zone, the maximum combined length of all portions of façades within 15 feet of the abutting side lot line is 40 feet.))~~

Section 28. Section 23.45.529 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

### 23.45.529 Design standards

*Note: This section would be comprehensively updated in order to improve design outcomes and meet new state rules requiring clear and objective standards.*

~~A. Intent. The intent of the design standards in this Section 23.45.529 is to:~~

~~1. Enhance street-facing and side facades to provide visual interest, promote new development that contributes to an attractive streetscape, and avoid the appearance of blank walls along a street or adjacent residential property;~~

~~2. Foster a sense of community by integrating new pedestrian-oriented multifamily development with the neighborhood street environment and promoting designs that allow easy surveillance of the street by area residents;~~

~~3. Promote livability in multifamily areas by providing a sense of openness and access to light and air; and~~

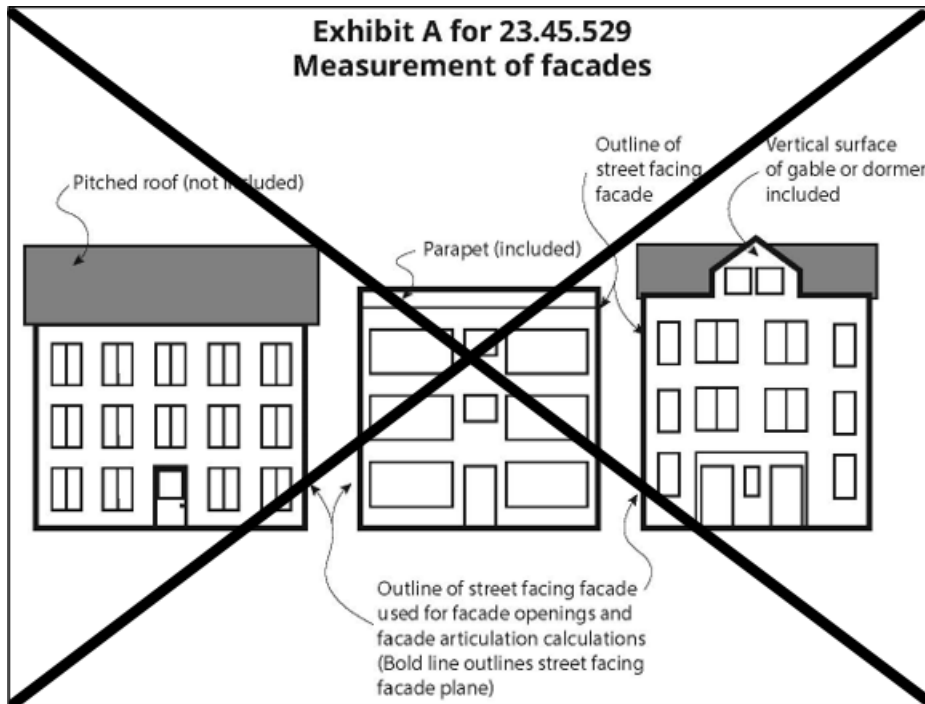
~~4. Encourage the compatibility of a variety of housing types with the scale and character of neighborhoods where new multifamily development occurs.~~

~~B. Application of provisions. The provisions of this Section 23.45.529 apply to all residential uses that do not undergo any type of design review pursuant to Chapter 23.41, except single-family dwelling units.~~

~~C. Treatment of street-facing facades. For the purposes of this subsection 23.45.529.C, a street-facing facade includes all vertical surfaces enclosing interior space, including gables and dormers, as shown in Exhibit A for 23.45.529.~~



**Exhibit A for 23.45.529**  
**Measurement of facades**



**1. Facade openings**

a. At least 20 percent of the area of each street-facing facade shall consist of windows and/or doors, except as provided in subsection 23.45.529.C.1.b. If a front and side facade are street-facing, the two facades may be combined for the purpose of this calculation.

b. For any rowhouse or townhouse dwelling unit that has both a front and a side facade that are street-facing, the percentage of the side street-facing facade required to consist of windows and/or doors is reduced to ten percent for the portion of the facade associated with that dwelling unit. This reduction to ten percent is not allowed if the facades are combined for the purpose of this standard pursuant to subsection 23.45.529.C.1.a or if any of the exceptions in subsection 23.45.529.C.3 are applied.

c. Windows count toward the requirement for facade openings in this subsection 23.45.529.C.1 only if they are transparent. Windows composed of glass blocks or opaque glass, garage doors, and doors to utility and service areas do not count.

**2. Facade articulation**

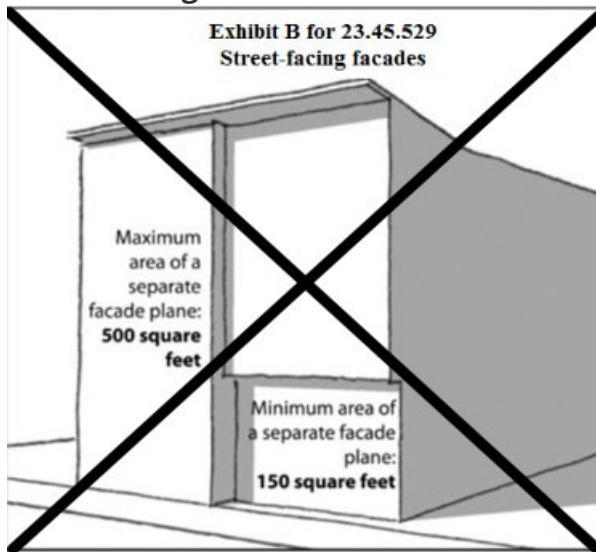
a. If a street-facing facade or portion of a street-facing facade is not vertical, the Director shall determine whether the facade is substantially vertical and required to comply with this subsection 23.45.529.C.

b. If the street-facing facade of a structure exceeds 750 square feet in area, division of the facade into separate facade planes is required (see Exhibit B for 23.45.529).

c. In order to be considered a separate facade plane for the purposes of this subsection 23.45.529.C.2, a portion of the street-facing facade shall have a minimum area of 150 square feet and a maximum area of 500 square feet, and shall project or be recessed from abutting facade planes by a minimum depth of 18 inches.

d. Trim that is a minimum of 0.75 inches deep and 3.5 inches wide is required to mark roof lines, porches, windows, and doors on all street-facing facades.

**Exhibit B for 23.45.529**  
**Street-facing facades**



3. The Director may allow exceptions to the facade opening requirements in subsection 23.45.529.C.1 and the facade articulation requirements in subsection 23.45.529.C.2, if the Director determines that the street-facing facade will meet the intent of subsection 23.45.529.A.1 for all housing types, and, as applicable, the intent of subsections 23.45.529.E.2, 23.45.529.F.3, and 23.45.529.G.4 for cottage housing developments, rowhouse developments, and townhouse developments, respectively, through one or more of the following street-facing facade treatments:

a. Variations in building materials and/or color, or both, that reflect the stacking of stories or reinforce the articulation of the facade;

b. Incorporation of architectural features that add interest and dimension to the facade, such as porches, bay windows, chimneys, pilasters, columns, cornices, and/or balconies;

c. Special landscaping elements provided to meet Green Factor requirements pursuant to Section 23.45.524, such as trellises, that accommodate vegetated walls covering a minimum of 25 percent of the facade surface;

d. Special fenestration treatment, including an increase in the percentage of windows and doors to at least 25 percent of the street-facing facade(s).

D. Treatment of side facades that are not street-facing. For the purposes of this subsection 23.45.529.D, a side facade that is not street-facing includes all vertical surfaces enclosing interior space, including gables and dormers, as shown in Exhibit A for 23.45.529, if located within 10 feet of a side lot line.

1. If the side facade of a structure that is not street-facing exceeds 1,000 square feet in area, one of the following must be met:

a. A portion of the side facade with a minimum area of 250 square feet and a maximum area of 750 square feet shall project or be recessed from abutting facade planes by a minimum depth of 18 inches; or

b. The side facade shall include vertical or horizontal variations in building materials or color, covering a minimum of 25 percent of the facade surface.

2. Structures shall be designed to maintain the privacy of dwelling units by minimizing placement of proposed windows where they would directly align with windows on the side facade of a structure on an abutting lot located within 20 feet of the side property line or by use of fencing, screening, landscaping, or translucent windows to create privacy between buildings.

E. Design standards for cottage housing developments

1. Pedestrian entry. Each cottage with a street-facing facade that is located within 10 feet of the street lot line shall have a visually prominent pedestrian entry through the use of covered stoops, porches, or other architectural entry features. For cottages on corner lots that have more than one street-facing facade within 10 feet of the street lot line, a visually prominent pedestrian entry is required on only one of the street-facing facades. Access to these entrances may be through a required private amenity area that abuts the street.

~~2. Architectural expression. Cottage housing developments shall include architectural details that reduce the visual scale of the units. Each cottage shall employ one or more of the following design techniques to reduce visual scale of the units:~~

~~a. Attached covered porch;~~

~~b. Roofline features such as dormers or clerestories;~~

~~c. Bay windows;~~

~~d. Variation in siding texture and materials; and~~

~~e. Other appropriate architectural techniques demonstrated by the applicant to reduce the visual scale of cottages.~~

#### ~~F. Design standards for rowhouse developments~~

~~1. Pedestrian entry. Each rowhouse unit shall have a pedestrian entry on the street-facing facade that is designed to be visually prominent through the use of covered stoops, porches, or other architectural entry features. For rowhouse units on corner lots, a visually prominent pedestrian entry is required on only one of the street-facing facades.~~

~~2. Front setback. Design elements to provide a transition between the street and the rowhouse units, such as landscaping, trees, fences, or other similar features, are required in the front setback.~~

~~3. Architectural expression. The street-facing facade of a rowhouse unit shall provide architectural detail or composition to visually identify each individual rowhouse unit as seen from the street. Design elements such as trim or molding, modulation, massing, color and material variation, or other similar features may be used to achieve visual identification of individual units. Rooftop features, such as dormers or clerestories, or roofline variation may be used to visually identify individual rowhouse units.~~

#### ~~G. Design standards for townhouse developments~~

~~1. Building orientation. Townhouse developments shall maximize the orientation of individual units to the street by complying with one of the following conditions:~~

~~a. When multiple buildings are located on a lot, at least 50 percent of the townhouse units shall be located so that there is no intervening principal structure between the unit and the street, unless the intervening principal structure was~~

established under permit as of October 31, 2001, or was granted a permit on October 31, 2001, and the permit has not expired; or

b. All townhouse units without a street-facing facade shall have direct access to a common amenity area meeting the requirements of Section 23.45.522 that either abuts the street or is visible and accessible from the street by a clear pedestrian pathway.

2. Pedestrian pathway. A clear pedestrian pathway from the street to the entrance of each townhouse unit shall be provided. The pedestrian pathway may be part of a driveway, provided that the pathway is differentiated from the driveway by pavement color, texture, or similar technique. Signage identifying townhouse unit addresses and the directions to the unit entrance(s) from the street shall be provided.

3. Pedestrian entry. Each townhouse unit with a street-facing facade shall have a pedestrian entry on the street-facing facade that is designed to be a visually prominent feature through the use of covered stoops, porches, or other architectural entry features. For townhouse units on corner lots, a visually prominent pedestrian entry is required on only one of the street-facing facades.

4. Architectural expression. Architectural detail or composition shall be provided to visually identify each individual townhouse unit, as seen from the public street. Design elements such as trim or molding, modulation, massing, color and material variation, or other similar features may be used to achieve visual identification of individual units. Rooftop features, such as dormers or clerestories, or roofline variation may be used to visually identify individual townhouse units.

#### H. Building entry orientation standards for apartments

1. For each apartment structure, a principal shared pedestrian entrance is required that faces either a street or a common amenity area, such as a landscaped courtyard, that abuts and has direct access to the street. Additional pedestrian entrances to individual units are permitted.

2. If more than one apartment structure is located on a lot, each apartment structure separated from the street by another principal structure shall have a principal entrance that is accessible from a common amenity area with access to the street.

3. The shared entrance of each apartment structure shall have a pedestrian entry that is designed to be visually prominent, through the use of covered stoops, overhead weather protection, a recessed entry, or other architectural entry features.

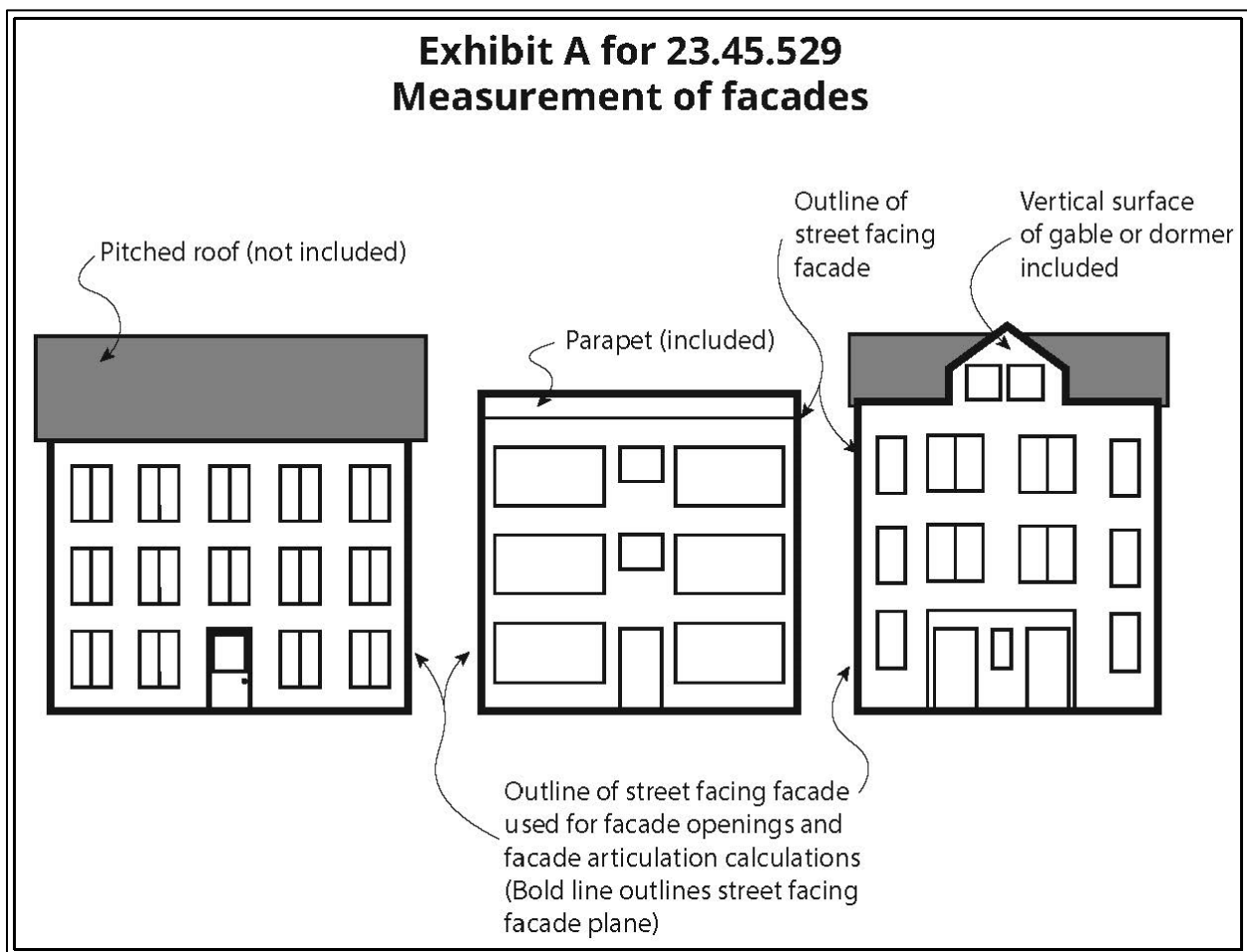
A. Application of provisions. The provisions of this Section 23.45.529 apply to all residential uses that do not undergo any type of design review pursuant to Chapter 23.41.

B. Definitions

1. For the purposes of this Section 23.45.529, a street-facing facade includes all vertical surfaces enclosing interior space, including gables and dormers, as shown in Exhibit A for 23.45.529.

**Exhibit A for 23.45.529**

**Measurement of facades**



2. For the purposes of this Section 23.45.529, requirements for street-facing facades shall only apply to structures located within 40 feet of a street lot line or a vehicle access easement serving ten or more residential units. For structures located within 40 feet of a vehicle access easement serving ten or more residential units but not within 40 feet of street lot line, the street-facing facade shall be the facade that faces the vehicle

access easement. If multiple facades face vehicle access easements, the applicant may decide which facade facing a vehicle access easement is considered the street-facing facade.

C. Access. Each unit shall have pedestrian access at least 3 feet in width to the sidewalk or, if no sidewalk exists, the front lot line. This access may be shared or private. This access may be over a driveway and may cross any required setbacks or interior separation. The pedestrian access may be part of a driveway.

D. Entrances. Each structure with a street-facing facade shall have a pedestrian entry on that street-facing facade meeting the following:

1. For stacked dwelling units, at least one pedestrian entry shall be required for the structure as a whole.

2. For attached and detached dwelling units, each individual dwelling with a street-facing facade within 40 feet of the street lot line shall have at least one pedestrian entry on the street-facing facade.

3. For structures or dwelling units on corner lots, a pedestrian entry is required on only one of the street-facing facades.

4. Required pedestrian entry on street-facing facades shall have weather protection, such as a covered porch, canopy, recessed entry or similar feature, measuring at least 3 feet by 3 feet in width and depth for attached and detached dwelling units and at least 6 feet in width and 4 feet in depth for stacked units.

5. For projects with multiple attached or detached dwelling units that are located on a corner lot, at least one pedestrian entry shall be located facing each street.

6. Exception. For attached and detached dwelling units, the pedestrian entry may be located on a wall perpendicular to the street-facing facade provided that the pedestrian entry abuts a covered porch or recessed entry that also abuts the street-facing facade.

E. Windows and doors. At least 20 percent of the area of each street-facing facade shall consist of windows and/or doors. If front and side facades are street-facing, the two facades shall be combined for the purpose of this calculation. Windows count toward the requirement for facade openings in this subsection 23.45.529.E only if they are transparent. Windows composed of garage doors and doors to utility and service areas do not count.

F. Materials. At least 60 percent of the area of each street-facing facade shall consist of materials that meet any combination of the following elements:

1. Windows and/or doors meeting the standards of subsection 23.45.529.E;

2. Bricks or other masonry materials that are no more than 12 inches in either height or width or brick or stone veneers that provide a similar appearance;

3. Wood slats no more than 16 inches in either height or width;

4. Overlapping boards, shingles, shakes, or similar elements that are no more than 16 inches in either height or width and a minimum of ½ inch in thickness; or

5. Contain indentations or projections with a minimum of ½ inch in depth and a minimum of ½ inch in width every 16 inches or less.

G. The Director may as a type 1 decision allow exceptions to the materials requirements in subsection 23.45.529.F if the Director determines that the design of the street-facing facade including materials, windows, and modulation will meet the intent of subsection 23.44.029.D to provide visual interest and prevent large, uninterrupted wall faces.

H. Projects must meet two of the following options:

1. Window treatment. At least 80 percent of windows on each street-facing facade are either:

a. Recessed by at least 2 inches behind the surface of the siding; or

b. Are surrounded by trim that is at least 3 inches wide.

2. Building projections

a. For attached and detached units, the street-facing facade of each dwelling unit located within 40 feet of a street lot line includes at least one projection of at least 2 feet in depth, 8 feet in width, and 18 feet in height.

b. For stacked units, street-facing facades must meet one of the following standards:

1) Have separate projections at least 2 feet in depth, 8 feet in width, and 8 feet in height spaced no more than 12 feet apart and no more than 12 feet from the edge of the building, measured vertically;

2) Have separate projections at least 2 feet in depth, 8 feet in width, and 18 feet in height spaced no more than 30 feet apart and no more than 30 feet from the edge of the building, measured vertically; or

3) Have separate projections or recessions at least 5 feet in depth, 8 feet in width, and 28 feet in height spaced no more than 40 feet apart and no more than 30 feet from the edge of the building, measured vertically.

c. All projections used to qualify for this standard must be at least 5 feet from other projections used to qualify for this standard.

d. As a Type 1 decision, the Director, may modify any of the standards of this subsection 23.45.529.H.2 where the street-facing facades of the buildings include



projections that are similar to the standards of this Section 23.45.529 and would meet the objective of providing visual interest in the building.

3. Balconies, porches, and canopies.

a. For stacked dwelling units, at least 50 percent of street-facing units shall have balconies, covered porches, or canopies.

b. For attached dwelling units, all street-facing units shall have a balcony, covered porch, or canopy on the street-facing facade.

c. Each balcony, porch, and canopy used to meet this requirement must be at least 30 square feet and must be accessible from the unit. If a canopy is provided to meet this requirement, the canopy may not be more than 15 feet above finished grade and at least 30 square feet of hardscaped surface must be provided at ground level underneath the canopy. Roof decks do not count toward meeting this requirement.

4. Windows meeting higher percentage. At least 35 percent of the area of each street-facing facade and at least 25 percent of each street-level, street-facing facade shall consist of windows and/or doors meeting the standards of 23.45.529.E. If a front and side facade are street-facing, the two facades shall be combined for the purpose of this calculation.

5. Materials meeting a higher standard. At least 75 percent of the area of each street-facing facade shall consist of materials that meet any combination of the following elements:

a. Windows and/or doors meeting the standards of subsection 23.45.529.E; or

b. Bricks or other masonry materials that are no more than 16 inches in either height or width or brick or stone veneers that provide a similar appearance.

Section 29. Section 23.45.531 of the Seattle Municipal Code, enacted by Ordinance 123495, is repealed:

~~[\(\(23.45.531 Development standards for cottage housing developments and carriage house structures](#)~~

~~A. Size limit for dwelling units.~~

~~1. The maximum gross floor area of each cottage in a cottage housing development is 950 square feet.~~

~~2. The maximum gross floor area of a carriage house is 600 square feet.~~

~~B. Size limit for garages. The maximum gross floor area for a shared garage structure in a cottage housing development is 1,200 square feet, and the garage shall contain no more than four parking spaces.~~

~~C. Carriage house structures. A carriage house structure is permitted in a cottage housing development subject to the following standards:~~

~~1. The maximum number of dwelling units permitted in carriage house structures is one-third of the total number of units in the cottage housing development on the lot.~~

~~2. The maximum gross floor area of the ground floor of a carriage house structure is 1,200 square feet.~~

~~D. Existing single-family dwelling units in a cottage housing development. Existing single-family dwelling units that are non-conforming with respect to the standards for a cottage housing development are permitted to remain, provided that the extent of the nonconformity shall not be increased.))~~

Section 30. Section 23.45.545 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

#### 23.45.545 Standards for ~~((certain accessory uses))~~ [solar collectors](#)

*Note: Standards in this section have been moved to the uses and setbacks sections consistent with other zones. Provisions for solar greenhouses, greenhouses, and solariums have been removed as they is rarely used and there is not a clear public benefit to allowing these portions of buildings to intrude into setbacks.*

~~A. ((Private, permanent swimming pools, hot tubs and other similar uses are permitted in any required setback, provided that:~~

~~1. No part of any swimming pools, hot tubs and other similar uses shall project more than 18 inches above existing grade in a required front setback; and~~

~~2. No swimming pool shall be placed closer than 5 feet to any front or side lot line.~~

~~B. Solar greenhouses, greenhouses and solariums~~

~~1. Solar greenhouses, greenhouses and solariums, in each case that are attached to and integrated with the principal structure and no more than 12 feet in height are permitted in a required rear setback, subject to subsection 23.45.545.B.3, and may extend a maximum of 6 feet into required front and side setbacks, subject to subsection 23.45.545.B.2.~~

~~2. An attached solar greenhouse, greenhouse or solarium, in a required setback, shall be no closer than 3 feet from side lot lines and 8 feet from front lot lines.~~

~~3. A solar greenhouse, greenhouse or solarium allowed pursuant to subsection 23.45.545.B.1 shall not be closer than 5 feet to the rear lot line, except that it may abut an alley if it is no taller than 10 feet along the rear lot line, is of no greater average height than 12 feet for a depth of 15 feet from the rear lot line, and is no wider than 50 percent of lot width for a depth of 15 feet from the rear lot line.~~

((€)) Solar collectors

1. Solar collectors are permitted in required setbacks, subject to the following:

a. Detached solar collectors are permitted in required rear setbacks, no closer than 5 feet to any other principal or accessory structure.

b. Detached solar collectors are permitted in required side setbacks, no closer than 5 feet to any other principal or accessory structure, and no closer than 3 feet to the side lot line.

2. Sunshades that provide shade for solar collectors that meet minimum written energy conservation standards administered by the Director may project into southern front or rear setbacks. Those that begin at 8 feet or more above finished grade may be no closer than 3 feet from the lot line. Sunshades that are between finished grade and 8 feet above finished grade may be no closer than 5 feet to the lot line.

3. Solar collectors on roofs. Solar collectors that are located on a roof are permitted as follows:

a. In LR zones up to 4 feet above the maximum height limit or 4 feet above the height of stair or elevator penthouse(s), whichever is higher; and

b. In MR and HR zones up to 10 feet above the maximum height limit or 10 feet above the height of stair or elevator penthouse(s), whichever is higher.

c. If the solar collectors would cause an existing structure to become nonconforming, or increase an existing nonconformity, the Director may permit the solar collectors as a special exception pursuant to Chapter 23.76. Solar collectors may be permitted under this subsection (~~(23.45.545.C.3.c)~~ 23.45.545.A.3.c even if the structure exceeds the height limits established in this subsection (~~(23.45.545.C.3)~~ 23.45.545.A, if the following conditions are met:

1) There is no feasible alternative solution to placing the collector(s) on the roof; and

2) The collector(s) are located so as to minimize view blockage from surrounding properties and the shading of property to the north, while still providing adequate solar access for the solar collectors.

~~((D. [Reserved.]~~

E) B. Nonconforming solar collectors. The Director may permit the installation of solar collectors that meet minimum energy standards and that increase an existing nonconformity as a special exception pursuant to Chapter 23.76. Such an installation may be permitted even if it exceeds the height limits established in this Section 23.45.545 and Section 23.45.514 when the following conditions are met:

1. There is no feasible alternative solution to placing the collector(s) on the roof; and

2. Such collector(s) are located so as to minimize view blockage from surrounding properties and the shading of property to the north, while still providing adequate solar access for the solar collectors.

~~((F. Open wet moorage facilities for residential uses are permitted as an accessory use pursuant to Chapter 23.60A, Shoreline District, if only one slip per residential unit is provided.~~

~~G. Bed and breakfast uses. A bed and breakfast use may be operated under the following conditions:~~

~~1. The bed and breakfast use has a valid business license tax certificate issued by the Department of Finance and Administrative Services;~~

~~2. All operators of bed and breakfast uses who use a short-term rental platform for listing the bed and breakfast shall have a valid short-term rental operator's license issued by the Department of Finance and Administrative Services.~~

~~3. The bed and breakfast use shall be operated by the primary resident of the dwelling unit where the bed and breakfast is located or the resident operator;~~

~~4. There shall be no evidence of a bed and breakfast use visible from the exterior of the dwelling unit other than a sign permitted by subsection 23.55.022.D.1; and~~

~~5. A bed and breakfast use may be located in a dwelling unit or an accessory dwelling unit.~~

~~H. Heat recovery incinerators, located on the same lot as the principal use, may be permitted by the Director as accessory administrative conditional uses, pursuant to Section 23.45.506.~~

~~I. Accessory dwelling units are allowed in single-family, rowhouse and townhouse units, as follows:~~

~~1. One accessory dwelling unit is allowed for each single-family, rowhouse, or townhouse unit that is a "principal unit." A "principal unit" is a dwelling unit that is not an accessory dwelling unit.~~

~~2. The height limit for a detached accessory dwelling unit is 20 feet, except that the ridge of a pitched roof on a detached accessory dwelling unit may extend up to 3 feet above the 20-foot height limit. All parts of the roof above the height limit shall be pitched at a rate of not less than 4:12. No portion of a shed roof is permitted to extend beyond the 20-foot height limit.~~

~~3. The maximum gross floor area of an accessory dwelling unit is 650 square feet, provided that the total gross floor area of the accessory dwelling unit does not exceed 40 percent of the total gross floor area in residential use on the lot or unit lot, if present, exclusive of garages, storage sheds, and other non-habitable spaces.~~

~~4. An accessory dwelling unit shall be located completely within the same structure as the principal unit or in an accessory structure located between the single-family, rowhouse, or townhouse unit and the rear lot line.~~

~~5. The entrance to an accessory dwelling unit provided within the same structure as the principal unit shall be provided through one of the following configurations:~~

~~a. Through the primary entry to the principal unit; or~~

~~b. Through a secondary entry on a different facade than the primary entry to the principal unit; or~~

~~c. Through a secondary entry on the same facade as the primary entry to the principal unit that is smaller and less visually prominent than the entry to the principal unit, and does not have a prominent stoop, porch, portico or other entry feature.~~

~~6. Exterior stairs. Exterior stairs providing access to an accessory dwelling unit may not exceed 4 feet in height, except for exterior stairs providing access to an accessory dwelling unit located above a garage.~~

~~7. Parking. Parking is not required for an accessory dwelling unit.~~

~~8. In the Shoreline District, accessory dwelling units in single-family, rowhouse, and townhouse units shall be as provided in Chapter 23.60A, and where allowed in the Shoreline District, are also subject to the provisions in this subsection 23.45.545.I.~~

~~J. Urban farms are subject to the standards in Section 23.42.051 and the conditional use requirements in subsection 23.45.504.C.8.)~~

Section 31. Section 23.45.550 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.45.550 Alternative Standards for development of affordable units on property owned or controlled by a religious organization

*Note: This section is being updated to reflect a new state requirement that allows additional density for lots with 2 or more affordable units.*

~~((In lieu of meeting development standards contained in subsections 23.45.510.B and 23.45.510.C (floor area), subsections 23.45.512.A and 23.45.512.B (density), and subsections 23.45.514.A and 23.45.514.B (height), a proposed development that meets the requirements of Section 23.42.055 may elect to meet the alternative development standards in this Section 23.45.550.))~~

A. Development on a lot that meets the requirements of Section 23.42.055 may elect to meet the following development standards in lieu of the standards in subsections 23.45.510.C (floor area), subsections 23.45.512.A and 23.45.512.B (density), and subsections 23.45.514.A and 23.45.514.B (height):

((A) 1. Floor area

((4)) a. Development permitted pursuant to Section 23.42.055 is subject to the FAR limits as shown in Table A for 23.45.550.

<b>Table A for 23.45.550 FAR limits for development permitted pursuant to Section 23.42.055</b>		
<b>Zone</b>	<b>Base FAR</b>	<b>Maximum additional exempt FAR <sup>1</sup></b>
LR1	1.5	0.3
LR2	1.8	0.3
LR3 outside urban centers and urban villages	2.5	0.5
LR3 inside urban centers and urban villages	3.25	0.5
MR	5.0	0.5
HR	16	1.0
Footnote to Table A for 23.45.550 <sup>1</sup> Gross floor area for uses listed in subsection 23.45.550.B.2 are exempt from FAR calculations up to this amount.		

((2)) b. In addition to the FAR exemptions in subsection 23.45.510.D, an additional FAR exemption up to the total amount specified in Table A for 23.45.550 is allowed for any combination of the following floor area:

((a-)) 1) Floor area in units with two or more bedrooms and a minimum net unit area of 850 square feet;

((b-)) 2) Floor area of a religious facility; and

((c-)) 3) Floor area in a structure designated as a Landmark pursuant to Chapter 25.12; and

~~((d.))~~ 4) Any floor area in a development located within 1/4 mile (1,320 feet) of a transit stop or station served by a frequent transit route as defined in subsection 23.54.015.B.4.

~~((3))~~ c. Split-zoned lots

~~((a.))~~ 1) On lots located in two or more zones, the FAR limit for the entire lot shall be the highest FAR limit of all zones in which the lot is located, provided that:

~~((1))~~ a) At least 65 percent of the total lot area is in the zone with the highest FAR limit;

~~((2))~~ b) No portion of the lot is located in a ~~((neighborhood residential))~~ Neighborhood Residential zone; and

~~((3))~~ c) A minimum setback of 10 feet applies for any lot line that abuts a lot in a ~~((neighborhood residential))~~ Neighborhood Residential zone.

~~((b.))~~ 2) For the purposes of this subsection ~~((23.45.550.A.3))~~ 23.45.550.A.1.c, the calculation of the percentage of a lot or lots located in two or more zones may include lots that abut and are in the same ownership at the time of the permit application.

~~((B))~~ 2. Maximum height

~~((1))~~ a. Development permitted pursuant to Section 23.42.055 is subject to the height limits as shown in Table B for 23.45.550.

<b>Table B for 23.45.550 Structure height for development permitted pursuant to Section 23.42.055</b>	
<b>Zone</b>	<b>Height limit (in feet)</b>
LR1	40
LR2	50
LR3 outside urban centers and urban villages	55



<b>Table B for 23.45.550 Structure height for development permitted pursuant to Section 23.42.055</b>	
<b>Zone</b>	<b>Height limit (in feet)</b>
LR3 inside urban centers and urban villages	65
MR	95
HR	480

~~((2))~~ b. Split-zoned lots

~~((a-))~~ 1) On lots located in two or more zones, the height limit for the entire lot shall be the highest height limit of all zones in which the lot is located, provided that:

~~((1))~~ a) At least 65 percent of the total lot area is in the zone with the highest height limit;

~~((2))~~ b) No portion of the lot is located in a ~~((neighborhood residential))~~ Neighborhood Residential zone; and

~~((3))~~ c) A minimum setback of 10 feet applies for any lot line that abuts a lot in a ~~((neighborhood residential))~~ Neighborhood Residential zone.

~~((b-))~~ 2) For the purposes of this subsection 23.45.550.B.2, the calculation of the percentage of a lot or lots located in two or more zones may include lots that abut and are in the same ownership at the time of the permit application.

~~((c))~~ 3. Density limits. Development permitted pursuant to this Section 23.45.550 is not subject to the standards of subsection ~~((s-23.45.512.A and))~~ 23.45.512.B.

B. Proposed development on a lot that does not meet the requirements of Section 23.42.055 but meets the following criteria may elect to build up to six dwelling units in lieu of the standards in subsection 23.44.012.B (density):

1. The lot was created prior to June 6, 2024; and the lot has not been divided by subdivision or short subdivision or modified by unit lot subdivision since June 6, 2024; and

2. The lot has at least two dwelling units which are low-income housing units.

### Changes to Other Sections

Section 32. Table A for Section 23.47A.004 of the Seattle Municipal Code, which section was last amended by Ordinance 127099, is amended as follows:

#### 23.47A.004 Permitted and prohibited uses

*Note: This section is proposed to be updated to reflect updates to the definition of residential and human service uses.*

\* \* \*

<b>Table A for 23.47A.004 Uses in Commercial zones</b>						
		<b>Permitted and prohibited uses by zone <sup>1</sup></b>				
<b>Uses</b>		<b>NC1</b>	<b>NC2</b>	<b>NC3</b>	<b>C1</b>	<b>C2</b>
A. AGRICULTURAL USES						
	A.1. Animal husbandry	A	A	A	A	P
	A.2. Aquaculture	10	25	P	P	P
	A.3. Community garden	P	P	P	P	P
	A.4. Horticulture	10	25	P	P	P
	A.5. Urban farm <sup>2</sup>	P	P	P	P	P
B. CEMETERIES		X	X	X	X	X
C. COMMERCIAL USES <sup>3</sup>						

<b>Table A for 23.47A.004 Uses in Commercial zones</b>						
		<b>Permitted and prohibited uses by zone <sup>1</sup></b>				
<b>Uses</b>		<b>NC1</b>	<b>NC2</b>	<b>NC3</b>	<b>C1</b>	<b>C2</b>
	C.1. Animal shelters and kennels	X	X	X	X	P
	C.2. Eating and drinking establishments					
	C.2.a. Drinking establishments	CU-10	CU-25	P	P	P
	C.2.b. Restaurants	10	25	P	P	P
	C.3. Entertainment uses					
	C.3.a. Cabarets, adult <sup>4</sup>	X	P	P	P	P
	C.3.b. Motion picture theaters, adult	X	X	X	X	X
	C.3.c. Panorams, adult	X	X	X	X	X
	C.3.d. Sports and recreation, indoor	10	25	P	P	P
	C.3.e. Sports and recreation, outdoor	X	X	X <sup>5</sup>	P	P
	C.3.f. Theaters and spectator sports facilities	X	25	P	P	P
	C.4. Food processing and craft work <sup>2</sup>	10	25	25	P	P
	C.5. Laboratories, research and development	10	25	P	P	P
	C.6. Lodging uses	X <sup>6</sup>	CU-25 <sup>6</sup>	P	P	P
	C.7. Medical services <sup>7</sup>	10 <sup>8</sup>	25	P	P	P
	C.8. Offices	10	25	P	35 <sup>9</sup>	35 <sup>9</sup>
	C.9. Sales and services, automotive					

<b>Table A for 23.47A.004 Uses in Commercial zones</b>						
		<b>Permitted and prohibited uses by zone <sup>1</sup></b>				
<b>Uses</b>		<b>NC1</b>	<b>NC2</b>	<b>NC3</b>	<b>C1</b>	<b>C2</b>
	C.9.a. Retail sales and services, automotive	10 <sup>10</sup>	25 <sup>10</sup>	P <sup>10</sup>	P	P
	C.9.b. Sales and rental of motorized vehicles	X	25	P	P	P
	C.9.c. Vehicle repair, major automotive	X	25	P	P	P
	C.10. Sales and services, general <sup>2</sup>					
	C.10.a. Retail sales and services, general <sup>2</sup>	10	25	P	P	P
	C.10.b. Retail sales, multipurpose	10 <sup>11</sup>	50	P	P	P
	C.11. Sales and services, heavy					
	C.11.a. Commercial sales, heavy	X	X	25	P	P
	C.11.b. Commercial services, heavy	X	X	X	P	P
	C.11.c. Retail sales, major durables	10	25	P	P	P
	C.11.d. Retail sales and services, non-household	10	25	P	P	P
	C.11.e. Wholesale showrooms	X	X	25	25	P
	C.12. Sales and services, marine					
	C.12.a. Marine service stations	10	25	P	P	P
	C.12.b. Sales and rental of large boats	X	25	P	P	P

<b>Table A for 23.47A.004 Uses in Commercial zones</b>						
		<b>Permitted and prohibited uses by zone <sup>1</sup></b>				
<b>Uses</b>		<b>NC1</b>	<b>NC2</b>	<b>NC3</b>	<b>C1</b>	<b>C2</b>
	C.12.c. Sales and rental of small boats, boat parts and accessories	10	25	P	P	P
	C.12.d. Vessel repair, major	X	X	X	S	S
	C.12.e. Vessel repair, minor	10	25	P	P	P
D. HIGH-IMPACT USES		X	X	X	X	X
E. <u>HUMAN SERVICE AND ((INSTITUTIONS)) INSTITUTIONAL USES</u>						
	E.1. <u>Human service and ((Institutions)) Institutional use</u> not listed below	10	25	P	P	P
	E.2. Major institutions subject to the provisions of Chapter 23.69	P	P	P	P	P
	E.3. Religious facilities	P	P	P	P	P
	E.4. Schools, elementary or secondary	P	P	P	P	P
	E.5. Child care centers	P	P	P	P	P
F. LIVE-WORK UNITS <sup>12</sup>		P	P	P	P	P
G. MANUFACTURING USES						
	G.1. Manufacturing, light <sup>2</sup>	X	10	25	P	P
	G.2. Manufacturing, general	X	X	X	P	P
	G.3. Manufacturing, heavy	X	X	X	X	X
H. PARKS AND OPEN SPACE		P	P	P	P	P

<b>Table A for 23.47A.004 Uses in Commercial zones</b>						
		<b>Permitted and prohibited uses by zone <sup>1</sup></b>				
<b>Uses</b>		<b>NC1</b>	<b>NC2</b>	<b>NC3</b>	<b>C1</b>	<b>C2</b>
I. PUBLIC FACILITIES						
	I.1. Jails					
	I.1.a. Youth Service Centers	X	X	P <sup>13</sup>	X	X
	I.1.b. All other jails	X	X	X	X	X
	I.2. Work-release centers	CCU-10	CCU-25	CCU	CCU	CCU
J. RESIDENTIAL USES <sup>14</sup>		<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>CU</u> <sup>15</sup>
	<del>((J.1. Residential uses not listed below</del>	<del>P</del>	<del>P</del>	<del>P</del>	<del>P</del>	<del>CU</del> <sup>15</sup>
	<del>J.2. Caretaker's quarters</del>	<del>P</del>	<del>P</del>	<del>P</del>	<del>P</del>	<del>P</del>
	<del>J.3. Congregate residence</del>	<del>P</del>	<del>P</del>	<del>P</del>	<del>P</del>	<del>CU</del> <sup>15</sup>
	<del>J.4. Low-income housing</del>	<del>P</del>	<del>P</del>	<del>P</del>	<del>P</del>	<del>P))</del>
K. STORAGE USES						
	K.1. Mini-warehouses	X	X	25	40	P
	K.2. Storage, outdoor	X	X	X <sup>16</sup>	P	P
	K.3. Warehouses	X	X	25	25	P
L. TRANSPORTATION FACILITIES						
	L.1. Cargo terminals	X	X	X	S	P
	L.2. Parking and moorage					

<b>Table A for 23.47A.004 Uses in Commercial zones</b>						
		<b>Permitted and prohibited uses by zone <sup>1</sup></b>				
<b>Uses</b>		<b>NC1</b>	<b>NC2</b>	<b>NC3</b>	<b>C1</b>	<b>C2</b>
	L.2.a. Boat moorage	S	S	S	S	S
	L.2.b. Dry boat storage	X	25	P	P	P
	L.2.c. Parking, flexible-use <sup>17</sup>	X	25	P	P	P
	L.2.d.i. Park and ride facilities on surface parking lots <sup>18</sup>	X	CU-25	CU	CU	CU
	L.2.d.ii. Park and ride facilities in parking garages	X	P <sup>19</sup>	P <sup>19</sup>	P <sup>19</sup>	P <sup>19</sup>
	L.2.e. Towing services	X	X	X	P	P
	L.3. Passenger terminals	X	X	25	P	P
	L.4. Rail transit facilities	P	P	P	P	P
	L.5. Transportation facilities, air					
	L.5.a. Airports (land-based)	X	X	X	X	X
	L.5.b. Airports (water-based)	X	X	X	X	S
	L.5.c. Heliports	X	X	X	X	X
	L.5.d. Helistops	X	X	CCU	CCU	CU
	L.6. Vehicle storage and maintenance					
	L.6.a. Bus bases	X	X	X	CCU	CCU
	L.6.b. Railroad switchyards	X	X	X	X	X

<b>Table A for 23.47A.004 Uses in Commercial zones</b>						
		<b>Permitted and prohibited uses by zone <sup>1</sup></b>				
<b>Uses</b>		<b>NC1</b>	<b>NC2</b>	<b>NC3</b>	<b>C1</b>	<b>C2</b>
	L.6.c. Railroad switchyards with a mechanized hump	X	X	X	X	X
	L.6.d. Transportation services, personal	X	X	P	P	P
<b>M. UTILITY USES</b>						
	M.1. Communication utilities, major <sup>20</sup>	X	X	X	CCU	CCU
	M.2. Communication utilities, minor <sup>20</sup>	P	P	P	P	P
	M.3. Power plants	X	X	X	X	X
	M.4. Recycling	X	X	X	P	P/CU <sup>21</sup>
	M.5. Sewage treatment plants	X	X	X	X	X
	M.6. Solid waste management	X	X	X	X	X
	M.7. Utility services uses	10	25	P	P	P
<p><del>((KEY))</del> <u>Key to Table A for 23.47A.004</u>  A = Permitted as an accessory use only  CU = Administrative Conditional Use (business establishment limited to the multiple of 1,000 square feet of any number following a hyphen, pursuant to Section 23.47A.010)  CCU = Council Conditional Use (business establishment limited to the multiple of 1,000 square feet of any number following a hyphen, pursuant to Section 23.47A.010)  P = Permitted  S = Permitted in shoreline areas only  X = Prohibited  CU-25 = Conditionally permitted; use is limited to 25,000 square feet, pursuant to Section 23.47A.010  10 = Permitted, business establishments limited to 10,000 square feet, pursuant to Section 23.47A.010  20 = Permitted, business establishments limited to 20,000 square feet, pursuant to Section 23.47A.010</p>						



<b>Table A for 23.47A.004 Uses in Commercial zones</b>					
	<b>Permitted and prohibited uses by zone <sup>1</sup></b>				
<b>Uses</b>	<b>NC1</b>	<b>NC2</b>	<b>NC3</b>	<b>C1</b>	<b>C2</b>
25 = Permitted, business establishments limited to 25,000 square feet, pursuant to Section 23.47A.010 35 = Permitted, business establishments limited to 35,000 square feet, pursuant to Section 23.47A.010 40 = Permitted, business establishments limited to 40,000 square feet, pursuant to Section 23.47A.010 50 = Permitted, business establishments limited to 50,000 square feet, pursuant to Section 23.47A.010					
<p>Footnotes to Table A for 23.47A.004</p> <p><sup>1</sup> In pedestrian-designated zones, a portion of the street-level street-facing facade of a structure along a designated principal pedestrian street may be limited to certain uses as provided in subsection 23.47A.005.D. In pedestrian-designated zones, drive-in lanes are prohibited (Section 23.47A.028).</p> <p><sup>2</sup> In addition to the provisions in this Chapter 23.47A, uses that entail major cannabis activity are subject to the requirements of Section 23.42.058.</p> <p><sup>3</sup> For commercial uses with drive-in lanes, see Section 23.47A.028.</p> <p><sup>4</sup> Subject to subsection 23.47A.004.H.</p> <p><sup>5</sup> Permitted at Seattle Center.</p> <p><sup>6</sup> Bed and breakfasts in existing structures are permitted outright with no maximum size limit.</p> <p><sup>7</sup> Medical services over 10,000 square feet within 2,500 feet of a medical Major Institution Overlay boundary require conditional use approval, unless they are included in a Major Institution Master Plan or dedicated to veterinary services.</p> <p><sup>8</sup> Medical service uses that are located in an urban center or urban village, which are in operation at such location before August 1, 2015, and that routinely provide medical services on a reduced fee basis to individuals or families having incomes at or below 200 percent of the poverty guidelines updated periodically in the Federal Register by the U.S. Department of Health and Human Services under the authority of 42 USC 9902(2), are limited to 20,000 square feet. This provision does not apply to medical service uses that are subject to a Major Institution Master Plan.</p> <p><sup>9</sup> Office uses in C1 and C2 zones are permitted up to the greater of 1 FAR or 35,000 square feet as provided in subsection 23.47A.010.D. Office uses in C1 and C2 zones are permitted outright with no maximum size limit if they meet the standards identified in subsection 23.47A.010.D.</p>					

<b>Table A for 23.47A.004 Uses in Commercial zones</b>					
	<b>Permitted and prohibited uses by zone <sup>1</sup></b>				
<b>Uses</b>	<b>NC1</b>	<b>NC2</b>	<b>NC3</b>	<b>C1</b>	<b>C2</b>
<p><sup>10</sup> Gas stations and other businesses with drive-in lanes are not permitted in pedestrian-designated zones (Section 23.47A.028). Elsewhere in NC zones, establishing a gas station may require a demonstration regarding impacts under Section 23.47A.028.</p> <p><sup>11</sup> Grocery stores meeting the conditions of subsection 23.47A.010.E are permitted up to 23,000 square feet in size.</p> <p><sup>12</sup> Subject to subsection 23.47A.004.G.</p> <p><sup>13</sup> Permitted pursuant to subsection 23.47A.004.D.7.</p> <p><sup>14</sup> Residential uses may be limited to 20 percent of a street-level street-facing facade pursuant to subsection 23.47A.005.C.</p> <p><sup>15</sup> Residential uses are conditional uses in C2 zones (<del>(under)</del>) <u>subject to</u> subsection 23.47A.006.A.3, except that low-income housing is allowed outright or as otherwise provided (<del>(above in Table A for 23.47A.004 or)</del>) in subsection 23.47A.006.A.3.</p> <p><sup>16</sup> Permitted at Seattle Center; see Section 23.47A.011.</p> <p><sup>17</sup> Flexible-use parking is subject to Section 23.54.026. In pedestrian-designated zones, surface parking is prohibited adjacent to principal pedestrian streets pursuant to subsection 23.47A.032.B.2.</p> <p><sup>18</sup> Permitted as surface parking only on surface parking lots existing as of January 1, 2017. In pedestrian-designated zones, surface parking is prohibited adjacent to principal pedestrian streets pursuant to subsection 23.47A.032.B.2.</p> <p><sup>19</sup> Permitted outright, except prohibited in the SAOD.</p> <p><sup>20</sup> See Chapter 23.57, Communications regulations, for regulation of communication utilities.</p> <p><sup>21</sup> A recycling use that is located on the same development site as a solid waste transfer station may be permitted by administrative conditional use, subject to the requirements of subsection 23.47A.006.A.7.</p>					

Section 33. Subsection 23.53.006.F of the Seattle Municipal Code, which section was last amended by Ordinance 127099, is amended as follows:

## 23.53.006 Pedestrian access and circulation

*Note: This section is being amended to remove references to single-family dwelling units and to implement state requirements limited street improvements for accessory dwelling units.*

\* \* \*

F. Exceptions. The following exceptions to pedestrian access and circulation requirements and standards apply:

1. Projects exempt from requirements. Pedestrian access and circulation improvements are not required for the following types of projects:

- a. Change of use;
- b. Alterations to existing structures;
- c. Additions to existing structures that are exempt from environmental review;
- d. Construction of a detached structure that does not contain a dwelling unit and is accessory to ((a single-family)) an existing dwelling unit in any zone, if the property owner enters into a no-protest agreement, as authorized by chapter 35.43 RCW, to future pedestrian access and circulation improvements and that agreement is recorded with the King County Recorder;
- e. Construction of ~~((a single-family))~~ one dwelling unit on a lot in any zone, if the property owner enters into a no-protest agreement, as authorized by chapter 35.43 RCW, to future pedestrian access and circulation improvements and that agreement is recorded with the King County Recorder, and if at least one of the following conditions is met:
  - 1) The lot is on a block front where there are no existing pedestrian access and circulation improvements within 100 feet of the lot; or
  - 2) Construction of pedestrian access and circulation improvements is not necessary because, for example, the existing right-of-way has suitable width and surface treatment for pedestrian use; or the existing right-of-way has a limited amount of existing and potential vehicular traffic; or the Director anticipates limited, if any, additional development near the lot because the development near the lot is at or near zoned capacity under current zoning designations;
- f. Construction of accessory dwelling units;

((f)) g. Expansions of surface parking, outdoor storage, outdoor sales and outdoor display of rental equipment of less than 20 percent of the parking, storage, sales or display area, or number of parking spaces;

((g)) h. In ~~((MML zone))~~ IG1 and IG2 zones, and on lots in IB zones that are not directly across the street from or abutting a lot in a residential or commercial zone, the addition of:

- 1) Fewer than ten artist's studio dwellings;
- 2) Less than 750 square feet of gross floor area of major and minor vehicle repair uses and multipurpose retail sales; and
- 3) Less than 4,000 square feet of gross floor area of non-residential uses not listed in subsection ~~((23.53.006.F.1.g.2))~~ 23.53.006.F.1.h.2; and

((h)) i. Construction of a new ~~(non-residential))~~ nonresidential structure of up to 4,000 square feet of gross floor area if the structure is at least 50 feet from any lot line abutting an existing street that does not have pedestrian access and circulation improvements.

2. Waiver or modification of pedestrian access and circulation requirements. The Director, in consultation with the Director of Transportation, may waive or modify pedestrian access and circulation requirements when one or more of the following conditions are met. The waiver or modification shall provide the minimum relief necessary to accommodate site conditions while maximizing pedestrian access and circulation.

a. Location in an environmentally critical area or buffer makes installation of a sidewalk, curb, and/or curb ramp structurally impracticable or technically infeasible;

b. The existence of a bridge, viaduct, or structure such as a substantial retaining wall in proximity to the project site makes installation of a sidewalk, curb, and/or curb ramp structurally impracticable or technically infeasible;

c. Sidewalk, curb, and/or curb ramp construction would result in undesirable disruption of existing drainage patterns, or disturbance to or removal of natural features such as significant trees or other valuable and character-defining mature vegetation; or

d. Sidewalk, curb, and/or curb ramp construction would preclude vehicular access to the lot, for example on project sites where topography would render driveway access in excess of the maximum 15 percent slope.

3. Notwithstanding any provision of Section 23.76.026, the applicant for a Master Use Permit or a building permit to which the Land Use Code in effect prior to October 30, 2009 applies may, by written election, use the exemptions in subsections 23.53.006.F.1 and 23.53.006.F.2.

Section 34. Section 23.53.025 of the Seattle Municipal Code, last amended by Ordinance 126682, is amended as follows:

#### 23.53.025 Access easement standards

*Note: This section is being edited to meet new state requirement implemented by HB 1110 to treat detached units similarly to attached units.*

If access by easement has been approved by the Director, the easement shall meet the following standards. Surfacing of easements, pedestrian walkways required within easements, and turnaround dimensions shall meet the requirements of the Right-of-Way Improvements Manual.

A. Vehicle access easements serving one or two ~~((single-family))~~ dwelling units ~~((or one multifamily residential use with a maximum of two units))~~ shall meet the following standards:

1. Easement width shall be a minimum of 10 feet.
2. No maximum easement length shall be set. If easement length is more than 150 feet, a vehicle turnaround shall be provided.
3. ~~((Curbcut))~~ Curb cut width from the easement to the street shall be the minimum necessary for safety and access.

B. Vehicle access easements serving at least three but fewer than ~~((five single-family))~~ ten dwelling units shall meet the following standards:

1. Easement width shall be a minimum of 10 feet.
2. The easement shall provide a hard-surfaced roadway at least 10 feet wide.

3. No maximum easement length shall be set. If the easement is over 600 feet long, a fire hydrant may be required by the Director.

4. A turnaround shall be provided unless the easement extends from street to street.

5. ~~((Curbcut))~~ Curb cut width from the easement to the street shall be the minimum necessary for safety and access.

C. ~~((Vehicle access easements serving at least five but fewer than ten single-family dwelling units, or at least three but fewer than ten multifamily dwelling units~~

1. ~~Easement width, surfaced width, length, turn around, and curbcut width shall be as required in subsection 23.53.025.B.~~

2. ~~No single-family structure shall be closer than 5 feet to the easement, except that structural features allowed to extend into required yards under subsection 23.44.014.C.6 are also allowed to extend into the 5-foot setback from an easement.~~

D.) ~~Vehicle~~ ~~((Access Easements Serving Ten))~~ access easements serving ten or more ~~((Residential))~~ dwelling ~~((Units.))~~ units shall meet the following standards:

1. Easement width shall be a minimum of 32 feet;

2. The easement shall provide a surfaced roadway at least 24 feet wide, except in the MPC-YT zone, where the minimum surfaced roadway width is 20 feet;

3. No maximum length shall be set. If the easement is over 600 feet long, a fire hydrant may be required by the Director;

4. A turnaround shall be provided unless the easement extends from street to street;

5. ~~((Curbcut))~~ Curb cut width from the easement to the street shall be the minimum necessary for safety access;

6. No ~~((single-family structure))~~ detached dwelling unit shall be located closer than ~~((10))~~ 5 feet to an easement, except that architectural features such as cornices, eaves, gutters, roofs, fireplaces, chimneys, and other similar features shall not be located closer than 3 feet to a required easement;

7. One pedestrian walkway shall be provided, extending the length of the easement.

E. ~~(Vehicle Access Easements Serving Nonresidential or Live-work Uses.~~

1.) For nonresidential or live-work uses providing fewer than ten ~~((10))~~ parking spaces, the easement shall meet the requirements of subsection ~~((C))~~ 23.53.025.C.

~~((2))~~ E. For nonresidential or live-work uses providing ten ~~((10))~~ or more parking spaces, the easement shall meet the requirements of subsection ~~((D))~~ 23.53.025.D.

~~((F))~~ G. Pedestrian ~~((Access Easements))~~ access easements. Where a lot proposed for a residential use abuts an alley but does not abut a street and the provisions of the zone require access by vehicles from the alley, or where the alley access is an exercised option, an easement providing pedestrian access to a street from the lot shall be provided meeting the following standards:

1. Easement width shall be a minimum of five ~~((5))~~ feet;
2. Easements serving one ~~((1))~~ or two ~~((2))~~ dwelling units shall provide a paved pedestrian walkway at least ~~((three-))~~3(~~(+))~~ feet wide;
3. Easements serving three ~~((3))~~ or more dwelling units shall provide a paved pedestrian walkway at least ~~((five-))~~5(~~(+))~~ feet wide;
4. Easements over ~~((one hundred-))~~100(~~(+))~~ feet in length shall provide lighting at intervals not to exceed ~~((fifty-))~~50(~~(+))~~ feet. Lighting placement shall not exceed ~~((fifteen-))~~15(~~(+))~~ feet in height;
5. Pedestrian access easements shall not exceed ~~((two hundred-))~~200(~~(+))~~ feet in length.

~~((G))~~ H. Vertical ~~((Clearance Above Easements))~~ clearance above easements. When an easement serves fewer than ten ~~((10))~~ residential units and crosses a residentially zoned lot, portions of structures may be built over the easement provided that a minimum vertical clearance of ~~((sixteen and one half (16 1/2)))~~ 16.5 feet is maintained above the surface of the easement roadway and a minimum turning path radius in accordance with Section 23.54.030.D ~~((C))~~ is maintained. ~~((See))~~ Exhibit A for 23.53.025 ~~((A)).~~

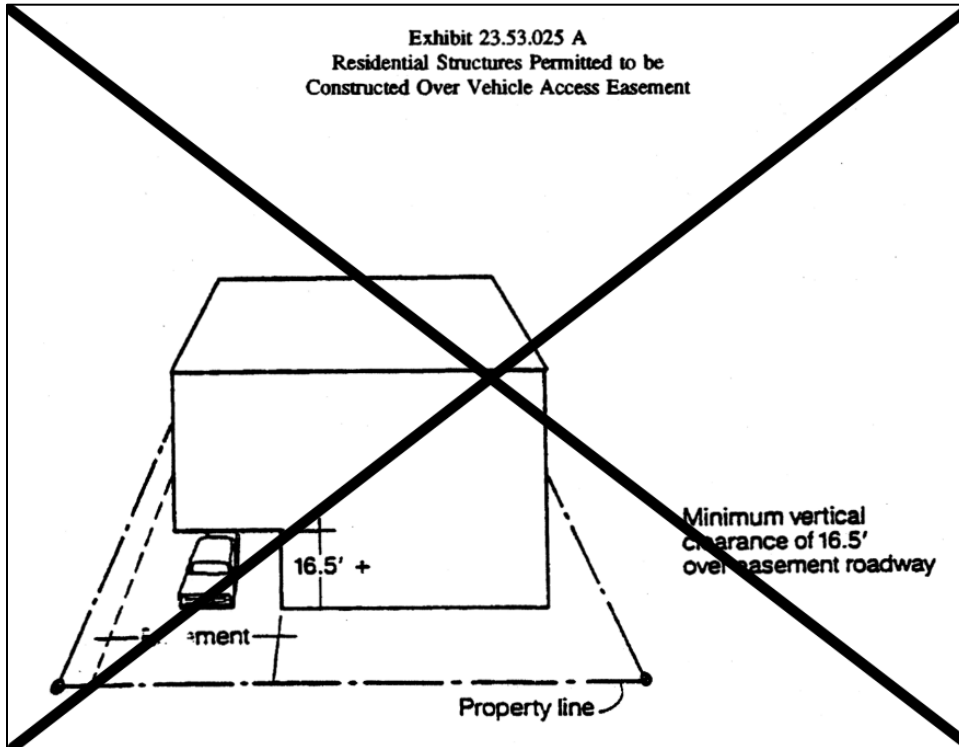
~~((H))~~ I. Exceptions ~~((From Access Easement Standards))~~ from access easement standards. The Director, in consultation with the Fire Chief, may modify the requirements for easement width and surfacing for properties located in environmentally critical areas or their buffers when it is determined that:

1. Such modification(s) would reduce adverse effects to identified environmentally critical areas or buffers; and

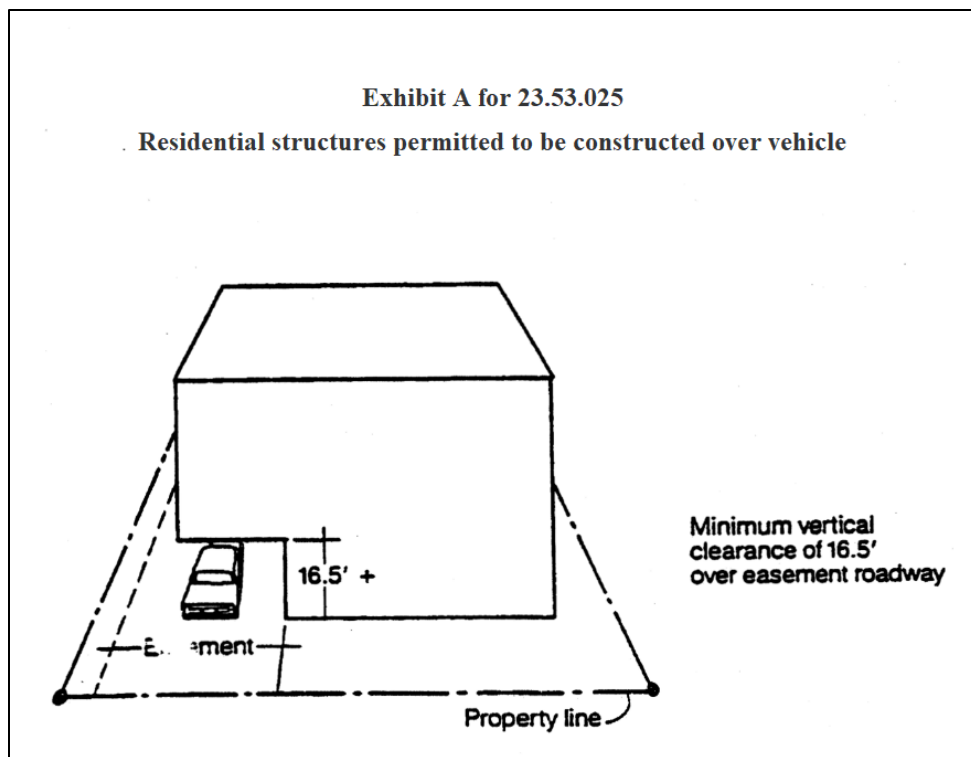
2. Adequate access and provisions for fire protection can be provided for structures served by the easement.

**Exhibit A for 23.53.025**

**Residential structures permitted to be constructed over vehicle access easement**







Section 35. Section 23.54.015 of the Seattle Municipal Code, which was last amended by Ordinance 127099, is amended as follows:

**23.54.015 Required vehicular parking and maximum vehicular parking limits**

*Note: This section is being updated to implement exempt areas near light rail and bus rapid transit stops from parking requirements, reduce the parking requirements for residential use in other areas, and reflect updated definitions for residential uses. Some of these changes are required under HB 1110 but other changes being proposed to provide flexibility to accommodate different housing types.*

A. Required parking. The minimum number of off-street motor vehicle parking spaces required for specific uses is set forth in Table A for 23.54.015 for (~~non-residential~~) nonresidential uses other than institutional uses, Table B for 23.54.015 for residential uses, and Table C for 23.54.015 for institutional uses, except as otherwise provided in this Chapter 23.54. Required parking is based upon gross floor area of a use within a structure minus gross floor area in parking uses, and the square footage of a use when located outside of an enclosed structure, or as otherwise specified. Maximum parking limits for specific uses and specific areas are set forth in subsection 23.54.015.C. Exceptions to motor vehicle parking requirements set forth in this Section 23.54.015 are provided in: subsections 23.54.015.B and 23.54.015.C; and in Section 23.54.020 unless otherwise specified. This Chapter 23.54 does not apply to parking for construction activity, which is regulated by Section 23.42.044.

## B. Required parking for specific zones and areas

1. Parking in downtown zones is regulated by Chapters 23.49 and 23.66, and not by this Section 23.54.015.

2. Parking in the MPC-YT zone is regulated by Section 23.75.180 and not by this Section 23.54.015.

3. Parking for major institution uses in the Major Institution Overlay District is regulated by Sections 23.54.015 and 23.54.016.

4. The Director shall adopt by rule a map of frequent transit service areas based on proximity to a transit station or stop served by a frequent transit route. The determination whether a proposed development site is in a scheduled frequent transit service area shall be based on the frequent transit service area map adopted by rule that exists on the date a project vests according to the standards of Section 23.76.026, provided that a rule that takes effect on a date after the project vests may be applied to determine whether the site is in a scheduled frequent transit service area, at the election of the project applicant in accordance with subsection 23.76.026.E.

## C. Maximum parking limits for specific zones or areas

1. In the Stadium Transition Area Overlay District certain uses are subject to a maximum parking ratio pursuant to subsection 23.74.010.A.1.b. When there are multiple uses on a lot, the total parking requirement for all uses subject to a maximum ratio cannot exceed the aggregate maximum for those uses under Section 23.74.010.

2. In all commercial zones, except C2 zones outside of urban villages, no more than 145 spaces per lot may be provided as surface parking or as flexible-use parking.

3. In all multifamily zones, commercial uses are limited to no more than ten parking spaces per business establishment.

4. In the Northgate Overlay District, the Director may permit parking to exceed applicable maximum parking limits as a Type I decision pursuant to Chapter 23.76 if:

a. The parking is provided in a structure according to a joint-use parking agreement with King County Metro Transit; and

b. It can be demonstrated to the satisfaction of the Director through a parking demand study that the spaces are only needed to meet evening and weekend demand or as overflow on less than ten percent of the weekdays in a year, and the spaces shall otherwise be available for daytime use by the general public.

5. Notwithstanding the minimum parking requirements set out in Table A for 23.54.015, in the Industry and Innovation zones, the maximum parking ratio for all uses is one space per 1,000 square feet of gross floor area.

D. Parking waivers for (~~non-residential~~) nonresidential uses

1. In all commercial zones, no parking is required for the first 1,500 square feet of each business establishment or the first 15 fixed seats for motion picture and performing arts theaters.

2. In all other zones, no parking is required for the first 2,500 square feet of gross floor area of (~~non-residential~~) nonresidential uses in a structure, except for the following:

a. Structures or portions of structures occupied by restaurants with drive-in lanes,

b. Motion picture theaters,

c. Offices, or

d. Institution uses, including Major Institution uses. When two or more uses with different parking ratios occupy a structure, the 2,500 square foot waiver is prorated based on the area occupied by the (~~non-residential~~) nonresidential uses for which the parking waiver is permitted.

E. Fleet vehicles. Notwithstanding any other provisions of this (~~section~~) Section 23.54.015, off-street parking shall be provided for all fleet vehicles and those parking spaces will not be counted toward the parking requirements of Table A for 23.54.015, Table B for 23.54.015, or Table C for 23.54.015.

F. Use and reuse of schools. For non-school uses permitted to locate in a former or existing public school, parking requirements will be determined by school use pursuant to criteria adopted according to Chapter 23.78, Establishment of Criteria for Joint Use or Reuse of Schools.

G. New (~~non-residential~~) nonresidential uses in existing structures in commercial and industrial zones. Up to 20 required parking spaces are waived for a new (~~non-residential~~) nonresidential use established in an existing structure or the expansion of an existing (~~non-residential~~) nonresidential use entirely within an existing structure. Existing required parking shall remain. For purposes of this Section 23.54.015, "existing structure" means a structure that was established under permit, or for which a building permit has been granted and has not expired, at least two years prior to the application to establish the new use or expand the use. Parking spaces required for loading and unloading of passengers are not eligible for the waiver under this subsection 23.54.015.G.

H. Uses not shown on parking tables. In the case of a use not shown on Table A for 23.54.015, Table B for 23.54.015, or Table C for 23.54.015, the requirements for off-street parking will be determined by the Director based on the requirements for the most comparable use. Where, in the judgment of the Director, none of the uses on Table A for 23.54.015, Table B for 23.54.015, and Table C for 23.54.015 are comparable to a proposed use, the Director may base his or her determination as to the amount of parking required for the proposed use on detailed information provided by the applicant. The information required may include, but not be limited to, a description of the physical structure(s), identification of potential users, and analysis of likely parking demand.

I. Uses in multiple parking table categories. If an entire use or structure, or the same portion of a use or structure, falls under more than one category in Table A for 23.54.015, Table B for 23.54.015, or Table C for 23.54.015 then, unless otherwise specified, the category requiring the smallest number of parking spaces applies except as expressly set forth on such tables.

J. Existing parking deficits. Existing legal parking deficits of legally established uses are allowed to continue even if a change of use occurs. This subsection 23.54.015.J will not be construed to permit a parking deficit caused by the failure to satisfy conditions of a reduced parking requirement for any use or structure.

<b>Table A for 23.54.015 Required parking for ((non-residential)) <u>nonresidential</u> uses other than institutions</b>		
<b>Use</b>		<b>Minimum parking required</b>
<b>I. General ((non-residential)) <u>nonresidential</u> uses (other than institutions)</b>		
A.	AGRICULTURAL USES <sup>1</sup>	1 space for each 2,000 square feet
B.	COMMERCIAL USES	
	B.1. Animal shelters and kennels	1 space for each 2,000 square feet
	B.2. Eating and drinking establishments	1 space for each 250 square feet
	B.3. Entertainment uses, general, except as noted below <sup>2</sup>	For public assembly areas: 1 space for each 8 fixed seats, or 1 space for each 100

**Table A for 23.54.015****Required parking for ((non-residential)) nonresidential uses other than institutions**

Use			Minimum parking required
			square feet of public assembly area not containing fixed seats
	B.3.a.	Adult cabarets	1 space for each 250 square feet
	B.3.b.	Sports and recreation uses <sup>3</sup>	1 space for each 500 square feet
	B.4.	Food processing and craft work	1 space for each 2,000 square feet
	B.5.	Laboratories, research and development	1 space for each 1,500 square feet
	B.6.	Lodging uses	1 space for each 4 rooms; For bed and breakfast facilities in neighborhood residential and multifamily zones, 1 space for each dwelling unit, plus 1 space for each 2 guest rooms
	B.7.	Medical services	1 space for each 500 square feet
	B.8.	Offices	1 space for each 1,000 square feet
	B.9.	Sales and services, automotive	1 space for each 2,000 square feet
	B.10.	Sales and services, general, except as noted below	1 space for each 500 square feet
	B.10.a.	Pet daycare centers <sup>4</sup>	1 space for each 10 animals or 1 space for each staff member, whichever is greater, plus 1 loading and unloading space for each 20 animals
	B.11.	Sales and services, heavy	1 space for each 2,000 square feet

**Table A for 23.54.015****Required parking for (~~non-residential~~) nonresidential uses other than institutions**

Use			Minimum parking required
	B.12.	Sales and services, marine	1 space for each 2,000 square feet
C.	HIGH IMPACT USES		1 space for each 2,000 square feet
D.	LIVE-WORK UNITS		0 spaces for units with 1,500 square feet or less; 1 space for each unit greater than 1,500 square feet; 1 space for each unit greater than 2,500 square feet, plus the parking that would be required for any nonresidential activity classified as a principal use
E.	MANUFACTURING USES		1 space for each 2,000 square feet
F.	STORAGE USES		1 space for each 2,000 square feet
G.	TRANSPORTATION FACILITIES		
	G.1.	Cargo terminals	1 space for each 2,000 square feet
	G.2.	Parking and moorage	
		G.2.a.	Flexible-use parking None
		G.2.b.	Towing services None
		G.2.c.	Boat moorage 1 space for each 2 berths
		G.2.d.	Dry storage of boats 1 space for each 2,000 square feet
	G.3.	Passenger terminals	1 space for each 100 square feet of waiting area
	G.4.	Rail transit facilities	None

**Table A for 23.54.015**

**Required parking for ~~((non-residential))~~ nonresidential uses other than institutions**

Use		Minimum parking required
G.5.	Transportation facilities, air	1 space for each 100 square feet of waiting area
G.6.	Vehicle storage and maintenance uses	1 space for each 2,000 square feet
H.	UTILITIES	1 space for each 2,000 square feet

**II. ~~((Non-residential))~~ Nonresidential use requirements for specific areas**

I.	<del>((Non-residential))</del> <u>Nonresidential</u> uses in urban centers or the Station Area Overlay District <sup>5</sup>	No minimum requirement
J.	<del>((Non-residential))</del> <u>Nonresidential</u> uses in urban villages that are not within an urban center or the Station Area Overlay District, if the <del>((non-residential))</del> <u>nonresidential</u> use is located within a frequent transit service area <sup>5</sup>	No minimum requirement
K.	<del>((Non-residential))</del> <u>Nonresidential</u> uses permitted in MR and HR zones pursuant to Section 23.45.504	No minimum requirement
L.	<del>((Non-residential))</del> <u>Nonresidential</u> uses permitted in II zones	No minimum requirement

Footnotes for Table A for 23.54.015

<sup>1</sup> No parking is required for urban farms or community gardens in residential zones.

<sup>2</sup> Required parking for spectator sports facilities or exhibition halls must be available when the facility or exhibition hall is in use. A facility shall be considered to be "in use" during the period beginning three hours before an event is scheduled to begin and ending one hour after a scheduled event is expected to end. For sports events of

**Table A for 23.54.015**

**Required parking for ~~((non-residential))~~ nonresidential uses other than institutions**

**Use**

**Minimum parking required**

variable or uncertain duration, the expected event length shall be the average length of the events of the same type for which the most recent data are available, provided it is within the past five years. During an inaugural season, or for nonrecurring events, the best available good faith estimate of event duration will be used. A facility will not be deemed to be "in use" by virtue of the fact that administrative or maintenance personnel are present. The Director may reduce the required parking for any event when projected attendance for a spectator sports facility is certified to be 50 percent or less of the facility's seating capacity, to an amount not less than that required for the certified projected attendance, at the rate of one space for each ten fixed seats of certified projected attendance. An application for reduction and the certification shall be submitted to the Director at least 15 days prior to the event. When the event is one of a series of similar events, such certification may be submitted for the entire series 15 days prior to the first event in the series. If the Director finds that a certification of projected attendance of 50 percent or less of the seating capacity is based on satisfactory evidence such as past attendance at similar events or advance ticket sales, the Director shall, within 15 days of such submittal, notify the facility operator that a reduced parking requirement has been approved, with any conditions deemed appropriate by the Director to ensure adequacy of parking if expected attendance should change. The parking requirement reduction may be applied for only if the goals of the facility's Transportation Management Plan are otherwise being met. The Director may revoke or modify a parking requirement reduction approval during a series, if projected attendance is exceeded.

<sup>3</sup> For indoor sports and recreation uses that exceed 25,000 square feet in size in a Manufacturing Industrial Center, the minimum requirement is ~~((4))~~ one space for each 2,000 square feet.

<sup>4</sup> The amount of required parking is calculated based on the maximum number of staff or animals the center is designed to accommodate.

<sup>5</sup> The general minimum requirements of Part I of Table A for 23.54.015 are superseded to the extent that a use, structure, or development qualifies for either a greater or a lesser minimum parking requirement (which may include no requirement) under any other provision. To the extent that a ~~((non-residential))~~ nonresidential use fits within more than one line in Table A for 23.54.015, the least of the applicable minimum parking requirements applies. The different parking requirements listed for certain categories of ~~((non-residential))~~ nonresidential uses shall not be construed to create separate uses for purposes of any requirements related to establishing or changing a use under this Title 23.



<b>Table B for 23.54.015 Required parking for residential uses</b>		
<b>Use</b>		<b>Minimum parking required</b>
<b>I. General residential uses</b>		
<del>((A.</del>	Adult family homes	<del>1 space for each dwelling unit))</del>
<del>((B))</del> <u>A.</u>	Artist's studio/dwellings <sup>1,2,3</sup>	1 space for each <u>2</u> dwelling units
<del>((C))</del> <u>B.</u>	Assisted living facilities <sup>1,2,3</sup>	1 space for each 4 assisted living units; plus 1 space for each 2 staff members on-site at peak staffing time; plus 1 barrier-free passenger loading and unloading space
<del>((D))</del> <u>C.</u>	Caretaker's quarters <sup>1,2,3</sup>	1 space for each <u>2</u> dwelling units
<del>((E))</del> <u>D.</u>	Congregate residences <sup>1,2,3</sup>	1 space for each 4 sleeping rooms
<del>((F.</del>	Cottage housing developments <sup>-1</sup>	<del>1 space for each dwelling unit</del>
<del>G.</del>	Floating homes	<del>1 space for each dwelling unit))</del>
<del>((H))</del> <u>E.</u>	Mobile home parks <sup>1,2,3</sup>	1 space for each <u>2</u> mobile home lots as defined in Chapter 22.904
<del>((I.</del>	<del>Multifamily residential uses, except as otherwise provided in this Table B for 23.54.015<sup>-1,2</sup></del>	<del>1 space per dwelling unit, or 1 space for each 2 small efficiency dwelling units))</del>
<del>J.</del>	Nursing homes	<del>1 space for each 2 staff doctors; plus 1 additional space for each 3 employees; plus 1 space for each 6 beds))</del>

<b>Table B for 23.54.015 Required parking for residential uses</b>		
<b>Use</b>		<b>Minimum parking required</b>
<del>((K))E.</del>	<del>((Single-family dwelling units)) Housing<sup>1, 2, 3, 4</sup></del>	1 space for each <u>2</u> dwelling units
<b>II. Residential use requirements for specific areas</b>		
<del>((L)) G.</del>	All residential uses within urban centers or within the Station Area Overlay District <sup>2</sup>	No minimum requirement
<del>((M)) H.</del>	All residential uses <del>((in commercial, RSL, and multifamily zones))</del> within urban villages that are not within urban center or the Station Area Overlay District if the residential use is located within a frequent transit service area <u>or within ½ mile of a major transit stop</u> <sup>2((4))</sup>	No minimum requirement
<del>I.</del>	<u>All residential uses within ½ mile of a major transit stop</u> <sup>2</sup>	<u>No minimum requirement</u>
<del>((N.</del>	<del>Multifamily residential uses within the University of Washington parking impact area shown on Map A for 23.54.015-<sup>2</sup></del>	<del>1 space per dwelling unit for dwelling units with fewer than 2 bedrooms; plus 1.5 spaces per dwelling units with 2 or more bedrooms; plus 0.25 spaces per bedroom for dwelling units with 3 or more bedrooms))</del>
<del>O.</del>	<del>Multifamily dwelling units, within the Alki area shown on Map B for 23.54.015-<sup>2</sup></del>	<del>1.5 spaces for each dwelling unit</del>

**Table B for 23.54.015  
Required parking for residential uses**

Use	Minimum parking required
P. Congregate residences located within one-half mile walking distance of a major transit stop	No minimum requirement))

Footnotes to Table B for 23.54.015

<sup>1</sup> For each moderate-income unit and each low-income unit, no minimum amount of parking is required.

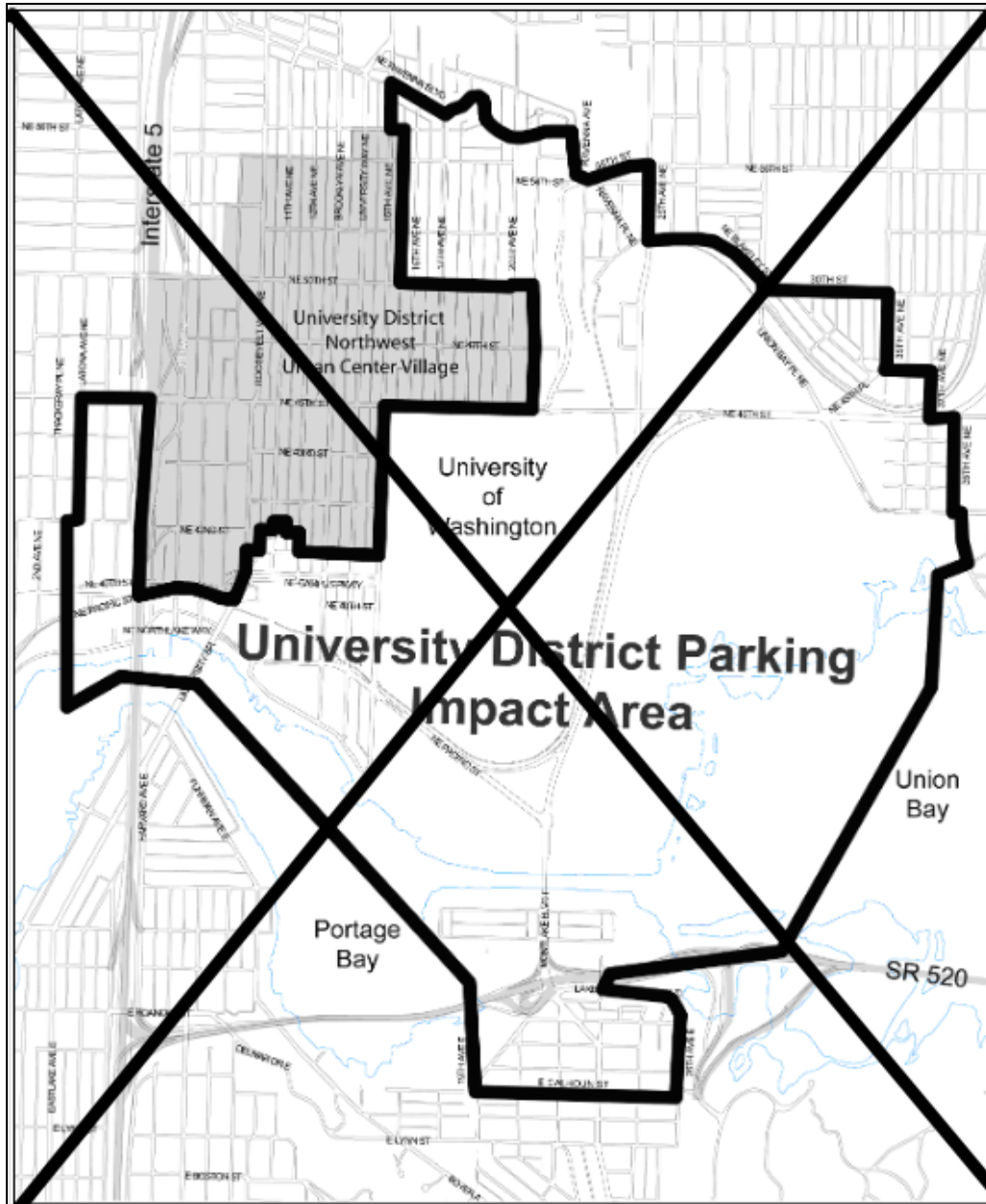
<sup>2</sup> The minimum amount of parking prescribed by Part I of Table B for 23.54.015 does not apply if a use, structure, or development qualifies for a ((greater or a)) lesser amount of minimum parking, including no parking, under any other provision of this Section 23.54.015. If more than one provision in this Table B for 23.54.015 is applicable, the provision requiring the least amount of minimum parking applies((, except that if item O in Part II of Table B for 23.54.015 applies, it shall supersede any other requirement in Part I or Part II of this Table B for 23.54.015)).

<sup>3</sup> A reduction or waiving of parking requirements may be permitted if the Director finds that the reduction or waiver is necessary in order to protect a Tier 2 tree as defined in Chapter 25.11.

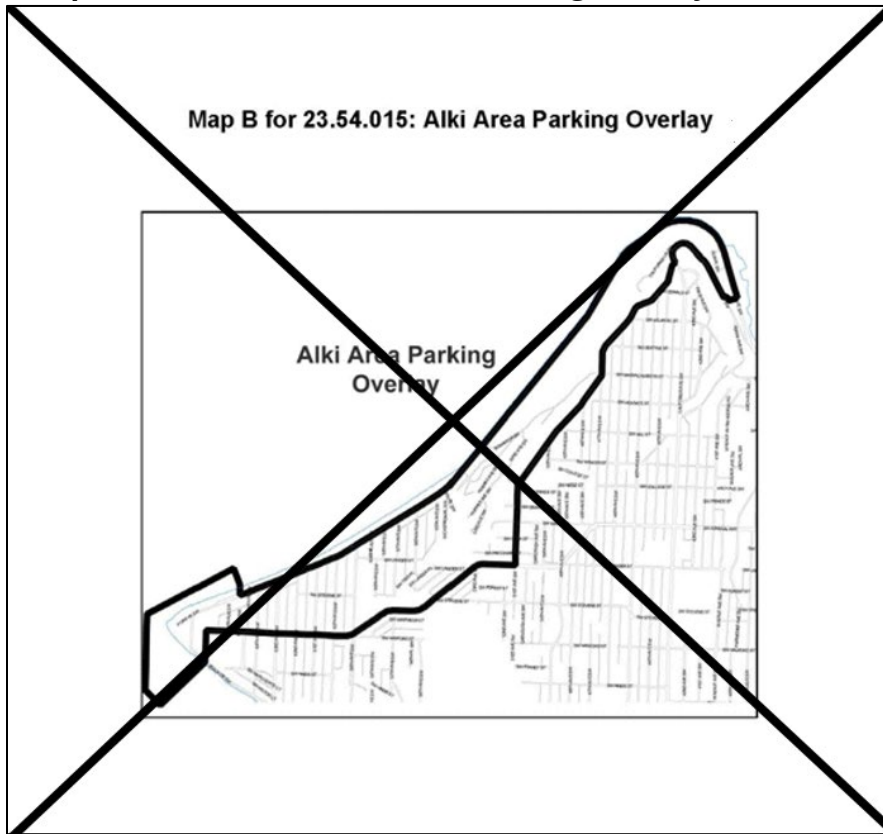
<sup>4</sup> No parking is required for ((single-family residential uses)) accessory dwelling units or for principle dwelling units on lots in any residential zone that are less than 3,000 square feet in size or less than 30 feet in width where access to parking is permitted through a required ((yard or)) setback abutting a street according to the standards of subsections ((23.44.016.B.2)) 23.44.036.D.2, 23.45.536.C.2, or 23.45.536.C.3.

((<sup>4</sup> Except as provided in Footnote 4, the minimum amounts of parking prescribed by Part I of Table B for 23.54.015 apply within 1,320 feet of the Fautleroy Ferry Terminal.))

**((Map A for 23.54.015: University District Parking Impact Area))**



**((Map B for 23.54.015: Alki Area Parking Overlay))**



<b>Table C for 23.54.015 Required parking for public uses and institutions</b>	
<b>Use</b>	<b>Minimum parking required</b>
<b>I. General public uses and institutions</b>	
A. Adult care centers <sup>1, 2, 3</sup>	1 space for each 10 adults (clients) or 1 space for each staff member, whichever is greater; plus 1 loading and unloading space for each 20 adults (clients)

**Table C for 23.54.015  
Required parking for public uses and institutions**

Use		Minimum parking required
B.	Child care centers <sup>2, 3, 4, ((+2)) 5</sup>	1 space for each 10 children or 1 space for each staff member, whichever is greater; plus 1 loading and unloading space for each 20 children
C.	Colleges	A number of spaces equal to 15 percent of the maximum number of students that the facility is designed to accommodate; plus 30 percent of the number of employees the facility is designed to accommodate; plus 1 space for each 100 square feet of spectator assembly area in outdoor spectator sports facilities
D.	Community centers owned and operated by the Seattle Department of Parks and Recreation (SPR) <sup>1, 6</sup>	1 space for each 555 square feet; or for family support centers, 1 space for each 100 square feet
E.	Community clubs, and community centers not owned and operated by SPR <sup>1, ((5)) 7, 8</sup>	1 space for each 80 square feet of floor area of all auditoria and public assembly rooms containing fixed seats; plus 1 space for each 350 square feet of all other indoor areas
F.	Community farms <sup>((5)) 8</sup>	1 space plus 1 space for each 10,000 square feet of site area, or 10 spaces, whichever is less
G.	Hospitals	1 space for each 2 staff doctors; plus 1 additional space for each 5 employees

**Table C for 23.54.015  
Required parking for public uses and institutions**

Use		Minimum parking required
		other than staff doctors; plus 1 space for each 6 beds
H.	Institutes for advanced study, except in <del>((neighborhood residential))</del> <u>Neighborhood Residential</u> zones	1 space for each 1,000 square feet of offices and similar spaces; plus 1 space for each 10 fixed seats in all auditoria and public assembly rooms; or 1 space for each 100 square feet of public assembly area not containing fixed seats
I.	Institutes for advanced study in <del>((neighborhood residential))</del> <u>Neighborhood Residential</u> zones (existing) <sup>1</sup>	3.5 spaces for each 1,000 square feet of office space; plus 10 spaces for each 1,000 square feet of additional building footprint to house and support conference center activities; or 37 spaces for each 1,000 square feet of conference room space, whichever is greater
J.	Libraries <sup>1, ((5)) 8,9</sup>	1 space for each 80 square feet of floor area of all auditoria and public meeting rooms containing fixed seats; plus 1 space for each 500 square feet of floor area of all other areas
K.	Museums <sup>1</sup>	1 space for each 80 square feet of all auditoria and public assembly rooms, not containing fixed seats; plus 1 space for every 10 fixed seats for floor area containing fixed seats; plus 1 space for each 250 square feet of other gross floor area open to the public

**Table C for 23.54.015  
Required parking for public uses and institutions**

Use		Minimum parking required
L.	Private clubs	1 space for each 80 square feet of floor area of all auditoria and public assembly rooms not containing fixed seats; or 1 space for every 8 fixed seats for floor area containing fixed seats; or if no auditorium or assembly room, 1 space for each 350 square feet, excluding ball courts
M.	Religious facilities <sup>1</sup>	1 space for each 80 square feet of all auditoria and public assembly rooms
N.	Schools, private elementary and secondary <sup>1</sup>	1 space for each 80 square feet of all auditoria and public assembly rooms, or if no auditorium or assembly room, 1 space for each staff member
O.	Schools, public elementary and secondary <sup>7, ((9)) 10, 11</sup>	1 space for each 80 square feet of all auditoria or public assembly rooms, or 1 space for every 8 fixed seats in auditoria or public assembly rooms containing fixed seats, for new public schools on a new or existing public school site
P.	Vocational or fine arts schools	1 space for each 2 faculty that the facility is designed to accommodate; plus 1 space for each 2 full-time employees other than faculty that the facility is designed to accommodate; plus 1 space for each 5 students, based on the maximum number of students that the school is designed to accommodate



**Table C for 23.54.015  
Required parking for public uses and institutions**

Use	Minimum parking required
<b>II. General public uses and institutions for specific areas</b>	
Q. General public uses, institutions and Major Institution uses, except hospitals, in urban centers or the Station Area Overlay District <sup>((4+)) 12</sup>	No minimum requirement
R. General public uses and institutions, except hospitals, including institutes for advanced study in <del>((neighborhood residential))</del> <u>Neighborhood Residential</u> zones, within urban villages that are not within the Station Area Overlay District, if the use is located within a frequent transit service area	No minimum requirement

Footnotes to Table C for 23.54.015

<sup>1</sup> When this use is permitted in a ~~((neighborhood residential))~~ Neighborhood Residential zone as a conditional use, the Director may modify the parking requirements pursuant to Section 23.44.022; when the use is permitted in a multifamily zone as a conditional use, the Director may modify the parking requirements pursuant to Section 23.45.570.

<sup>2</sup> The amount of required parking is calculated based on the maximum number of staff, children, or clients that the center is designed to accommodate on site at any one time.

<sup>3</sup> As a Type I decision, the Director, in consultation with the Director of the Seattle Department of Transportation, may allow adult care and child care

**Table C for 23.54.015  
Required parking for public uses and institutions**

Use	Minimum parking required
	<p>centers to provide loading and unloading spaces on street, if not prevented by current or planned transportation projects adjacent to their property, when no other alternative exists.</p> <p><sup>4</sup> A child care facility, when co-located with an assisted living facility, may count the passenger load/unload space required for the assisted living facility toward its required passenger load/unload spaces.</p> <p><sup>5</sup> <del>((When this use is permitted outright in a neighborhood residential or multifamily zone, the Director may reduce the parking and loading requirements of Section 23.54.015 and the requirements of Section 23.44.016 or Section 23.45.536 on a case-by-case basis if the applicant can demonstrate that the modification is necessary due to the specific features, activities, or programs of the institution and links the reduction to the features of the institution that justify the reduction. Such modifications shall be valid only under the conditions specified, and if those conditions change, the standard requirement shall be satisfied.))</del> <u>The Director may reduce the minimum parking requirements for a child care center in any zone if a portion of its parking demand can be accommodated in nearby on-street parking</u></p> <p><sup>6</sup> When family support centers are located within community centers owned and operated by the Department of Parks and Recreation, the Director may lower the combined parking requirement by up to a maximum of 15 percent, pursuant to subsection 23.54.020.1.</p> <p><sup>7</sup> Indoor gymnasiums are not considered ball courts, nor are they considered auditoria or public assembly rooms unless they contain bleachers (fixed seats). If the gymnasium contains bleachers, the parking requirement for the gymnasium is one parking space for every eight fixed seats. Each 20 inches of width of bleachers is counted as one fixed seat for the purposes of determining parking requirements. If the gymnasium does not contain bleachers and is in a school, there is no parking requirement for the gymnasium. If the gymnasium does not contain bleachers and is in a community center, the parking requirement is one space for each 350 square feet.</p> <p><sup>8</sup> <u>When this use is permitted outright in a Neighborhood Residential or multifamily zone, the Director may reduce the parking and loading requirements of Section 23.54.015 and the requirements of Section 23.44.016 or Section 23.45.536 on a case-by-case basis if the applicant can demonstrate that the modification is necessary due to the specific features, activities, or</u></p>

**Table C for 23.54.015  
Required parking for public uses and institutions**

**Use**

**Minimum parking required**

programs of the institution and links the reduction to the features of the institution that justify the reduction. Such modifications shall be valid only under the conditions specified, and if those conditions change, the standard requirement shall be satisfied.

<sup>2</sup>When a library is permitted in a multifamily or commercial zone as a conditional use, the Director may modify the parking requirements of Section 23.54.015 and the requirements of Section 23.45.536 or Sections 23.47A.030 and 23.47A.032 on a case-by-case basis if the applicant can demonstrate that the modification is necessary due to the specific features, activities, or programs of the institution and links the reduction to the features of the institution that justify the reduction. Such modifications shall be valid only under the conditions specified, and if those conditions change, the standard requirement shall be satisfied.

<sup>(9)</sup><sup>10</sup> For public schools, when an auditorium or other place of assembly is demolished and a new one built in its place, parking requirements are determined based on the new construction. When an existing public school on an existing public school site is remodeled, additional parking is required if any auditorium or other place of assembly is expanded or additional fixed seats are added. Additional parking is required as shown in this Table C for 23.54.015 for the increase in floor area or increase in number of seats only. If the parking requirement for the increased area or seating is ~~((40))~~ ten percent or less than that for the existing auditorium or other place of assembly, then no additional parking is required.

<sup>(40)</sup><sup>11</sup> Development standard departures may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79 to reduce the required or permitted number of parking spaces.

<sup>(44)</sup><sup>12</sup> The general requirements of lines A through P of this Table C for 23.54.015 for general public uses and institutions, and requirements of subsection 23.54.016.B for Major Institution uses, are superseded to the extent that a use, structure, or development qualifies for either a greater or a lesser parking requirement (which may include no requirement) under any other provision. To the extent that a general public use, institution, or Major Institution use fits within more than one line in this Table C for 23.54.015, the least of the applicable parking requirements applies. The different parking requirements listed for certain categories of general public uses or institutions

**Table C for 23.54.015**

**Required parking for public uses and institutions**

**Use**

**Minimum parking required**

shall not be construed to create separate uses for purposes of any requirements related to establishing or changing a use under this Title 23.  
<sup>(12)</sup> The Director may reduce the minimum parking requirements for a child care center in any zone if a portion of its parking demand can be accommodated in nearby on-street parking.)

~~((K. Bicycle parking. The minimum number of parking spaces for bicycles required for specified uses is set forth in Table D for 23.54.015. Long-term parking for bicycles shall be for bicycles parked four or more hours. Short-term parking for bicycles shall be for bicycles parked less than four hours. In the case of a use not shown on Table D for 23.54.015, one bicycle parking space per 10,000 gross square feet of either short- or long-term bicycle parking is required, except single-family residential use is exempt from bicycle parking requirements. The minimum requirements are based upon gross floor area of the use in a structure minus gross floor area in parking uses, or the square footage of the use when located outside of an enclosed structure, or as otherwise specified.~~

~~1. Rounding. For long-term bicycle parking, calculation of the minimum requirement shall round up the result to the nearest whole number. For short-term bicycle parking, calculation of the minimum requirement shall round up the result to the nearest whole even number.~~

~~2. Performance standards. Provide bicycle parking in a highly visible, safe, and convenient location, emphasizing user convenience and theft deterrence, based on rules promulgated by the Director of the Seattle Department of Transportation that address the considerations in this subsection 23.54.015.K.2.~~

~~a. Provide secure locations and arrangements of long-term bicycle parking, with features such as locked rooms or cages and bicycle lockers. The bicycle parking should be installed in a manner that avoids creating conflicts with automobile accesses and driveways.~~

~~b. For a garage with bicycle parking and motor vehicle parking for more than two dwelling units, provide pedestrian and bicycle access to long-term bicycle parking that is separate from other vehicular entry and egress points or uses the same entry or egress point but has a marked walkway for pedestrians and bicyclists.~~

c. Provide adequate lighting in the bicycle parking area and access routes to it.

d. If short-term bicycle parking facilities are not clearly visible from the street or sidewalk or adjacent on-street bicycle facilities, install directional signage in adequate amounts and in highly visible locations in a manner that promotes easy wayfinding for bicyclists.

e. Provide signage to long-term bicycle parking that is oriented to building users.

f. Long-term bicycle parking shall be located where bicyclists are not required to carry bicycles on exterior stairs with more than five steps to access the parking. The Director, as a Type I decision, may allow long-term bicycle parking for rowhouse and townhouse development to be accessed by stairs with more than five steps, if the slope of the lot makes access with five or fewer steps infeasible.

g. Where practicable, long-term bicycle parking shall include a variety of rack types to accommodate different types of bicycles.

h. Install bicycle parking hardware so that it can perform to its manufacturer's specifications and any design criteria promulgated by the Director of the Seattle Department of Transportation, allowing adequate clearance for bicycles and their riders.

i. Provide full weather protection for all required long-term bicycle parking.

### 3. Location of bicycle parking

a. Long-term bicycle parking required for residential uses shall be located on-site except as provided in subsection 23.54.015.K.3.c.

b. Short-term bicycle parking may be provided on the lot or in an adjacent right-of-way, subject to approval by the Director of the Seattle Department of Transportation, or as provided in subsection 23.54.015.K.3.c.

c. Both long-term and short-term bicycle parking for residential uses may be provided off-site if within 600 feet of the residential use to which the bicycle parking is accessory and if the site of the bicycle parking is functionally interrelated to the site of the residential use to which the bicycle parking is accessory, such as within a unit lot subdivision or if the sites are connected by access easements, or if a covenant or similar property right is established to allow use of the off-site bicycle parking.

4. Long-term bicycle parking required for small efficiency dwelling units and congregate residence sleeping rooms is required to be covered for full weather protection. If the required, covered long-term bicycle parking is located inside the

building that contains small efficiency dwelling units or congregate residence sleeping rooms, the space required to provide the required long-term bicycle parking shall be exempt from floor area ratio (FAR) limits. Covered long-term bicycle parking that is provided beyond the required bicycle parking shall not be exempt from FAR limits.

5. Bicycle parking facilities shared by more than one use are encouraged.

6. Except as provided in subsection 23.54.015.K.7, bicycle parking facilities required for non-residential uses shall be located:

a. On the lot; or

b. For a functionally interrelated campus containing more than one building, in a shared bicycle parking facility within 600 feet of the lot; or

c. Short-term bicycle parking may be provided in an adjacent right-of-way, subject to approval by the Director of the Seattle Department of Transportation.

7. For non-residential uses on a functionally interrelated campus containing more than one building, both long-term and short-term bicycle parking may be located in an off-site location within 600 feet of the lot, and short-term public bicycle parking may be provided in a right-of-way, subject to approval by the Director of the Seattle Department of Transportation. The Director of the Seattle Department of Transportation may consider whether bicycle parking in the public place shall be sufficient in quality to effectively serve bicycle parking demand from the site.

8. Bicycle commuter shower facilities. Structures containing 100,000 square feet or more of office use floor area shall include shower facilities and clothing storage areas for bicycle commuters. Two showers shall be required for every 100,000 square feet of office use. They shall be available in a manner that results in equal shower access for all users. The facilities shall be for the use of the employees and occupants of the building, and shall be located where they are easily accessible to bicycle parking facilities, which may include in places accessible by elevator from the bicycle parking location.

9. Bicycle parking spaces within dwelling units or on balconies do not count toward the bicycle parking requirement, except if the bike parking spaces are located:

a. In a private garage; or

b. Within the ground floor of a dwelling unit in a townhouse or rowhouse development.

**Table D for 23.54.015  
Parking for bicycles<sup>1</sup>**

USE		Bike parking requirements	
		Long-term	Short-term
A. COMMERCIAL USES			
A.1.	Eating and drinking establishments	1 per 5,000 square feet	1 per 1,000 square feet
A.2.	Entertainment uses other than theaters and spectator sports facilities	1 per 10,000 square feet	Equivalent to 5 percent of maximum building capacity rating
	A.2.a. Theaters and spectator sports facilities	1 per 10,000 square feet	Equivalent to 8 percent of maximum building capacity rating <sup>2</sup>
A.3.	Lodging uses	3 per 40 rentable rooms	1 per 20 rentable rooms plus 1 per 4,000 square feet of conference and meeting rooms
A.4.	Medical services	1 per 4,000 square feet	1 per 2,000 square feet
A.5.	Offices and laboratories, research and development	1 per 2,000 square feet	1 per 10,000 square feet
A.6.	Sales and services, general	1 per 4,000 square feet	1 per 2,000 square feet

**Table D for 23.54.015  
Parking for bicycles<sup>1</sup>**

USE		Bike parking requirements	
		Long-term	Short-term
A.7.	Sales and services, heavy	1 per 4,000 square feet	1 per 10,000 square feet of occupied floor area; 2 spaces minimum
<b>B. INSTITUTIONS</b>			
B.1.	Institutions not listed below	1 per 4,000 square feet	1 per 10,000 square feet
B.2.	Child care centers	1 per 4,000 square feet	1 per 20 children. 2 spaces minimum
B.3.	Colleges	1 per 5,000 square feet	1 per 2,500 square feet
B.4.	Community clubs or centers	1 per 4,000 square feet	1 per 1,000 square feet
B.5.	Hospitals	1 per 4,000 square feet	1 per 10,000 square feet
B.6.	Libraries	1 per 4,000 square feet	1 per 2,000 square feet
B.7.	Museums	1 per 4,000 square feet	1 per 2,000 square feet
B.8.	Religious facilities	1 per 4,000 square feet	1 per 2,000 square feet
B.9.	Schools, primary and secondary	3 per classroom	1 per classroom



**Table D for 23.54.015  
Parking for bicycles<sup>1</sup>**

USE		Bike parking requirements	
		Long-term	Short-term
B.10.	Vocational or fine arts schools	1 per 5,000 square feet	1 per 2,500 square feet
C. MANUFACTURING USES		1 per 4,000 square feet	1 per 20,000 square feet
D. RESIDENTIAL USES <sup>3</sup>			
D.1	Congregate residences <sup>4</sup>	1 per sleeping room	1 per 20 sleeping rooms. 2 spaces minimum
D.2	Multifamily structures other than townhouse and rowhouse developments <sup>4,5</sup>	1 per dwelling unit	1 per 20 dwelling units
D.3	Single-family residences	None	None
D.4	Townhouse and rowhouse developments <sup>5</sup>	1 per dwelling unit	None
E. TRANSPORTATION FACILITIES			
E.1.	Park and ride facilities on surface parking lots	At least 20 <sup>6</sup>	At least 10
E.2.	Park and ride facilities in parking garages	At least 20 if parking is the principal use of a property; zero if non-parking uses are the principal use of a property	At least 10 if parking is the principal use of a property; zero if non-parking uses are the principal use of a property

**Table D for 23.54.015  
Parking for bicycles<sup>1</sup>**

USE		Bike parking requirements	
		Long-term	Short-term
E.3.	Flexible-use parking garages and flexible-use parking surface lots	1 per 20 auto spaces	None
E.4.	Rail transit facilities and passenger terminals	Spaces for 5 percent of projected AM peak period daily ridership <sup>6</sup>	Spaces for 2 percent of projected AM peak period daily ridership

Footnotes to Table D for 23.54.015

<sup>1</sup> Required bicycle parking includes long-term and short-term amounts shown in this Table D for 23.54.015.

<sup>2</sup> The Director may reduce short-term bicycle parking requirements for theaters and spectator sport facilities that provide bicycle valet services authorized through a Transportation Management Program. A bicycle valet service is a service that allows bicycles to be temporarily stored in a secure area, such as a monitored bicycle corral.

<sup>3</sup> For residential uses, after the first 50 spaces for bicycles are provided, additional spaces are required at three-quarters the ratio shown in this Table D for 23.54.015.

<sup>4</sup> For congregate residences or multifamily structures that are owned and operated by a not-for-profit entity serving seniors or persons with disabilities, or that are licensed by the State and provide supportive services for seniors or persons with disabilities, as a Type I decision, the Director shall have the discretion to reduce the amount of required bicycle parking to as few as zero if it can be demonstrated that residents are less likely to travel by bicycle.

<sup>5</sup> In low-income housing, there is no minimum required long-term bicycle parking requirement for each unit subject to affordability limits no higher than 30 percent of median income and long-term bicycle parking requirements may be waived by the Director as a Type I decision for each unit subject to affordability limits greater than 30 percent of median income and no higher than 80 percent of median income if a reasonable alternative is provided (e.g., in-unit vertical bike storage).

<sup>6</sup> The Director, in consultation with the Director of Transportation, may require more bicycle parking spaces based on the following factors: area topography; pattern and volume of expected bicycle users; nearby residential and employment density; proximity to the Urban Trails system and other existing and planned bicycle facilities;

<b>Table D for 23.54.015 Parking for bicycles<sup>4</sup></b>		
<b>USE</b>	<b>Bike parking requirements</b>	
	<b>Long-term</b>	<b>Short-term</b>
projected transit ridership and expected access to transit by bicycle; and other relevant transportation and land use information.)		

Section 36. Section 23.54.020 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

[23.54.020 Parking quantity exceptions](#)

*Note: This section is being updated to reflect new state requirements contained in SB 6015.*

The motor vehicle parking quantity exceptions set forth in this Section 23.54.020 apply in all zones except downtown zones, which are regulated by Section 23.49.019, and Major Institution zones, which are regulated by Section 23.54.016.

A. Adding ~~((Units))~~ units to ~~((Existing Structures))~~ existing structures in Multifamily and Commercial ~~((Zones.))~~ zones

1. For the purposes of this Section 23.54.020, "existing structures" means those structures that were established under permit, or for which a permit has been granted and has not expired as of the applicable date, as follows:

- a. In multifamily zones, August 10, 1982;
- b. In commercial zones, June 9, 1986.

2. In locations in a multifamily or commercial zone where there is a minimum parking requirement, one dwelling unit may either be added to an existing structure or may be built on a lot that contains an existing structure without additional parking if both of the following requirements are met:

- a. Either the existing parking provided on the lot meets development standards, or the lot area is not increased and existing parking is screened and landscaped to the greatest extent practical; and

b. Any additional parking shall meet all development standards for the zone.

3. In locations in a multifamily or commercial zone where there is a minimum parking requirement, the Director may authorize a reduction or waiver of the parking requirement as a Type I decision when dwelling units are proposed to be added either to an existing structure or on a lot that contains an existing structure, in addition to the exception permitted in subsection 23.54.020.A.2, if the conditions in subsection ~~(§)~~ 23.54.020.A.3.a ~~((and b))~~ below are met, and either of the conditions in subsections ~~((23.54.020.A.3.c or d))~~ 23.54.020.A.3.b or 23.54.020.A.3.c below are met:

a. The only use of the structure will be residential; and

b. ~~((The lot is not located in either the University District Parking Overlay Area (Map A for 23.54.015) or the Alki Area Parking Overlay (Map B for 23.54.015); and~~

~~€.)~~ c.) The topography of the lot or location of existing structures makes provision of an off-street parking space physically infeasible in a conforming location; or

~~((d))~~ c. The lot is located in a residential parking zone (RPZ) and a current parking study is submitted showing a utilization rate of less than 75 percent for on-street parking within 400 feet of all lot lines.

B. Tandem Parking in Multifamily Structures. ~~((4.))~~ Off-street parking required for multifamily structures may be provided as tandem parking, as defined in Section 23.54.030. ~~((A tandem parking space counts as one and one-half parking spaces, except as provided in subsection 23.54.020.B.2 below, and must meet the minimum size requirements of subsection 23.54.030.A.~~

~~2. When a minimum of at least one parking space per dwelling unit in a multifamily structure is required, the total number of parking spaces provided, counting each tandem parking space as one space, may not be less than the total number of dwelling units.)~~ A tandem parking space counts at a rate of one space for every 20 linear feet of depth excluding any necessary provisions for maneuvering.

\* \* \*

Section 37. Section 23.54.030 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

## 23.54.030 Parking space and access standards

*Note: This section would be updated to comply with parking space dimensions required by SB 6015 and reflect new definitions for building types. This section is also proposed to be separated into multiple sections consistent with modern code drafting sections.*

All parking spaces provided, whether required by Section 23.54.015 or not, and required barrier-free parking, shall meet the standards of this Section 23.54.030.

### A. Parking space dimensions

1. "Large vehicle" means the minimum size of a large vehicle parking space shall be ~~((8-5))~~ 8 feet in width and 19 feet in length.

2. "Medium vehicle" means the minimum size of a medium vehicle parking space shall be 8 feet in width and 16 feet in length.

3. "Small vehicle" means the minimum size of a small vehicle parking space shall be 7.5 feet in width and 15 feet in length.

4. "Barrier-free parking" means a parking space meeting the following standards:

a. Parking spaces shall not be less than 8 feet in width and shall have an adjacent access aisle not less than 5 feet in width. Van-accessible parking spaces shall have an adjacent access aisle not less than 8 feet in width. Where two adjacent spaces are provided, the access aisle may be shared between the two spaces. Boundaries of access aisles shall be marked so that aisles will not be used as parking space.

b. A minimum length of 19 feet or when more than one barrier-free parking space is provided, at least one shall have a minimum length of 19 feet, and other spaces may be the lengths of small, medium, or large spaces in approximate proportion to the number of each size space provided on the lot.

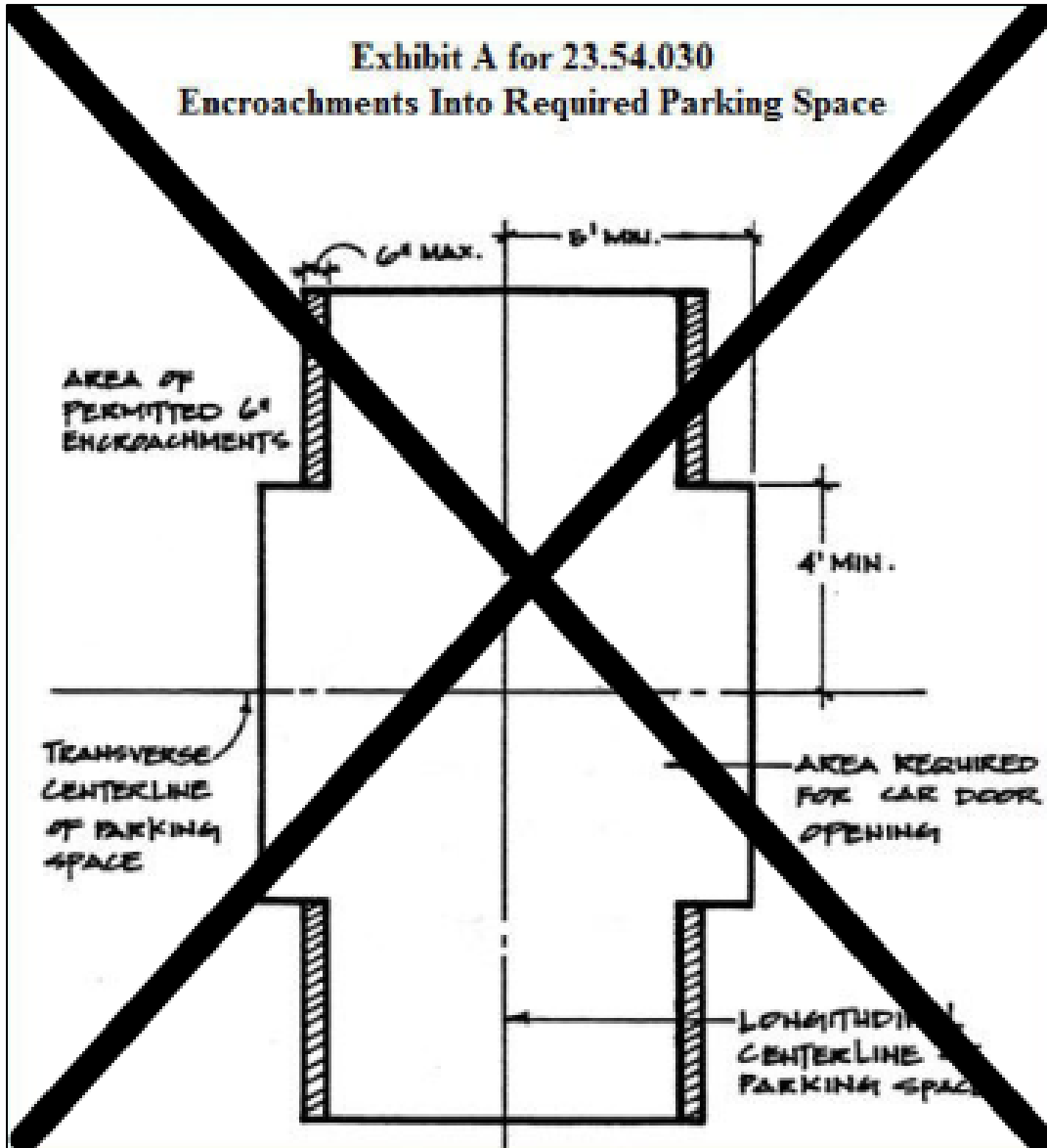
5. "Tandem parking" means a parking space equal to the width and two times the length of the vehicle size standards in subsections 23.54.030.A.1, 23.54.030.A.2, and 23.54.030.A.3 for the size of the vehicle to be accommodated.

6. No wall, post, guardrail, or other obstruction, or lot line, is permitted within the area for car door opening. Columns or other structural elements may encroach into the parking space a maximum of 6 inches on a side, except in the area for car door opening 5 feet from the longitudinal centerline, or 4 feet from the transverse centerline of a parking space (see Exhibit A for 23.54.030).

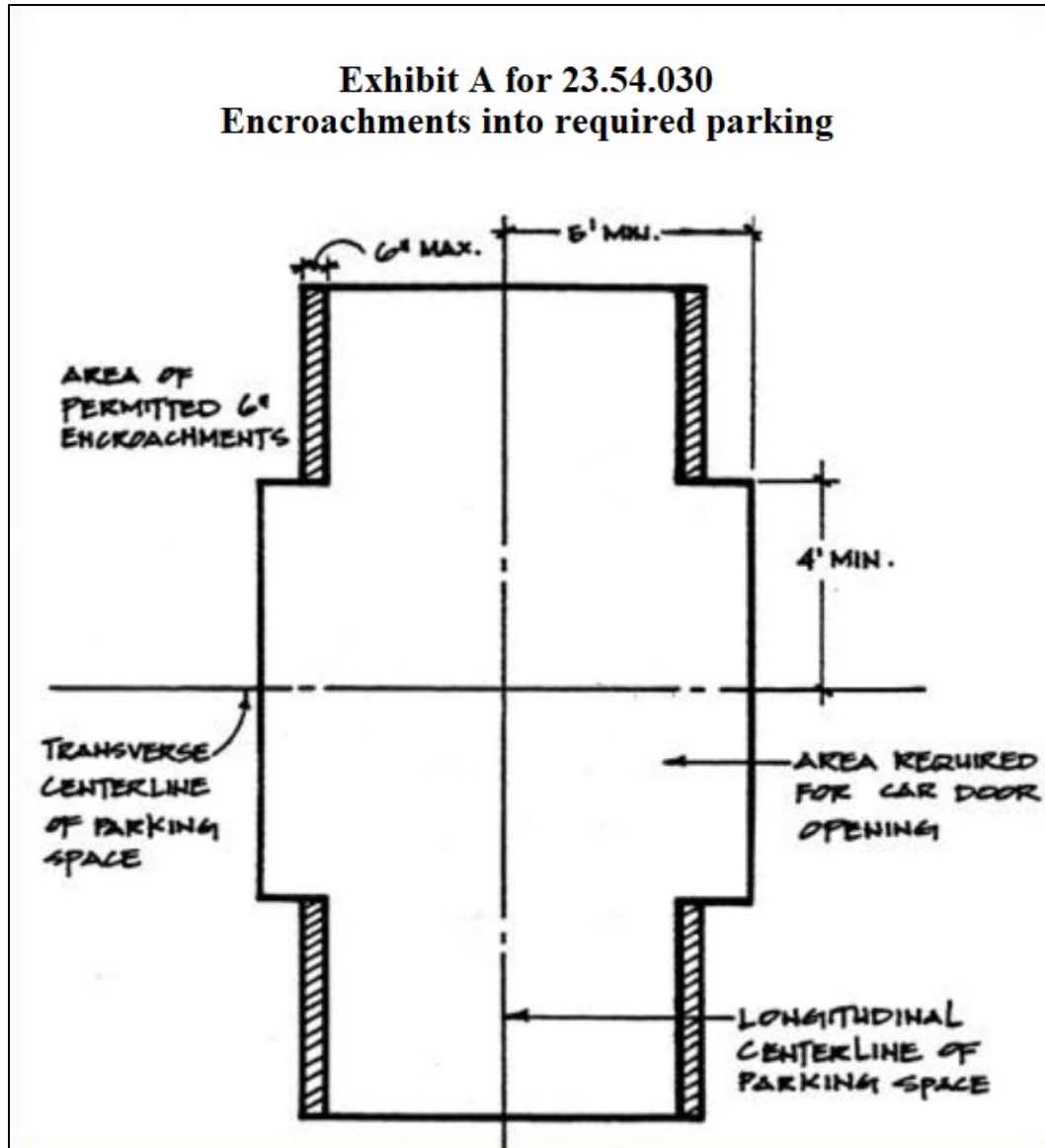
7. If the parking space is next to a lot line and the parking space is parallel to the lot line, the minimum width of the space is 9 feet.

**Exhibit A for 23.54.030**

**Encroachments ((Into Required Parking Space)) into required parking space**



**Exhibit A for 23.54.030  
Encroachments into required parking**



B. Parking space requirements. The required size of parking spaces shall be determined by whether the parking is for a residential, live-work, or ~~((non-residential)) nonresidential~~ use. In structures containing residential uses and also containing either ~~((non-residential)) nonresidential~~ uses or live-work units, parking that is clearly set aside and reserved for residential or live-work use shall meet the standards of subsection 23.54.030.B.1. Parking for all other uses within the structure shall meet the standards of subsection 23.54.030.B.2. All uses shall provide barrier-free accessible parking if required by the Seattle Building Code or the Seattle Residential Code.

1. Residential uses

a. When five or fewer parking spaces are provided, the minimum required size of a parking space shall be for a medium vehicle, as described in subsection 23.54.030.A.2, except as provided in subsection 23.54.030.B.1.d.

b. When more than five parking spaces are provided, a minimum of 60 percent of the parking spaces shall be striped for medium vehicles. The minimum size for a medium parking space shall also be the maximum size. Forty percent of the parking spaces may be striped for any size category in subsection 23.54.030.A, provided that when parking spaces are striped for large vehicles, the minimum required aisle width shall be as shown for medium vehicles.

c. Assisted living facilities. Parking spaces shall be provided as in subsections 23.54.030.B.1.a and 23.54.030.B.1.b, except that a minimum of two spaces shall be striped for a large vehicle.

d. (~~Townhouse unit.~~) For an individual garage serving (~~a townhouse~~) an individual dwelling unit, the minimum required size of a parking space shall be for a medium vehicle, as described in subsection 23.54.030.A.

## 2. (~~Non-residential~~) Nonresidential uses

a. When ten or fewer parking spaces are provided, a maximum of 25 percent of the parking spaces may be striped for small vehicles. A minimum of 75 percent of the spaces shall be striped for large vehicles.

b. When between 11 and 19 parking spaces are provided, a minimum of 25 percent of the parking spaces shall be striped for small vehicles. The minimum required size for these small parking spaces shall also be the maximum size. A maximum of 65 percent of the parking spaces may be striped for small vehicles. A minimum of 35 percent of the spaces shall be striped for large vehicles.

c. When 20 or more parking spaces are provided, a minimum of 35 percent of the parking spaces shall be striped for small vehicles. The minimum required size for small parking spaces shall also be the maximum size. A maximum of 65 percent of the parking spaces may be striped for small vehicles. A minimum of 35 percent of the spaces shall be striped for large vehicles.

d. The minimum vehicle clearance shall be at least 6 feet 9 inches on at least one floor, and there shall be at least one direct entrance that is at least 6 feet 9 inches in height for all parking garages accessory to (~~non-residential~~) nonresidential uses and live-work units and for all flexible-use parking garages.



3. Live-work uses. The first required parking space shall meet the parking standards for residential use. Additional required parking for a live-work use shall meet the parking standards for ~~(non-residential)~~ nonresidential use.

C. Backing ~~((Distances))~~ distances and ~~((Moving Other Vehicles.))~~ moving other vehicles

1. Adequate ingress to and egress from all parking spaces shall be provided without having to move another vehicle, except in the case of multiple spaces provided for a single~~((family))~~ dwelling unit ~~((or an accessory dwelling unit associated with a single-family dwelling,))~~ or in the case of tandem parking authorized under ~~((Section))~~ subsection 23.54.020.B.

2. Except for lots with fewer than three parking spaces, ingress to and egress from all parking spaces shall be provided without requiring backing more than 50 feet.

D. Driveways. Driveway requirements for residential and nonresidential uses are described below. When a driveway is used for both residential and nonresidential parking, it shall meet the standards for nonresidential uses described in subsection 23.54.030.D.2.

1. Residential uses~~((,-))~~

a. Driveway width. Driveways less than 100 feet in length that serve 30 or fewer parking spaces shall be a minimum of 10 feet in width for one-way or two-way traffic.

b. Except for driveways serving one ~~((single-family))~~ dwelling unit, driveways more than 100 feet in length that serve 30 or fewer parking spaces shall either:

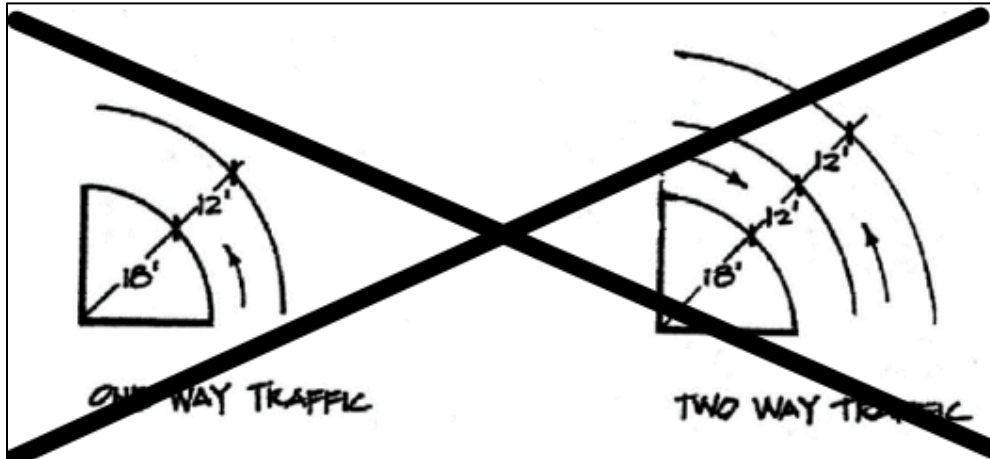
1) be a minimum of 16 feet wide, tapered over a 20 foot distance to a 10 foot opening at the lot line; or

2) be a minimum of 10 feet wide and provide a passing area at least 20 feet wide and 20 feet long. The passing area shall begin 20 feet from the lot line, with an appropriate taper to meet the 10 foot opening at the lot line. If a taper is provided at the other end of the passing area, it shall have a minimum length of 20 feet.

c. Driveways of any length that serve more than 30 parking spaces shall be at least 10 feet wide for one-way traffic and at least 20 feet wide for two-way traffic.

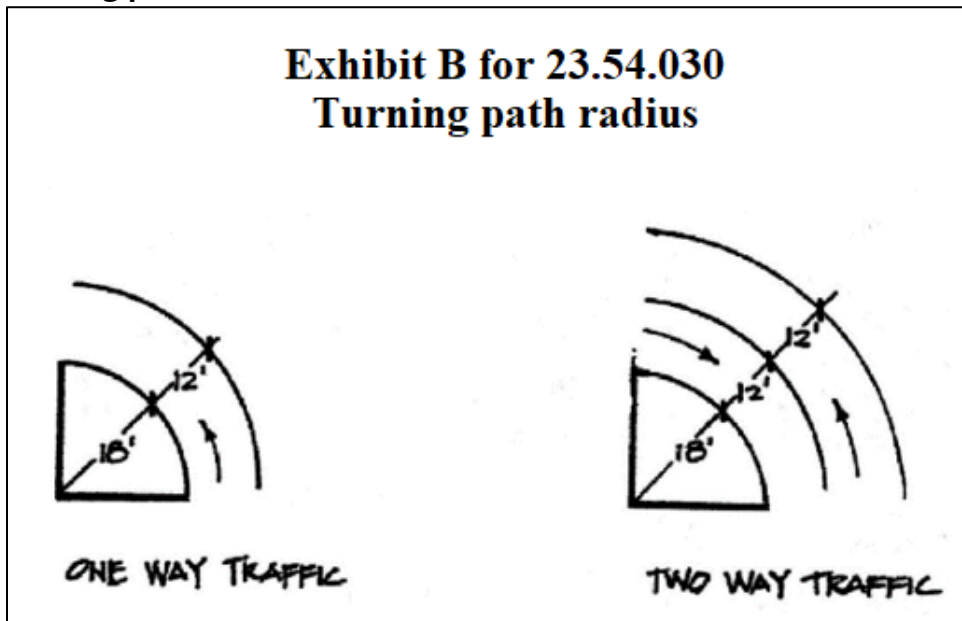
d. Driveways for two attached (~~rowhouse or townhouse~~) dwelling units may be paired so that there is a single curb cut providing access. The maximum width of the paired driveway is 18 feet.

e. Driveways with a turning radius of more than 35 degrees shall conform to the minimum turning path radius shown in Exhibit B for 23.54.030.



~~((Exhibit B for 23.54.030: Turning Path Radius))~~

**Exhibit B for 23.54.030**  
**Turning path radius**



f. Vehicles may back onto a street from a parking area serving five or fewer vehicles, provided that either:

1) The street is not an arterial as defined in Section 11.18.010;  
or

2) For a lot with one (~~single-family~~) dwelling unit, the Director may permit backing onto an arterial based on a safety analysis that addresses visibility, traffic volume, and other relevant issues.

g. Nonconforming driveways. The number of parking spaces served by an existing driveway that does not meet the standards of this subsection 23.54.030.D.1 shall not be increased. This prohibition may be waived by the Director after consulting with the Director of the Seattle Department of Transportation, based on a safety analysis.

2. Nonresidential (~~Uses~~) uses

a. Driveway (~~Widths~~) widths

1) The minimum width of driveways for (~~one-way~~) one-way traffic shall be 12 feet and the maximum width shall be 15 feet.

2) The minimum width of driveways for (~~two-way~~) two-way traffic shall be 22 feet and the maximum width shall be 25 feet.

b. Driveways shall conform to the minimum turning path radius shown in Exhibit B for 23.54.030.

c. For driveways that provide access to a solid waste management use the Director may allow both a maximum driveway width greater than the limits set in subsection 23.54.030.D.2.a and appropriate turning path radii, as determined necessary for truck maneuvering.

3. Driveway slope for all uses. No portion of a driveway, whether located on a lot or on a right-of-way, shall exceed a slope of 15 percent, except as provided in this subsection 23.54.030.D.3. The maximum 15 percent slope shall apply in relation to both the current grade of the right-of-way to which the driveway connects, and to the proposed finished grade of the right-of-way if it is different from the current grade. The ends of a driveway shall be adjusted to accommodate an appropriate crest and sag. The Director may permit a driveway slope of more than 15 percent if it is found that:

a. The topography or other special characteristic of the lot makes a 15 percent maximum driveway slope infeasible;

b. The additional amount of slope permitted is the least amount necessary to accommodate the conditions of the lot; and

c. The driveway is still useable as access to the lot.

E. Parking aisles

1. Parking aisles shall be provided according to the requirements of Table A for 23.54.030 and Exhibit C for 23.54.030.

<b>Table A for 23.54.030</b>						
<b>Parking aisle dimensions</b>						
<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>	<b>G</b>
<u>Parking Angle (in degrees)</u>	<u>Stall Width</u>	<u>Stall Length (in feet)</u>	<u>Aisle Width (in feet)<sup>1</sup></u>	<u>Curb Depth Per Car (in feet)</u>	<u>Unit Width (in feet)<sup>2</sup></u>	<u>Curb Length Per Car (in feet)</u>
0°	<u>Small</u>	<u>18</u>	<u>10</u>	<u>7.5</u>	<u>25</u>	<u>18</u>
	<u>Medium</u>	<u>20</u>	<u>10</u>	<u>8</u>	<u>26</u>	<u>20</u>
	<u>Large</u>	<u>24</u>	<u>12</u>	<u>8</u>	<u>28</u>	<u>24</u>
45°	<u>Small</u>	<u>15</u>	<u>11</u>	<u>15.91</u>	<u>42.82</u>	<u>10.61</u>
	<u>Medium</u>	<u>16</u>	<u>13</u>	<u>16.97</u>	<u>46.94</u>	<u>11.3</u>
	<u>Large</u>	<u>19</u>	<u>13</u>	<u>19.09</u>	<u>51.18</u>	<u>11.3</u>
60°	<u>Small</u>	<u>15</u>	<u>13</u>	<u>16.74</u>	<u>46.48</u>	<u>8.66</u>
	<u>Medium</u>	<u>16</u>	<u>15</u>	<u>17.86</u>	<u>50.72</u>	<u>9.24</u>
	<u>Large</u>	<u>19</u>	<u>17.5</u>	<u>20.45</u>	<u>58.41</u>	<u>9.24</u>
75°	<u>Small</u>	<u>15</u>	<u>16.5</u>	<u>16.43</u>	<u>49.36</u>	<u>7.76</u>
	<u>Medium</u>	<u>16</u>	<u>18.5</u>	<u>17.52</u>	<u>53.55</u>	<u>8.25</u>
	<u>Large</u>	<u>19</u>	<u>20</u>	<u>20.42</u>	<u>60.84<sup>2</sup></u>	<u>8.25</u>
90°	<u>Small</u>	<u>15</u>	<u>20</u>	<u>15</u>	<u>50</u>	<u>7.5</u>
	<u>Medium</u>	<u>16</u>	<u>22</u>	<u>16</u>	<u>54</u>	<u>8</u>
	<u>Large</u>	<u>19</u>	<u>24<sup>3</sup></u>	<u>19</u>	<u>62.0<sup>2</sup></u>	<u>8</u>

Footnotes for Table A for 23.54.030

<sup>1</sup> Required aisle width is for one-way traffic only. If two-way traffic is proposed, then the minimum aisle width shall be 20 feet or greater.

<sup>2</sup> 60 feet may be substituted for required unit width on lots where the available width is in 60-foot whole multiples, provided that the minimum width of the parking stalls shall be 9 feet

<sup>3</sup> For lots 44 feet in width or less, the Director may reduce the aisle width to as low as 20 feet if large parking spaces are provided at 90 degrees as long as the spaces are 9 feet wide.

A Parking Angle	B Stall Width	C Stall Length	D Aisle Width <sup>1</sup>	E Curb Depth Per Car	F Unit Width <sup>2</sup>	G Curb Length Per Car
0°	7.5	18.0	10.0	7.5	25.0	18.0
	8.0	20.0	10.0	8.0	26.0	20.0
	8.5	24.0	12.0	8.5	29.0	24.0
45°	7.5	15.0	11.0	15.91	42.82	10.61
	8.0	16.0	13.0	16.97	46.90	11.3
	8.5	19.0	13.0	19.44	51.88	12.02
60°	7.5	15.0	13.0	16.74	46.45	8.66
	8.0	16.0	15.0	17.86	50.72	9.24
	8.5	19.0	17.5	20.70	57.90	9.82
75°	7.5	15.0	16.5	16.43	49.36	7.76
	8.0	16.0	18.5	17.52	53.54	8.25
	8.5	19.0	20.0	20.55	61.10 <sup>2</sup>	8.80
90°	7.5	15.0	20.0	15.0	50.0	7.5
	8.0	16.0	22.0	16.0	54.0	8.0
	8.5	19.0 <sup>2</sup>	24.0 <sup>2</sup>	19.0	62.0 <sup>3</sup>	8.5

<sup>1</sup> Required aisle width is for one-way traffic only. If two-way traffic is proposed, then the minimum aisle width shall be 20 feet or greater.

<sup>2</sup> When lot width is less than 43 feet, 40 feet may be substituted for a two-way aisle and a single row of cars at 90° to the aisle, provided that the minimum width of the parking stalls shall be 9½ feet.

<sup>3</sup> 60 feet may be substituted for required unit width on lots where the available width is in 60-foot whole multiples, provided that the minimum width of the parking stalls shall be 9½ feet.

The following equations may be used to compute dimensions for parking angles other than those provided in the chart above:

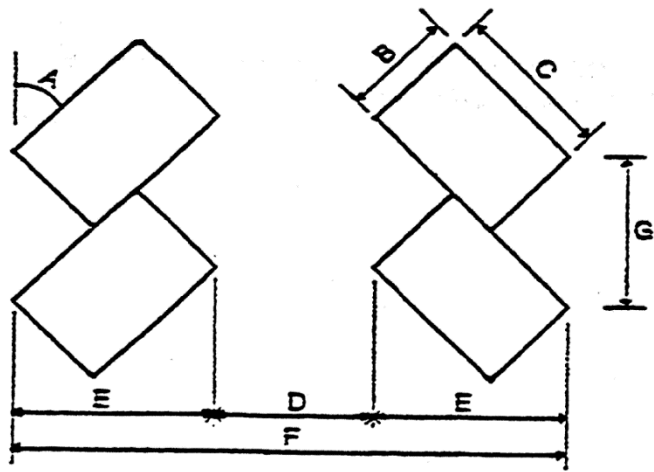
$$E = C \sin A + B \cos A$$

$$G = B / \sin A$$

NOTE: Aisle widths shall be provided as required for the next greater parking angle shown in the chart above.

((Exhibit C for 23.54.030: Parking Aisle Dimensions))

**Exhibit C for 23.54.030**  
**Parking aisle dimension measurement**



The following equations may be used to compute dimensions for parking angles other than those provided in the chart above:

$$E = C \sin A + B \cos A$$

$$G = B / \sin A$$

NOTE: Aisle widths shall be provided as required for the next greater parking angle shown in the chart above.

2. Minimum aisle widths shall be provided for the largest vehicles served by the aisle.

3. Turning and maneuvering areas shall be located on private property, except that alleys may be credited as aisle space.

4. Aisle slope shall not exceed 17 percent provided that the Director may permit a greater slope if the criteria in subsections 23.54.030.D.3.a, 23.54.030.D.3.b, and 23.54.030.D.3.c are met.

~~((F. Curb cuts. The number of permitted curb cuts is determined by whether the parking served by the curb cut is for residential or nonresidential use, and by the zone in which the use is located. If a curb cut is used for more than one use or for one or more live-work units, the requirements for the use with the largest curb cut requirements shall apply.~~

1. Residential uses

a. Number of curb cuts

1) For lots not located on a principal arterial as designated by the Seattle Department of Transportation, curb cuts are permitted according to Table A for 23.54.030:

<b>Table A for 23.54.030 Curb cuts for lots not located on a principal arterial or easement frontage</b>	
<b>Street or easement frontage of the lot</b>	<b>Number of curb cuts permitted</b>
80 feet or less	1
Greater than 80 feet up to 160 feet	2
Greater than 160 feet up to 240 feet	3
Greater than 240 feet up to 320 feet	4
For lots with frontage in excess of 320 feet, the pattern established above continues.	

2) For lots on principal arterials as designated by the Seattle Department of Transportation, curb cuts are permitted according to Table B for 23.54.030:

<b>Table B for 23.54.030 Curb cuts for principal arterial street frontage</b>	
<b>Street or easement frontage of the lot</b>	<b>Number of curb cuts permitted</b>
160 feet or less	1
Greater than 160 feet up to 320 feet	2
Greater than 320 feet up to 480 feet	3
For lots with street frontage in excess of 480 feet, the pattern established above continues.	

~~3) On a lot that has both principal arterial and non-principal arterial street frontage, the total number of curb cuts on the principal arterial is calculated using only the length of the street lot line on the principal arterial.~~

~~4) If two adjoining lots share a common driveway, the combined frontage of the two lots will be considered as one in determining the maximum number of permitted curb cuts.~~

~~b. Curb cut width. Curb cuts shall not exceed a maximum width of 10 feet except that:~~

~~1) For lots on principal arterials as designated by the Seattle Department of Transportation, the maximum curb cut width is 23 feet;~~

~~2) One curb cut greater than 10 feet but in no case greater than 20 feet in width may be substituted for each two curb cuts permitted by subsection 23.54.030.F.1.a;~~

~~3) A greater width may be specifically permitted by the development standards in a zone;~~

~~4) If subsection 23.54.030.D requires a driveway greater than 10 feet in width, the curb cut may be as wide as the required width of the driveway; and~~

~~5) A curb cut may be less than the maximum width permitted but shall be at least as wide as the minimum required width of the driveway it serves.~~

~~c. Distance between curb cuts~~

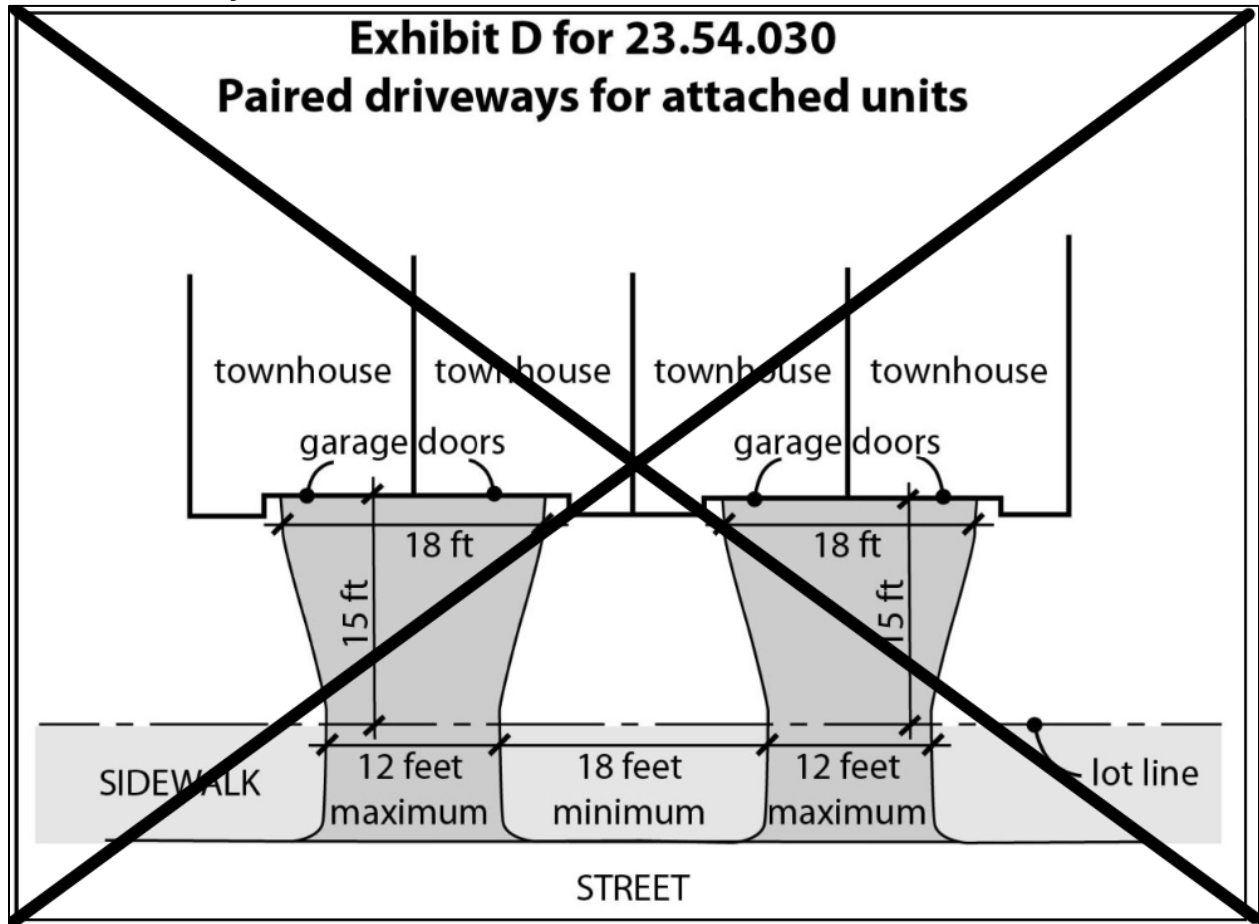
~~1) The minimum distance between any two curb cuts located on a lot is 30 feet, except as provided in subsection 23.54.030.F.1.c.2).~~

~~2) For rowhouse and townhouse developments, the minimum distance between curb cuts is 18 feet (See Exhibit D for 23.54.030). For located on abutting lots, the minimum distance between curb cuts is 18 feet.~~



**Exhibit D for 23.54.030**

**Paired driveways for attached units**



**2. Nonresidential uses in all zones except industrial zones**

**a. Number of curb cuts**

1) In all residential zones, RC zones, and within the Major Institution Overlay District, two-way curb cuts are permitted according to Table C for 23.54.030:

<b>Table C for 23.54.030 Number of curb cuts in residential zones, RC zones and the Major Institution Overlay District</b>	
<b>Street frontage of the lot</b>	<b>Number of curb cuts permitted</b>
80 feet or less	1
Greater than 80 feet up to 240 feet	2
Greater than 240 feet up to 360 feet	3
Greater than 360 feet up to 480 feet	4
For lots with frontage in excess of 480 feet, one curb cut is permitted for every 120 feet of street frontage.	

2) The Director may allow two one-way curb cuts to be substituted for one two-way curb cut, after determining, as a Type I decision, that there would not be a significant conflict with pedestrian traffic.

3) The Director shall, as a Type I decision, determine the number and location of curb cuts in C1 and C2 zones and the location of curb cuts in SM zones.

4) In downtown zones, a maximum of two curb cuts for one-way traffic at least 40 feet apart, or one curb cut for two-way traffic, are permitted on each street front where access is permitted by subsection 23.49.019.H. No curb cut shall be located within 40 feet of an intersection. These standards may be modified by the Director as a Type I decision on lots with steep slopes or other special conditions, to the minimum extent necessary to provide vehicular and pedestrian safety and facilitate a smooth flow of traffic.

5) For public schools, the Director shall permit, as a Type I decision, the minimum number of curb cuts that the Director determines is necessary.

6) In NC zones, curb cuts shall be provided according to subsection 23.47A.032.A, or, when 23.47A.032.A does not specify the maximum number of curb cuts, according to subsection 23.54.030.F.2.a.1.

7) For police and fire stations the Director shall permit the minimum number of curb cuts that the Director determines is necessary to provide adequate maneuverability for emergency vehicles and access to the lot for passenger vehicles.

b. Curb cut widths

1) For one-way traffic, the minimum width of curb cuts is 12 feet, and the maximum width is 15 feet.

2) For two-way traffic, the minimum width of curb cuts is 22 feet, and the maximum width is 25 feet, except that the maximum width may be increased to 30 feet if truck and auto access are combined.

3) For public schools, the maximum width of a curb cut is 25 feet. Development standard departures may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79.

4) For fire and police stations, the Director may allow curb cuts up to, and no wider than, the minimum width necessary to provide access for official emergency vehicles that have limited maneuverability and that must rapidly respond to emergencies. Curb cuts for fire and police stations are considered curb cuts for two-way traffic.

5) If one of the following conditions applies, the Director may require a curb cut of up to 30 feet in width, if it is found that a wider curb cut is necessary for safe access:

i. The abutting street has a single lane on the side that abuts the lot; or

ii. The curb lane abutting the lot is less than 11 feet wide; or

iii. The proposed development is located on an arterial with an average daily traffic volume of over 7,000 vehicles; or

iv. Off-street loading berths are required according to Section 23.54.035.

c. The entrances to all garages accessory to nonresidential uses or live-work units and the entrances to all flexible-use parking garages shall be at least 6 feet 9 inches high.

### 3. All uses in industrial zones

a. ~~Number and location of curb cuts. The number and location of curb cuts will be determined by the Director.~~

b. ~~Curb cut width. Curb cut width in Industrial zones shall be as follows:~~

~~1) Except as set forth in subsection 23.54.030.F.3.b.4, if the curb cut provides access to a parking area or structure, it must be a minimum of 15 feet wide and a maximum of 30 feet wide.~~

~~2) If the curb cut provides access to a loading berth, the maximum width may be increased to 50 feet.~~

~~3) Within the minimum and maximum widths established by this subsection 23.54.030.F.3, the Director shall determine the size of the curb cuts.~~

~~4) If the curb cut provides access to a solid waste management use, the Director may determine the maximum width of the curb cut.~~

### 4. Curb cuts for access easements

a. ~~If a lot is crossed by an access easement serving other lots, the curb cut serving the easement may be as wide as the easement roadway.~~

b. ~~The curb cut serving an access easement shall not be counted against the number or amount of curb cuts permitted to a lot if the lot is not itself served by the easement.~~

~~5. Curb cut flare. A flare with a maximum width of 2.5 feet is permitted on either side of curb cuts in any zone.~~

~~6. Replacement of unused curb cuts. When a curb cut is no longer needed to provide access to a lot, the curb and any planting strip must be replaced.~~

~~7. Curb cuts are not allowed on streets if alley access to a lot is feasible but has not been provided.~~

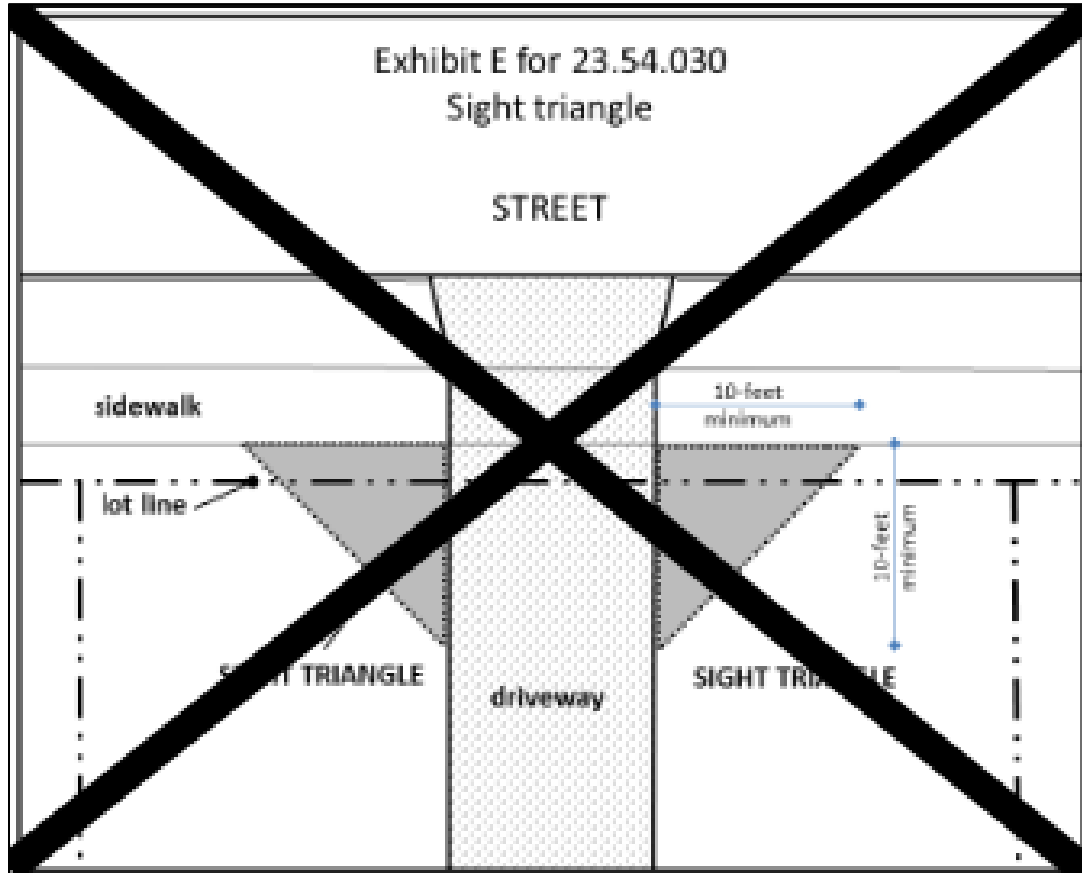
### G. Sight triangle

~~1. For exit-only driveways and easements, and two way driveways and easements less than 22 feet wide, a sight triangle on both sides of the driveway or easement shall be provided, and shall be kept clear of any obstruction for a distance of~~

10 feet from the intersection of the driveway or easement with a driveway, easement, sidewalk or curb intersection if there is no sidewalk, as depicted in Exhibit E for 23.54.030.

**Exhibit E for 23.54.030**

**Sight triangle**



2. For two way driveways or easements 22 feet wide or more, a sight triangle on the side of the driveway used as an exit shall be provided, and shall be kept clear of any obstruction for a distance of 10 feet from the intersection of the driveway or easement with a driveway, easement, sidewalk, or curb intersection if there is no sidewalk. The entrance and exit lanes shall be clearly identified.

3. The sight triangle shall also be kept clear of obstructions in the vertical spaces between 32 inches and 82 inches from the ground.

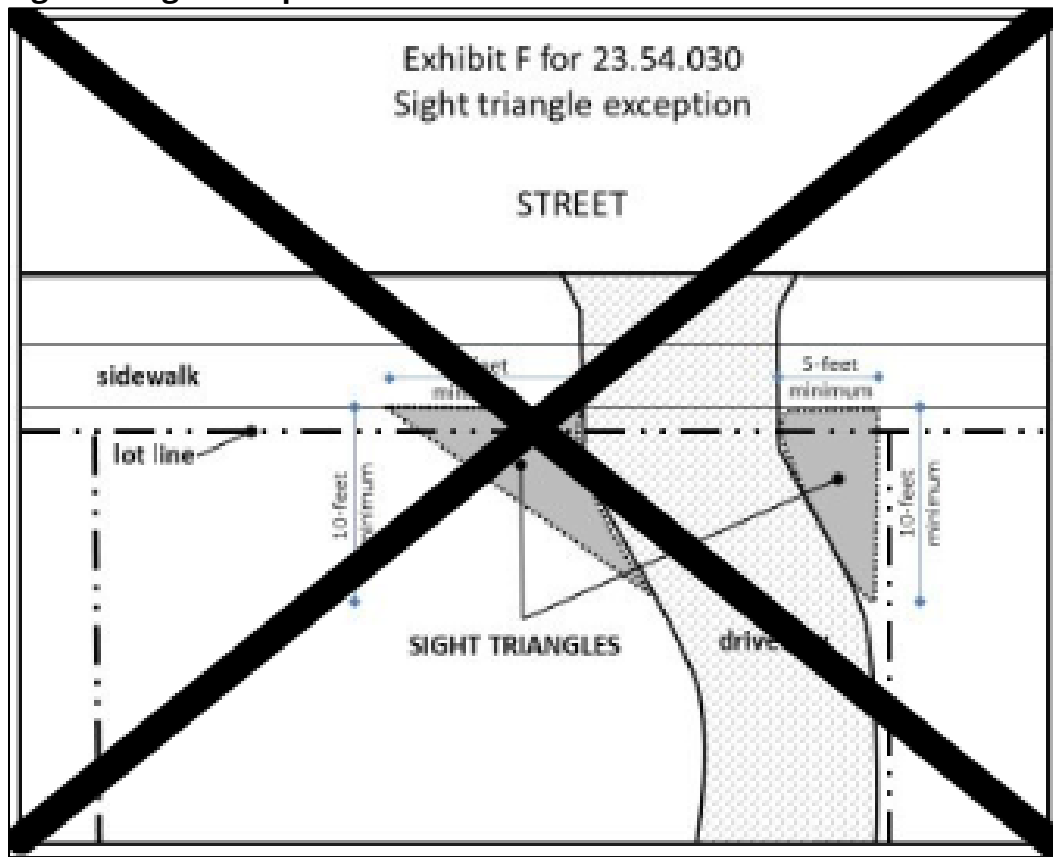
4. When the driveway or easement is less than 10 feet from the lot line, the sight triangle may be provided as follows:

a. An easement may be provided sufficient to maintain the sight triangle. The easement shall be recorded with the King County Recorder; or

b. The driveway may be shared with a driveway on the neighboring lot; or

c. The driveway or easement may begin 5 feet from the lot line, as depicted in Exhibit F for 23.54.030.

**Exhibit F for 23.54.030  
Sight triangle exception**



5. An exception to the sight triangle requirement may be made for driveways serving lots containing only residential uses and fewer than three parking spaces, when providing the sight triangle would be impractical.

6. In all Downtown, Industrial, Commercial 1, and Commercial 2 zones, the sight triangle at a garage exit may be provided by mirrors and/or other approved safety measures.

7. Sight triangles are not required for one-way entrances into a parking garage or surface parking area.

8. Sight triangles are not required when access to parking is provided from an alley.)

~~((H))~~ E. Attendant ~~((Parking-In))~~ downtown zones, any off-street parking area or structure providing more than ~~((5))~~ five parking spaces where automobiles are parked solely by attendants employed for that purpose shall have parking spaces at least 8 feet in width, and 15 feet in length. Subsections ~~((A, B, C, D and E of this Section 23.54.030))~~ 23.54.030.A, 23.54.030.B, 2054.030.C, 23.54.030.D, and 23.54.030.E shall not apply, except that the grade curvature of any area used for automobile travel or storage shall not exceed that specified in subsection 23.54.030.D.3. Should attendant operation be discontinued, the provisions of subsections ~~((23.54.030 A, B, C, D and E))~~ 23.54.030.A, 23.54.030.B, 2054.030.C, 23.54.030.D, and 23.54.030.E shall apply to the parking.

~~((I))~~ G. Off-street ~~((Bus Parking))~~ bus parking. Bus parking spaces, when required, shall be 13 feet in width and 40 feet in length. Buses parked en masse shall not be required to have adequate ingress and egress from each parking space.

~~((J))~~ H. The Director may, as a Type I decision, modify any required dimension or distribution percentage of parking spaces identified in subsections 23.54.030.A or 23.54.030.B to allow more efficient use of a surface parking area or parking garage, when the parking area or parking garage provides adequate and safe circulation.

~~((K. Pedestrian access to garage. For new structures that include a garage, in a zone where flexible-use parking is permitted, at least one pedestrian access walkway or route shall be provided between a garage and a public right-of-way, which may be an alley, including a side-hinged door for pedestrian use. A fire exit door, or other access through lobbies, may serve this purpose if the access route and doors are accessible for ingress and egress by garage users.~~

~~L. Electric vehicle (EV) charging infrastructure. New parking spaces provided on a lot when a new building is constructed shall be "EV-ready" as specified in this subsection 23.54.030.L. The required number of EV-ready parking spaces shall be determined by whether the parking is for a residential or nonresidential use. Parking that is clearly set aside and reserved for residential use shall meet the standards of subsection 23.54.030.L.1; parking for all other uses within the structure shall meet the standards of subsection 23.54.030.L.2.~~

#### ~~1. Residential uses~~

~~a. Private parking for individual residential units. When parking for any individual dwelling unit is provided in a private garage, carport, or parking area, separate from any parking facilities serving other units, at least one parking space in that garage, carport, or parking area shall be EV-ready.~~

~~b. Surface parking for multiple residences. When parking for multifamily residential uses is provided in a surface parking area serving multiple residences, the number of parking spaces that shall be EV-ready shall be as follows:~~

~~1) When between one and six parking spaces are provided, each of those parking spaces shall be EV-ready;~~

~~2) When between seven and 25 parking spaces are provided, a minimum of six of those parking spaces shall be EV-ready; and~~

~~3) When more than 25 parking spaces are provided, a minimum of 20 percent of those parking spaces shall be EV-ready.~~

~~c. Parking garages for multiple residences. When parking for multifamily residential uses is provided in a parking garage serving multiple residences, a minimum of 20 percent of those parking spaces shall be EV-ready.~~

~~d. Other residential uses. When parking is provided for all other residential uses, a minimum of 20 percent of those spaces shall be EV-ready.~~

~~2. Nonresidential uses. When parking is provided for nonresidential uses, a minimum of ten percent of those spaces shall be EV-ready.~~

~~3. Rounding. When calculating the number of required EV-ready parking spaces, any fraction or portion of an EV-ready parking space required shall be rounded up to the nearest whole number.~~

#### ~~4. Reductions~~

~~a. The Director may, in consultation with the Director of Seattle City Light, reduce the requirements of this subsection 23.54.030.L as a Type I decision where there is substantial evidence substantiating that the added electrical load that can be attributed to meeting the requirements will:~~

~~1) Alter the local utility infrastructure design requirements on the utility side of the legal point of service, so as to require on-property power transformation; or~~

~~2) Require an upgrade to an existing residential electrical service.~~

~~b. In cases where the provisions of subsection 23.54.030.L.4.a have been met, the maximum quantity of EV charging infrastructure required to be installed shall be reduced to the maximum service size that would not require the changes to~~



~~transformation or electrical service in subsection 23.54.030.L.4.a. The Director may first reduce the required level of EV infrastructure at EV-ready parking spaces from 40-amp to 20-amp circuits. If necessary, the Director may also then reduce the number of required EV-ready parking spaces or otherwise reduce the level of EV infrastructure at EV-ready parking spaces.~~

~~c. The Director may establish by rule the procedures and documentation required for a reduction.~~

~~5. All EV charging infrastructure shall be installed in accordance with the Seattle Electrical Code. Where EV-ready surface parking spaces are located more than 4 feet from a building, raceways shall be extended to a pull box or stub in the vicinity of the designated space and shall be protected from vehicles.~~

~~6. Accessible parking. Where new EV-ready parking spaces and new accessible parking are both provided, parking facilities shall be designed so that at least one accessible parking space shall be EV-ready.~~

~~7. Nothing in this subsection 23.54.030.L shall be construed to modify the minimum number of off-street motor vehicle parking spaces required for specific uses or the maximum number of parking spaces allowed, as set forth in Section 23.54.015 or elsewhere in this Title 23.~~

~~8. This Section 23.54.030 does not require EV supply equipment, as defined by Article 100 of the Seattle Electrical Code, to be installed.))~~

Section 38. A new Section 23.54.031 is added to the Seattle Municipal Code as follows:

### 23.54.031 Curb cuts

*Note: This new section is being created to move existing rules from Section 23.54.030 into a new section in order to break up a very large section. It would not change existing rules.*

The number of permitted curb cuts is determined by whether the parking served by the curb cut is for residential or nonresidential use, and by the zone in which the use is located. If a curb cut is used for more than one use or for one or more live-work units, the requirements for the use with the largest curb cut requirements shall apply.

#### A. Residential uses

##### 1. Number of curb cuts

a. For lots not located on a principal arterial as designated by the Seattle Department of Transportation, curb cuts are permitted according to Table A for 23.54.031:

<b>Table A for 23.54.031 Curb cuts for lots not located on a principal arterial or easement frontage</b>	
<b>Street or easement frontage of the lot</b>	<b>Number of curb cuts permitted</b>
80 feet or less	1
Greater than 80 feet up to 160 feet	2
Greater than 160 feet up to 240 feet	3
Greater than 240 feet up to 320 feet	4
For lots with frontage in excess of 320 feet, the pattern established above continues.	

b. For lots on principal arterials as designated by the Seattle Department of Transportation, curb cuts are permitted according to Table B for 23.54.031:

<b>Table B for 23.54.031 Curb cuts for principal arterial street frontage</b>	
<b>Street or easement frontage of the lot</b>	<b>Number of curb cuts permitted</b>
160 feet or less	1
Greater than 160 feet up to 320 feet	2
Greater than 320 feet up to 480 feet	3

<b>Table B for 23.54.031 Curb cuts for principal arterial street frontage</b>	
<b>Street or easement frontage of the lot</b>	<b>Number of curb cuts permitted</b>
For lots with street frontage in excess of 480 feet, the pattern established above continues.	

c. On a lot that has both principal arterial and non-principal arterial street frontage, the total number of curb cuts on the principal arterial is calculated using only the length of the street lot line on the principal arterial.

d. If two adjoining lots share a common driveway, the combined frontage of the two lots will be considered as one in determining the maximum number of permitted curb cuts.

2. Curb cut width. Curb cuts shall not exceed a maximum width of 10 feet except that:

a. For lots on principal arterials as designated by the Seattle Department of Transportation, the maximum curb cut width is 23 feet;

b. One curb cut greater than 10 feet but in no case greater than 20 feet in width may be substituted for each two curb cuts permitted by subsection 23.54.031.A.1;

c. A greater width may be specifically permitted by the development standards in a zone;

d. If subsection 23.54.030.D requires a driveway greater than 10 feet in width, the curb cut may be as wide as the required width of the driveway; and

e. A curb cut may be less than the maximum width permitted but shall be at least as wide as the minimum required width of the driveway it serves.

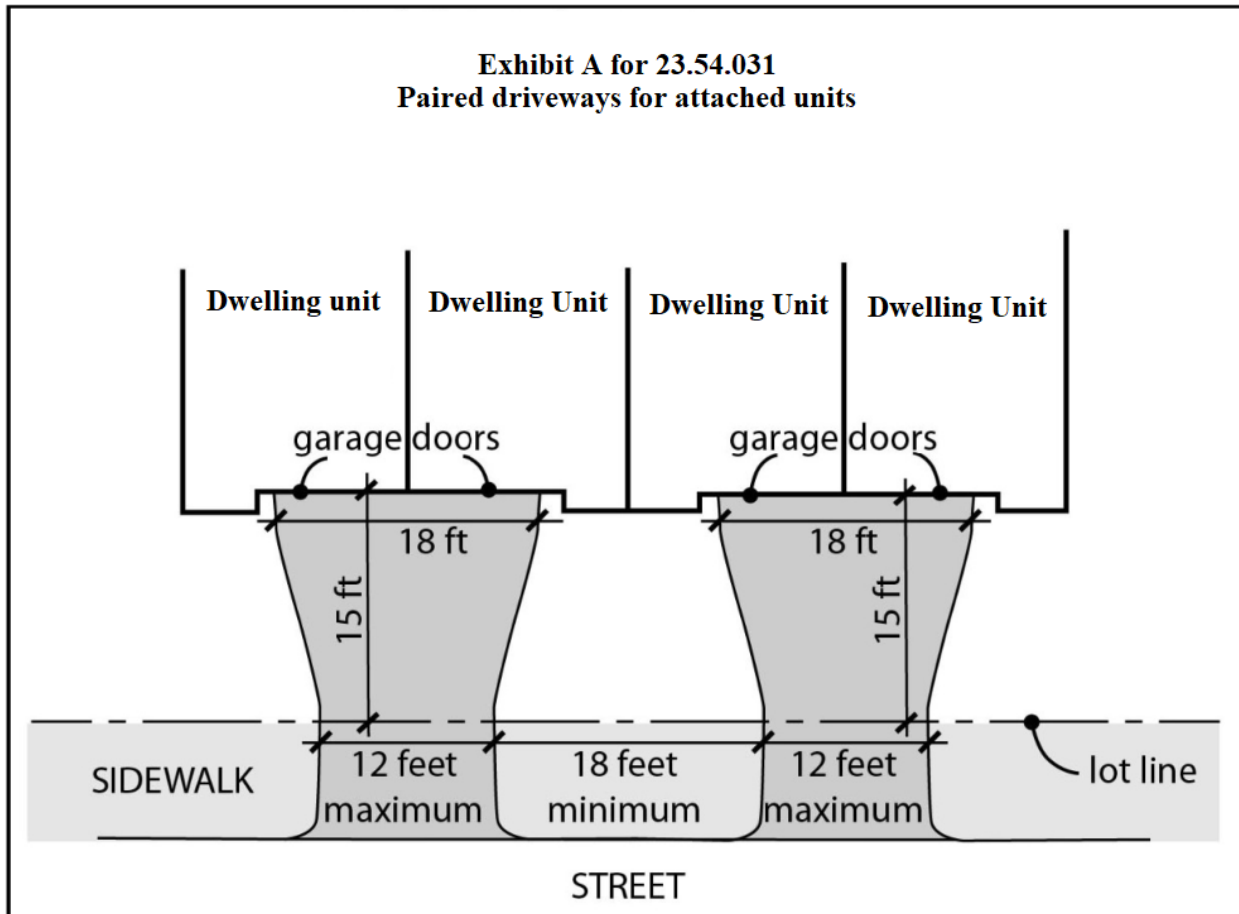
3. Distance between curb cuts

a. The minimum distance between any two curb cuts located on a lot is 30 feet, except as provided in subsection 23.54.031.A.3.b.

b. For attached dwelling units, the minimum distance between curb cuts is 18 feet (See Exhibit A for 23.54.031). For attached dwelling units located on abutting lots, the minimum distance between curb cuts is 18 feet.

**Exhibit A for 23.54.031**

**Paired driveways for attached units**



**B. Nonresidential uses in all zones except industrial zones**

**1. Number of curb cuts**

a. In all residential zones, RC zones, and within the Major Institution Overlay District, two-way curb cuts are permitted according to Table C for 23.54.031:

<b>Table C for 23.54.031 Number of curb cuts in residential zones, RC zones and the Major Institution Overlay District</b>	
<b>Street frontage of the lot</b>	<b>Number of curb cuts permitted</b>
80 feet or less	1
Greater than 80 feet up to 240 feet	2
Greater than 240 feet up to 360 feet	3
Greater than 360 feet up to 480 feet	4
For lots with frontage in excess of 480 feet, one curb cut is permitted for every 120 feet of street frontage.	

b. The Director may allow two one-way curb cuts to be substituted for one two-way curb cut, after determining, as a Type I decision, that there would not be a significant conflict with pedestrian traffic.

c. The Director shall, as a Type I decision, determine the number and location of curb cuts in C1 and C2 zones and the location of curb cuts in SM zones.

d. In downtown zones, a maximum of two curb cuts for one-way traffic at least 40 feet apart, or one curb cut for two-way traffic, are permitted on each street front where access is permitted by subsection 23.49.019.H. No curb cut shall be located within 40 feet of an intersection. These standards may be modified by the Director as a Type I decision on lots with steep slopes or other special conditions, to the minimum extent necessary to provide vehicular and pedestrian safety and facilitate a smooth flow of traffic.

e. For public schools, the Director shall permit, as a Type I decision, the minimum number of curb cuts that the Director determines is necessary.

f. In NC zones, curb cuts shall be provided according to subsection 23.47A.032.A, or, when subsection 23.47A.032.A does not specify the maximum number of curb cuts, according to subsection 23.54.031.B.1.a.

g. For police and fire stations the Director shall permit the minimum number of curb cuts that the Director determines is necessary to provide adequate maneuverability for emergency vehicles and access to the lot for passenger vehicles.

## 2. Curb cut widths

a. For one-way traffic, the minimum width of curb cuts is 12 feet, and the maximum width is 15 feet.

b. For two-way traffic, the minimum width of curb cuts is 22 feet, and the maximum width is 25 feet, except that the maximum width may be increased to 30 feet if truck and auto access are combined.

c. For public schools, the maximum width of a curb cut is 25 feet. Development standard departures may be granted or required pursuant to the procedures and criteria set forth in Chapter 23.79.

d. For fire and police stations, the Director may allow curb cuts up to, and no wider than, the minimum width necessary to provide access for official emergency vehicles that have limited maneuverability and that must rapidly respond to emergencies. Curb cuts for fire and police stations are considered curb cuts for two-way traffic.

e. If one of the following conditions applies, the Director may require a curb cut of up to 30 feet in width, if it is found that a wider curb cut is necessary for safe access:

1) The abutting street has a single lane on the side that abuts the lot; or

2) The curb lane abutting the lot is less than 11 feet wide; or

3) The proposed development is located on an arterial with an average daily traffic volume of over 7,000 vehicles; or

4) Off-street loading berths are required according to Section 23.54.035.

3. The entrances to all garages accessory to nonresidential uses or live-work units and the entrances to all flexible-use parking garages shall be at least 6 feet 9 inches high.

## C. All uses in industrial zones

1. Number and location of curb cuts. The number and location of curb cuts will be determined by the Director.

2. Curb cut width. Curb cut width in Industrial zones shall be as follows:

a. Except as set forth in subsection 23.54.031.C.2.d, if the curb cut provides access to a parking area or structure, it must be a minimum of 15 feet wide and a maximum of 30 feet wide.

b. If the curb cut provides access to a loading berth, the maximum width may be increased to 50 feet.

c. Within the minimum and maximum widths established by this subsection 23.54.031.C, the Director shall determine the size of the curb cuts.

d. If the curb cut provides access to a solid waste management use, the Director may determine the maximum width of the curb cut.

D. Curb cuts for access easements

1. If a lot is crossed by an access easement serving other lots, the curb cut serving the easement may be as wide as the easement roadway.

2. The curb cut serving an access easement shall not be counted against the number or amount of curb cuts permitted to a lot if the lot is not itself served by the easement.

E. Curb cut flare. A flare with a maximum width of 2.5 feet is permitted on either side of curb cuts in any zone.

F. Replacement of unused curb cuts. When a curb cut is no longer needed to provide access to a lot, the curb and any planting strip must be replaced.

G. Curb cuts are not allowed on streets if alley access to a lot is feasible but has not been provided.

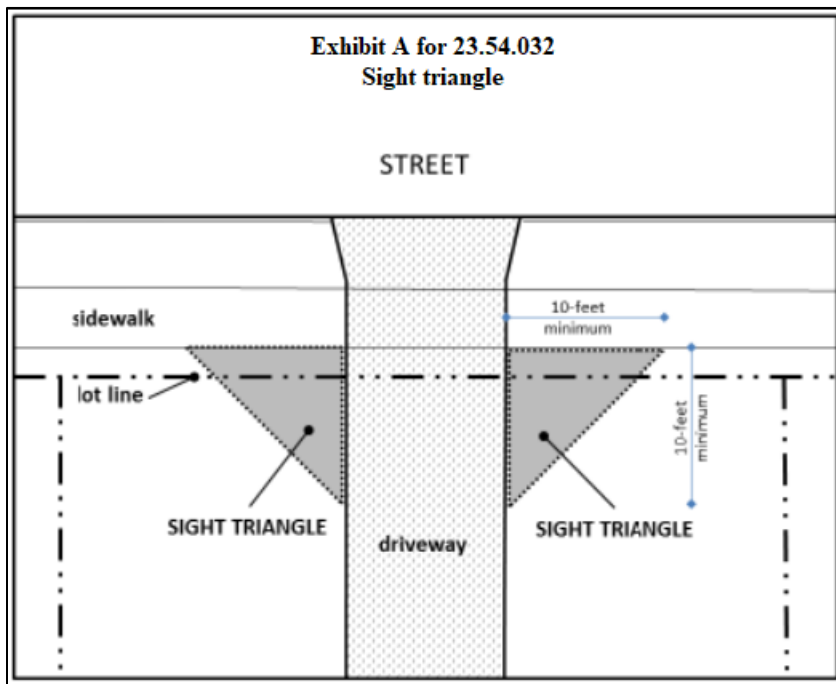
Section 39. A new Section 23.54.032 is added to the Seattle Municipal Code as follows

### 23.54.032 Sight Triangles

*Note: This new section is being created to move existing rules from Section 23.54.030 into a new section in order to break up a very large section. It would not change existing rules.*

A. For exit-only driveways and easements, and two way driveways and easements less than 22 feet wide, a sight triangle on both sides of the driveway or easement shall be provided and shall be kept clear of any obstruction for a distance of 10 feet from the intersection of the driveway or easement with a driveway, easement, sidewalk or curb intersection if there is no sidewalk, as depicted in Exhibit A for 23.54.032.

#### **Exhibit A for 23.54.032 Sight triangle**



B. For two-way driveways or easements 22 feet wide or more, a sight triangle on the side of the driveway used as an exit shall be provided, and shall be kept clear of any obstruction for a distance of 10 feet from the intersection of the driveway or easement with a driveway, easement, sidewalk, or curb intersection if there is no sidewalk. The entrance and exit lanes shall be clearly identified.

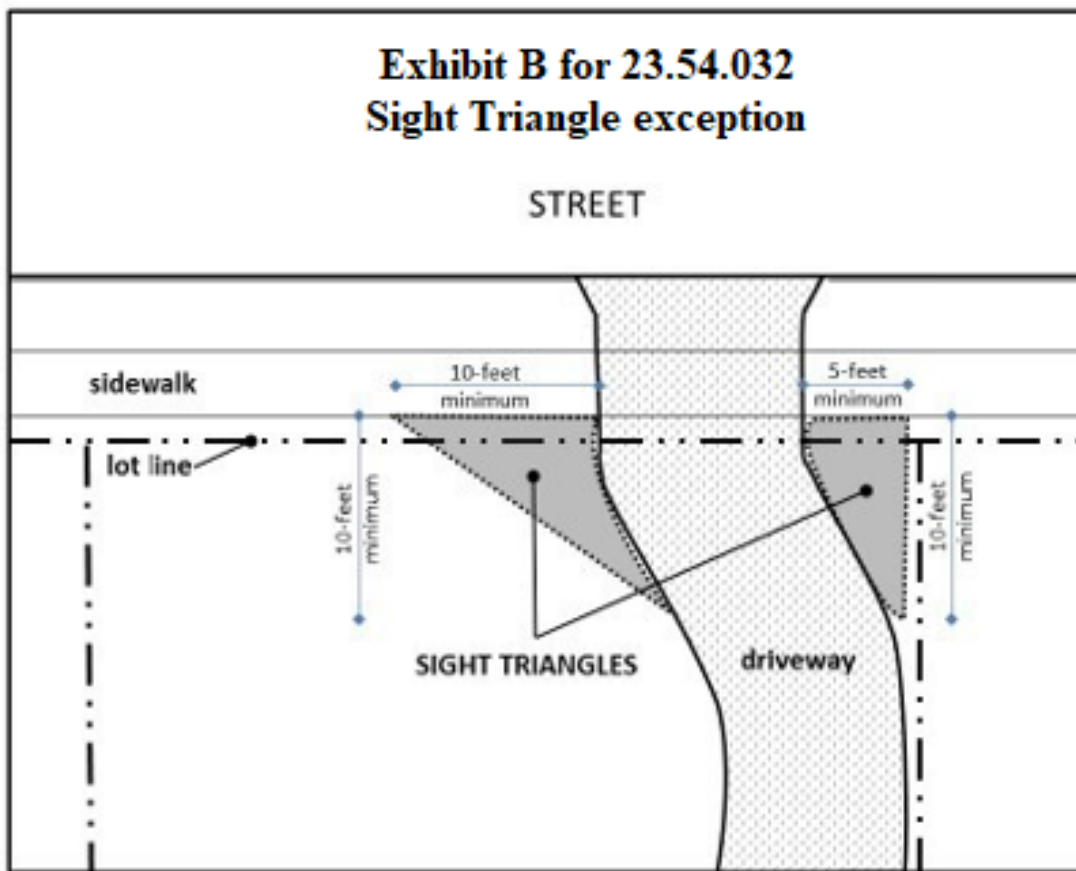
C. The sight triangle shall also be kept clear of obstructions in the vertical spaces between 32 inches and 82 inches from the ground.



D. When the driveway or easement is less than 10 feet from the lot line, the sight triangle may be provided as follows:

1. An easement may be provided sufficient to maintain the sight triangle. The easement shall be recorded with the King County Recorder; or
2. The driveway may be shared with a driveway on the neighboring lot; or
3. The driveway or easement may begin 5 feet from the lot line, as depicted in Exhibit B for 23.54.032.

**Exhibit B for 23.54.032  
Sight triangle exception**



E. An exception to the sight triangle requirement may be made for driveways serving lots containing only residential uses and fewer than three parking spaces, when providing the sight triangle would be impractical.

F. In all Downtown, Industrial, Commercial 1, and Commercial 2 zones, the sight triangle at a garage exit may be provided by mirrors and/or other approved safety measures.

G. Sight triangles are not required for one-way entrances into a parking garage or surface parking area.

H. Sight triangles are not required when access to parking is provided from an alley.

Section 40. A new Section 23.54.033 is added to the Seattle Municipal Code as follows:

#### [23.54.033 Pedestrian access to garage](#)

*Note: This new section is being created to move existing rules from Section 23.54.030 into a new section in order to break up a very large section. It would not change existing rules.*

For new structures that include a garage, in a zone where flexible-use parking is permitted, at least one pedestrian access walkway or route shall be provided between a garage and a public right-of-way, which may be an alley, including a side-hinged door for pedestrian use. A fire exit door, or other access through lobbies, may serve this purpose if the access route and doors are accessible for ingress and egress by garage users.

Section 41. A new Section 23.54.034 is added to the Seattle Municipal Code as follows:

#### [23.54.034 Electric vehicle \(EV\) charging infrastructure](#)

*Note: This new section is being created to move existing rules from Section 23.54.030 into a new section in order to break up a very large section. The updated section includes changes to make it consistent with recent changes to the Seattle Electrical Code.*

New parking spaces provided on a lot when a new building is constructed shall be "EV-ready" as specified in this Section 23.54.034. The required number of EV-ready parking spaces shall be determined by whether the parking is for a residential or nonresidential use. Parking that is clearly set aside and reserved for residential use shall meet the standards of subsection 23.54.034.A; parking for all other uses within the structure shall meet the standards of subsection 23.54.034.B.

## A. Residential uses

1. Private parking for individual dwelling units. When parking for any individual dwelling unit is provided in a private garage, carport, or parking area, separate from any parking facilities serving other units, at least one parking space in that garage, carport, or parking area shall be EV-ready.

2. Surface parking for multiple dwelling units. When parking for multiple dwelling units is provided in a surface parking area serving multiple dwelling units, the number of parking spaces that shall be EV-ready shall be as follows:

a. For up to 25 provided parking spaces, the first 12 shall be EV-ready.

b. When more than 25 parking spaces are provided, 45 percent of all parking spaces shall be EV-ready.

3. Parking garages for multiple dwelling units. When parking for multiple dwelling units is provided in a parking garage serving multiple dwelling units, a minimum of 45 percent of those parking spaces shall be EV-ready.

B. Nonresidential uses. When parking is provided for nonresidential uses, a minimum of 30 percent of those spaces shall be EV-ready, except that the following uses are not required to provided EV-ready spaces:

1. Institutional uses

2. Eating and drinking establishments

3. Sales and service uses

C. Rounding. When calculating the number of required EV-ready parking spaces, any fraction or portion of an EV-ready parking space required shall be rounded up to the nearest whole number.

## D. Reductions

1. The Director may, in consultation with the Director of Seattle City Light, reduce the requirements of this Section 23.54.034 as a Type I decision where there is substantial evidence substantiating that the added electrical load that can be attributed to meeting the requirements will:

a. Alter the local utility infrastructure design requirements on the utility side of the legal point of service, so as to require on-property power transformation; or

b. Require an upgrade to an existing residential electrical service.

2. In cases where the provisions of subsection 23.54.034.D.1 have been met, the maximum quantity of EV charging infrastructure required to be installed shall be reduced to the maximum service size that would not require the changes to transformation or electrical service in subsection 23.54.034.D.1. The Director may first reduce the required level of EV infrastructure at EV-ready parking spaces from 40-amp to 20-amp circuits. If necessary, the Director may also then reduce the number of required EV-ready parking spaces or otherwise reduce the level of EV infrastructure at EV-ready parking spaces.

3. The Director may establish by rule the procedures and documentation required for a reduction.

E. All EV charging infrastructure shall be installed in accordance with the Seattle Electrical Code. Where EV-ready surface parking spaces are located more than 4 feet from a building, raceways shall be extended to a pull box or stub in the vicinity of the designated space and shall be protected from vehicles.

F. Accessible parking. Where new EV-ready parking spaces and new accessible parking are both provided, parking facilities shall be designed so that at least 20 percent of the accessible parking space shall be EV-ready with no fewer than two EV-ready spaces.

G. Nothing in this subsection 23.54.034 shall be construed to modify the minimum number of off-street motor vehicle parking spaces required for specific uses or the maximum number of parking spaces allowed, as set forth in Section 23.54.015 or elsewhere in this Title 23.

H. This Section 23.54.034 does not require EV supply equipment, as defined by Article 100 of the Seattle Electrical Code, to be installed.

Section 42. A new Section 23.54.037 is added to the Seattle Municipal Code as follows:

#### [23.54.037 Bicycle Parking](#)

*Note: This new section is being created to move existing rules from Section 23.54.030 into a new section in order to break up a very large section. It would not change existing rules.*

A. Number of spaces

1. The minimum number of parking spaces for bicycles required for specified uses is set forth in Table A for 23.54.037.

2. Long-term parking for bicycles shall be for bicycles parked four or more hours. Short-term parking for bicycles shall be for bicycles parked less than four hours. In the case of a use not shown on Table A for 23.54.037, one bicycle parking space per 10,000 gross square feet of either short- or long-term bicycle parking is required.

3. The minimum requirements are based upon gross floor area of the use in a structure minus gross floor area in parking uses, or the square footage of the use when located outside of an enclosed structure, or as otherwise specified.

4. Rounding. For long-term bicycle parking, calculation of the minimum requirement shall round up the result to the nearest whole number. For short-term bicycle parking, calculation of the minimum requirement shall round up the result to the nearest whole even number.

<b>Table A for 23.54.037 Parking for bicycles <sup>1</sup></b>			
<b>Use</b>		<b>Bike parking requirements</b>	
		<b>Long-term</b>	<b>Short-term</b>
<b>A. COMMERCIAL USES</b>			
<u>A.1.</u>	<u>Eating and drinking establishments</u>	<u>1 per 5,000 square feet</u>	<u>1 per 1,000 square feet</u>
<u>A.2.</u>	<u>Entertainment uses other than theaters and spectator sports facilities</u>	<u>1 per 10,000 square feet</u>	<u>Equivalent to 5 percent of maximum building capacity rating</u>
	<u>A.2.a. Theaters and spectator sports facilities</u>	<u>1 per 10,000 square feet</u>	<u>Equivalent to 8 percent of maximum building capacity rating <sup>2</sup></u>
<u>A.3.</u>	<u>Lodging uses</u>	<u>3 per 40 rentable rooms</u>	<u>1 per 20 rentable rooms plus 1 per 4,000 square</u>

			<u>feet of conference and meeting rooms</u>
A.4.	<u>Medical services</u>	<u>1 per 4,000 square feet</u>	<u>1 per 2,000 square feet</u>
A.5.	<u>Offices and laboratories, research and development</u>	<u>1 per 2,000 square feet</u>	<u>1 per 10,000 square feet</u>
A.6.	<u>Sales and services, general</u>	<u>1 per 4,000 square feet</u>	<u>1 per 2,000 square feet</u>
A.7.	<u>Sales and services, heavy</u>	<u>1 per 4,000 square feet</u>	<u>1 per 10,000 square feet of occupied floor area; 2 spaces minimum</u>
<u>B. INSTITUTIONS</u>			
B.1.	<u>Institutions not listed below</u>	<u>1 per 4,000 square feet</u>	<u>1 per 10,000 square feet</u>
B.2.	<u>Child care centers</u>	<u>1 per 4,000 square feet</u>	<u>1 per 20 children. 2 spaces minimum</u>
B.3.	<u>Colleges</u>	<u>1 per 5,000 square feet</u>	<u>1 per 2,500 square feet</u>
B.4.	<u>Community clubs or centers</u>	<u>1 per 4,000 square feet</u>	<u>1 per 1,000 square feet</u>
B.5.	<u>Hospitals</u>	<u>1 per 4,000 square feet</u>	<u>1 per 10,000 square feet</u>
B.6.	<u>Libraries</u>	<u>1 per 4,000 square feet</u>	<u>1 per 2,000 square feet</u>
B.7.	<u>Museums</u>	<u>1 per 4,000 square feet</u>	<u>1 per 2,000 square feet</u>
B.8.	<u>Religious facilities</u>	<u>1 per 4,000 square feet</u>	<u>1 per 2,000 square feet</u>
B.9.	<u>Schools, primary and secondary</u>	<u>3 per classroom</u>	<u>1 per classroom</u>

B.10.	<u>Vocational or fine arts schools</u>	<u>1 per 5,000 square feet</u>	<u>1 per 2,500 square feet</u>
<u>C. MANUFACTURING USES</u>		<u>1 per 4,000 square feet</u>	<u>1 per 20,000 square feet</u>
<u>D. RESIDENTIAL USES</u> <sup>3</sup>			
D.1	<u>Assisted Living Facility</u>	<u>None</u>	<u>None</u>
D.2	<u>Congregate residences</u> <sup>4, 5</sup>	<u>1 per sleeping room</u>	<u>1 per 20 sleeping rooms. 2 spaces minimum</u>
D.3	<u>Permanent supportive housing</u>	<u>None</u>	<u>None</u>
D.4	<u>Other residential uses</u> <sup>4, 5</sup>	<u>1 per dwelling unit</u>	<u>1 per 20 dwelling units, except none for projects with less than 20 dwelling units</u>
<u>E. TRANSPORTATION FACILITIES</u>			
E.1.	<u>Park and ride facilities on surface parking lots</u>	<u>At least 20</u> <sup>6</sup>	<u>At least 10</u>
E.2.	<u>Park and ride facilities in parking garages</u>	<u>At least 20 if parking is the principal use of a property; zero if non-parking uses are the principal use of a property</u>	<u>At least 10 if parking is the principal use of a property; zero if non-parking uses are the principal use of a property</u>
E.3.	<u>Flexible-use parking garages and flexible-use parking surface lots</u>	<u>1 per 20 auto spaces</u>	<u>None</u>
E.4.	<u>Rail transit facilities and passenger terminals</u>	<u>Spaces for 5 percent of projected AM peak period daily ridership</u> <sup>6</sup>	<u>Spaces for 2 percent of projected AM peak period daily ridership</u>

Footnotes to Table A for 23.54.037

<sup>1</sup> Required bicycle parking includes long-term and short-term amounts shown in this Table A for 23.54.037.

<sup>2</sup> The Director may reduce short-term bicycle parking requirements for theaters and spectator sport facilities that provide bicycle valet services authorized through a Transportation Management Program. A bicycle valet service is a service that allows bicycles to be temporarily stored in a secure area, such as a monitored bicycle corral.

<sup>3</sup> For residential uses, after the first 50 spaces for bicycles are provided, additional spaces are required at three-quarters the ratio shown in this Table A for 23.54.037.

<sup>4</sup> For congregate residences or multifamily structures that are owned and operated by a not-for-profit entity serving seniors or persons with disabilities, or that are licensed by the State and provide supportive services for seniors or persons with disabilities, as a Type I decision, the Director shall have the discretion to reduce the amount of required bicycle parking to as few as zero if it can be demonstrated that residents are less likely to travel by bicycle.

<sup>5</sup> In low-income housing, there is no minimum required long-term bicycle parking requirement for each unit subject to affordability limits no higher than 30 percent of median income and long-term bicycle parking requirements may be waived by the Director as a Type I decision for each unit subject to affordability limits greater than 30 percent of median income and no higher than 80 percent of median income if a reasonable alternative is provided (e.g., in-unit vertical bike storage).

<sup>6</sup> The Director, in consultation with the Director of Transportation, may require more bicycle parking spaces based on the following factors: area topography; pattern and volume of expected bicycle users; nearby residential and employment density; proximity to the Urban Trails system and other existing and planned bicycle facilities; projected transit ridership and expected access to transit by bicycle; and other relevant transportation and land use information.

B. Performance standards. Provide bicycle parking in a highly visible, safe, and convenient location, emphasizing user convenience and theft deterrence, based on rules promulgated by the Director of the Seattle Department of Transportation that address the considerations in this subsection 23.54.037.B.

1. Provide secure locations and arrangements of long-term bicycle parking, with features such as locked rooms or cages and bicycle lockers. The bicycle parking should be installed in a manner that avoids creating conflicts with automobile accesses and driveways.

2. For a garage with bicycle parking and motor vehicle parking for more than two dwelling units, provide pedestrian and bicycle access to long-term bicycle parking that is separate from other vehicular entry and egress points or uses the same entry or egress point but has a marked walkway for pedestrians and bicyclists.



3. Provide adequate lighting in the bicycle parking area and access routes to it.

4. If short-term bicycle parking facilities are not clearly visible from the street or sidewalk or adjacent on-street bicycle facilities, install directional signage in adequate amounts and in highly visible locations in a manner that promotes easy wayfinding for bicyclists.

5. Provide signage to long-term bicycle parking that is oriented to building users.

6. Long-term bicycle parking shall be located where bicyclists are not required to carry bicycles on exterior stairs with more than five steps to access the parking. The Director, as a Type I decision, may allow long-term bicycle parking for rowhouse and townhouse development to be accessed by stairs with more than five steps, if the slope of the lot makes access with five or fewer steps infeasible.

7. Where practicable, long-term bicycle parking shall include a variety of rack types to accommodate different types of bicycles.

8. Install bicycle parking hardware so that it can perform to its manufacturer's specifications and any design criteria promulgated by the Director of the Seattle Department of Transportation, allowing adequate clearance for bicycles and their riders.

9. Provide full weather protection for all required long-term bicycle parking.

#### C. Location of bicycle parking

1. Long-term bicycle parking required for residential uses shall be located on-site except as provided in subsection 23.54.037.C.3.

2. Short-term bicycle parking may be provided on the lot or in an adjacent right-of-way, subject to approval by the Director of the Seattle Department of Transportation, or as provided in subsection 23.54.037.C.3.

3. Both long-term and short-term bicycle parking for residential uses may be provided off-site if within 600 feet of the residential use to which the bicycle parking is accessory and if the site of the bicycle parking is functionally interrelated to the site of the residential use to which the bicycle parking is accessory, such as within a unit lot subdivision or if the sites are connected by access easements, or if a covenant or similar property right is established to allow use of the off-site bicycle parking.

D. Long-term bicycle parking required for small efficiency dwelling units and congregate residence sleeping rooms is required to be covered for full weather protection. If the required, covered long-term bicycle parking is located inside the building that contains small efficiency dwelling units or congregate residence sleeping

rooms, the space required to provide the required long-term bicycle parking shall be exempt from floor area ratio (FAR) limits. Covered long-term bicycle parking that is provided beyond the required bicycle parking shall not be exempt from FAR limits.

E. Bicycle parking facilities shared by more than one use are encouraged.

F. Except as provided in subsection 23.54.015.G, bicycle parking facilities required for nonresidential uses shall be located:

1. On the lot; or

2. For a functionally interrelated campus containing more than one building, in a shared bicycle parking facility within 600 feet of the lot; or

3. Short-term bicycle parking may be provided in an adjacent right-of-way, subject to approval by the Director of the Seattle Department of Transportation.

G. For nonresidential uses on a functionally interrelated campus containing more than one building, both long-term and short-term bicycle parking may be located in an off-site location within 600 feet of the lot, and short-term public bicycle parking may be provided in a right-of-way, subject to approval by the Director of the Seattle Department of Transportation. The Director of the Seattle Department of Transportation may consider whether bicycle parking in the public place shall be sufficient in quality to effectively serve bicycle parking demand from the site.

H. Bicycle commuter shower facilities. Structures containing 100,000 square feet or more of office use floor area shall include shower facilities and clothing storage areas for bicycle commuters. Two showers shall be required for every 100,000 square feet of office use. They shall be available in a manner that results in equal shower access for all users. The facilities shall be for the use of the employees and occupants of the building, and shall be located where they are easily accessible to bicycle parking facilities, which may include in places accessible by elevator from the bicycle parking location.

I. Bicycle parking spaces within dwelling units or on balconies do not count toward the bicycle parking requirement, except if the bike parking spaces are located:

1 In a private garage; or

2. Within the ground floor of a dwelling unit in a townhouse or rowhouse development.

## Changes to Definitions

Section 43. Section 23.84A.002 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.84A.002 "A"

\* \* \*

"Adult family home"~~((See Residential use))~~ means the occupation of a dwelling unit by an adult family home defined and licensed as such by the State of Washington in chapter 70.128 RCW.

\* \* \*

Section 44. Section 23.84A.006 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.006 "C"

\* \* \*

~~("Carriage House" See "Residential use."  
"Carriage House structure" See "Residential use".)~~

\* \* \*

Section 45. Section 23.84A.008 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.008 "D"

\* \* \*

"Dwelling unit" means a room or rooms located within a structure that are configured to meet the standards of Section 23.42.048, ~~((and that are occupied or intended to be occupied by not more than one household as living accommodations independent from any other household.))~~ providing independent living facilities for one household, including permanent provisions for sleeping, food preparation, and sanitation.

"Dwelling unit, accessory((-)" ~~((See "Residential use."))~~ means a dwelling unit that:

a. is located within the same structure as a principal dwelling unit or within an accessory structure on the same lot as a principal dwelling unit; and

b. is designed, arranged, and intended to be occupied as living facilities independent from any dwelling unit.

~~(("Dwelling unit, detached accessory." Also known as a backyard cottage. See "detached accessory dwelling unit" under the definition of "Residential use" in Section 23.84A.032.))~~

"Dwelling unit, attached" means a dwelling unit that:

1. occupies space from the ground to the roof of the structure in which it is located; and

2. is attached to another dwelling unit. Dwelling units shall be considered attached if they share a common or party wall or have walls containing floor area that are located within 2 feet of each other.

"Dwelling unit, detached" means a dwelling unit that:

1. occupies space from the ground to the roof of the structure in which it is located; and

2. is not attached to any other dwelling unit.

"Dwelling unit, principal" means a dwelling unit that is not accessory to another dwelling unit.

"Dwelling unit, stacked" means dwelling units that are located above or below other dwelling units such as apartments or condominium buildings.

"Dwelling unit - small efficiency" means a dwelling unit with an amount of square footage less than the minimum amounts specified for Efficiency Dwelling Units in the Seattle Building Code, and that meet the standards prescribed in Section 23.42.048.

Section 46. Section 23.84A.010 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

23.84A.010 "E"

\* \* \*

"Essential public facilities" within the City of Seattle means airports, sewage treatment plants, jails, light rail transit systems, and power plants.

"EV-ready" means a minimum 40-ampere dedicated 208- or 240-volt branch circuit (32-amp load) terminated at a junction box or receptacle outlet in close proximity to a parking space.

\* \* \*

Section 47. Section 23.84A.024 of the Seattle Municipal Code, last amended by Ordinance 126855, is amended as follows:

23.84A.024 "L"

\* \* \*

"Lot line, front" means, in the case of a lot with frontage on a single street, the lot line separating the lot from the street, and in the case of a lot with frontage on more than one street other than a through lot, the lot line separating the lot from any abutting street, provided the other lot line(s) that abut streets are considered to be either side street lot line(s) or the rear lot line according to the definitions of those terms. In the case of a through lot, the lot lines separating the lot from the streets that are parallel or within 15 degrees of parallel to each other are both front lines. For new development on a lot with no street frontage, the front lot line shall be the lot line designated by the project applicant in accordance with Section 23.86.010. If the area of the front yard based on a front lot line determined according to this definition is less than 20 percent of the total lot area and is less than 1,000 square feet in area, the Director may designate a different lot line as the front lot line or, in the case of a through lot, designate one of the front lots lines as a rear in order to provide structural setbacks, building separations, and open space that are more consistent with those of other lots that are ~~((within 100 feet))~~ in the vicinity of the property.

\* \* \*

Section 48. Section 23.84A.025 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

23.84A.025 "M"

\* \* \*

"Major retail store" means a structure or portion of a structure that provides adequate space of at least ~~((eighty thousand ()))~~ 80,000~~(( ))~~ square feet to accommodate the

merchandising needs of a major new retailer with an established reputation, and providing a range of merchandise and services, including both personal and household items, to anchor downtown shopping activity around the retail core, thereby supporting other retail uses and the area's vitality and regional draw for customers.

"Major transit stop" means:

1. Stops on a bus route operated by Sound Transit;
2. Commuter rail stops;
3. Stops on light rail, street car, or trolley bus systems;
4. Stops on bus rapid transit routes; and
5. Any future stop on a bus rapid transit route funded for development and projected for construction within an applicable six-year transit plan under RCW 35.58.2795.

\* \* \*

Section 49. Section 23.84A.030 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

#### 23.84A.030 "P"

~~"Permanent supportive housing" ((means low income housing that is paired with on or off site voluntary human services to support people living with complex and disabling behavioral health or physical health conditions and experiencing homelessness or at imminent risk of homelessness prior to moving into such housing.)) . See~~  
"Residential use, permanent supportive housing."

Section 50. Section 23.84A.032 of the Seattle Municipal Code, last amended by Ordinance 127099, is amended as follows:

#### 23.84A.032 "R"

\* \* \*

~~"Residential use" means ((any))~~ a use in one or more structures, including interior and exterior accessory spaces, in which people primarily live, in one or more of the following:

- ~~1. ("Accessory dwelling unit" means one or more rooms that:~~

~~a. Are located within a principal dwelling unit or within an accessory structure on the same lot as a principal dwelling unit;~~

~~b. Meet the standards of Section 23.44.041, Section 23.45.545, or Chapter 23.47A, as applicable;~~

~~c. Are designed, arranged, and intended to be occupied by not more than one household as living accommodations independent from any other household; and~~

~~d. Are so occupied or vacant.~~

~~2. "Attached accessory dwelling unit" means an accessory dwelling unit that is within a principal dwelling unit.~~

~~3. "Adult family home" means an adult family home defined and licensed as such by the State of Washington in a dwelling unit.~~

~~4. "Apartment" means a multifamily residential use that is not a cottage housing development, rowhouse development, or townhouse development.~~

~~5.) "Artist's studio/dwelling" means a residential uses with a combination working studio and dwelling unit for artists, consisting of a room or suite of rooms occupied by not more than one household.~~

~~((6)) 2. "Assisted living facility" means a residential use licensed by the State of Washington as a boarding home that contains at least two assisted living units for people who have either a need for assistance with activities of daily living (which are defined as eating, toileting, ambulation, transfer (e.g., moving from bed to chair or chair to bath), and bathing) or some form of cognitive impairment but who do not need the skilled critical care provided by nursing homes. See "Assisted living unit."~~

~~((7. "Carriage house" means a dwelling unit in a carriage house structure.~~

~~8. "Carriage house structure" means a structure within a cottage housing development, in which one or more dwelling units are located on the story above an enclosed parking garage at ground level that either abuts an alley and has vehicle access from that alley, or is located on a corner lot and has access to the parking in the structure from a driveway that abuts and runs parallel to the rear lot line of the lot. See also "Carriage house.")~~

~~((9))~~ 3. "Caretaker's quarters" means a residential use accessory to a ~~((non-residential))~~ nonresidential use consisting of a dwelling unit not exceeding 800 square feet of living area and occupied by a caretaker or watchperson.

~~((10))~~ 4. "Congregate residence" means a residential use in which sleeping rooms are independently rented and lockable and provide living and sleeping space, and residents share kitchen facilities and other common elements with other residents in a building.

~~((11. "Cottage housing development" means a use consisting of cottages arranged on at least two sides of a common open space or a common amenity area. A cottage housing development may include a carriage house structure. See "Cottage," "Carriage house," and "Carriage house structure."))~~

~~12. "Detached accessory dwelling unit" means an accessory dwelling unit in an accessory structure.~~

~~13. "Domestic violence shelter" means a structure or portion of a structure managed by a nonprofit organization, which unit provides housing at a confidential location and support services for victims of domestic violence.~~

~~14. "Floating home" means a dwelling unit constructed on a float that is moored, anchored, or otherwise secured in the water.~~

~~15. "Low-income housing.")~~

5. "Housing" means all other residential uses where individual dwelling units are provided, whether in detached or attached structures.

~~((16))~~ 7. "Mobile home" means a structure that is designed and constructed to be transportable in one or more sections and built on a permanent chassis, designed to be used as a dwelling unit without a permanent foundation, and connected to utilities that include plumbing, heating, and electrical systems. A structure that was transportable at the time of manufacture is still considered to meet this definition notwithstanding that it is no longer transportable.

~~((17. "Mobile home park" means a tract of land that is rented for the use of more than one mobile home occupied as a dwelling unit.~~

~~18. "Multifamily residential use" means a use consisting of two or more dwelling units in a structure or portion of a structure, excluding accessory dwelling units, or a congregate residence.~~



~~19. "Nursing home" means a use licensed by the State of Washington as a nursing home, that provides full-time convalescent and/or chronic care for individuals who, by reason of chronic illness or infirmity, are unable to care for themselves, but that does not provide care for the acutely ill or surgical or obstetrical services. This definition excludes hospitals or sanitariums.))~~

~~((20) 8. "Permanent supportive housing((-))" means a residential use where low-income housing is paired with on or off-site voluntary human services to support people living with complex and disabling behavioral health or physical health conditions and experiencing homelessness or at imminent risk of homelessness prior to moving into such housing.~~

~~((21. "Rowhouse development" means a multifamily residential use in which all principal dwelling units on the lot meet the following conditions:~~

~~a. Each dwelling unit occupies the space from the ground to the roof of the structure in which it is located;~~

~~b. No portion of a dwelling unit, except for an accessory dwelling unit or shared parking garage, occupies space above or below another dwelling unit;~~

~~c. Each dwelling unit is attached along at least one common wall to at least one other dwelling unit, with habitable interior space on both sides of the common wall, or abuts another dwelling unit on a common lot line;~~

~~d. The front of each dwelling unit faces a street lot line;~~

~~e. Each dwelling unit provides pedestrian access directly to the street that it faces; and~~

~~f. No portion of any other dwelling unit, except for an attached accessory dwelling unit, is located between any dwelling unit and the street faced by the front of that unit.~~

~~22. "Single-family dwelling unit" means a detached principal structure having a permanent foundation, containing one dwelling unit, except that the structure may also contain one or two attached accessory dwelling units where expressly authorized pursuant to this Title 23. A detached accessory dwelling unit is not considered a single-family dwelling unit for purposes of this Chapter 23.84A.~~

~~23. "Townhouse development" means a multifamily residential use that is not a rowhouse development, and in which:~~

~~a. Each dwelling unit occupies space from the ground to the roof of the structure in which it is located;~~

~~b. No portion of a dwelling unit occupies space above or below another dwelling unit, except for an attached accessory dwelling unit and except for dwelling units constructed over a shared parking garage, including shared parking garages that project up to 4 feet above grade; and~~

~~c. Each dwelling unit is attached along at least one common wall to at least one other dwelling unit, with habitable interior space on both sides of the common wall, or abuts another dwelling unit on a common lot line.)~~

\* \* \*

Section 51. Section 23.84A.036 of the Seattle Municipal Code, last amended by Ordinance 126157, is amended as follows:

#### 23.84A.036 "S"

\* \* \*

"Short subdivision" means the division or redivision of land into nine ~~((9))~~ or fewer lots, tracts, parcels, sites, or divisions for the purpose of sale, lease, development, or financing.

"Short subdivision, zero lot line" means a short subdivision that conforms to the unit lot subdivision standards in Section 23.24.045.

\* \* \*

"Solar collector" means ~~((any))~~ a device used to collect direct sunlight for use in the heating or cooling of a structure, domestic hot water, ~~((or))~~ swimming pool, or the generation of electricity, including photovoltaic panels and solar thermal panels.

~~(("Solar greenhouse" means a solar collector that is a structure or portion of a structure utilizing glass or similar glazing material to collect direct sunlight for space heating purposes.))~~

\* \* \*

"Structure, accessory." See "Accessory structure."

"Structure, attached" means a structure that shares a common or party wall with another structure or has a wall containing floor area that is located within 2 feet of a wall containing floor area of another structure.

"Structure, detached " means a structure (~~(having no common or party wall with another structure))~~ that is not attached to any other dwelling unit.

\* \* \*

"Subdivision" means the division or redivision of land into ten (~~((40))~~) or more lots, tracts, parcels, sites, or divisions for the purpose of sale, lease, or transfer of ownership.

"Subdivision, zero lot line" means a subdivision that conforms to the unit lot subdivision standards in Section 23.22.062.

\* \* \*

Section 52. Section 23.84A.048 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

#### 23.84A.048 "Z"

\* \* \*

~~(("Zone, neighborhood residential" means a zone with a classification that includes any of the following: NR1, NR2, NR3, and RSL)).~~

\* \* \*

"Zone, residential" means a zone with a classification that includes any of the following: NR(~~1, NR2, NR3, RSL~~), LR1, LR2, LR3, MR, HR, RC, DMR, IDR, SM/R, SM-SLU/R, and SM-U/R which classification also may include one or more suffixes, but not including any zone with an RC designation.

~~(("Zone, single-family" means a neighborhood residential zone with a classification that includes any of the following: Neighborhood Residential 1 (NR1), Neighborhood Residential 2 (NR2), Neighborhood Residential 3 (NR3), and Residential Small Lot (RSL)).~~

#### Changes to Measurements

Section 53. Section 23.86.002 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

### 23.86.002 General provisions

*Note: This section is being updated to reflect that RSL zones have been deleted and that density limits have been implemented in NR zones.*

A. For all calculations, the applicant shall be responsible for supplying drawings illustrating the measurements. These drawings shall be drawn to scale, and shall be of sufficient detail to allow verification upon inspection or examination by the Director.

#### B. Fractions

1. Unless otherwise indicated, if any measurement technique for determining the number of items required or allowed, including but not limited to motor vehicle parking, or required trees or shrubs, results in fractional requirements, any fraction up to and including 0.5 of the applicable unit of measurement shall be disregarded and fractions over 0.5 shall require the next higher full unit of measurement.

2. If any measurement technique for determining required minimum or allowed maximum dimensions, including but not limited to height, yards, setbacks, lot coverage, open space, building depth, parking space size, or curb cut width, results in fractional requirements, the dimension shall be measured to the nearest inch. Any fraction up to and including 0.5 of an inch shall be disregarded and fractions over 0.5 of an inch shall require the next higher unit.

3. Except within Lowrise and ((RSL)) NR zones, if density calculations result in a fraction of a unit, any fraction up to and including 0.5 constitutes zero additional units, and any fraction over 0.5 constitutes one additional unit. Within Lowrise zones, the effect of a density calculation that results in a fraction of a unit is as described in Section 23.45.512. Within ((RSL)) NR zones, the effect of a density calculation that results in a fraction of a unit is as described in Section 23.44.017. This provision may not be applied to density calculations that result in a quotient less than one.

C. Where the location of a lot line varies depending on elevation, such as partial right-of-way vacations and dedications that include below-grade areas but exclude the area at ground level, development standards that rely on lot lines shall be based on the location of lot lines at grade.

Section 54. Section 23.86.006 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

### 23.86.006 Structure height measurement

*Note: This section would be updated as height averaging is proposed to be removed from NR zones.*

\* \* \*

B. Within the South Lake Union Urban Center, at the applicant's option, structure height shall be measured either as provided for in subsection 23.86.006.A, ~~((23.86.006.E))~~ 23.86.006.D, or under provisions of this subsection 23.86.006.B. Structure height shall be measured for all portions of the structure. All measurements shall be taken vertically from existing or finished grade, whichever is lower, to the highest point of the structure located directly above each point of measurement. Existing or finished grade shall be established by drawing straight lines between the corresponding elevations at the perimeter of the structure. The straight lines will be existing or finished grade for the purpose of height measurement. When a contour line crosses a facade more than once, that contour line will be disregarded when establishing existing or finished grade.

~~C. ((Height averaging for neighborhood residential zones. In a neighborhood residential zone, when expanding an existing structure occupied by a nonconforming residential use per Section 23.42.106, the following measurement shall be used to determine the average height of the closest principal structures on either side:~~

~~1. Each structure used for averaging shall be on the same block front as the lot for which a height limit is being established. The structures used shall be the nearest single-family structure on each side of the lot, and shall be within 100 feet of the side lot lines of the lot.~~

~~2. The height limit for the lot shall be established by averaging the elevations of the structures on either side in the following manner:~~

~~a. If the nearest structure on either side has a roof with at least a 4:12 pitch, the elevation to be used for averaging shall be the highest point of that structure's roof minus 5 feet.~~

~~b. If the nearest structure on either side has a flat roof, or a roof with a pitch of less than 4:12, the elevation of the highest point of the structure's roof shall be used for averaging.~~

~~c. Rooftop features which are otherwise exempt from height limitations according to subsection 23.44.012.C, shall not be included in elevation calculations.~~

~~d. The two elevations obtained from subsection 23.86.006.B.2.a and/or subsection 23.86.006.B.2.b shall be averaged to derive the height limit for the lot. This height limit shall be the difference in elevation between the midpoint of a line parallel to the front lot line at the required front setback and the average elevation derived from subsection 23.86.006.B.2.a and/or subsection 23.86.006.B.2.b.~~

~~e. The height measurement technique used for the lot shall then be the City's standard measurement technique, subsection 23.86.006.A.~~

~~3. If there is no single-family structure within 100 feet of a side lot line, or if the nearest single-family structure within 100 feet of a side lot line is not on the same block front, the elevation used for averaging on that side shall be 30 feet plus the elevation of the midpoint of the front lot line of the abutting vacant lot.~~

~~4. If the lot is a corner lot, the height limit may be the highest elevation of the nearest structure on the same block front, provided that the structure is within 100 feet of the side lot line of the lot and that both front yards face the same street.~~

~~5. In no case shall the height limit established according to these height averaging provisions be greater than 40 feet.~~

~~6. Lots using height averaging to establish a height limit shall be eligible for the pitched roof provisions of subsection 23.44.012.B.~~

~~D.)) Stories or portions of stories of a structure that are underground are not analyzed for purposes of structure height measurement.~~

~~((E)) D. Height measurement techniques in downtown zones and in the South Lake Union Urban Center~~

~~1. Determine the major street lot line, which shall be the lot's longest street lot line. When the lot has two or more street lot lines of equal length, the applicant shall choose the major street lot line.~~

~~2. Determine the slope of the lot along the entire length of the major street lot line.~~

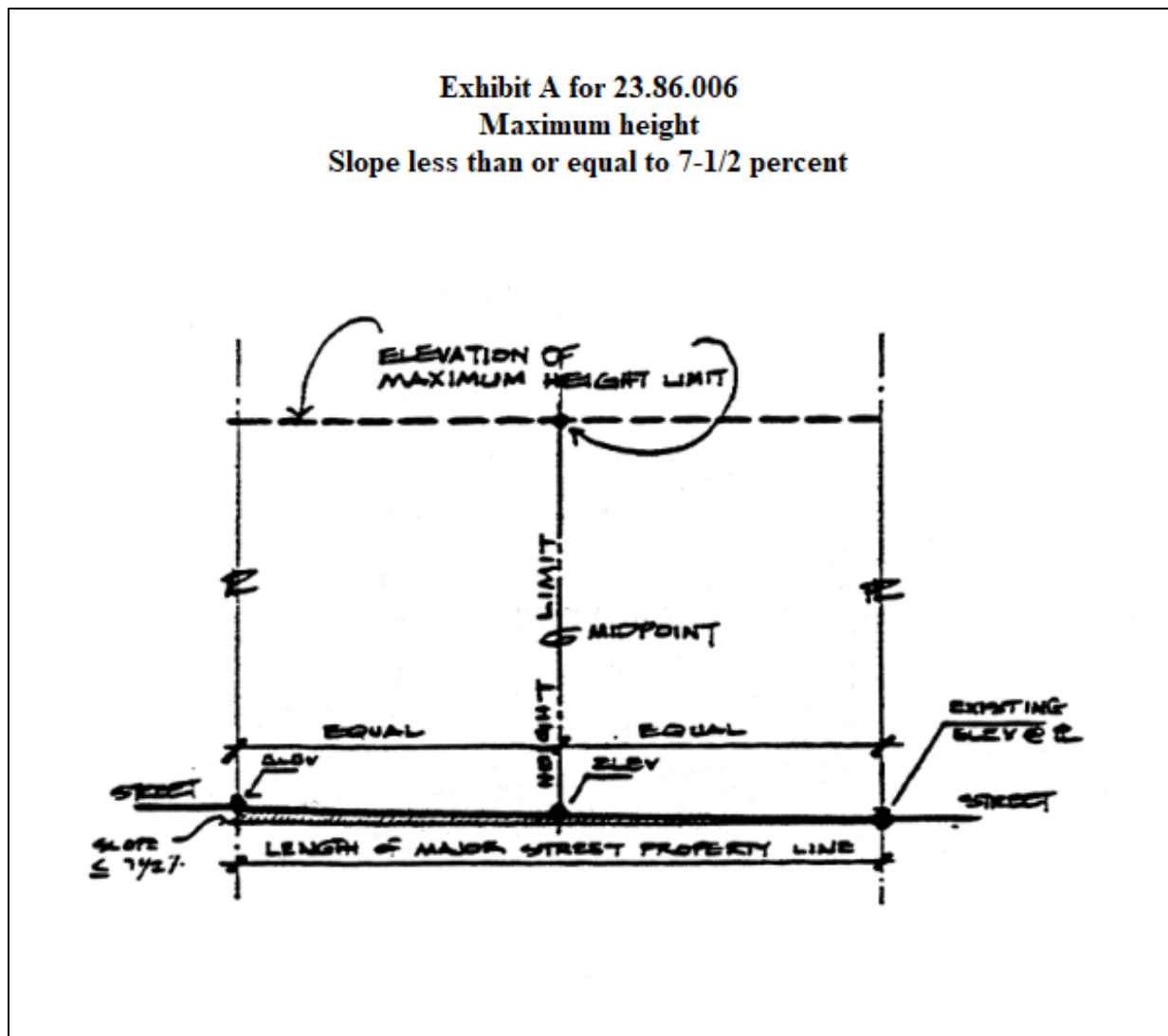
~~3. The maximum height shall be measured as follows:~~

a. When the slope of the major street lot line is less than or equal to 7.5 percent, the elevation of maximum height shall be determined by adding the maximum permitted height to the existing grade elevation at the midpoint of the major street lot line. On a through-lot, the elevation of maximum height shall apply only to the half of the lot nearest the major street lot line. On the other half of a through-lot, the elevation of maximum height shall be determined by the above method using the street lot line opposite and parallel to the major street lot line as depicted in Exhibit ((B)) A for 23.86.006.

**Exhibit A for 23.86.006**

**Maximum Height**

**Slope Less than or equal to 7-1/2 percent**



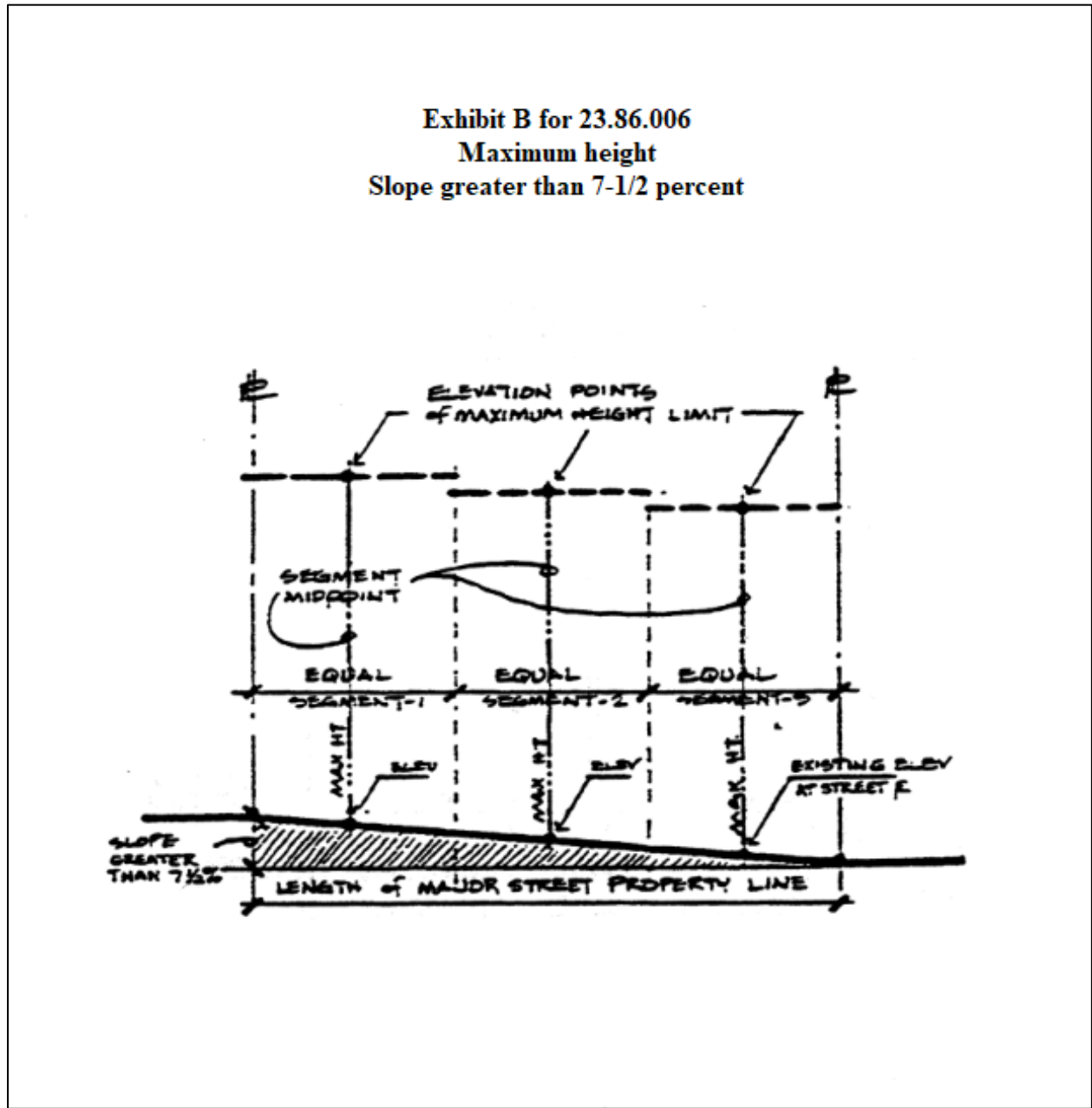
b. When the slope of the major street lot line exceeds 7.5 percent, the major street lot line shall be divided into four or fewer equal segments no longer than 120 feet in length. The elevation of maximum height shall be determined by adding the maximum permitted height to the existing grade elevation at the midpoint of each segment. On a through-lot, the elevation of maximum height shall apply only to the half of the lot nearest the major street lot line. On the other half of a through-lot, the elevation of maximum height shall be determined by the above method using the street lot line opposite and parallel to the major street lot line, as depicted in Exhibit ((C)) B for 23.86.006.



**Exhibit B for 23.86.006**

**Maximum height**

**Slope greater than 7-1/2 percent**



c. For lots with more than one street frontage, where there is no street lot line that is essentially parallel to the major street lot line, when a measurement has been made for the portion of the block containing the major street lot line, the next measurement shall be taken from the remaining street lot line that is opposite and most distant from the major street lot line.

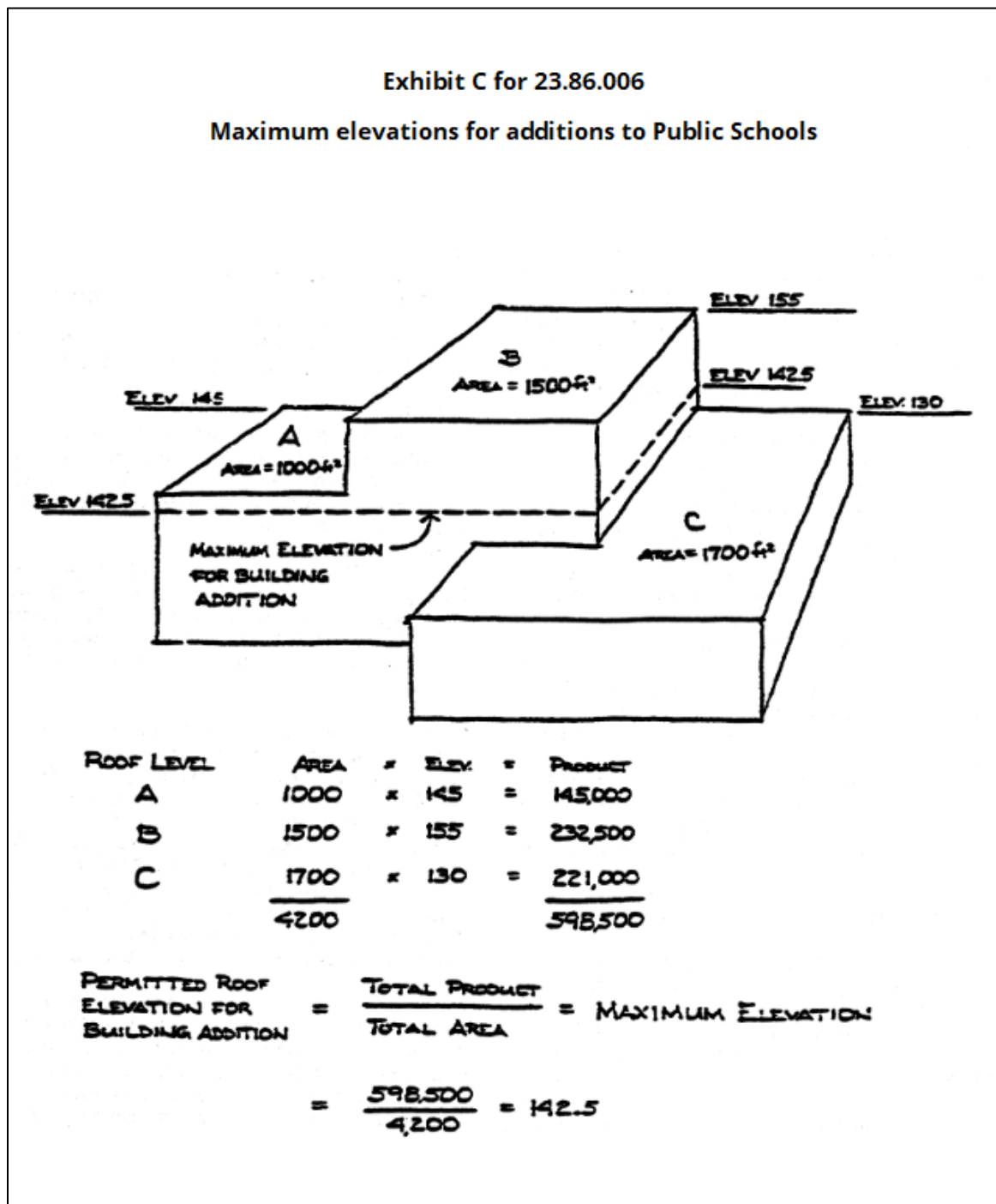
~~((F))~~ E. Determining the height of existing public school structures. When the height of the existing public school structure is measured for purposes of determining the permitted height or lot coverage of a public school structure, either of the following measurement methods may be used:

1. If all parts of the new roof are pitched at a rate of not less than 4:12, the ridge of the new roof may extend to the highest point of the existing roof. A shed roof does not qualify for this option; or

2. If all parts of the new roof are not pitched at a rate of not less than 4:12, then the elevation of the new construction may extend to the average height of the existing structure. The average height shall be determined by measuring the area of each portion of the building at each height and averaging those areas, as depicted in Exhibit ~~((D))~~ C for 23.86.006.

**Exhibit C for 23.86.006**

**Maximum elevations for additions to Public Schools**



((G)) E. Height measurement technique for structures located partially within the Shoreline District. When any portion of the structure falls within the Shoreline District,

structure height for the entire structure shall be measured according to Section 23.60A.952, Height.

((H)) G. For projects accepted into the Living Building Pilot Program authorized pursuant to Section 23.40.060, the applicant may choose either the height definition of Chapter 2 of the Seattle Building Code or the height measurement method described in this Section 23.86.006.

Exhibit 23.86.006 B  
Maximum Height. Slope Less Than or  
Equal to 7½%

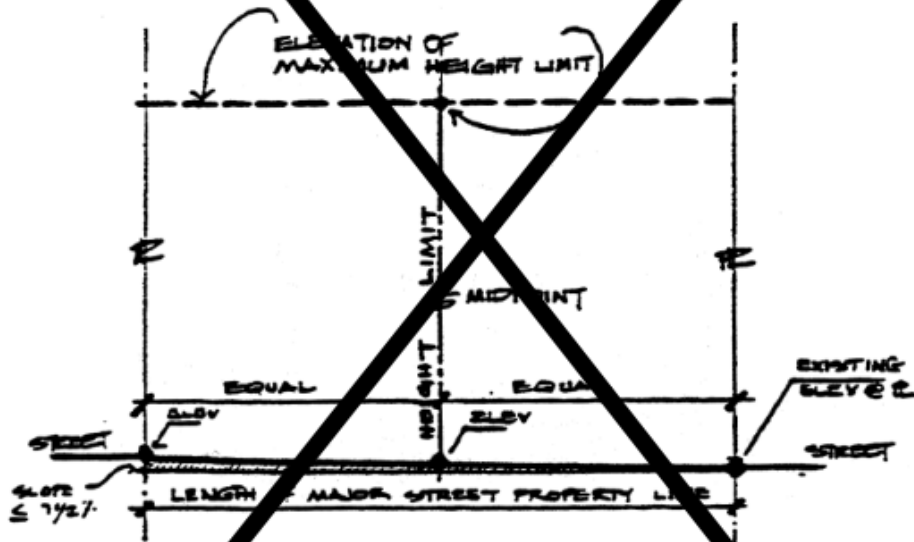


Exhibit 23.86.006 C  
Maximum Height, Slope Greater Than 7-1/2%

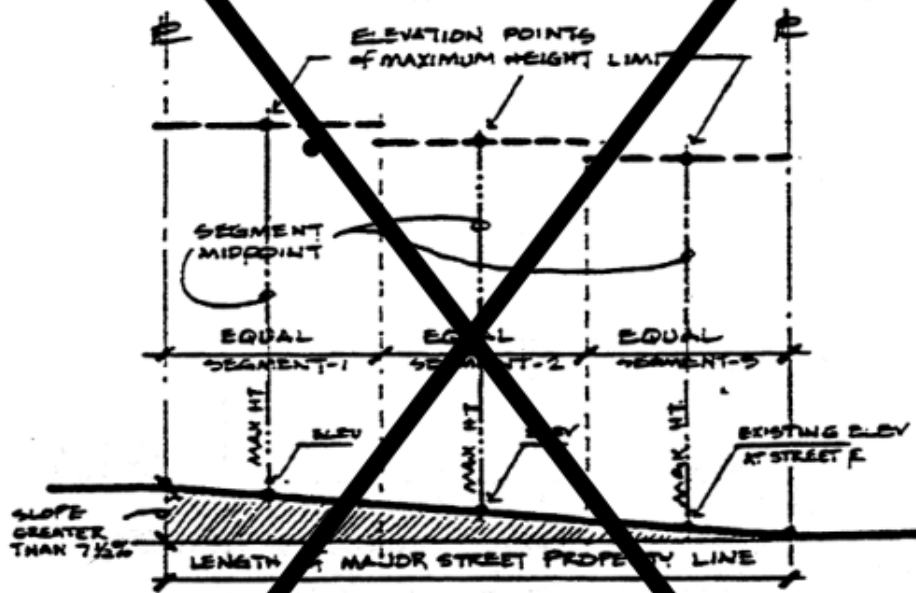
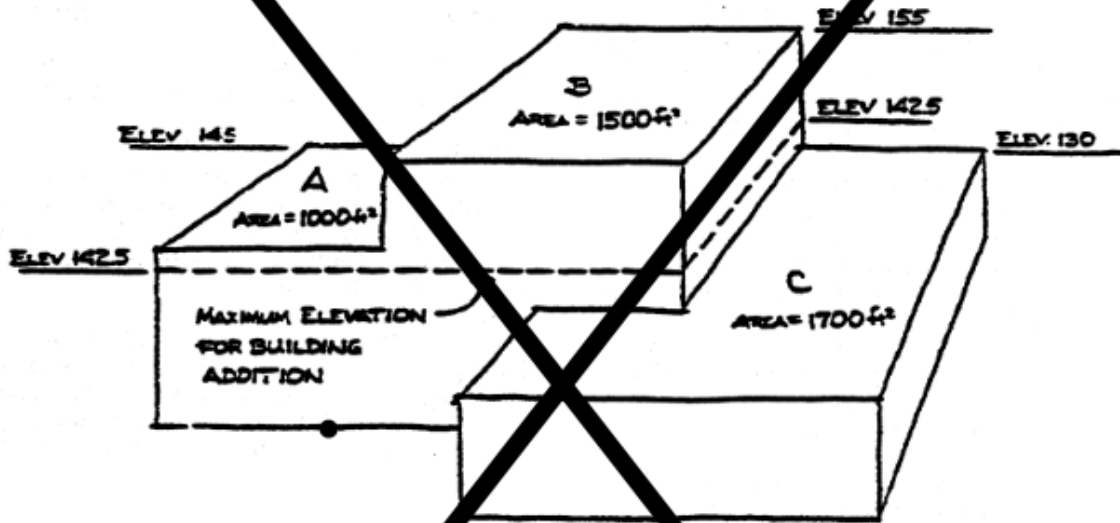


Exhibit 23.86.006 D



ROOF LEVEL	AREA	x	ELEV.	=	PRODUCT
A	1000	x	145	=	145,000
B	1500	x	155	=	232,500
C	1700	x	130	=	221,000
	<u>4200</u>				<u>598,500</u>

$$\begin{aligned}
 \text{PERMITTED ROOF ELEVATION FOR BUILDING ADDITION} &= \frac{\text{TOTAL PRODUCT}}{\text{TOTAL AREA}} = \text{MAXIMUM ELEVATION} \\
 &= \frac{598,500}{4,200} = 142.5
 \end{aligned}$$

Section 55. Section 23.86.008 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

23.86.008 Lot ((coverage,)) width ((and depth,)) in Neighborhood Residential zones

*Note: This section is proposed to be updated to simply the explanation and remove outdated lot coverage calculations.*

~~((A. Lot coverage shall be calculated in accordance with Exhibit 23.86.008 A.~~

~~B. In neighborhood residential zones, lot depth shall be the length of the line extending between the front lot line or front lot line extended, and the rear lot line or lines, or in the case of a through lot, between the two (2) front lot lines or lines extended. This line shall be perpendicular to the front lot line or front lot line extended. Where an alley abuts the rear of the property, one-half (½) of the width of the alley shall be included as a portion of the lot for determining lot depth.~~

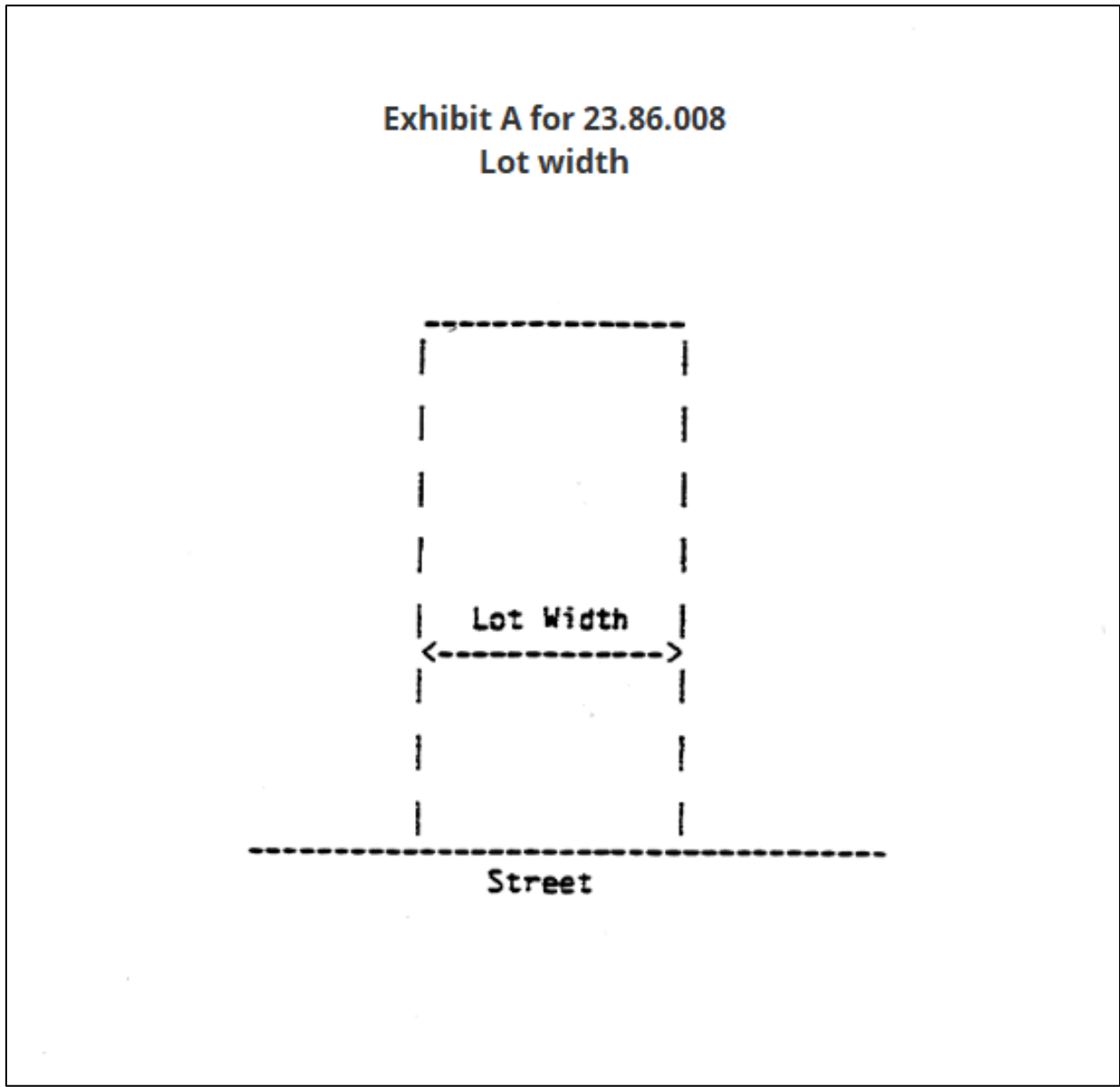
~~C. Lot Width in Neighborhood Residential Zones:))~~

~~((4)) A. When a lot is essentially rectangular, the lot width shall be the mean horizontal distance between side lot lines measured at right angles to lot depth ((Exhibit 23.86.008 B))) Exhibit A for 23.86.008.~~



**Exhibit A for 23.86.008**

**Lot width**



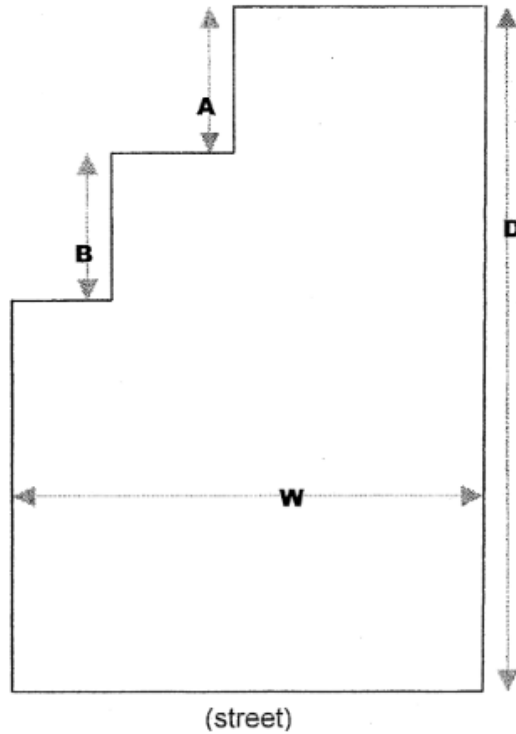
((2)) B. In the case of a lot with more than one ((4)) rear lot line ((Exhibits 23.86.008 C and 23.86.008 D)) Exhibit B for 23.86.008 and Exhibit C for 23.86.008, the lot width shall be measured according to the following:

**Exhibit B for 23.86.008**

**Lots with more than one rear lot line,**  
**and where the distance between the rear**  
**lot line is less than 50 percent of lot depth**

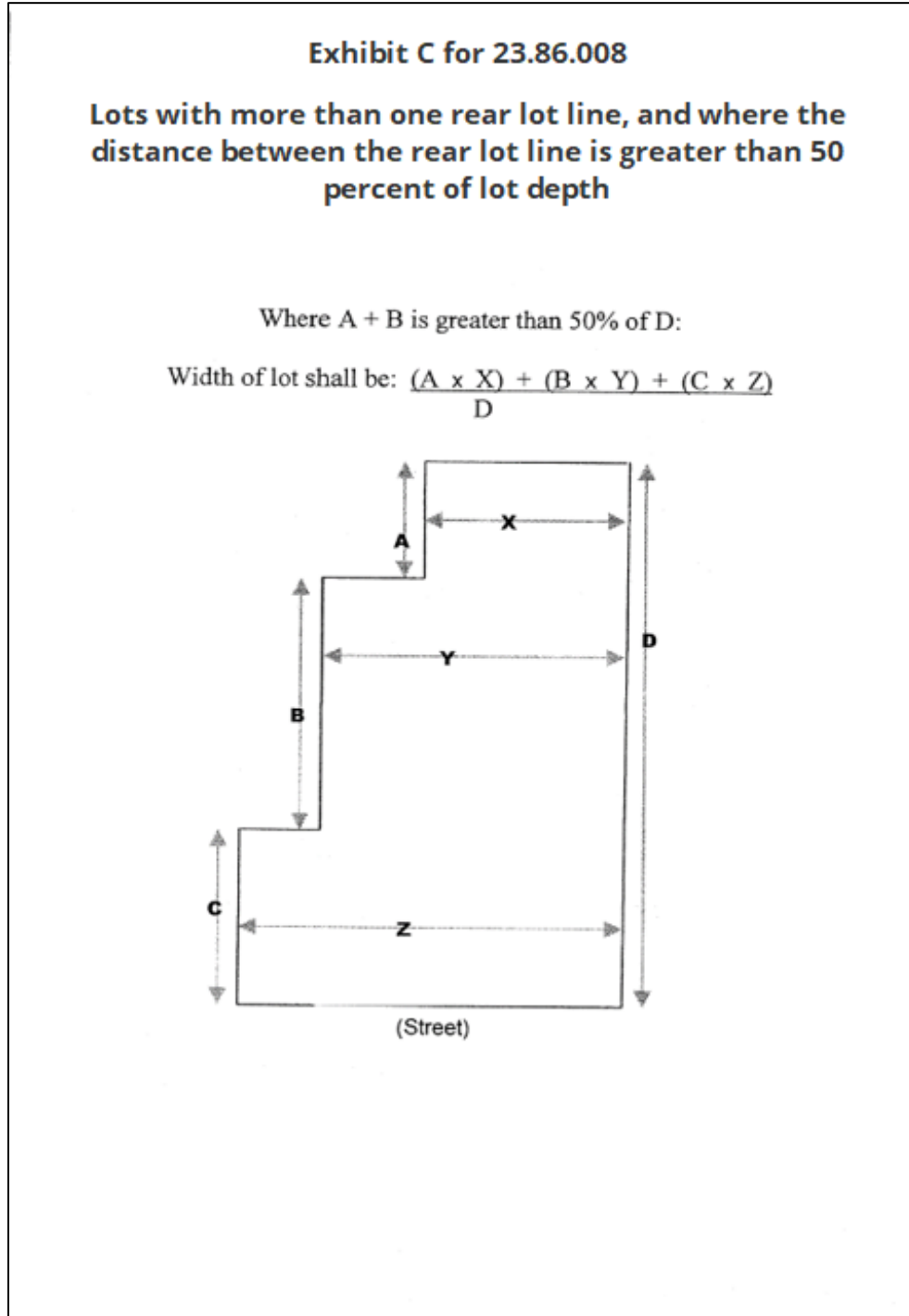
**Exhibit B for 23.86.008**  
**Lots with more than one rear lot line,**  
**and where the distance between the rear**  
**lot line is less than 50 percent of lot depth**

Where  $A + B$  is less than 50% of  $D$ , the lot width shall be  $W$ .



**Exhibit C for 23.86.008**

**Lots with more than one rear lot line, and where the distance between the rear lot line is greater than 50 percent of lot depth**



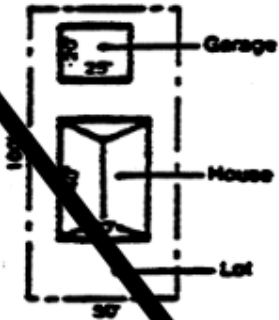
((a)) 1. If the distance between the rear lot lines is ((fifty (50))) percent or less of the lot depth, the lot width shall be measured parallel to the front lot

line and shall be the greatest distance between the side lot lines (~~((Exhibit 23.86.008 C))~~)  
Exhibit B for 23.86.008; or

~~((b))~~ 2. If the distance between the rear lot lines is greater than ~~((fifty~~  
~~())50((%))~~ percent of the lot depth, the lot width shall be determined by measuring average  
lot width according to ~~((Exhibit 23.86.008 D))~~ Exhibit C for 23.86.008.

~~((3))~~ C. For irregular lots not meeting the conditions of subsections ~~((C1 or~~  
~~C2))~~ 23.86.008.A or 23.86.008.B, the Director shall determine the measurement of lot  
width.

Exhibit 23.86.008 A  
Lot Coverage



**Total Lot Area**  
=5,000 sq. ft.

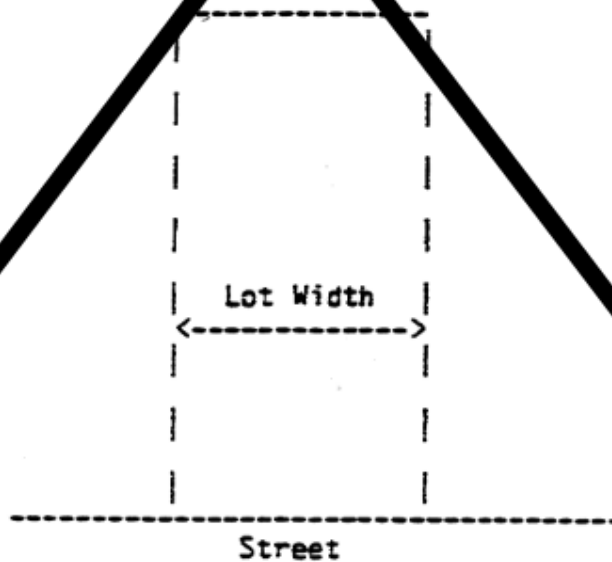
**House Area**  
=1,200 sq. ft.

**Garage Area**  
=500 sq. ft.

$(1,700 \text{ sq. ft.} / 5,000 \text{ sq. ft.}) = 100\%$   
=34%

**Total Lot Coverage**  
=34%

Exhibit 23.86.008 B  
Lot Width

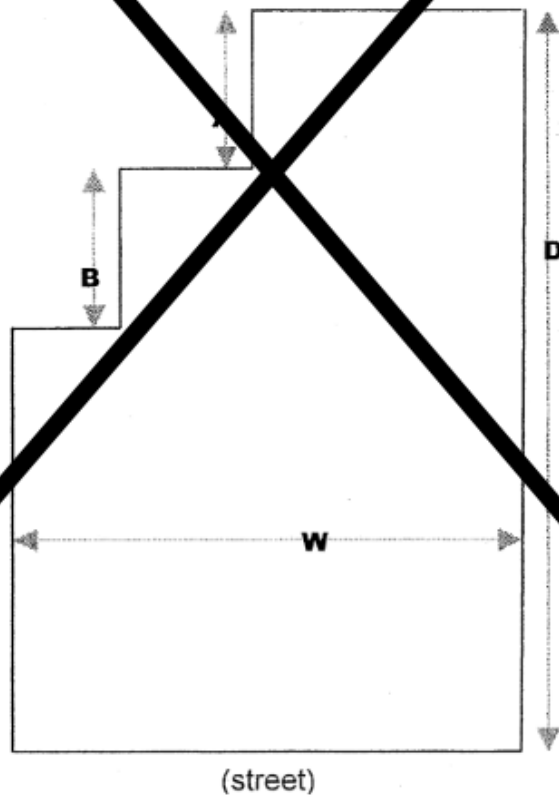


((Exhibits 23.86.008A, 23.86.008B))

**Exhibit 23.86.008 C**

Lots With More Than One Rear Lot Line,  
And Where The Distance Between The Rear  
Lot Line Is Less Than 50% Of Lot Depth

Where  $A + B$  is less than 50% of  $D$ , the lot width shall be  $W$ .



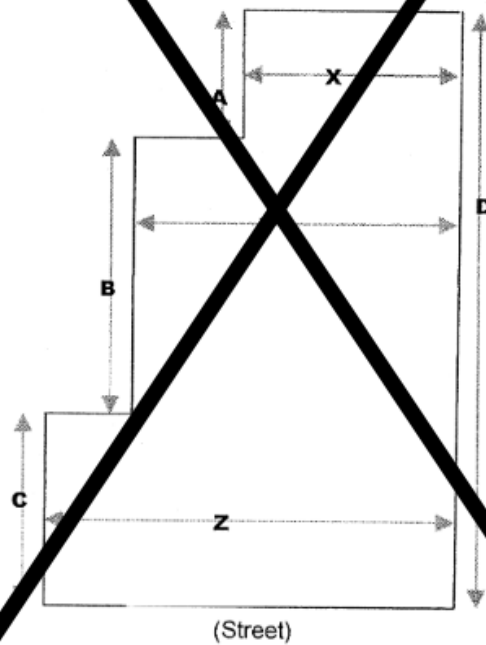
((Exhibit 23.86.008C))

**Exhibit 23.86.008 D**

Lots with More Than One Rear Lot Line, And Where  
The Distance Between the Rear Lot Line  
Is Greater than 50% Of Lot Depth

Where A + B is greater than 50% of D

Width of lot shall be:  $\frac{(A \times X) + (B \times Y) + (C \times Z)}{D}$



Section 56. Section 23.86.010 of the Seattle Municipal Code, last amended by Ordinance 126509, is repealed:

## ~~((23.86.010 Yards~~

*Note: This section is proposed to be removed as Neighborhood Residential zones would use the term setbacks rather than yards, consistent with other zones. All other zones use setback regulations.*

~~A. Measuring required yards. Required yard dimensions shall be horizontal distances, measured perpendicular to the appropriate lot lines (Exhibit A for 23.86.010). For lots with no street frontage, the applicant may designate the front lot line, provided that under the resulting orientation, the area of the front yard is at least 20 percent of the area of the lot or 1,000 square feet whichever is less. If a lot with frontage on more than one street is developed with an existing principal structure, the orientation of the lot for the purpose of current yard requirements shall be the orientation under which the existing structure is most conforming to current yard standards.~~

### ~~B. Front Yards.~~

~~1. Determining Front Yard Requirements. Front yard requirements are presented in the development standards for each zone. Where the minimum required front yard is to be determined by averaging the setbacks of structures on either side of a lot, the following provisions apply:~~

~~a. The required depth of the front yard shall be the average of the distance between single-family structures and front lot lines of the nearest single-family structures on each side of the lot (Exhibit B for 23.86.010). If the front facade of the single-family structure is not parallel to the front lot line, the shortest distance from the front lot line to the structure shall be used for averaging purposes (Exhibit C for 23.86.010).~~

~~b. The yards used for front yard averaging shall be on the same block front as the lot, and shall be the front yards of the nearest single-family structures within 100 feet of the side lot lines of the lot.~~

~~c. For averaging purposes, front yard depth shall be measured from the front lot lines to the wall nearest to the street or, where there is no wall, the plane between supports, which comprises 20 percent or more of the width of the front facade of the single-family structure. Enclosed porches shall be considered part of the single-family structure for measurement purposes. Attached garages or carports permitted in front yards under 23.44.016.D, decks, uncovered porches, eaves, attached solar collectors, and other similar parts of the structure shall not be considered part of the structure for measurement purposes.~~



d. If there is a dedication of street right-of-way to bring the street abutting the lot closer to the minimum widths established in Section 23.53.015, for averaging purposes the amount of the dedication shall be subtracted from the front yard depth of the structures on either side.

e. If the first single-family structure within 100 feet of a side lot line of the lot is not on the same block front, or does not provide its front yard on the same street, or if there is no single-family structure within 100 feet of the side lot line, the yard depth used for averaging purposes on that side shall be 20 feet (Exhibits D and E for 23.86.010).

f. If the front yard of the first single-family structure within 100 feet of the side lot line of the lot exceeds 20 feet, the yard depth used for averaging purposes on that side shall be 20 feet (Exhibit F for 23.86.010).

g. In cases where the street is very steep or winding, the Director shall determine which adjacent single-family structures should be used for averaging purposes.

2. Sloped Lots in Neighborhood Residential Zones. For a lot in a neighborhood residential zone, reduction of the required front yard is permitted at a rate of 1 foot for every percent of slope in excess of 35 percent. For the purpose of this provision the slope shall be measured along the centerline of the lot. In the case of irregularly shaped lots, the Director shall determine the line along which slope is calculated.

C. Rear yards. Rear yard requirements are presented in the standard development requirements for each zone. In determining how to apply these requirements, the following provisions shall apply:

1. The rear yard shall be measured horizontally from the rear lot line if the lot has a rear lot line that is essentially parallel to the front lot line for its entire length.

2. If the front lot line is essentially parallel to portions of the rear property line, as with a stepped rear property line, each portion of the rear property line that is opposite and essentially parallel to the front lot line is considered to be a rear lot line for the purpose of establishing a rear yard.

3. On a lot with a rear property line, part of which is not essentially parallel to any part of the front lot line, the rear yard is measured from a line or lines drawn from side lot line(s) to side lot line(s), at least 10 feet in length, parallel to and at a maximum distance from the front lot line. If an alley abuts the rear of the property, 1/2 the width of the alley, between the side lot lines extended, is considered to be part of the lot for

drawing this line. For those portions of the rear lot line that are essentially parallel to the front lot line, subsection 23.86.010.C.2 above shall apply. The lot depth is then measured perpendicularly from this 10 foot long line extended as needed to the point on the actual front lot line that is the furthest distance away. This establishes lot depth, which then may be used to determine the required rear yard depth.

4. For a lot with a curved front lot line, the rear yard is measured from a line at least 10 feet in length, parallel to and at a maximum distance from a line drawn between the endpoints of the curve. The lot depth is then measured perpendicularly from this 10 foot long line extended as needed to the point on the actual front lot line that is the furthest distance away. This establishes lot depth, which then may be used to determine the required rear yard depth.

5. For a lot with an irregular shape or with an irregular front lot line not meeting conditions of subsections 23.86.010.C.1 through 23.86.010.C.4, the Director shall determine the measurement of the rear yard.

#### D. Side Yards.

1. Side Yard Averaging. Side yard requirements are presented in the standard development requirements for each zone. In certain cases where specifically permitted, the side yard requirement may be satisfied by averaging the distance from side lot line to structure facade for the length of the structure. In those cases the side yard shall be measured horizontally from side lot line to the side facade of the structure.

Exhibit 23.86.010 A  
Standard Required Yards  
(NR Zone Example)

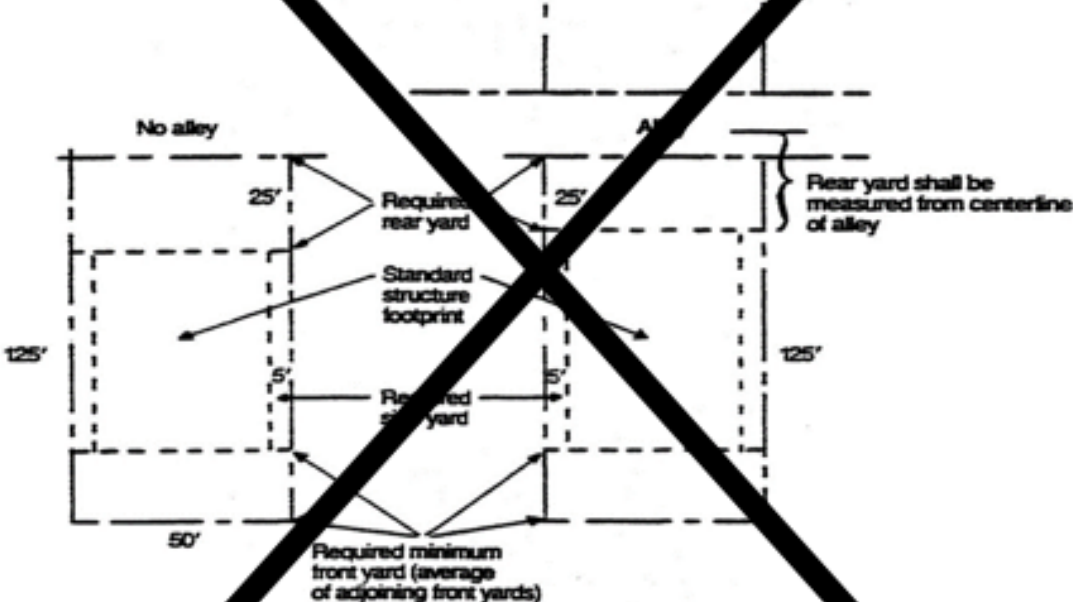


Exhibit B for 23.86.010  
Determination of Front Yard Setback

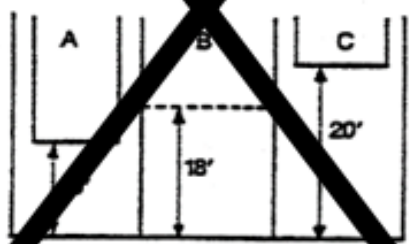
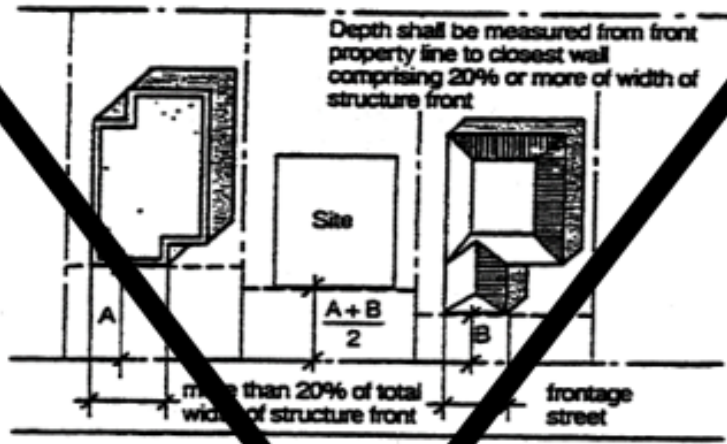
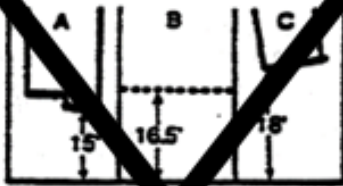


Exhibit C for 23.86.010

Calculating Minimum Required Front Yard  
Unusual Front Walls

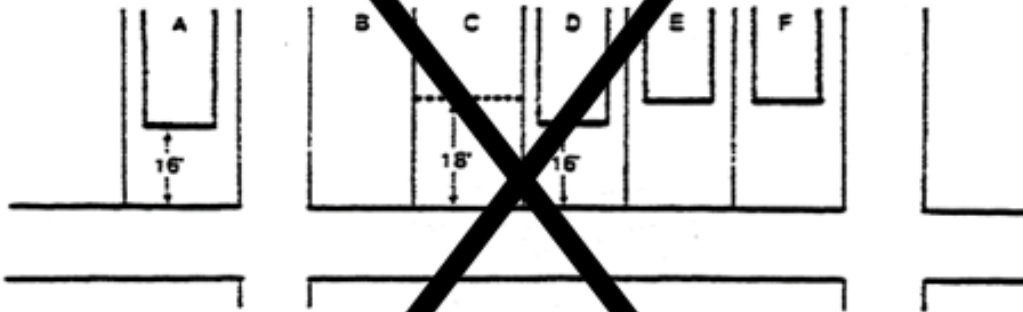


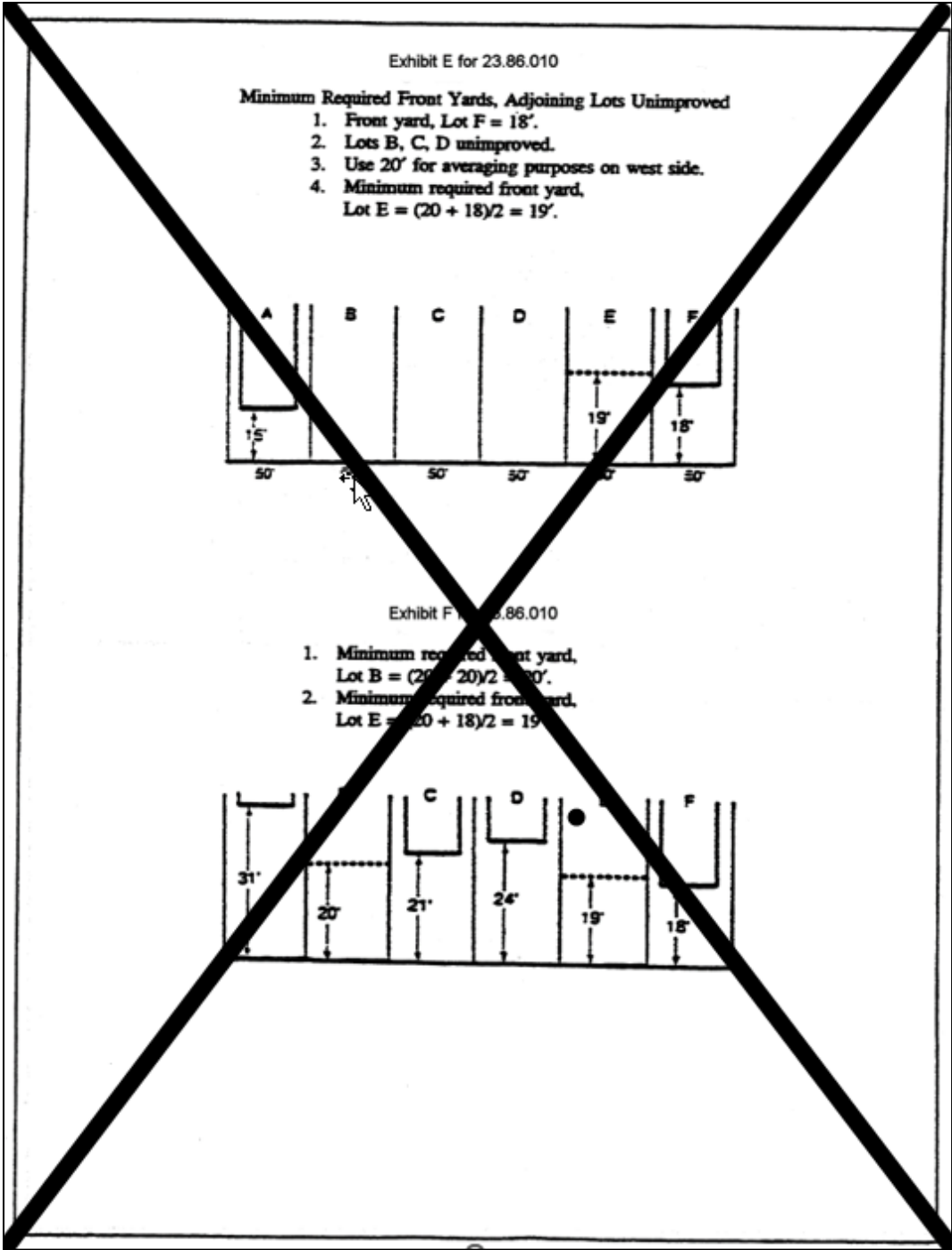
Minimum required front yard for Lot B:

1. Front yard, Lot A = 15'.
2. Front yard, Lot C = 18'.
3. Average front yard = 16.5'.
4. Required minimum front yard for lot B = 16.5'

Exhibit D for 23.86.010

1. Front yard, Lot D = 16'.
2. Lot B unimproved.
3. Lot A not on same block front.
4. Use 20' for averaging purposes on west side.
5. Minimum required front yard,  
Lot C =  $(20 + 16)/2 = 18'$ .





Section 57. Section 23.86.012 of the Seattle Municipal Code, last amended by Ordinance 125791, is amended as follows:

## 23.86.012 (~~Multifamily and commercial zone setback~~) Setback measurement

*Note: This section is being updated to add standards for setback measurement that are currently contained in a Director's Rule and to remove subsection C which contains a measurement technique for an approach that was removed in previous legislation.*

A. For purposes of setback standards, measurement shall be taken to the outside of building foundations and exterior walls rather than to exterior finishing provided that exterior finishes extend more than 6 inches into a required setback.

~~((A))~~ B. Setback averaging. In multifamily and commercial zones, certain required setbacks may be averaged. In such cases the following provisions apply:

1. The average front and rear setbacks are calculated based on the entire width of the structure;

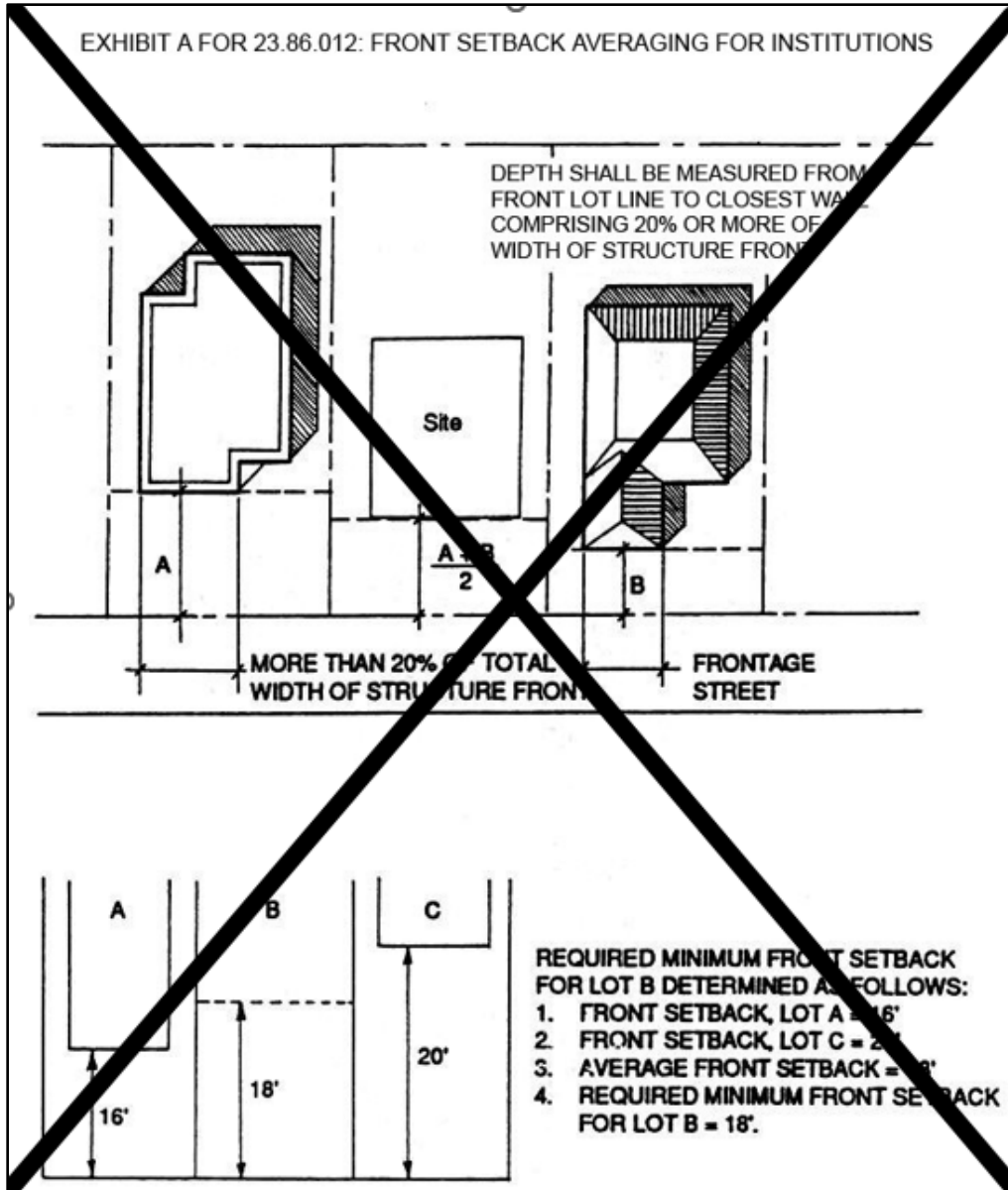
2. The average side setbacks are calculated based on the entire depth of the structure;

3. Setbacks are measured horizontally from the lot line to the facade of the structure. The facade(s) used in calculating the average and minimum setback requirements shall be those facades that are nearest to that lot line except that any features allowed to project into the setback are excluded.

~~((B. Determining front setbacks for institutions. In LR zones, the minimum required front setback for institutions is determined by averaging the setbacks of structures on either side of the subject lot, as follows:~~

~~1. The required front setback is the average of the distances between principal structures and front lot lines of the nearest principal structures on each side of the subject lot if each of those structures is on the same block front as the subject lot and is within 100 feet of the side lot lines of the subject lot (Exhibit A for 23.86.012).~~





2. If the first principal structure within 100 feet of a side lot line of the subject lot is not on the same block front or there is no principal structure within 100 feet of the side lot line, the setback depth used for averaging purposes on that side is 7 feet.

3. For averaging purposes, the front setback is the shortest distance from the front lot line to the nearest wall or, where there is no wall, the plane between supports that span 20 percent or more of the width of the front facade of the principal structure. Attached garages and enclosed porches are considered part of the principal structure for measurement purposes. Decks less than 18 inches above existing grade, uncovered porches, eaves, attached solar collectors and other similar parts of the structure are not considered part of the principal structure.

~~4. If there is a dedication of street right-of-way to bring the street abutting the lot closer to the minimum widths established in Section 23.53.015, for averaging purposes the amount of dedication is subtracted from the front setbacks of the structures on either side.~~

~~5. If the front setback of the first principal structure within 100 feet of the side lot line of the subject lot exceeds 20 feet, the setback depth used for averaging purposes on that side is 20 feet.~~

~~6. In cases where the street is very steep or winding, the Director will determine which adjacent structures should be used for averaging purposes.~~

~~7. In the case of a through lot, the front setback is determined independently for each street frontage. The measurement techniques of this section 23.86.012 apply to each street frontage separately.~~

~~8. For multiple structures on the same lot, the front setback of a principal structure on the same lot may be used for averaging purposes.))~~

### C. Upper-level setback

1. Upper-level setbacks apply only to portions of structures that occur above the height at which the setback begins.

2. For upper-level setbacks required from a street lot line, the height at which the setback begins is measured at all points along the street lot line from sidewalk grade or, if there is no sidewalk, from finished grade at the street lot line.

3. For upper-level setbacks required from other lot lines, the height at which the setback begins is measured at all points along the lot line from the finished grade where the wall meets the grade or, if the structure is cantilevered or posted, where the downward projection of the portion of the structure that is cantilevered or posted meets the grade.

Section 58. Section 23.86.017 of the Seattle Municipal Code, enacted by Ordinance 123495, is amended as follows:

#### 23.86.017 Amenity area measurement

*Note: This section is proposed to be updated to remove a provision for woonerfs that has been problematic because the definition of woonerf is so broad that it has not been possible to get*

agreement between project applications and reviewers. The woonerf provision has primarily been used to try justify approaches that are more car-friendly rather than innovative shared streets.

~~((Certain zones require a minimum amount of amenity area to be provided on the lot.))~~ If amenity area is required, the following provisions shall apply:

A. If the applicable development standards specify a minimum contiguous amenity area, areas smaller than the minimum contiguous area are not to be counted toward fulfilling amenity area requirements.

1. Driveways and vehicular access easements, whether paved or unpaved, shall be considered to separate the amenity areas they bisect ~~((, except for woonerfs permitted to qualify as required amenity area))~~.

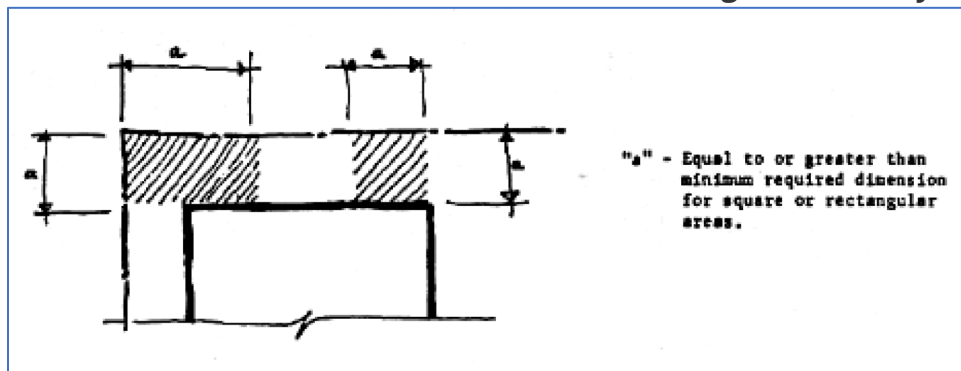
2. Pedestrian access areas shall not be considered to break the contiguity of amenity area on each side.

B. In shoreline areas, when determining the amount of amenity area required or provided, no land waterward of the ordinary high water mark shall be included in the calculation.

C. In cases where the shape or configuration of the amenity area is irregular or unusual, the Director shall determine whether amenity area requirements have been met, notwithstanding the following provisions, based on whether the proposed configuration would result in amenity area that is truly usable for normal residential recreational purposes. For the purpose of measuring the minimum horizontal dimension of the amenity area, if one is specified, the following provisions shall apply:

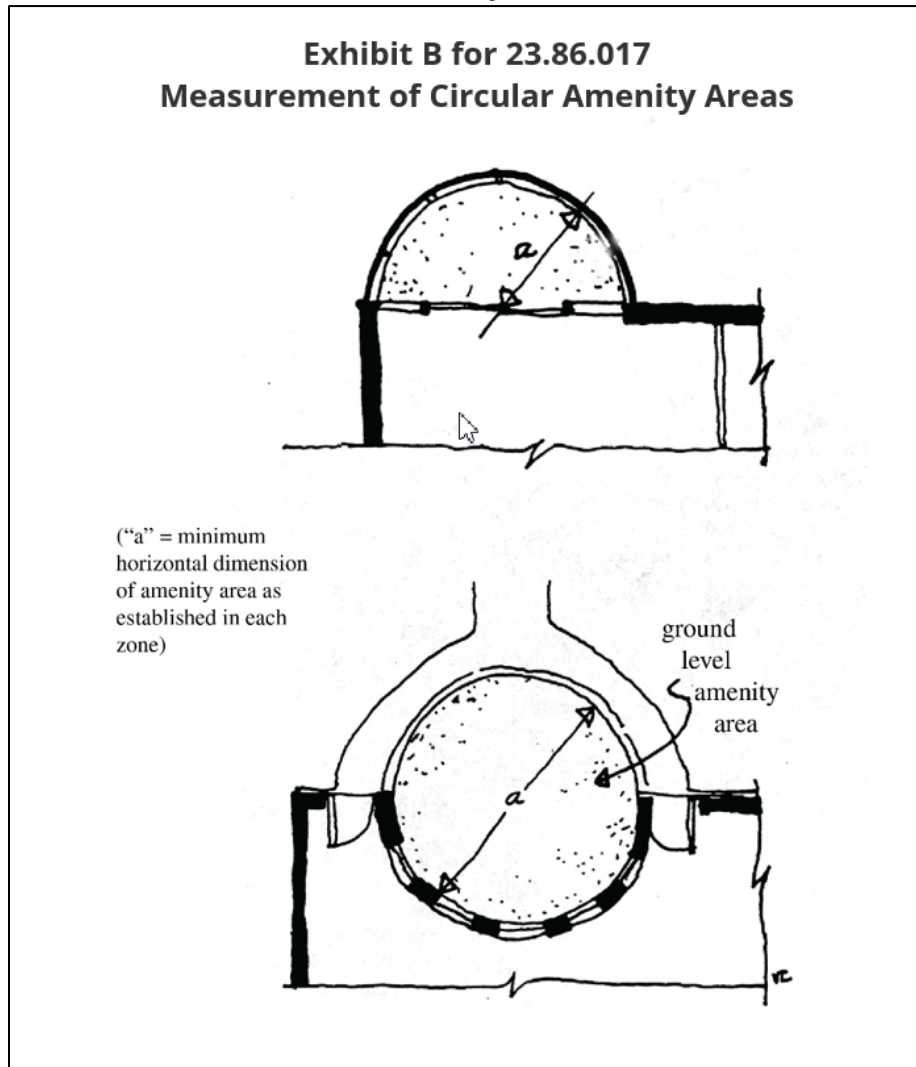
1. For rectangular or square areas, each exterior dimension of the area shall meet the minimum dimension (Exhibit A for 23.86.017).

**Exhibit A for Section 23.86.017: Measurement of Regular Amenity Area**



2. For circular areas, the diameter of the circle shall meet the minimum dimension; for semicircular areas, the radius of the area shall meet the minimum dimension (Exhibit B for 23.86.017).

**Exhibit B for 23.86.017(~~: Measurement of Circular Amenity Areas~~)  
Measurement of circular amenity areas**



Section 59. Section 23.86.026 of the Seattle Municipal Code, last amended by Ordinance 124503, is amended as follows:

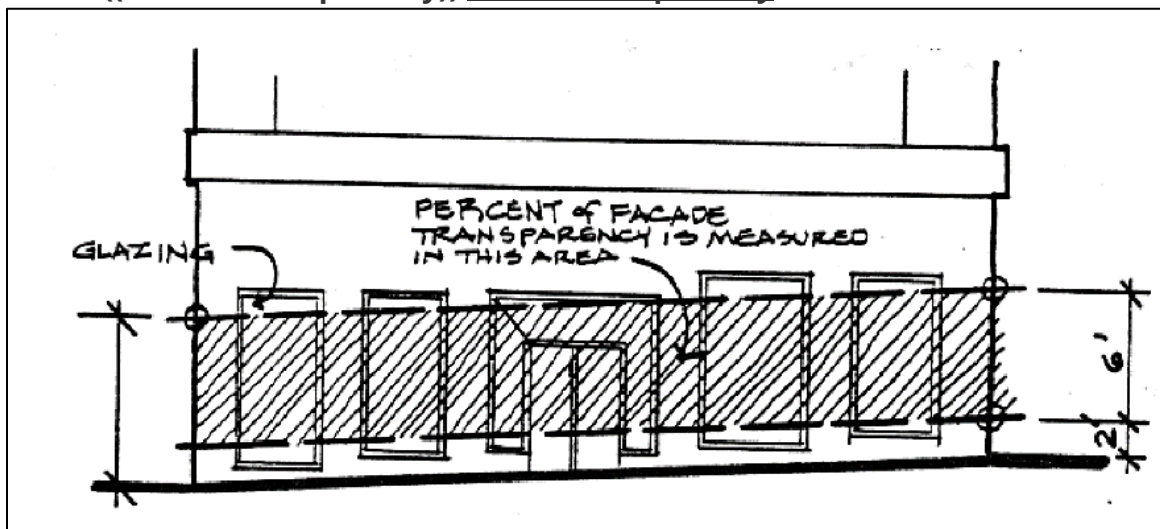
**23.86.026 Facade transparency**

*Note: This section would be updated to clarify that facade transparency has a different calculation technique in Neighborhood Residential and Lowrise zones.*

A. In zones other than Neighborhood Residential or Lowrise zones where a certain percentage of the street-facing facade is required to be transparent, transparency shall be measured in an area between 2 feet and 8 feet above the elevation of the lot line at the sidewalk, as depicted in Exhibit A for 23.86.026, unless a different area is specified in the development standards applicable to the lot. Areaways, stairways, and other excavations at the lot line shall not be considered in measuring the elevation of the street lot line. When sidewalk widening is required according to Section 23.49.022, the elevation of the lines establishing the new sidewalk width shall be used rather than the street lot line.

**Exhibit A for 23.86.026**

**Street ((Facade Transparency)) facade transparency**



B. When transparency is required for facades that abut bonused public open spaces, the measurement of facade transparency shall be from the elevation of the public open space.

C. The full length of ((landmark)) Landmark designated structures, and character structures retained according to Section 23.73.015, shall not be counted in determining the required transparency.

Section 60. Section 23.90.019 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

### 23.90.019 Civil penalty for unauthorized dwelling units ~~((in neighborhood residential zones))~~

*Note: This section would be updated to reflect new definitions and to apply consistent rules for unauthorized dwelling units across all zones and building types.*

In addition to any other sanction or remedial procedure that may be available, the following penalties apply to unauthorized dwelling units ~~((in neighborhood residential zones in violation of Section 23.44.006))~~. An owner of a ~~((neighborhood residential zoned))~~ lot ~~((that has more than one single-family dwelling unit and))~~ who is issued a notice of violation for an unauthorized dwelling unit, is subject to a civil penalty of \$5,000 for each ~~((additional))~~ dwelling unit ~~((, unless the additional unit is an authorized dwelling unit in compliance with Section 23.44.041, is a legal non-conforming use, or is approved as part of an administrative conditional use permit pursuant to Section 25.09.260))~~. Penalties for ~~((violation of Sections 23.44.006 and 23.44.041, except for violations of subsection 23.44.041.C or except for those violations subject to subsection 23.90.018.B,))~~ unauthorized dwelling units in this Section 23.90.019 shall be reduced from \$5,000 to \$500 if, prior to the compliance date stated on the notice of violation for an unauthorized dwelling unit, the dwelling unit is removed or authorized ~~((in compliance with Section 23.44.041))~~, is a legal non-conforming use, or is approved as part of an administrative conditional use permit pursuant to Section 25.09.260.

## Changes to other Titles

Section 61. Section 25.09.052 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

### 25.09.052 Replacing structures in environmentally critical areas and buffers

A. Replacing structures destroyed by acts of nature and other acts beyond the control of the owner excluding normal deterioration

1. Replacing any structure destroyed by acts of nature is allowed if it complies with the following provisions:

a. The replacement is located within the same footprint as and does not exceed the height of the destroyed structure;

b. The replacement does not increase the impact to or further alter an environmentally critical area or buffer;

c. Action toward the replacement is commenced within one year of the destruction of the structure;

d. A permit application for the replacement is submitted within two years; and

e. The replacement is diligently pursued.

2. A structure that is replaced and activities related to replacing the structure shall:

a. Comply with restrictions on flood hazard areas reconstruction, if the structure is located in a flood-prone area; and

b. Comply with the development standards for the environmentally critical area and buffer in which it is located to the maximum extent feasible, including requirements for access and shall comply with the standards in Sections 25.09.060, 25.09.065, and 25.09.070.

B. Replacing a ~~((single-family residence))~~ detached dwelling unit voluntarily in wetlands, wetland buffers, and fish and wildlife habitat conservation areas

1. Replacing a ~~((single-family residence))~~ detached dwelling unit and its appurtenant structures and access is allowed in wetlands, wetland buffers, and fish and wildlife habitat conservation areas if the replacement complies with the following:

a. The replacement is in substantially the same location as the original development;

b. The area of the footprint of the replacement does not exceed that of the original development;

c. The proposed access does not exceed the width and length of necessary access;

d. Lot size

1) Riparian watercourse and wetlands. For a ~~((single-family residence))~~ detached dwelling unit located over a riparian watercourse or built in a wetland, the replaced ~~((residence))~~ dwelling unit and necessary access meets wetland buffer or riparian management area requirements to the maximum extent feasible; or

2) For all other property, the lot does not have sufficient area to site a ~~((residence))~~ dwelling unit with the same area of footprint as existed on May 14,

2017, plus necessary access, consistent with the regulations for the applicable environmentally critical area and buffer, including reducing the yard and setback requirements for front and rear yards ~~((in Title 23))~~ allowed under Section 25.09.280, except subsection 25.09.280.B.2, to the minimum necessary to accommodate the ~~((residence))~~ dwelling unit and necessary access; and

e. The site for the ~~((residence))~~ dwelling unit, necessary access, and utilities has the least impact on the functions and values of the environmentally critical area.

2. A structure that is replaced and activities related to replacing the structure shall:

a. Comply with restrictions on flood hazard areas reconstruction, if the structure is located in a flood-prone area; and

b. Comply with the development standards for the environmentally critical area and buffer in which it is located to the maximum extent feasible, including requirements for access and shall comply with the standards in Sections 25.09.060, 25.09.065, and 25.09.070; and

c. Mitigate impacts to the functions and values of the environmentally critical area and buffers, in compliance with Section 25.09.065, including any impacts caused by removing the ~~((residence))~~ dwelling unit from its original location, runoff from impervious surfaces, and/or replacing any portion of the ~~((residence))~~ dwelling unit within the environmentally critical area or buffer.

Section 62. Section 25.09.240 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

#### 25.09.240 Short subdivisions and subdivisions

*Note: This section would be amended to reflect that standards for measuring lot coverage on sites with environmentally critical area have been added directly to the relevant sections in the NR and LR chapters.*

\* \* \*

~~((D. Development standards for new lots in neighborhood residential zones. If new lots are created in neighborhood residential zones by short subdivision or subdivision, the following development standards apply based on the area of each new lot that is outside~~



~~the environmentally critical areas listed in subsection 25.09.240.A, plus environmentally critical areas in which development is allowed pursuant to subsections 25.09.240.B.1, 25.09.240.B.2, and 25.09.240.B.3:~~

~~1. Lot coverage and lot coverage exceptions according to subsections 23.44.010.C and 23.44.010.D.~~

~~2. Height limits according to Section 23.44.012, including the requirements of subsection 23.44.012.A.3 if the area of the largest rectangle or other quadrilateral that can be drawn within the lot lines of the new lot outside the environmentally critical areas is less than 3,200 square feet.)~~

~~((E)) D. Lots shall be configured to preserve the environmentally critical areas and buffers identified in subsection 25.09.240.A by:~~

~~1. Establishing a separate buffer tract or lot with each owner having an undivided interest; or~~

~~2. Establishing non-disturbance areas on individual lots.~~

~~((F)) E. The environmentally critical areas and buffers identified in subsection 25.09.240.A, except for areas qualifying for development under subsections 25.09.240.B.1, 25.09.240.B.2, and 25.09.240.B.3, shall be designated non-disturbance areas on the final plat. A statement that these non-disturbance areas are located on the lots and the definition of "non-disturbance area" shall be recorded in the King County Recorder's Office along with the final plat in a form approved by the Director. At the same time, a covenant protecting non-disturbance areas shall be recorded as set out in Section 25.09.335.~~

~~((G)) E. In computing the number of lots a parcel in a ~~((neighborhood residential))~~ Neighborhood Residential zone may contain, the Director shall exclude ~~((the following areas:~~~~

~~1. The)) environmentally critical areas and buffers identified in subsection 25.09.240.A, unless:~~

~~((a)) 1. The environmentally critical areas and buffers are on a lot that meets the provisions of subsection 25.09.240.B; or~~

~~((b)) 2. The applicant obtains an administrative conditional use under Section 25.09.260, if it is not practicable to meet the requirements of subsection 25.09.240.B considering the parcel as a whole.~~

Section 63. Section 25.09.260 of the Seattle Municipal Code, last amended by Ordinance 126509, is amended as follows:

#### 25.09.260 Environmentally critical areas administrative conditional use

*Note: This section would be amended to remove yard reductions that are no longer relevant due to updated setback requirements.*

##### A. Administrative conditional use

1. ~~((In neighborhood residential zones the Director is authorized to approve an environmentally critical areas administrative conditional use pursuant to Section 23.42.042 and this Section 25.09.260 for one or both of the following purposes:~~

~~a.)) In calculating the maximum number of lots and units allowed on the entire parcel in Neighborhood Residential zones under Section 23.44.012 and subsection 25.09.240.G, the Director may count ~~((environmentally critical areas and/or buffers, except the open water area of a wetland or riparian corridor,))~~ steep slope erosion hazard area or buffer that would otherwise be excluded, if an applicant is unable to demonstrate compliance with the requirements of subsection 25.09.240.B for the entire parcel proposed to be subdivided.~~

~~((b. For the entire parcel proposed to be subdivided, the Director may approve development of single family residences that meet the development standards of subsection 25.09.260.B.3 and the platting conditions in subsections 25.09.260.B.1 and 25.09.260.C.2.b. Except as specifically superseded by the development standards of subsection 25.09.260.B.3 and the platting conditions of subsection 25.09.260.C.2.b, all applicable regulations of Title 23 shall also apply to the entire parcel. The entire parcel is designated as the site.))~~

2. Process. If an administrative conditional use application includes an application to authorize development in a steep slope erosion hazard area or buffer, the application is not required to include an application for the variances allowed under Sections 25.09.280 or 25.09.290, but the application must address the criteria listed in subsection 25.09.260.B.1.c.

B. Criteria. An application under this Section 25.09.260 shall provide information sufficient to demonstrate that the proposal meets the following criteria:

##### 1. Environmental impacts on environmentally critical areas and buffers

a. No development is in a biodiversity area or corridor, riparian corridor, wetland, or wetland buffer.

b. No riparian management area or wetland buffer is reduced.

c. ~~((No development is on a steep slope erosion hazard area or its buffer unless either the))~~ The proposed development meets the criteria of subsections 25.09.090.B.2.a, 25.09.090.B.2.b, or 25.09.090.B.2.c or the property is a lot in existence as a legal building site prior to October 31, 1992, is predominantly characterized by steep slope erosion hazard areas, and the following criteria are met:

1) The proposed development shall be located away from steep slope erosion hazard areas and buffers to the extent practicable.

2) The Director shall require clear and convincing evidence that the provisions of this subsection 25.09.260.B are met if development is located on steep slope erosion hazard areas and buffers with these characteristics:

a) A wetland over 1,500 square feet in size or a watercourse designated part of a riparian corridor;

b) An undeveloped area over 5 acres characterized by steep slope erosion hazard areas; or

c) Areas designated by the Washington Department of Fish and Wildlife (WDFW) as biodiversity areas and corridors, or areas identified by the Director with significant tree and vegetation cover providing wildlife habitat.

3) ~~((If the application includes a proposal to develop in a steep slope erosion hazard area or buffer, the))~~ The development in the steep slope erosion hazard area or buffer shall be the minimum necessary to achieve the number of ~~((single family))~~ dwelling units that would be allowed on the original entire parcel according to the calculation for subdivision required under subsection 25.09.240.G in the following order of priority:

a) ~~((The proposal reduces the front and/or rear yards pursuant to subsection 25.09.260.B.3.b.1 and complies with the building separation standards of subsections 25.09.260.B.3.b.2 and 25.09.260.B.3.b.3;~~

b)) The proposal reduces the steep slope erosion hazard area buffer; and

~~((c))~~ b) The proposal intrudes into not more than 30 percent of the steep slope erosion hazard area.

d. The proposal protects WDFW priority species and maintains wildlife habitat.

e. The proposal does not result in unmitigated negative environmental impacts pursuant to Section 25.09.065, including drainage and water quality, erosion, loss of trees and vegetation, and slope stability on the identified environmentally critical area and buffer.

f. The proposal promotes expansion, restoration, or enhancement of the identified environmentally critical area and buffer.

## 2. General environmental impacts and site characteristics

a. The proposal minimizes potential negative effects of the development on the undeveloped portion of the site and preserves topographic features.

b. The proposal retains and protects trees and vegetation on designated non-disturbance areas, protects stands of mature trees, minimizes tree removal, removes noxious weeds and non-native vegetation and replaces this vegetation with native trees and vegetation, and protects the visual continuity of treed and vegetated areas and tree canopy.

## ~~(3. Development standards~~

~~a. The total number of single-family dwelling units permitted through the environmentally critical areas conditional use regulations shall not exceed the number that would be allowed based on compliance with the use regulations of Section 23.44.008, and the minimum lot area standards of the underlying neighborhood residential zone, and shall be established only on the site comprised of the original entire parcel, with subdivision of the original entire parcel allowed only as unit lots approved through the unit lot subdivision process in Section 25.09.260.C.2.b.2.~~

~~b. Single-family dwelling units shall be the sole type of principal use permitted through the environmentally critical areas conditional use regulations and shall meet the development standards of Chapter 23.44, except that the following standards apply instead of the standards in Chapter 23.44, as applicable:~~

~~1) Front and rear yards required by subsections 23.44.014.A and 23.44.014.B may be reduced to no less than 10 feet each and 30 feet for the sum of both yards if the reduction would minimize or eliminate any intrusion into the steep slope erosion hazard area or required buffer;~~

~~2) Front and rear building separations between proposed single family residences shall be a minimum of 25 feet;~~

~~3) Side building separations shall be a minimum of 10 feet;~~

~~4) The maximum lot coverage shall be calculated by deducting required non-disturbance areas from total lot size; and~~

~~5) Front, rear, and side separations shall be determined by the Director, based on location of the building in relation to other buildings and the front lot line.))~~

### C. Conditions

1. In authorizing an administrative conditional use, mitigation pursuant to Section 25.09.065 shall apply to protect and mitigate negative impacts to biodiversity areas and corridors, priority habitat and setbacks, riparian corridors, wetlands, wetland buffers, and steep slope erosion hazard areas and buffers, and the Director may impose additional conditions to protect other properties that could be adversely affected in the zone or vicinity in which the property is located.

2. In addition to any conditions imposed under subsection 25.09.260.C.1, the following conditions apply to all administrative conditional uses approved under this Section 25.09.260:

a. Replacement and establishment of native trees and vegetation shall be required where it is not possible to save trees and vegetation and shall comply with Section 25.09.070.

b. If a subdivision or short-subdivision is proposed, the following standards apply:

1) The development as a whole shall meet development standards under Title 23 and this Chapter 25.09 applicable at the time the application is vested.

~~2) ((A unit lot short subdivision or unit lot subdivision proposal shall be required to ensure that the development standards of subsection 25.09.260.B.3 are implemented for development.))~~ New unit lots created under this Section 25.09.260 shall be approved through the unit lot subdivision regulations of Sections 23.22.062 and 23.24.045 and by compliance with this Section 25.09.260. Development on individual unit lots, except as otherwise set forth in this Section 25.09.260, may be nonconforming as to some or all of the development standards.

3) Subsequent platting actions or additions or modifications to structures may not create or increase any nonconformity of the development as a whole to this Chapter 25.09, and this shall be noted on the document creating the new unit lots that is recorded with the King County Recorder's Office.

4) Access easements and joint use and maintenance agreements shall be executed for use of common garage or parking areas, common open space, and other similar features and be recorded with the King County Recorder's Office.

D. The Director shall issue written findings of fact and conclusions to support the Director's decision. The process and procedures for notice of decision and appeal of this administrative conditional use shall be as prescribed for Type II land use decisions in Chapter 23.76.

Section 64. Section 25.09.520 of the Seattle Municipal Code, last amended by Ordinance 126685, is amended as follows:

#### 25.09.520 Definitions

\* \* \*

"Department" means the Seattle Department of Construction and Inspections or its successor department.

"Detached dwelling unit" means a detached dwelling unit as defined in Section 23.84A.008

\* \* \*

~~("Single family residence" means single family dwelling unit as defined in Section 23.84A.032 in the definition of "residential use.")~~

\* \* \*

Section 65. Section 25.11.090 of the Seattle Municipal Code, last amended by Ordinance 126821, is amended as follows:

## 25.11.090 Tree replacement, maintenance, and site restoration

*Note: This section would be amended to clarify how the new tree point system in NR zones relates to tree replacement requirements.*

A. In all zones, Tier 1, Tier 2, and Tier 3 trees removed in association with development or because they are hazardous, infested by insects, pests, or pathogens, or an invasive or nuisance tree, or in accordance with the removal criteria in subsection 25.11.050.D, shall be replaced by one or more new trees, the size and species of which shall be determined by the Director; the tree replacement required shall be designed to result, upon maturity, in a canopy cover that is at least roughly proportional to the canopy cover prior to tree removal. Site restoration where there is on-site tree replacement in association with development shall include the removal of all invasive vegetation and shall prohibit replacement with invasive species. When on-site replacement is proposed, such trees count toward the Green Factor under ((SMC) Section 23.86.019 and private property tree point requirements under subsection 23.44.024. When off-site replacement is proposed, preference for the location shall be on public property.

B. For each relocated or required replacement tree, maintenance and monitoring is required for a five-year period. The period begins when the replacement tree is planted. Maintenance and monitoring shall include the following:

1. Sufficient maintenance actions to ensure survival of the replacement tree:
  - a. When more than one replacement tree is required, 80 percent survival of new trees planted at the end of five years;
  - b. When one replacement tree is required, 100 percent survival of the new tree planted at the end of five years;
2. Replacement and replanting of failed trees; and
3. Photographic documentation of planting success retained for the five-year period. Submission of documentation to the Seattle Department of Construction and Inspections is not required unless requested by the Department.

C. In addition to the maintenance actions for replacement trees described in subsection 25.11.090.B.1, the Director shall promulgate rules to maintain the long-term health and ensure survival of replacement trees. This shall include rules that specify:

1. The watering of replacement trees necessary to ensure survival; and

2. Tree species that will fulfill the replacement requirement. Qualifying tree species shall be limited to trees that are native and/or culturally significant, and resilient to climate change.

D. The locations of replacement and relocated trees shall be available to the public on a City web page through an online mapping tool by March 31, 2024.



## **K Marked Draft EIS Comment Letters**



May 20, 2024

Jim Holmes  
 City of Seattle Office of Planning & Community Development  
 Planning and Community Development  
 P.O. Box 94788  
 Seattle, WA, 98124-7088

Via e-mail to: jim.holmes@seattle.gov

Re. Snoqualmie Tribe's comments on the City of Seattle Comprehensive Plan DEIS

Dear Mr. Holmes,

The Snoqualmie Indian Tribe ("Tribe") has reviewed the City of Seattle's Draft Comprehensive Plan DEIS. Please find the Tribe's comments for the Draft:

1. Section 1.3: The Study Area should be expanded to include waters and lands affected by City Utilities and City-owned properties that exist outside of City Limits. City Comp Plan policies affect these lands, the use of land and waters, and affect Tribal inherent and sovereign rights which must be fully considered.

2. Page 1-26, "With Mitigation..." section: The City is a key influencer of local and regional earth and water processes. While the City is already heavily developed, future development will still potentially cause significant adverse impacts. While Seattle is a degraded habitat, it is still habitat. People and wildlife rely on the integrity of earth and water resources being protected and preserved in the City. Also, City policies affect resources outside the City, such as water impoundment and export related to City reservoirs.

3. Section 3.12.1: As in comment 1 above, the entire area served by wholesale customers and covered by City projects should be included in the DEIS.

4. General Comment: The DEIS lacks analysis of the effects of the City's policies regarding tree canopy. The City must analyze the effects of its interpretation of "equity" regarding tree canopy, where the City allows degradation in some areas while waiting for new trees to grow in other areas. Instead of this policy, the City should focus on preserving canopy in all parts of the City while also uplifting overburdened communities' canopy. In any case, the DEIS fails to make this critical analysis.

5. General Comment: The City of Seattle was platted 173 years ago in 1851, and its namesake is the respected leader siʔaʔ. However, the first ləliʔaʔk<sup>w</sup>bix<sup>w</sup> (Non-Indigenous Colonizers) built this young village upon the ancient inter-Tribal trade, commercial, cultural, and governmental hub of the Northwest



Coast, dʒidʒəlaʎič. The connection the ʔaciɬtalbix<sup>w</sup> (all of the Puget Sound People, often translated as the simplified and colonized terms “Native American” or “Indian”) have to the larger Puget Sound region reaches back into history 13 millennia and continues into 2024. This connection and legacy of ecological stewardship, cultural heritage, and sustainable environmental practices continue to be supported archaeologically and Ethno-historically for over 12,000 years, A.K.A., since time immemorial.

The Snoqualmie Indian Tribe appreciates the opportunity comment on these draft updates to the City of Seattle Comprehensive Plan DEIS. We welcome any questions or clarification you have on these comments.

1-3  
Cont.

Sincerely,

DocuSigned by:  
*Cindy Spiry*  
4F29C7E29A044FA...  
Cindy Spiry, Director  
Env. and Natural Resources Dept.

DocuSigned by:  
*Jaime Martin*  
55ECFF68F5D44FA...  
Jaime Martin, Executive Director  
Government Affairs and Special Projects

DocuSigned by:  
*Steven Moses*  
BF AA35FF98E048D...  
Steven Moses, Director  
Archaeology & Historic Preservation

CC:

To: Mayor Harrel; Seattle Office of Planning and Community Development

[OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

CC: City Council Members

From: Representative Gerry Pollet, 46<sup>th</sup> District ([Gerry.pollet@leg.wa.gov](mailto:Gerry.pollet@leg.wa.gov); [gerry@gerrypollet.com](mailto:gerry@gerrypollet.com))

Comments on the One Seattle Draft Comprehensive Plan and Draft EIS

May 5, 2024

Mayor Harell, OPCD and Council Members:

I join other members of the Seattle Legislative Delegation in thanking you for briefings and committing to work with the City and your staff to improve the One Seattle Plan (Draft Comprehensive Plan) as incorporated below.

I join many of my Seattle Legislative Delegation colleagues in their comments, which begin:

Thank you for the briefing your team provided to the Seattle legislative delegation on the initial draft of the One Seattle Comprehensive Plan. We appreciate the opportunity to share our feedback based on years of working with community members on these complex issues.

As legislators, we share the goals you and your team outlined in the plan, including increasing housing and affordability, promoting a more equitable city as we grow, and focusing investment on building complete, walkable communities. We have concerns that the first draft release of the One Seattle Plan falls short of these shared ambitions, particularly as it relates to encouraging diverse housing types, equitable development, affordability, and displacement protections.

Seattle legislators have led our colleagues in policymaking to address a statewide housing crisis which impacts our city most acutely, through the passage of landmark bills such as [HB 1923](#) in 2019, [HB 1220](#) in 2021 and [HB 1110](#) in 2023, among others. We are deeply in tune with what Seattleites are asking for – a housing plan that encourages the development of dense and vibrant communities. As such, **we are asking to partner with you and your staff to update the housing provisions in the current draft plan to fully realize our collective bold vision for the city's housing future.**

Washington State is experiencing a housing crisis caused in large part by a shortage of homes and many of us have been working to address this for several years if not our whole careers. We are proud of the actions the legislature has acted to enable the construction of diverse housing options by legalizing permanent supportive housing, accessory dwelling units, middle housing, and co-living spaces. These steps are crucial to beginning to bend the curve of our housing shortage and begin building abundant housing. **Our local governments are essential partners in facing this challenge and taking adequate steps to address it.**

**In addition, I provide my own comments on key elements of the Plan and the draft EIS which include:**

- **Urging adoption of an increased goal for housing units; and specifically calling out the need for the Plan to meet the requirements of HB 1220 (2021), now codified in RCW 36.70A.070(2).**

2-1

2-2

**Those requirements are for the Plan to identify the needs for housing units for households at every economic / income level and plans for how the City will meet those needs.**<sup>1</sup> The draft Plan fails to provide any plan to meet these needs, particularly for lower income residents and working families, in addition to the overall goal for housing units being inadequate.

- As part of this increased goal, I agree with other legislators who have urged increasing the number of “neighborhood centers.” The Plan should assess what radius to include in various settings and how to ensure via good planning that neighborhoods transition from higher to lower density with distance from the fixed transit and commercial center.<sup>2</sup>
- Alternatives 2, 3 and 5 would result in approximately 20,000 more housing units over the next twenty years than the no action alternative base of 80,000; and Alternative 5 would produce an estimated 40,000 more units. Reductions in areas proposed for neighborhood centers, etc. would result in the proposed Plan only increasing the number of housing units projected for by 2045 from 80,000 to 89,000.<sup>3</sup>

2-2 cont

**This meager increase is not the level of growth in housing units that my constituents and I believe is adequate or acceptable.**

- Your administration worked closely with me to ensure that Seattle was not preempted from applying its own anti-displacement and affordable housing programs in housing legislation, such as for middle housing (HB 1110). I appreciated that close collaboration.

Thus, I have been surprised in my extensive reading of the Plan and participating in several briefings, meetings and open houses to find that there is no meaningful discussion, *new* proposals or consideration in the Plan of appropriate policies to prevent displacement in the identified areas with high displacement potential for people /

---

<sup>1</sup> The requirements include identifying “sufficient capacity of land” to meet the identified needs for housing that is affordable to each economic segment of households in the City. RCW 36.70A.070(2)(c). The Plan does identify land for duplexes, triplexes and town homes (and four units per lot in each residential area and six units when closer to major transit stops, pursuant to HB 1110). But the Plan and EIS do not propose or assess any strategies for designating land or what portion of available land that will be available for the required units of housing to be built that is affordable to persons in each income segment below median income. The number of units identified as needed for households below 120% median and above the levels eligible for publicly supported subsidized housing dwarfs the number of units projected as needed for households over 120% of median. The Plan lacks any proposal and analysis of how the City will meet this need for housing for persons of modest income who are often the backbone of our workforce that we want to attract and keep in Seattle, such as educators, workers in health care, social workers, hospitality workers and police.

<sup>2</sup> Increasing multifamily midrise [over 3 story] development over 3-5 blocks from frequent transit and which is not centered on permanently anchored frequent bus transit or stable commercial development is likely to leave residents stranded, e.g., when a bus stop or route is moved, or private commercial stores closed. Many constituents in the 46<sup>th</sup> District have moved to live close to bus transit, which they relied on for work health care and school – including high school students, and subsequently found themselves without reliable transit when bus service was reduced or eliminated. The Plan and the transportation element must include commitments for reliable continuity of bus service for areas that are designated to have increased housing based on proximity to bus service.

<sup>3</sup> See Draft EIS Vol 3. 3 for an example of the summary of housing units for each alternative.

households who currently reside in housing that is affordable for persons in the below median income levels. Indeed, the Plan and Draft EIS leave the City and public without a clear view of the likely degree of loss of “naturally” occurring affordable housing and alternatives for preserving communities and affordable housing opportunities in these high risk areas.

2-2 cont

I hope to be able to partner with you and the City to ensure that the City has all the tools it needs to prevent displacement and preserve affordable housing.

- The City is missing an opportunity to develop a plan for how it will attract and retain families with school age children and essential workers in health care, education, other public services, hospitality, etc. Retaining these important portions of our workforce depends on producing housing that is affordable to moderate income households. If the City only plans for increasing housing by 89,000 units, then market forces will result in the growing high income workforce gobbling up a disproportionate share of new housing and forcing all housing rents and prices to skyrocket. The City should adopt a proactive plan to provide support for public service workers with families, including health care workers and educators, to afford rent and purchase of homes in Seattle. This would entail programs that provide incentives for inclusion of those units in new developments and subsidies.

The Plan does not include any provision to ensure that modest income working households will be able to afford housing in the areas of increased density in Regional Centers. The City should include a commitment to revisit the HALA program to have housing which is affordable at different income levels in all housing that benefits from proximity to the massive public investments in transit and other infrastructure.

2-3

- The City could consider using a form of tax increment financing to capture the greatly increased value of properties near our public transit and infrastructure investments, e.g., NE 130<sup>th</sup> St. Station upzone area, and devote the revenues to providing affordable housing in those units. This could be done either through direct subsidy of rent or purchase or building units (with nonprofit partners). This, of course, could be included as an anti-displacement strategy.

For example, the plan and EIS do not consider new approaches to use of the Multi Family Tax Exemption (or even if it would be more cost effective to stop losing property tax revenue in exchange for a small portion of units being set aside in MFTE developments and, instead, use the increased revenue to provide funds for building new affordable units and providing subsidies.

- The Plan should commit to ensuring that new housing developments that benefit from proximity to the taxpayers’ massive investments in light rail, fixed transit and other infrastructure do not result in windfall profits and exclusive high income housing. Increased housing density near public investments in transit should be accompanied by **a change to HALA policies to require inclusion of affordable units of housing in new developments** taking advantage of increased density allowances. Equity and improving access to the benefits of transit and other public infrastructure should be reflected in adoption of policies to ensure that a significant number (20-25%) of housing

units in these areas serve the City's goals to provide affordable housing for persons (and family units) at the <30%, < 60%, < 80% and < 100% AMI levels.

Why should the beneficiaries of the increased housing around public investment in transit go only to the highest income level households? Why should the developers of these properties not be required to share the windfall from the public investment by including housing for lower income households?

2-3 cont

- **The Plan and EIS fail to address new statutory requirements for consideration of climate change and environmental justice.** This includes failing to address the City's admitted **backsliding on Seattle's adopted goal to have 30% tree canopy by 2037**, and the documented impacts this has on human health and the environment for overburdened communities and vulnerable populations.

2-4

- The new Urban Center at NE 130<sup>th</sup> St: I have heard from numerous constituents that this area should have additional planning with additional density along Roosevelt Way NE. Currently, the plan is centered on the future light rail station – which is years away. Commercial and midrise development are already anchoring Roosevelt Way NE. Allowing for further development potential would create a neighborhood center that is viable and strong.

2-5

### **The Draft Comprehensive Plan and EIS Fail to Reflect the Requirements of HB 1220, Which Requires Cities to Plan for Adequate Housing to Meet the Needs of Residents of All Economic and Income Levels.**

- HB 1220 / RCW 36.70A.070(2) requires planning to meet projected housing needs for households at every income level. This is a major change from prior planning cycles when cities only had to identify capacity to meet an overall housing need for the projected growth in population. **The draft Plan fails to identify a plan to meet these needs at each income level, particularly for lower income residents and working families, in addition to the overall goal for housing units being inadequate.**
- The Plan forecasts that approximately 20,000 housing units are needed for households between 50% AMI and 120% AMI by 2045. Housing Appendix Tabel 2, Page 14.
- The Plan forecasts about 13% of the projected 89,000 units needed by 2045 will be for housing affordable to households earning from 50 to 80% AMI, or 11,570 units.<sup>4</sup>
- After identifying these targets, per RCW 36.70A.070(2), **the Plan and EIS fail to propose how a new Plan will ensure that there is housing for each of these segments of our population.**
- *The Plan misses the opportunity for Seattle to adopt a more aggressive target to attract more essential workers, public servants, educators, etc. to live in Seattle by ensuring that there will be housing affordable to these households earning below 100% AMI.*

2-6

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<sup>4</sup> Id.

- The Plan and forecast fail to take into account that the AMI for Seattle has skyrocketed due to the influx of very high wage tech workers.
- The Plan should assess workforce housing needs for city employees and other public servants, educators, health care workers and what housing strategies can increase housing available for those households.
- The overall housing need from 2019 – 2045 was projected at 112,000. The Plan is for 2025-25, a twenty year window. However, the City chose a goal of 89,000 units. The minimum goal should have been in the 110,000 range.
- 63% of the housing needed is for households <80% AMI.<sup>5</sup> That would be 56,070 units. What is the plan to build 56,070 units affordable to persons below 80% AMI? The Plan lacks any plan to add 56,070 affordable housing units.

2-6 cont

Moreover, the plan acknowledges that the middle income level housing needs are double that forecast. If governmental supported housing is relied on for the 0-50% AMI bands, a plan is needed for how the city will ensure adding about 13% of the need for housing from 50 to 80% AMI, or 11,570 units<sup>6</sup> and for approximately 20,000 units for households with incomes of 50-120% of AMI.<sup>7</sup>

- The Commerce model relied on for these projections dramatically underestimated the need for moderate income housing in Seattle. It is based on the erroneous theoretical assumption that each new unit added to accommodate a currently cost burdened lower income household frees up one additional housing unit in the income band above it.<sup>8</sup> This is clearly at odds with reality in Seattle where the lower income need remains far above the new supply. This also ignores the reality that the City has thousands of unhoused residents awaiting new housing units. Adding desperately new units for these extremely low and very low income level unhoused residents does not free up a housing unit in the economic band above. Thus, the new unit at 0-30% or 30-50% AMI *does not* vacate a unit for someone else who is in the next higher up income to now rent the vacated apartment without being cost burdened. Another household in the lower income level desperate to find housing close to work, healthcare or school will be cost burdened and seek to fill the unit vacated by someone moving to publicly supported housing and the pressure from higher income workers joining the city's workforce will keep the rent high.
  - As the Housing Appendix acknowledges, this model likely results in a major underestimation of housing need at the lower and middle levels:
 

“By assuming needs within the lowest income categories are met, the model may underestimate needs of other low- and moderate-income households. After all, if the needs of the lowest-income households remain unmet, those shortfalls will not only leave those households cost

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<sup>5</sup> Housing Appendix at page 16

<sup>6</sup> Id.

<sup>7</sup> Draft Plan page 94.

<sup>8</sup> Housing Appendix footnote 12, page 15.



burdened but also contribute to shortages felt by households somewhat higher up the income ladder.”<sup>9</sup>

- **Thus, at least another 11,570 units affordable for households earning from 50-80% AMI should be in the Plan’s goals.**
- HB 1110, for example defines affordable housing at <60% of AMI for renting and < 80% for home ownership. The Plan is required to implement HB 1110 but does not reflect this aspect. Nor does it include a breakout of need for these units rather than breaking out need for housing for households earning over or under 120% AMI and for low and extremely low incomes.
- The Plan should include proposals to ensure that the full mix of housing units proposed under HB 1110 (which includes stacked flats, cottages, and duplexes through sixplexes) to be affordable for purchase by households < 80% AMI or rented by those <60% AMI will be available to meet the projected need.
- **In addition to planning just by income level, the Plan should revisit the City’s definition of family sized housing.** This is now defined as 2 bedrooms. There is no analysis of the impact of this on the ability of households with school age children to remain in Seattle Public Schools and reside in Seattle. At minimum, the Plan should include policies for households needing 3 bedrooms.

2-6 cont

**Tree Canopy and Climate; Tree Preservation and other Environmental Elements are Not Adequately Addressed in the EIS. Required Mitigation Measures to Achieve Policies are Not Addressed or Proposed in the Comprehensive Plan or SEPA Review / EIS.**

**The results from this failure to properly address the required climate change and tree canopy policies and lack of inclusion in the Plan and lack of analysis in the EIS are likely to be:**

- a tremendous loss of mature tree canopy as the City falls further and further behind from its **adopted policy goal for 30% tree canopy coverage by 2037**;
- adverse health impacts from loss of tree and green space (particularly for overburdened or highly impacted communities);
  - health impacts will almost certainly include increasing mortality and hospitalizations of vulnerable populations due to projected increasing days of severe high temperature with the highest temperatures in residential areas that lack tree canopy and whose residents have the most adverse social determinants of health (e.g., overburdened and highly impacted communities and populations under the State HEAL Act).
- adverse impacts due to increased storm water runoff, including stream erosion, contamination entering surface waters, harm to salmon or fish habitat and recovery and biological diversity in surface waters and shoreline habitat,
- impacts on meeting legal requirements to reduce combined sewage overflows and lack of mitigation for increased runoff from increasing impervious surfaces from other plan policies.

2-7

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<sup>9</sup> Housing Appendix page 16.

Mature trees in urban settings have been well documented to reduce stormwater runoff<sup>10</sup> as well as decreasing urban temperatures. As such mature tree canopy must be an important element of a climate change element under comprehensive planning to reduce the impacts of climate change and severe high temperatures, particularly in residential areas with lower and moderate income residents and older housing stock that lack air conditioners.

The findings of the City's own Tree Canopy Assessment were summarized by the City:

- **Canopy loss is not happening equitably.** Neighborhoods impacted by racial and economic injustice started with less canopy and lost more than the citywide average. Compared to neighborhoods with greater advantages,<sup>[1]</sup> these neighborhoods had 31% less canopy in 2021, an increase in disparity from 2016 (when they had 27% less). While there were some canopy gains in environmental justice priority areas attributed to forest restoration programs, the losses outpaced the gains.
- **Tree canopy cover is critical for lowering temperatures and reducing heat island effects in our warming climate.** Trees are a key component of our climate preparedness and resilience strategies as they protect us from extreme heat and improve air quality. The report finds that, on a hot day, neighborhoods<sup>[2]</sup> with 25% canopy cover were 1 degree cooler than neighborhoods with no canopy. Industrial areas and major transportation corridors have lower canopy and warmer temperatures. These conditions were also found in some neighborhoods, such as in the Chinatown-International District and in the south end of Rainier Valley.

*“The data show we are further away now than we were five years ago from our goal of 30% canopy coverage,” said Jessyn Farrell, Director of Seattle’s Office of Sustainability & Environment. “To reverse this backward slide and achieve our vision of an equitably distributed urban forest in Seattle, our strategies must better align development and tree preservation and include innovative and equity-driven actions in planning, maintenance, planting, and engagement. In short, a healthy, thriving Seattle needs more housing and more trees and we can absolutely do both.”*

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<sup>10</sup> For example, of the well documented reduction in storm water runoff associated with mature tree canopy in urban areas, see:

US Environmental Protection Agency resources: Center for Watershed Protection, Swann, Chris; Review of the Available Literature and Data on the Runoff and Pollutant Removal Capabilities of Urban Trees; 2017.

Michael Richter \*ORCID, Kirya Heinemann, Nadine Meiser and Wolfgang Dickhaut ; Trees in Sponge Cities—A Systematic Review of Trees as a Component of Blue-Green Infrastructure, Vegetation Engineering Principles, and Stormwater Management; Department of Environmentally Sound Urban and Infrastructure Planning, HafenCity University Hamburg;

“Trees reduce stormwater runoff and soil erosion through direct retention on leaves and branches when they become wet (interception), runoff of water via the trunk (stem runoff) and infiltration through the soil [20]. Additionally, substrates filter pollutants from stormwater before it infiltrates into groundwater”

Citing:

Elliott, R.M.; Adkins, E.R.; Culligan, P.J.; Palmer, M.I. Stormwater infiltration capacity of street tree pits: Quantifying the influence of different design and management strategies in New York City. *Ecol. Eng.* **2018**, *111*, 157–166.

Charles River Watershed Stormwater Association. Stormwater, Trees, and the Urban Environment. A Comparative Analysis of Conventional Street Tree Pits and Stormwater Tree Pits for Stormwater Management in Ultra Urban Environments. 2009.

City of Seattle, “*Seattle Releases 2021 Tree Canopy Assessment Showing Slow Decline in Canopy Cover Between 2016 and 2021*”, [Viewable at this link](#).

The Draft EIS also recognizes that mature tree canopy reduces pollution in runoff, which is toxic to fish, in addition to the benefits in regard to heat and climate resiliency.<sup>11</sup>

Much of the mature tree canopy and habitat in Seattle’s residential neighborhoods, which are home to nearly 50% of the tree canopy despite being a much lower percent of the total land area, are evergreen trees. Evergreen, including Douglas Fir and Cedar, are documented to intercept 27 to 66% of precipitation (preventing that from reaching the ground to be rapid runoff).<sup>12</sup> This is far more than deciduous trees.

Seattle’s existing native mature tree canopy has a far greater percentage of evergreen trees, which intercept and prevent stormwater runoff, than deciduous. However, tree replacement, especially street tree planting, is primarily deciduous and of much smaller canopy, resulting in a far greater relative increase in stormwater runoff. Preservation of mature tree canopy in residential areas is, therefore, necessary mitigation to accomplish the City’s Tree Canopy, Climate and runoff goals and policies.

2-7 cont

HB 1181, Chapter 228, Laws of 2023 requires cities to incorporate climate change goals and elements in comprehensive plans. There is a concomitant requirement to address climate change impacts and related policies in the Environmental Impact Statement (EIS) accompanying the draft comprehensive plan.

RCW 36.70A.070(9) now requires that the City’s Comprehensive Plan:

‘must enhance resiliency to and avoid the adverse impacts of climate change, which must include efforts to reduce localized greenhouse gas emissions and **avoid creating or worsening localized climate impacts to vulnerable populations and overburdened communities.**”

(emphasis added).

Neither the Plan nor the Draft EIS adequately consider how the loss of tree canopy, which has already been documented by the City, and which will accelerate under the proposed Plan, will result in increased “heat islands” and adverse health effects on vulnerable populations and overburdened communities from reducing tree canopy. Indeed, the Plan and EIS are required to have strategies to reverse the documented loss of tree canopy reflected in Seattle now being further from its goal than when the goal was adopted.

The Climate section of the draft Plan refers to a Climate and Environment Policy CE 9.3<sup>13</sup>:

“Expand tree canopy and greenspace, especially in communities that experience disproportionate impacts of extreme heat and smoke events.”

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<sup>11</sup> [Draft EIS Vol 3 Page 3.3-3.](#)

<sup>12</sup> Center for Watershed Protection. 2017. Review of the Available Literature and Data on the Runoff and Pollutant Removal Capabilities of Urban Trees. Crediting Framework Product #1 for the project Making Urban Trees Count: A Project to Demonstrate the Role of Urban Trees in Achieving Regulatory Compliance for Clean Water; at 4.

<sup>13</sup> Plan at page 147.

As I quote the City's own findings, the City is losing tree canopy. Thus, a plan is required along with analysis of alternatives and mitigation measures to not only stem the loss but to "expand" tree canopy. No plan is presented.

The Tree Canopy section is devoid of any plan or meaningful discussion. Most notable, there is no plan or discussion relating to how the development goals will be coordinated with proactive policies to preserve and increase mature tree canopy in residential areas, where most of the tree canopy, and most of the risk for loss of canopy under the Plan will occur.

Policy CE 12.6<sup>14</sup> refers only to City property and street rights of way which cannot meet the goals:

Preserve, restore, maintain, and enhance tree canopy on City property and rights-of way.

2-7 cont

Street trees offer far less of the benefits than large mature trees.

CE 12.8 recognizes this with a policy goal:

Encourage the protection, maintenance, and expansion of tree canopy throughout the community, prioritizing residential and mixed-use areas with the least current tree canopy to equitably distribute benefits.

How will the City "encourage" protection, maintenance and expansion of tree canopy?

Mitigation is required for specific climate, environmental and human environment (including environmental justice) policies that are adversely impacted by competing policies.

The Draft Plan and EIS fail to adequately address that it is not possible to retain or replant trees when the land area is covered by new structures. The Seattle Comprehensive Plan should follow Portland's example by acknowledging that the only means of achieving 30-percent equitable citywide canopy cover is to designate at least 30% of the residential lot area with space for trees.

The DEIS discusses the in-lieu fee program which may result in increasing tree canopy in overburdened communities that currently have less than 25% tree canopy.<sup>15</sup> While this may provide vitally important benefits, cutting trees in one area while replacing them with new trees that require approximately \$5,000 for their first four years of survival is untested and does not account for the reality that it would take many years for the new trees to provide the same net benefits of the cut trees. Nor does the City consider the reasonably foreseeable adverse impacts on the areas (and streams) that will lose tree canopy.

The Draft EIS and plan do not consider the reasonable alternatives for revising the City's Tree Ordinance, including measures which would assist in reaching the goal or reducing loss of canopy, such as applying the ordinance evenly to all areas / zones in the City.

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<sup>14</sup> Plan at page 150.

<sup>15</sup> DEIS page 3.3-28.

The Draft EIS explicitly states that none of the alternatives considered include any proposal to improve regulation or incentives to reduce the pace of tree canopy loss, much less to reverse and make progress towards the goal of having 30% canopy coverage by 2037:

Under any of the alternatives, the potential for adverse effects on plants and animals would be avoided, minimized, documented, and mitigated to the greatest extent possible through regulatory reviews and permitting processes that apply to individual projects (see Section 3.3.3). None of the alternatives propose any modifications to those processes.

Draft EIS Section 3.3.2 at page 3.3-13.

The Draft EIS does not even acknowledge that many of the housing projects which might adversely affect the tree canopy retention policies will be exempt from further SEPA review under the City's adopted categorical exemptions. This will preclude consideration of area specific or cumulative impacts from multiple individual developments authorized under the Comprehensive Plan and Development Ordinances.

The Draft acknowledges the obvious: that the existing tree ordinance and policies are failing, as shown in the loss of canopy.

But, without any analysis, the DEIS asserts that the new tree ordinance will reverse this. However, the City refused to do an EIS or new analysis on the drastically revised ordinance that the Council passed. Thus, there is no analysis or basis for statements that the new ordinance will improve performance towards the goal. Further, the DEIS acknowledges that the new ordinance anticipates replacing mature canopy with street trees.<sup>16</sup> SEPA requires environmental analysis of the impacts – and mitigation measures – for such a switch since the record establishes that street trees cannot replace the heat, habitat, stream protection and stormwater benefits of mature trees.

To reflect the adopted Tree Canopy goal and required climate change element, and SEPA requirements for mitigation to achieve polices, the Comprehensive Plan and EIS should:

- explicitly include increased height bonuses or adding other residential unit area for preserving the entire tree canopy space required to keep existing significant trees healthy;
- include mitigation measures to apply the same tree protections and requirements for retention and permitting / review for removal by existing property owners to all new development in residential zones;
- adjust FAR ratios for each zone, to accommodate tree preservation;

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<sup>16</sup> DEIS page 3.3-13 and 14: Stating that the existing tree ordinance “did not prevent development and redevelopment projects from contributing to tree canopy loss. After that study was completed, however, the City updated its regulations to implement stronger tree planting requirements and to require street trees to be planted as part of development in Neighborhood Residential zones. With the current regulations, it is expected that a substantial amount of development-related loss of tree canopy would be reversed over time as replacement trees grow larger. Since some tree placement would occur off-site through the fee-in-lieu option, this could also result in a shifting of canopy cover onto public property and the right-of-way where the City might have more control over tree establishment and maintenance.” This is speculation without any analysis of the potential adverse effects or mitigation measures to ensure that the City would even meet its own expectations.

commit to requiring that the height bonus be utilized rather than merely being an option, as under current code, for developers to save significant trees by increasing development height or square footage elsewhere above what would otherwise be allowed to compensate for the area of the development reduced to ensure that significant trees on the property or adjacent properties are preserved and healthy.

E.g., developers of a five story building currently have a choice to remove a tree in the proposed building envelope, or to save the tree and add replacement footage. Mitigation and commitment to the Seattle Tree Canopy Goal and required Climate goal per HB 1181, Chapter 228 Laws of 2023, should result in the Plan and mitigation commitments under SEPA including this change which honors both increased housing unit goals and climate and tree preservation policies.

2-7 cont

- Provide examples of developments that meet increasing housing goals (including reflecting the requirement to allow various types of housing with four to six units per lot, depending on location) while preserving healthy existing mature trees on a development lot;
- Commit to adoption of an ordinance adjusting lot split and short plat lot lines to maximize preservation of existing mature trees as an element of required mitigation and commitment to the City's tree canopy and climate goals.
- Commit to increasing height for residential units in regional and neighborhood centers and expanding those centers along the entire arterials that have infrastructure completed or committed to for both light rail and bus rapid transit with the 800 foot walkable diameter zone (and fully consider on a local basis whether to expand each from three blocks / 800 feet to a quarter mile / five blocks with decreasing height and FAR moving away from the transit stop; and, couple this with the tree preservation mitigation elements above to prevent this expansion from adversely affecting climate resiliency due to loss of further mature tree canopy.
- Include consideration of potential mitigation requiring both street tree planting and small pedestrian or child friendly public access areas with larger shade trees within developments close to transit. Adjust the FAR to include increased height potential for meeting a required inclusion of plazas with trees, seating areas and play structures.

**Park considerations:** if the City moves to include specifically increasing height and housing units based on proximity to parks as an equity issue, then the EIS must address how increasing height and development FAR (requiring greater lot coverage) will impact natural habitat within the park boundaries. This must include mitigation measures to ensure that development close to park boundaries will not adversely affect either the tree root system or tree canopy habitat for trees within the park, habitat for birds and bats, light pollution in the park, the effect of shade and blockage of sunlight. The EIS would also have to address impacts from loss of sunlight and other impacts on parks that are primarily recreational. The consideration of increased density near parks should differentiate between natural areas and recreational areas (i.e., ball fields, courts, lawns, play areas).

Increased housing density that is explicitly based on increasing equitable access to parks should include a **change to HALA policies to require inclusion of affordable units of housing in new developments** taking advantage of increased density requirements. Equity and improving access to the benefits of parks requires adoption of policies to ensure that a significant number (20-25%) of housing units serve the City's goals to provide affordable housing for persons (and family units) at the <30%, < 60% and < 80% AMI levels.

Increasing the height and development potential (FAR) next to parks would be a windfall for developers. The value and market rent or sale value of units next to parks, especially with a view of preserved public park space, is far above that of other properties. If developers are going to be given such a potential windfall, there needs to be a requirement that a significant number of the units are dedicated to lower income residents and working families.

**From:** [Pollet, Rep. Gerry](#)  
**To:** [PCD\\_OneSeattleCompPlan](#)  
**Cc:** [Moore, Cathy](#); [Rivera, Maritza](#); [Saka, Rob](#); [Morales, Tammy](#); [Hollingsworth, Joy](#); [Strauss, Dan](#); [rob.kettle@seattle.gov](#); [Woo, Tanya](#); [Nelson, Sara](#); [Hubner, Michael](#); [breenon.staley@seattle.gov](#); [Holmes, Jim](#); [Burgess, Tim](#); [Emery, Adiam](#); [Harrell, Bruce](#); [Wong, Greg](#); [Washington, Tiffany](#); [Eder, Dan](#); [Grupp, Emily](#); [Gerry Pollet](#); [patrice.caroll@seattle.gov](#)  
**Subject:** Comments and proposals for Seattle Comprehensive Plan and follow-up  
**Date:** Sunday, May 5, 2024 11:12:32 AM  
**Attachments:** [Comments on Seattle Comprehensive Plan and Draft EIS, Rep Gerry Pollet May 2024.pdf](#)

**CAUTION: External Email**

Dear Mayor Harrell, Council Members, and the One Seattle Comprehensive Plan team: Please find my detailed comments on the One Seattle Comprehensive Plan and Draft EIS attached. These supplement the joint comments submitted by a large number of my Seattle legislative colleagues. I join in that letter’s offer to collaborate further on meeting our joint state and city goals.

In addition, I provide my own comments on key elements of the Plan and the draft EIS. Some of the highlights include:

- Urging adoption of an increased goal for housing units; and specifically calling out the need for the Plan to meet the requirements of HB 1220 (2021), now codified in RCW 36.70A.070(2). Those requirements are for the Plan to identify the needs for housing units for households at every economic / income level and plans for how the City will meet those needs
- Alternatives 2, 3 and 5 would result in approximately 20,000 more housing units over the next twenty years than the no action alternative base of 80,000; and Alternative 5 would produce an estimated 40,000 more units. Reductions in areas proposed for neighborhood centers, etc. would result in the proposed Plan only increasing the number of housing units projected for by 2045 from 80,000 to 89,000. <sup>[1]</sup>

3-1

This meager increase is not the level of growth in housing units that my constituents and I believe is adequate or acceptable.

- Your administration worked closely with me to ensure that Seattle was not preempted from applying its own anti-displacement and affordable housing programs in housing legislation, such as for middle housing (HB 1110). I appreciated that close collaboration. Thus, I have been surprised in my extensive reading of the Plan and participating in several briefings, meetings and open houses to find that there is no meaningful discussion, *new* proposals or consideration in the Plan of appropriate policies to prevent displacement in the identified areas with high displacement potential for people /
- **The Plan and EIS fail to address new statutory requirements for consideration of climate change and environmental justice.** This includes failing to address the City’s admitted **backsliding on Seattle’s adopted goal to have 30% tree canopy by 2037**, and the documented impacts this has on human health and the environment for overburdened communities and vulnerable populations.

3-2

3-3

I believe my role as a legislator is to assist the City in meeting the goals set by City officials and our state’s policies. I am available to meet and discuss concepts in the comments and how I can be of further assistance.

*Gerry*  
 Representative Gerry Pollet  
 46<sup>th</sup> District (Northeast and North Seattle)  
 Member: Appropriations, Education, Post-Secondary Education and Workforce



Development, Rules Committees  
Executive Committee for Joint Legislative Audit and Review Committee

Please email me if you'd like to join one of my Saturday morning drop-in discussions "**Traveling Town Halls.**" Notice is also posted on my website and FB page during the legislative session. I hold these most Saturdays from 9:30 -11am during Session since constituents shouldn't have to go to Olympia to see your Representative. From March-December, I will hold them one Saturday a month. Email me for dates and link or location, or to arrange a group meeting.

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<sup>[1]</sup> See Draft EIS Vol 3. 3 for an example of the summary of housing units for each alternative.

May 8, 2024

From: Joy Hollingsworth, Councilmember, District 3

To: Rico Quirindongo, Director, PCD

Cc: Brennon Staley, PCD  
Michael Hubner, PCD

Director Quirindongo,

Our office has reviewed the Draft Environmental Impact Statement accompanying the Draft One Seattle Plan. We appreciate your department's incredible contribution to the success and health of the city. We know this plan will inform some of the most important decisions that our Council and our Mayor will make.

4-1

I do have several questions and I am requesting this feedback be incorporated into the final EIS.

The baseline and all alternatives plan for addition of 158,000 jobs in Seattle during the planning horizon. This suggests that for all alternatives, a varying number of people must live outside the city and commute in for work. As a result, the alternatives that result in fewer housing units constructed within the city would cause an increase in trips from outside of the city and vice versa, which has varying impacts.

- **Transportation** – The transportation analysis appears to only account for residents living within any given subarea and does not include the additional out-of-city trips and commutes caused by imbalance between job and housing additions. Alternatives that provide less housing in the city, likely cause more commutes and other trips into and out of the city limits. These commutes would be longer than any in-city commute. Non-work trips into the city would also be more frequent.

**Request:** Please include in the analysis of each alternative the transportation impacts that are caused by the imbalance between the number of projected new jobs vs the projected number of new housing units, accounting for the implied trips caused by new in-city workers that necessarily live outside the city limits.

- **GHG Emissions** – Unlike criteria pollutants, greenhouse gas emissions are not locally toxic or harmful. Greenhouse gas management is solely a global collective

4-2

action problem. The DEIS appears to assume that the studied alternatives have no effect on GHG emissions outside of the city. It is important we know the true GHG impacts of the city's choices on the goal of preventing catastrophic climate change.

4-2 cont

When the city plans for 158,000 new jobs but not enough homes to house all those new workers, a number of new households will necessarily be formed outside of the city limits. Those households, across all their lifestyle choices and constraints, will likely have a carbon footprint, up to double that of a typical Seattle household.

**Request:** Please account for the changes to GHG emissions that result from the imbalance between housing increases and job increases in each of the alternatives. Please model changes in the carbon intensity from living in the city vs outside the city among the following: construction, transportation & car dependency, residential heating and cooling loads, and land-use intensity (i.e. changes in habitat destruction outside the city limits).

- **Plants & Animals** – While in-city tree canopy and plant coverage provide a wide variety of critical environmental and livability benefits to the city, the city's impacts on habitat outside the city limits are likely just as more impactful for the objectives of wildlife preservation, fish health, and environmental stability. Because some new households will necessarily be formed outside the city limits, those households will likely form in areas where each one consumes much more land for the housing itself as well as the supporting public and private services (e.g. roads, parking, and commercial shopping centers).

4-3

**Request:** In addition to analyzing the effects on tree canopy, habitat loss, and aquatic environmental health within the city limits, please also analyze the effects outside the city limits as implied by the jobs-to-housing deficits in each alternative.

- **Population** – When comparing the population distribution of Seattle versus the population distribution of Washington State, it is clear Seattle has far larger share of young adult, childless individuals than the State, and has a severe deficit of both children and middle-aged individuals. Similarly, when comparing households by income, Seattle has higher shares of high-income households and low-income households, with a significant deficit of middle-income households (50% - 150% AMI).

4-4

These demographic trends suggest that Seattle is failing to supply adequate housing for middle class households, and especially households with children.

Those households appear to have been displaced to elsewhere in the State. Alternatives that produce more family-sized housing would likely reduce this displacement and similarly plans that fully satisfy demand for single-member, middle income households would likely reduce the formation of roommate households, leaving more inventory for families.

4-4 cont

**Request:** Please also analyze how each alternative changes the changes the supply of housing suitable for households with children as well as how they change demand pressure for the formation roommate households. Also, please evaluate how the impacts the supply of housing for middle-income households.

### Neighborhood Character

A significant concern I hear from District 3 residents is retaining neighborhood character while still growing. Most—if not all—Seattle neighborhoods have a significant supply of multifamily structures that were built either prior to the creation of Seattle’s first zoning code in 1923, or prior to the major revision in 1957. These multifamily structures are definitionally part of the neighborhood character and beautiful charm of Seattle.

4- 5

It is important that the Comprehensive Plan address neighborhood character concerns by allowing new multifamily structures that are similar to the historic multifamily structures that have existed since Seattle’s neighborhoods were formed.

**Request:** Please ensure that the Final EIS not preclude zoning changes in the Comprehensive Plan that would bring all or substantially all the multiple family structures built prior to 1957 to conforming status in the zone they reside in as of April 18<sup>th</sup>, 2024, and/or legalize new multifamily structures of equivalent appearance, size, shape, floor area, height, position on lot, etc. To the extent additional EIS analysis is required, assume a street configuration and tree canopy in adjacent right of ways that is consistent with existing multifamily structures.

### Building Form

I have heard from many District 3 residents that we are seeing a lack of diversity in the forms of new housing being constructed in the city. Townhome construction is heavily represented in larger sized unit construction. The large number of stairs in townhomes

4- 6

provides significant challenges to individuals with mobility limitations, the elderly, and families with young children. Our city needs to provide incentives for stacked flats and larger apartment homes to meet the housing needs of these households.

**Request:** Please ensure that the Final EIS does not preclude future changes to the Comprehensive Plan that could be used to incentivize the construction of multifamily structures as alternatives to townhomes. Possible changes could be unit count bonuses, height bonuses, lot coverage increases, setback reductions, FAR bonuses, parking exemptions, height limit increases, and similar measures for the construction of small apartment buildings or stacked flats.

Thank you for your hard work preparing this DEIS, the draft One Seattle Plan, and your tireless efforts these last two months presenting the plan to the public. Your team has done a phenomenal job, and we look forward to working with you to bring the plan to reality for our community.



Joy Hollingsworth  
District 3 Councilmember



April 26 2024

Jim Holmes, Office of Planning and Community Development  
via e-mail to: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

Re: Draft One Seattle Plan Draft Environmental Impact Statement Comment Letter

Dear Mr. Holmes,

The Seattle Planning Commission appreciates the opportunity to comment on the One Seattle Plan Draft Environmental Impact Statement (DEIS). The Seattle Planning Commission is a 16-member independent, advisory body. We provide guidance and recommendations to the City of Seattle’s Mayor and City Council, as well as City departments, on planning goals, policies, and plans for the physical development of the City. We offer the following comments to help expand the environmental analysis and support the City in drafting a transformative Comprehensive Plan for Seattle. We have also provided comments on the Draft One Seattle Plan, which can be found [here](#).

First, we want to highlight some aspects of the DEIS that we appreciate. We value the inclusion of the detailed historical context of housing in Seattle. The Land Use section provides a summary of the history and impacts of housing segregation, redlining, and exclusionary zoning in Seattle. The Population, Housing, and Employment section describes how a long history of under-production of housing has led to a housing shortage and how decades of discriminatory housing policy created an inequitable housing environment in Seattle. In addition to a well-written narrative of these past harms, the DEIS provides evidence of housing disparities by race, ethnicity, and income present in Seattle’s housing market today that the One Seattle Plan must work to reconcile. The inclusion of this racial equity and historical harms lens provides an important grounding for the work of this Comprehensive Plan and we are glad to see it included to shape the discussion around housing and land use in the plan.

We also appreciate the City’s multi-faceted approach to studying displacement in the DEIS. We recognize that displacement is a complex mixture of many different forces and choices that can be challenging to study. We are pleased to see the DEIS explore an expanded concept of displacement by studying potential causes and impacts of physical, economic, and cultural displacement.

**Areas for Additional Analysis**

We identified several areas for improvement, detailed as recommendations by topic below.

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

**5-1**

**Staff**

- Vanessa Murdock  
*Executive Director*
- Olivia Baker  
*Policy Analyst*
- John Hoey,  
*Senior Policy Analyst*
- Robin Magonegil  
*Administrative Analyst*

### *Overall Recommendations*

- Provide a detailed explanation for how the areas and place types are defined and selected.

The Planning Commission would like to see a detailed explanation for how the areas and place types studied under each alternative are defined and selected. For example, it would be helpful to know more about how a corridor is defined. The Corridors alternative is described as focusing growth within a short walk of frequent transit, but more information is needed to understand the exact parameters. We would also like to learn more about the criteria used in the selection of Neighborhood Centers and how those analyzed were narrowed down from the original list of Neighborhood Centers in the EIS Scoping Report.

- Provide a more complete exploration of how the alternatives reduce racial disparities throughout the DEIS.

The DEIS summary indicates that equity is one of the main objectives of the major update. Each section of the DEIS analysis includes an equity impact section, yet many of these discussions focus on income disparities and do not include an exploration of disparate impacts by race or ethnicity. While themes of racial equity are explored at a high level throughout the document, these themes are not carried through to the detailed analysis by alternative and by study area. The application of this lens is inconsistent throughout the document. For example, the Race and Social Equity Index is mentioned in the Transportation chapter, but not in the Housing chapter. The DEIS should use the already established Race and Social Equity Index maintained by the City to conduct an equity analysis for each topic area that recognizes the complex and intersectional nature of equity concerns in Seattle.

- Include an analysis of Seattle’s emergency preparedness and response for major earthquakes.

The EIS should include a study of how the updated Comprehensive Plan and the proposed growth strategy interact with the City’s existing emergency preparedness and earthquake preparedness and response plans. It is not a matter of if, but a matter of when Seattle will experience a major earthquake and the EIS should analyze whether the City is prepared to handle such an emergency as Seattle plans to accommodate more people and changes to the built environment. Mitigation measures should be proposed if the analysis shows existing emergency plans fall short in preparing for growth.

- Inclusion of the 130<sup>th</sup>/145<sup>th</sup> Street Station Area in this larger EIS adds confusion.

The summary of potential impacts in the 130<sup>th</sup> Street and 145<sup>th</sup> Street station areas does not appear to provide a full analysis of these two new station areas. For example, it may be confusing to the public that impacts on these station areas are only studied for Alternatives 2 and 5, because it is assumed that the station area plans would not be applied under the other growth strategies. While the attempt at efficiency by including these in the DEIS is appreciated, the Planning Commission recommends completing these studies separately from the One Seattle EIS.

- Study the Planning Commission’s recommendations (found [here](#)) on the draft One Seattle Plan, specifically those related to Growth Strategy, Land Use, Housing, Transportation and Climate and Environment in the Final EIS

The Commission requests the study of recommendations, when not addressed in the DEIS, in the Final EIS to assist decision makers in determining the best path forward in the City's plan for sustainable and equitable growth. This includes analyzing Accessory Dwelling Units as a unique housing type not likely to be fully built out across the city in all areas and providing a housing option for a select number of people/households.

5-2 cont

### *Air Quality and GHG Emissions*

- Study the impacts of locating sensitive uses near additional high-volume traffic roadways beyond the freeways.

We appreciate that the DEIS provides a detailed explanation of the criteria pollutants studied and their potential impacts, such as how PM2.5 can increase the risk of cardiovascular and respiratory problems. The DEIS also notes the risks associated with locating sensitive uses (residential, daycare, schools, etc.) next to major roadways and rail lines. Due to these risks, the DEIS shows what a 1000-foot buffer around freeways through the City would look like and what uses are currently in these buffer areas. The DEIS does not, however, discuss the potential air quality impacts of large arterials like Aurora Ave N or MLK Way S, which also move large volumes of cars through the city. Additionally, the DEIS does not draw a connection between the impacts of locating sensitive uses such as housing along roadways and the Corridors strategy in Alternative 4, which would focus housing growth along such roads.

5-3

The land use decisions made today can have long-term impacts for the health of future Seattle residents. Uses such as housing and schools, which require large amounts of land, can be challenging to site through the permitting and building process, and will likely be used for the next 50 to 100 years. The City should study the impacts on sensitive uses near other high-capacity roadways and arterials beyond just the freeways, especially if policy will be developed to apply the mitigation measures identified in the DEIS, such as additional ventilation or air purification requirements, near studied pollution sources.

### *Land Use Patterns & Urban Form*

The Planning Commission appreciates inclusion of a thorough summary of the history and impacts of housing segregation, redlining, and exclusionary zoning in Seattle. This section provides important background and context for the analysis of impacts and proposed mitigation.

- Provide more detail and context on negative land use impacts and the consequences of those impacts. The land use impacts analysis emphasizes the following potential negative impacts:
  - Increased frequency of areas with mixing of uses and heights.
  - Different land use types locating close to one another.
  - Land use patterns that contain mixes of land uses with differing levels of intensity.

5-4

This analysis is general across all the action alternatives and does not adequately describe the rationale for why these impacts are negative and what the consequences of these negative impacts are. Similarly, the impacts analysis states that redevelopment would create a potential for localized adverse



compatibility issues and sharper transitions. This analysis is general across all the action alternatives and does not adequately identify the consequences of these negative impacts.

- Emphasize that negative impacts resulting from urban growth are expected and only temporary.

The DEIS repeatedly uses language describing the potential negative impacts of height, bulk, scale, and transitions that is likely to be of concern to residents in existing low-density neighborhoods. The mitigation analysis states that these impacts would be temporary as an expected characteristic of urban population and employment growth and will be resolved over time. To alleviate the concerns of neighboring residents, it should be emphasized that no significant unavoidable adverse impacts to land use patterns, compatibility, or urban form are expected under any of the alternatives.

- Highlight both positive and negative equity impacts.

The Planning Commission appreciates the inclusion of Equity and Climate Vulnerability Considerations in the impacts analysis for each of the alternatives. This section discloses both positive and negative equity issues for a range of populations. We applaud identification of increasingly negative impacts on people living along inhospitable arterials with unhealthy traffic impacts, such as safety, air quality, and noise, in the Relationship to Social Wellbeing and Sociability section. We also appreciate the discussion of positive equity impacts related to increased density in the action alternatives, including more equitable impacts to housing choice, a more varied urban form, more opportunity for vibrant neighborhoods, and opportunities for more multifamily housing. Lastly, we appreciate the identification of the positive relationship between intensifying land use and opportunities for increasing active transportation. Increased density across all neighborhoods in Seattle would allow more people to live in walkable and bikeable communities with improved access to transit.

- Include additional mitigation measures in areas of the city subject to sea level rise.

Encouraging growth in areas subject to sea level rise, such as South Park, should be accompanied by policies committing to investments and building requirements in those parts of the city.

### ***Population, Housing, and Employment***

- Provide additional employment analysis related to the changing nature of work location post-pandemic.

The DEIS should do more to explore impacts and changes to work location and employment opportunity across alternatives. The DEIS assumes the pattern of job growth in Seattle will remain largely the same as current patterns regardless of the growth strategy selected. The DEIS does not explain why this assumption is made nor does it consider the changing nature of work location due to the increase in remote work and the shifting climate of work post-pandemic. We recommend the City provide further analysis of how different land use configurations in the alternatives may influence job location and acknowledge that employer location may differ from worker location for some employees, creating different travel patterns and consumer patterns within and across neighborhoods.

- Study how each alternative may support or hinder the implementation of anti-displacement policies in the draft plan beyond just Mandatory Housing Affordability (MHA).

5- 4 cont

5- 5

The DEIS provides a strong exploration of the historical context of housing in Seattle and displacement pressures in the city and we appreciate the inclusion of this context. The DEIS also attempts to break down and explain displacement occurring in the city through exploration of physical, economic, and cultural displacement but lacks enough data to provide a clear picture of how each alternative would impact displacement in high-risk areas of the city. We recognize that displacement is a complex topic that is challenging to study, and we think the following suggestion could help provide a more complete picture.

5- 5 cont

To provide further analysis of how the One Seattle Plan can impact displacement, the EIS should study how each alternative growth strategy may support or hinder the implementation of anti-displacement policies beyond just MHA. For example, the EIS could provide an analysis of the displacement strategies explored in the draft plan which include allowing only three units in Neighborhood Residential zones in high displacement risk areas rather than four units in low-risk areas. The EIS could also include a discussion of how other efforts might be impacted, like projects supported by the City's Equitable Development Initiative or community land trusts operating in the City. Providing a direct comparison between each alternative and the Displacement Risk Index would also help strengthen this analysis.

- Study the impact of each alternative on housing affordability and supply more deeply.

The current housing analysis in the DEIS looks at housing affordability through a generalized, high-level discussion. The EIS should go deeper and explore the potential AMI levels served by the types of housing allowed under each alternative. The analysis could also discuss the economic feasibility of building different housing types that the plan hopes to encourage, such as middle housing and more affordable ownership options, under each alternative.

The EIS should also clearly identify how the supply of housing will be impacted if the housing target for each alternative is achieved. The analysis should consider what types of housing can be built under each alternative and how that aligns with the housing needs identified in Exhibit 3.7-4 Net New Housing Units and Emergency Housing Needed, 2019-2044. For example, looking at Alternative 1, if you add up the housing units needed for all categories of housing serving households at 80 percent AMI and below, the need is over 50,000 units. How does the supply of housing expected under Alternative 1 align with these stated needs for low-income housing units? The EIS should study how the supply of housing units anticipated in each alternative stacks up against the stated housing need at each income level. Additionally, how do policies proposed in the draft plan, such as only allowing up to three housing units per lot in high-displacement risk areas, impact the anticipated supply of housing?

- Include a discussion of how each alternative impacts housing choice in areas of high opportunity.

The EIS should include an analysis of housing choice in areas of high opportunity for each alternative. The City previously created an Access to Opportunity Index that explores how different areas of the city compare in terms of access to resources such as high-performing schools, jobs, parks, and stores with fresh produce. The DEIS discusses the legacy of harm created by past planning policies that prevented low-income households and households of color from living in certain areas of the city. The EIS should have a more nuanced discussion of where each alternative increases housing options in the city and to what extent the alternatives address that legacy of harm. The analysis should consider where each alternative creates new housing relative to the Access to Opportunity Index and who will be able

to afford that housing. The DEIS should examine how the alternatives compare in the effort to change existing patterns of racially disparate housing outcomes in Seattle's housing market.

### *Transportation*

- Describe the relationship between transportation analysis for this DEIS and the Seattle Transportation Plan.

The Planning Commission would like to better understand the relationship between the transportation impact analysis conducted for the One Seattle Plan DEIS and similar analysis conducted for the Seattle Transportation Plan (STP). We understand that the STP used the One Seattle Plan's Alternative 5 growth strategy for its baseline to determine transportation impacts. However, it is our understanding that the One Seattle Plan used existing land use conditions as the baseline for its transportation impact analysis.

The DEIS states that the action alternatives are expected to result in higher vehicle miles traveled (VMT) than the No Action Alternative due to increased growth levels. The impact analysis also states that all the action alternatives are expected to have significant impacts to transit passenger load, corridor travel time, intersection level of service in the NE 130th/NE 145th Street Subarea, and state facilities. The proposed mitigation measures include targeted transportation capacity improvements; bicycle, pedestrian, and freight connections; and demand management using policies, programs, and investments aimed at shifting travel to modes other than single occupant vehicles. While we are supportive of these mitigation measures, we would like more information on whether these mitigation measures are consistent with those proposed in the STP.

- Proposed mitigation measures should be inherent to development of a citywide transportation system.

The Planning Commission appreciates identification of specific negative impacts in the equity discussion, including the following:

- Underserved communities often face the highest effects of vehicle emissions.
- Freight traffic emissions or poor air quality due to proximity of housing to heavily congested roadways and freeways.
- Increased population in areas with low sidewalk connectivity.

We are very supportive of all the proposed mitigation measures, including pedestrian and bicycle system improvement, transit strategies, parking management, and safety strategies. These transportation programs and investments should be essential components of a citywide transportation system even in the absence of the perceived negative impacts of growth described in the DEIS.

- Provide more information on significant unavoidable adverse impacts to transit capacity.

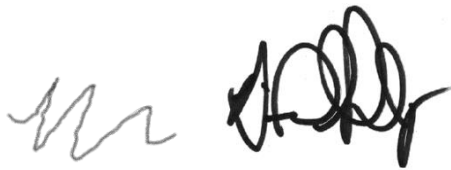
The DEIS states that significant unavoidable adverse impacts to transit capacity are expected from the action alternatives. We would like more information on the potential magnitude of this impact and the consequences for regional transit agencies. These documented impacts could serve as an opportunity for our regional transit agencies to plan for significant expansion of capacity to meet the need.

- Results of the impact analysis should be presented in terms that are accessible to lay audiences.

The Planning Commission applauds the comprehensive nature of the detailed analysis of transportation impacts, but the results are presented in jargon and technical terms that could be difficult for lay audiences to understand. The language and overall communication of the analysis could be improved to be more easily digestible for comprehension by the public.

Thank you for your consideration of our comments and recommendations and please do not hesitate to contact us or our Executive Director, Vanessa Murdock, at [vanessa.murdock@seattle.gov](mailto:vanessa.murdock@seattle.gov) should you have any questions.

Sincerely,



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

Cc: Mayor Bruce Harrell  
Marco Lowe, Christa Valles; Office of the Mayor  
Seattle City Councilmembers  
Rico Quirindongo, Michael Hubner; Office of Planning and Community Development

**DISCLOSURES/RECUSALS:**

Co-Chair McCaela Daffern works for King County and has recused herself from review of the Seattle Comprehensive Plan in her role at King County. She disclosed that her opinions are her own, not her employer's.

Commissioner David Goldberg disclosed his views are his own and not those of his employer, the Washington State Department of Transportation.

Commissioner Xio Alvarez disclosed her views are her own and not those of her employer, LMN Architects.

Commissioner Rick Mohler disclosed his views are his own and not those of his employer, the University of Washington

Commissioner Radhika Nair disclosed her views are her own and not those of her company, Seva Workshop. While she has worked on many City projects, she has not worked on this draft Plan.

Commissioner Dhyana Quintanar disclosed that her views are her own, not those of her employer, WSP.

Commissioner Lauren Squires disclosed that her opinions are her own, not those of her employer, King County Metro.

Commissioner Jamie Stroble disclosed that she worked with one of the community-based organizations funded by the City to provide input on the One Seattle Comprehensive Plan. She

disclosed that her opinions are her own, not those of any present (the Nature Conservancy) or former employer.

Commissioner Rose Lew Tsai-Le Whitson disclosed that their opinions are their own, not those of their employer, Jacobs Engineering.



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May 20, 2024

Michael Hubner  
Long Range Planning Manager  
One Seattle Plan Project Manager  
Office of Planning and Community Development  
PO Box 94788  
Seattle WA 98124-7088

Sent via electronic mail to [Michael.hubner@seattle.gov](mailto:Michael.hubner@seattle.gov)

RE: Comment Letter for Submittal ID 2024-S-6934 – City of Seattle Draft Comprehensive Plan, Draft Environmental Impact Statement, and SEPA Infill Exemption

Dear Michael:

Thank you for the opportunity to comment on the City of Seattle's proposed draft 2024 comprehensive plan, draft EIS (DEIS), and notice of SEPA infill exemption received on March 11, 2024. Growth Management Services processed the final documents with material identification number 2024-S-6934.

Your submission represents a great deal of work and substantial progress towards the 2024 periodic update of your comprehensive plan due December 31, 2024. We especially appreciate the extensive work conducted on the city's public outreach and engagement process and applaud you on what appears to be a robust public participation plan!

As part of our review, we referenced the draft One Seattle Plan Update (2024) and DEIS. We have focused our review on the following comprehensive plan elements, and offer respective comments and/or suggestions as follows:

1. Land Use

- a. Based on our review, it appears the land use element does not include population projections as required by the Growth Management Act (GMA). Per [RCW 36.70A.070\(1\)](#), "The land use element shall include population densities, building intensities, and estimates of future population growth". To better align with statute, we recommend including a population projection in your Land Use Element and, for consistency, throughout other elements in your comprehensive plan.
- b. The city shall adopt a comprehensive plan and development regulations that are consistent with and implement the comprehensive plan, per [RCW 36.70A.040](#). It appears that development standards with which to implement the comprehensive plan elements, policies and goals are not yet available, or are incomplete. Please provide a draft of all associated development regulations

and zoning updates for the One Seattle Plan draft comprehensive plan so that it may be reviewed for consistency with the Growth Management Act (GMA), [RCW 36.70A.106](#).

6-1  
cont

## 2. Housing

- a. The Growth Strategy and draft land use element include policies on moderate density housing options (e.g. duplexes, triplexes, etc.), however, these policies do not appear in the draft housing element, per [RCW 36.70A.070](#). Please consider including a policy on a variety of moderate density housing types in the Housing Element as well.
- b. The draft comprehensive plan does not provide supporting documentation indicating sufficient land capacity for emergency housing and emergency shelter, per [RCW 36.70A.070\(2\)\(c\)](#). While Commerce guidance indicates jurisdictions do not need to complete a land capacity analysis (LCA) for emergency housing and emergency shelter if they allow these uses in all zones that allow hotels, [RCW 36.70A.070\(2\)\(c\)](#) states jurisdictions must ensure sufficient capacity for all housing types, including emergency housing and emergency shelter, are identified in the housing element. Therefore, we recommend the city consider including this information in the final LCA.
- c. We appreciate the analysis you completed for the “Housing Production Barriers and Actions” section as well as the policies in your draft housing element addressing these barriers. However, the strategies identified in the “Actions to Address Barriers” section do not appear to clearly address barriers to housing across *all* income levels, particularly deeply affordable housing, emergency housing and permanent supportive housing, per [RCW 36.70a.070\(2\)\(d\)\(i\) and \(ii\)](#). We encourage you to expand your analysis of barriers to affordable housing and develop a detailed list of actions to remove these barriers. Completing this exercise can help guide your work over the coming years, including your required five-year implementation progress report ([RCW 36.70A.130\(9\)](#)). For more information, please refer to “[Chapter 4. Adequate provisions](#)” and checklists in Appendix B in [Book 2](#).
- d. We applaud the “Historical Context of Racist Housing and Land Use Practices” and “Geographic Analysis of Racial and Social Equity in Housing” sections provided in your draft documents. The Housing Appendix could be improved by including a review of housing element policies that have led to racially disparate impacts. For more information, see “Step 3. Evaluate Policies” in the [Racially Disparate Impacts Guidance \(Book 3\)](#).

6-2

## 3. Transportation

- a. A transition plan for transportation, as required in [Title II of the Americans with Disabilities Act \(ADA\)](#), is required in the city’s transportation element. Local governments are required to perform self-evaluations of current facilities and develop a program access plan to address deficiencies and achieve the identification of physical obstacles, establish methods, perform modifications and identify leadership roles. [RCW 36.70A.070\(6\)\(a\)\(iii\)\(G\)](#), new in 2023. Please add this item to the One Seattle Comprehensive Plan.
- b. A transition plan as required by [HB 1181](#) is not required until the 5 year check-in. However, it appears that that the city intends to comply with the climate requirements (multimodal levels of service standards and vehicle miles traveled reduction strategies), therefore we recommend the city include a transition plan sooner, rather than later, to guide your work over the coming years, including your five-year implementation progress report ([RCW 36.70A.130\(9\)\(a\)](#)).

6-3

- c. It appears that a description of existing and planned transportation demand management (TDM) strategies, such as HOV lanes or subsidy programs, and parking policies, is not included in the transportation element, per [RCW 36.70A.070\(6\)\(a\)\(vi\)](#) and [WAC 365-196-430\(2\)\(i\)](#). Please ensure a detailed description of each of the demand management strategies is included in the final One Seattle Plan Update (2024).
- d. If probable funding falls short of meeting identified needs of the transportation system, including state transportation facilities, a discussion of how additional funds will be raised, or how land use assumptions will be reassessed to ensure that LOS standards will be met is required. ([RCW 36.70A.070\(6\)\(a\)\(iv\)\(C\)](#) and [WAC 365-196-430\(2\)\(l\)\(iii\)](#)). There is mention of this in the funding investments section and land use assumption discussion in the appendix. However, we recommend you add a more detailed discussion on how additional funds will be raised and how land use assumptions will be reassessed.
- e. There appears to be minimal language in the plan concerning compatible airport siting. General aviation airports are essential public facilities. We recommend expanded discussion on appropriate compatibility, high intensity uses, airspace and height hazard obstruction, noise and safety issues, and other issues unique to each airport, such as topography and geography, per [RCW 36.70.547](#).

#### 4. Capital Facilities

- a. An Inventory of existing capital facilities indicating their respective locations and capacities does not appear to be included in the draft “[One Seattle Plan – Comprehensive Plan Update](#)” as required by [RCW 36.70A.070\(3\)\(a\)](#). While there is an “Appendices” section listing the names and contents of said appendices, the appendices are not included for review. Please provide the “Capital Facilities Appendix” so it may be reviewed for consistency with the Growth Management Act (GMA). See [WAC 365-196-415\(2\)\(a\)](#) for additional guidance pertaining to GMA requirements for the capital facilities inventory.
- b. A forecast of future needs for capital facilities during the planning period do not appear to be included in the draft “[One Seattle Plan – Comprehensive Plan Update](#)” as required by [RCW 36.70A.070\(3\)\(b\)](#). Please provide the “Capital Facilities Appendix” so it may be reviewed for consistency with the Growth Management Act (GMA). See [WAC 365-196-415\(2\)\(b\)](#) for additional guidance pertaining to GMA requirements for the capital facilities forecast of future needs.
- c. Proposed locations of expanded or new capital facilities appear to be addressed in the [adopted 6-year Capital Improvement Plan](#) (CIP), however, the capacities of said expanded or new capital facilities are not provided as required by [RCW 36.70A.030\(3\)\(c\)](#) and [WAC 365-196-415\(1\)\(c\)](#) and (3)(c). We recommend an amendment to the CIP to include capacities of expanded or new capital facilities. We also want to note that infrastructure investments should consider equity and plan for any potential displacement impacts.
- d. The draft capital facilities element does not appear to include a policy or procedure to reassess the land use element if probable funding falls short of meeting existing needs as required by [RCW 36.70A.070\(3\)\(e\)](#). We recommend adding a policy or procedure to reassess directly in the capital facilities element as required by statute. See [WAC 365-196-415\(2\)\(d\)](#) for additional guidance.

6-3  
cont

6-4



5. Utilities Element

- a. An inventory of existing utilities consisting of the general location, proposed location, and capacity of all existing and proposed utilities does not appear to be included in the draft “One Seattle Plan – Comprehensive Plan Update” as required by [RCW 36.70A.070\(4\)\(a\)](#). While there is an “Appendices” section listing the names and contents of said appendices, the appendices are not included for review. Please provide the “Utilities Appendix” so it may be reviewed for consistency with the Growth Management Act (GMA). See [WAC 365-196-420\(2\)\(a\)](#) for additional guidance pertaining to GMA requirements for the utilities element inventory.

6-5

Thank you again for the opportunity to comment. If you have any questions or concerns about this letter, or any other growth management issues, please feel free to contact me at (360)280-3147 or [catherine.mccoy@commerce.wa.gov](mailto:catherine.mccoy@commerce.wa.gov). We extend our continued support to the City of Seattle in achieving the goals of the GMA.

Sincerely,



Catherine McCoy  
Senior Planner  
Growth Management Services

CM:lw

cc: David Andersen, AICP, Senior Managing Director, Growth Management Services  
Valerie Smith, AICP, Deputy Managing Director, Growth Management Services  
Benjamin Serr, AICP, Eastern Region Manager, Growth Management Services  
Carol Holman, MUP, Western Region Manager, Growth Management Services  
Anne Fritzel, AICP, Housing Programs Manager, Growth Management Services  
Brennon Staley, Strategic Advisor, Growth Strategy Lead, Seattle Office of Planning & Community Development  
Jim Holmes, EIS Lead, Seattle Office of Planning & Community Development

**From:** [JT Cooke](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Seattle One Comments  
**Date:** Tuesday, May 7, 2024 12:06:03 PM  
**Attachments:** [2024.5.7 Seattle One Comment letter.pdf](#)

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**CAUTION: External Email**

Hello,  
Please see the attached comments.  
Thank you,  
JT



**JOHN T. (J.T.) COOKE**  
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May 7, 2024

VIA Email: [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov); [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

RE: **One Seattle Plan and Draft Environmental Impact Statement**

Dear:

We represent Blue Rooster Building East, LLC (“BRB”) the owner of real property located at 1300 N. Northlake Way, in Seattle Washington (“BRB Property”). Thank you for the opportunity to comment on the One Seattle Plan (“Plan”) and Draft Environmental Impact Statement (“DEIS”).

**The City Needs to Reconsider the 20-Year Incremental Planning Horizon When Strategizing for Growth**

The Plan does not go far enough to address the current housing deficit and future demand. Past comprehensive planning has not kept up with actual demand. This is part of the cause for the housing deficit in the City. The City needs to rethink the incremental planning approach to meeting the City’s housing needs. That approach has led to lower density development in areas where higher density development is needed now. The current plan continues the same failed approach to development.

The problem with the incremental (or step-up) approach to accommodating population growth over 20-year horizons is that developed property stays developed well past the 20-year planning horizon the City uses. Thus, when the City updates its plans and development regulations to achieve more density to meet projected demand, that density is often not is not capable of being realized where it is desired because land that has been designated for higher density development has already been developed under more restrictive development regulations.

**The Seattle One Plan and DEIS Should Assess Expanding The Fremont Hub Urban Village Boundaries (or Urban Centers) to Incorporate Underutilized or Undeveloped Properties**

None of the alternatives, as far as we can tell, assess expansion of the boundaries of the Fremont Hub Urban Village (which will be renamed Urban Centers) as an alternative. This is a missed opportunity. Urban Villages allow for higher density development and are generally centered around core services like transit and employment centers. Most of the land in these areas is already developed and is not likely to be redeveloped during the current planning cycle. There are, however, underutilized or undeveloped

7-1  
cont

7-2

properties on the periphery of the existing boundary of the Fremont Hub Urban Village that will likely be redeveloped during the next 20-year planning cycle. The City cannot afford to miss the opportunity to maximize development of these parcels.

For example, BRB's property at King County Parcel 4088804710 is located just outside the current Fremont Hub Urban Village. The parcel is underutilized and will likely be redeveloped during the next planning cycle. Expanding the urban village boundary to include properties like this one will help the City meet the current housing deficit and future housing demands by allowing higher density development.

**Alternative 4 and 5 Are the Alternatives that will Most Likely Achieve Required Housing Density**

Alternatives 4 and 5 are most likely to achieve the City's long-term housing needs. As noted above, under-utilized or undeveloped properties are the properties that are most likely to see redevelopment in the next twenty years. Alternatives 4 and 5 are the only alternatives that capture large portions of the City and are most likely to capture properties that will be developed over the next twenty years.

Thank you for considering these comments.

Sincerely,



John (JT) Cooke  
Attorneys for Blue Rooster Building East LLC

Cc: Client (via email)

7-2  
cont

Vulcan Real Estate

May 6, 2024

Office of Planning & Community  
Development  
Attn: Jim Holmes, Strategic Advisor  
City of Seattle  
P.O. Box 94788  
Seattle, WA 98124-7088

*Via Email*

Re: *Combined Comments on Draft Environmental Impact Statement and the Draft One Seattle Comprehensive Plan*

Dear Mr. Holmes:

Thank you for the opportunity to comment on the draft One Seattle Plan (the “Draft Plan”) and the associated Draft Environmental Impact Statement (“DEIS”). We recognize and appreciate the tremendous amount of time and energy that the City and its team have devoted to preparing the Draft Plan and DEIS, and are pleased to offer our comments in support of a strengthened final product that will maximize our city’s housing and jobs potential.

Vulcan Real Estate (“Vulcan”) is a Seattle-based developer focused on providing positive impacts on Seattle and its greater region through successful, inclusive development and management of technology and life science workspaces, as well as residential and mixed-use projects. We are proud of our sustainability- and community-focused engagement in every aspect of development in this region, from acquisition and financing through development, construction, marketing, leasing, and management. To date, we have delivered more than 13.6 million square feet, leased more than 10.2 million square feet to some of our region’s biggest and most innovative employers, and retain 5.2 million square feet under management. We are deeply invested in the Pacific Northwest, and have industry-leading expertise in sustainable and forward-thinking office and residential development.

Vulcan knows what it takes provide dense, modern, transit-oriented housing supply and commercial space. We support the vision articulated in the Draft Plan for a Seattle with new housing opportunities, complete walkable communities, climate resilience and more equitable outcomes. We also believe that under the leadership of this Mayor, Council, and Office of Planning and Community Development, the City can go even farther to support steady housing and job growth over the next two decades. With that in mind, we offer the following comments on the Draft Plan and DEIS.

**A. The Final Plan and EIS Must Provide Further Analysis of Sound Transit’s Plans and Should Articulate the City’s Preferred Direction in Order to Maintain South Lake Union as a Thriving Jobs Center.**

The Draft Plan identification of South Lake Union as a Regional Center, with the assumption that it will provide 25,000 new jobs over the next two decades. However, we are deeply concerned that Sound Transit’s plan for a Denny Station “Shifted North” at Westlake Avenue and a South Lake Union Station at 7th and Harrison as part of the West Seattle Ballard Link Expansion (“WSBLE”) would have major adverse impacts on the neighborhood, including multi-year closures on Westlake Avenue and other major streets, deeply challenging the City’s ability to achieve its goals for new job opportunities in this Regional Center. Expansion of regional transit infrastructure by Sound Transit presents an incredible opportunity to move people to and through Seattle, and will be a significant asset to the City—but only to the extent that the infrastructure is designed and implemented strategically to avoid adverse outcomes.

8-2

The Final Plan should enumerate a specific Policy of partnering with Sound Transit to deliver new stations and alignments in locations *that meet the City’s goals* for job and housing growth and minimize impacts. The FEIS must also study the potential job and housing impacts from multi-year closures of key arterials like Westlake and others throughout the City’s Regional and Urban Centers to fully understand the cumulative impacts of the Draft Plan and Sound Transit’s light rail expansion.

**B. The Final Plan and EIS Should Identify a Higher Level of Job Growth to Ensure a Thriving Economy.**

The Draft Plan and all DEIS Alternatives—including the “no action” Alternative—assume that only 159,000 new jobs<sup>1</sup> will be created in Seattle over the next two decades, which is far less than the 175,000<sup>2</sup> jobs that Seattle grew in the one decade between 2010 and 2020. The DEIS’s assumed job growth number is based solely on the City’s regionally identified growth target, without any apparent analysis of what level of job growth is actually likely (or needed) for Seattle’s thriving economy. The Plan shouldn’t just assume job growth will occur exactly as targeted—instead, it should center the Plan around strategies for Seattle to flourish economically.

8-3

Further, although we strongly support the Draft Plan’s vision for providing 30% of job opportunities in our Downtown Core, the Draft Plan and DEIS do not identify any different strategies or mitigation measures to help achieve that goal. Similarly all DEIS alternatives show from 63-65% of new jobs opportunities in Regional Centers, without explanation of how that job growth will actually be achieved.<sup>3</sup> Since COVID, the City has seen significant public safety issues in Downtown and South Lake Union, and Downtown office vacancy is expected to reach 30% in the near term. We commend the Mayor, his Administration, and the newly seated Council for their progress on these issues through the Downtown Action Plan, but a longer-term

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<sup>1</sup> The DEIS appears to state 158,000 jobs and the Draft Plan states 159,000 jobs, but we assume this is a minor error that will be corrected.

<sup>2</sup> Draft Plan at 4.

<sup>3</sup> DEIS Exhibit 3.8-5.3.

vision must also be articulated to ensure robust job growth in the City’s densest areas for the next two decades. We specifically request:

1. The FEIS identify the necessary increases in job growth to ensure a thriving Seattle economy, which we believe are much greater than the regional growth target number, and identify how differences in the zoning strategies articulated (including changes in height, bulk and scale) in each Alternative will impact the amount of job growth, especially in Regional Centers.
2. The Final Plan and EIS each identify specific strategies and mitigation measures the City can use to attract and retain employers, and enhance economic growth.
3. The Final Plan and EIS each support additional flexibility in ground-level uses in all Regional Centers to counter ground-level retail vacancy and encourage eyes on the street.

**C. The Final Plan and EIS Should Take a Bolder, Clearer Approach to Zoning Changes in Regional Centers and Urban Centers, While Recognizing the Benefits of Neighborhood Centers.**

The Draft Plan recognizes that Regional Centers are the areas likely to accommodate the greatest amounts of new density, both in terms of housing units and employment opportunities.<sup>4</sup> But in order for the Mayor’s Recommended Plan to be truly *comprehensive*, it should include more information about envisioned increases in density in these areas. Baseline density changes should occur in the near term as part of Plan implementation, and not only through future Subarea planning.

The Final Plan should incorporate, and the FEIS should fully study, zoning to allow heights of at least 85 feet (or 95 feet for mass timber construction) and 5.75 FAR for all areas in Regional Centers, and heights of no less than 240 feet and 8 FAR for all of Downtown (including Belltown) and South Lake Union, as well as for any areas within an 800-foot radius of existing and future light rail stations. Setting this zoning baseline will help maximize the potential for housing and jobs in Regional Centers. In addition, Subarea planning for Regional Centers should be accelerated. All of these changes will help release properties from regulatory uncertainty, freeing them to be developed as soon as market conditions allow.

Likewise, the Draft Plan is very vague regarding future zoning changes in Urban Centers, *even though Urban Centers are not anticipated for future Subarea planning*. These areas are critical density hubs, and both the final Plan and FEIS should devote additional attention and clarity to baseline zoning changes that should occur. At a minimum, the Final Plan should include and the FEIS should thoroughly study zoning for a baseline allowed height of 85’ and FAR of no less than 5.75 in all Neighborhood Commercial (“NC”) or Seattle Mixed zoned land in Urban Centers, along with density increases in lower zoning designations.<sup>5</sup> This will maximize the potential to build the midrise housing projects that will do the most to alleviate our housing supply crisis.

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<sup>4</sup> See, e.g., DEIS at 1-65 (“in all Alternatives, a majority of employment growth is expected to occur in . . . centers such as Downtown, South Lake Union, University District, and Northgate”).

<sup>5</sup> See, e.g., DEIS at 3.6-91 and 3.6-172.

The Final Plan should also adopt, and the FEIS should thoroughly study, refinement of NC and Midrise zones to maximize housing potential, including removal of 250' building length limits and all upper-level setbacks.

We also support the City's new Neighborhood Center designation. As a company that believes in and has invested heavily in building this City and completing neighborhoods like Yesler Terrace, we agree balanced neighborhoods should have jobs, residents and amenities. We support the idea behind the Neighborhood Centers in lower density areas and agree that it was a good idea to judiciously identify the locations where these Centers make sense based on transit connectivity. We support the Draft Plan's designations, and wouldn't oppose identifying a few additional centers. However, the City also should not lose sight of the fact that most of our new housing and jobs will not be in these areas, so common sense baseline zoning changes in our Urban Centers and Regional Centers will do more to advance our shared One Seattle goals in the coming decades.

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#### **D. Identify Strategies to Reduce Costs and Restore Regulatory Certainty.**

As you know, the current development market is extremely challenging because of high interest rates and high costs of labor, land, materials, and permits. The City's success depends on the success of the development community (including public, private, nonprofit and institutional builders) in delivering the housing and commercial spaces needed to support growth. The City also benefits directly from development as a revenue source through construction sales tax. We encourage the City to identify strategies and policies in the Final Plan and in the EIS to reduce costs and incentivize development, especially in this market environment, so that the pace of development can keep up with the City's needs, especially for housing supply.

8-5

The City should employ several strategies to achieve these ends. Seattle's broad community of housing stakeholders has long observed that "[d]esign review and historic review are among the primary drivers of the permitting timeline [and] can lead to cost increases and high development contingencies."<sup>6</sup> The Final Plan and EIS should both propose policies and study significant reforms in these processes to expand exemptions, speed up permit timelines, and provide greater regulatory certainty for the projects our communities need. Reforms are now mandated by state law, but the City should consider going *beyond* the state's current requirements, and think critically of how permitting and regulatory programs should function to best support housing and job growth and not inhibit it. The Final Plan and EIS should likewise each provide a basis to support continuation of the current exemption from SEPA for housing projects, and higher SEPA thresholds for commercial projects overall.

#### **E. Conclusion.**

Comprehensive planning under the Growth Management Act is a tremendous project in the best of times. Given today's confluence of intersecting policy crises, state mandates and economic problems, it is not an overstatement to write that this periodic update's scope of work

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<sup>6</sup> HALA recommendations at 37.



is monumental. We truly appreciate all your hard work, thoughtfulness, and countless hours spent endeavoring to balance countless competing priorities and get this job done right.

We believe the Draft Plan is a step in the right direction, and sets the stage for a finished product that can unlock our shared One Seattle goals for prosperity, abundant housing, equity, and sustainability for decades to come. Vulcan is committed to working with you to bringing this result to fruition, and stands ready to provide any additional support we can.

Thank you for taking the time to consider these comments.

Sincerely,

Ada Healey, Chief Real Estate Officer

**From:** [Jack McCullough](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [PCD\\_OneSeattleCompPlan](#)  
**Subject:** RE: Comment letter  
**Date:** Monday, May 6, 2024 5:02:16 PM  
**Attachments:** [Comp Plan EIS Comment Letter \(Interbay Work Lofts\) \(5-6-24\).pdf](#)

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**CAUTION: External Email**

Please note in the draft text amendment attachment to this comment letter that the date of the structure’s existence should be January 1, 2015, not 2010.

Thanks.

Jack

John C. McCullough  
Attorney at Law  
**McCULLOUGH HILL PLLC**  
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**From:** Jack McCullough  
**Sent:** Monday, May 6, 2024 7:24 AM  
**To:** [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)  
**Cc:** [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)  
**Subject:** Comment letter

Please see the attached comment letter.

Thanks.

Jack

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**Proposed Text Amendment**  
*Residential Uses in Existing Buildings in II zones*

Residential use in II zones. Residential uses are permitted as an administrative conditional use in II zones if all of the following criteria are met. The residential use may be part of a Major Phased Development.

1. The residential use shall be located in a structure existing as of January 1, 2015 and not exceeding 75,000 square feet in gross floor area; and
2. The residential use shall not exceed a density limit of 80 dwelling units per acre; and
3. The residential use shall not be located within 200 feet of a shoreline; and
4. The residential use shall be located adjacent to a non-industrial use; and
5. All dwelling units shall have sound-insulating windows sufficient to maintain interior sound levels at 60 decibels or below in consideration of existing environmental noise levels at the site. The applicant shall submit an analysis of existing noise levels and documentation of the sound insulating capabilities of windows as part of the conditional use permit application; and
6. All dwelling units shall have a permanently installed air cooling system and a balanced ventilation system, which may be combined. The ventilation system shall filter any outdoor air supply through filters rated MERV 13 or higher as determined by the American Society of Heating, Refrigerating, and Air Conditioning Engineers (ASHRAE). The air cooling and ventilation systems shall be indicated on the plan; and
7. The residential use shall be located, designed, and configured in a manner to reduce potential conflict with adjacent existing industrial business operations; and
8. The owner(s) of a building seeking a conditional use for the residential use must sign and record a covenant and equitable servitude, on a form acceptable to the Director, that acknowledges that the owner(s) and occupants of the building accept the industrial character of the neighborhood and agree that existing or permitted industrial uses do not constitute a nuisance or other inappropriate or unlawful use of land. Such covenant and equitable servitude must state that it is binding on the owner(s)' successors, heirs, and assigns, including any lessees of the residential use; and
9. The residential use shall be a part of a mixed-use development that includes non-residential uses permitted in II zones; and
10. Occupancies of dwelling units are voluntarily limited by the building owner to support the availability of housing that is affordable to area workers, such that the residential use consists of either:
  - a. All dwelling units are live-work units in which the commercial activity qualifies as industrial, or are caretakers' quarters associated with a business on the same site provided no single business shall have more than three associated caretakers' quarters; or

b. A minimum of 50 percent of the dwelling units are made available at affordable rent or affordable sale price for a period of 75 years beginning January 1 of the year following final certificate of occupancy to eligible households with annual incomes at or below 60 percent of median income for SEDUs, 80 percent of median income for studio and one bedroom units, and 90 percent of median income for two-bedroom and larger units. Standardized procedures and definitions established by the Office of Housing for administration of [Chapter 5.73](#) shall apply. Dwelling units eligible for the multifamily housing tax exemption may be counted towards the minimum 50 percent.



May 6, 2024

Jim Holmes, Strategic Advisor  
Office of Planning & Community Development  
P.O. Box 94788  
Seattle, WA 98124

Via email ([OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov); [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov))

*Re: Holland Partner Group's Comments on the One Seattle Plan Comprehensive Draft Plan and Draft Environmental Impact Statement*

Dear Mr. Holmes:

Holland Partner Group is a West Coast multifamily developer deeply invested in Pacific Northwest – we have built or are in the process of building over 6,000 housing units in the City of Seattle, with more in the pipeline. Our company goal is to create sustainable, socially connected places where people work, live, and enjoy life.

We write to provide comments on the City of Seattle's Draft One Seattle Comprehensive Draft Plan ("Draft Plan") and corresponding Draft Environmental Impact Statement ("DEIS"). The City is engaged in an important planning process that will shape its future. We are strongly supportive of a future Seattle with more housing opportunities for everyone, and we are committed to doing our part to build housing to help alleviate the shortage in Seattle and the Puget Sound. Many of our projects also incorporate income-restricted affordable units through our participation in the City's Multi-Family Housing Tax Exemption program, and we are one of the few high-rise developers who have done so.

We commend the City in releasing Draft Plan policies that seek to ease barriers to housing development. The Draft Plan represents a good start, but more clarity is needed to ensure the City capitalizes on all opportunities to create new housing as quickly and efficiently as possible. We offer the following comments to highlight such opportunities:

1. *Additional Growth Potential Should be Identified for Regional, Urban, and Neighborhood Centers.*

Three of the four "Key Moves" stated at the outset of the Draft Plan emphasize growth. Growth in terms of housing units and affordability, growth as a corollary to equity and opportunity, and prioritizing growth in complete, walkable communities. Growth in each

10-1

of these contexts is premised on projects occurring, which requires them to be economically viable. The City’s Comprehensive Plan policies should therefore recognize that its existing land use and zoning framework must be adjusted to ensure housing is economically viable and efficient to construct. Increasing density and removing barriers in the land use code and development process are important ways to do this. We have the following suggestions for study in the final EIS and inclusion in the Plan.

A. *Regional Centers and Urban Centers*

The newly renamed Regional Centers contain Seattle’s densest neighborhoods and many of the City’s jobs. DEIS at 1-8. The Draft Plan anticipates that the Regional Centers will also accommodate a substantial share of the City’s growth. Draft Plan at 21. Yet the Draft Plan and DEIS do not provide specific plans for how this will be achieved. We understand the City intends to complete future subarea plans in these areas, but it is a missed opportunity to delay zoning updates.

We support DEIS Alternative 5 which anticipates the largest increase in supply of housing, designates Ballard a Regional Center, and proposes to expand Uptown’s Regional Center boundaries as well as several other Urban Centers, but the final Plan and FEIS should also include more information about the likely increases in density in the Regional Centers and Urban Centers, and should make some baseline changes ahead of any future subarea planning work.

Baseline changes to Regional and Urban Centers that should be implemented with the Plan include:

- i. **Heights.** Zoning should allow, at minimum, heights of 85 feet (and corresponding Floor Area Ratio (“FAR”) of 5.75+) for all land in Regional and Urban Centers. This is the height limit that promotes midrise apartment construction, which is the most cost-efficient housing type to deliver. Further, in core areas of Urban Centers, Regional Centers, and areas nearby frequent transit infrastructure (light rail or Bus Rapid Transit lines, in particular), the zoned height should increase to at least 180 feet to align with height limits for mass timber construction with additional corresponding FAR. Finally, in all areas of Downtown and South Lake Union, zoning should allow, at minimum, heights of 240’ and corresponding FAR.
- ii. **Building Lengths.** Many zones in Regional and Urban Centers restrict building lengths to 250 feet. This restriction is arbitrary, as structures

on separate sites could be built immediately adjacent to each other and result in far greater than 250 feet of perceived building length. Building length limits should be removed in all Regional and Urban Centers, which will result in more efficient housing floorplates for midrise buildings.

- iii. **Floorplates.** Many zones in Regional and Urban Centers contain rigid, upper-level floorplate limits that apply to high-rise buildings. These limit the number of units achieved per floor, and by extension, the number of units any single project can deliver. In contrast, floorplate size limits for commercial structures are typically much greater. The City should rethink these limits. High-rise residential floorplate limits in Regional and Urban Centers should be increased to allow at least 14,000 square feet per floor.
- iv. **Setbacks.** Many zones in Regional and Urban Centers require upper-level setbacks, especially on zone edges. The City should study largely removing these setback requirements as they add arbitrary building modulation, cost, and inefficiency in delivering housing.

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cont

### *B. Neighborhood Centers*

We support the Neighborhood Center concept. It is a smart idea to allow a variety of uses and building forms in the center of neighborhoods so that the services desired by residents are delivered where they live. With moderate-density housing and commercial centers, we agree Neighborhood Centers will help create a more equitable, livable, inclusive, and climate resilient City envisioned in the in the Draft Plan and DEIS. The City should continue with this approach, but it should make a few adjustments to increase the likelihood of success with this strategy.

- i. **Additional Neighborhood Centers.** The City should consider whether additional Neighborhood Centers should be strategically added to the Plan, including those that were studied but not included in the Draft Plan. In particular, any Neighborhood Centers directly bordering Urban Centers should be considered for inclusion.
- ii. **Strategically Expand Neighborhood Center Radius.** The Draft Plan establishes a goal of providing an 800-foot radius around the existing core of Neighborhood Centers. This radius should be increased to a

10-2



1/4 mile walkshed in areas where it makes sense based on existing neighborhood features or transit facilities.

- iii. **Height Limits.** DEIS alternative 5, which studied the highest levels of growth, contemplates a 75 ft. height limit in the Neighborhood Centers. DEIS at 3.6-172. Yet the Draft Plan describes limiting Neighborhood Centers to 6-story buildings. The Plan should allow 7 story buildings to maximize housing, at least for a full block depth along main streets in Neighborhood Centers. This modest increase will allow development to increase beyond inefficient 4- to 6-story buildings and result in more housing.

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- 2. *The Draft Plan and FEIS Must Articulate a Plan for Supporting Job Growth and Commercial Development if the City’s Planning Efforts are to be Truly Comprehensive.*

The DEIS anticipates 158,000 new jobs from 2024-2044 under all alternatives studied, but it does not articulate the strategies the City will employ to achieve this level of job growth. DEIS at 1-3, Exhibit 1.1-1. The Draft Plan indicates that this figure is based on growth targets adopted by the King County Growth Planning Council, even though these estimates have been consistently exceeded in previous years and are far lower than what the City needs to truly succeed. See DEIS at 1-14.

Job growth and commercial development must be considered if the City intends to create a roadmap for where and how Seattle will grow. Economic growth is vital for a thriving City. We encourage the City to study higher job growth beyond the estimate by the King County Growth Planning Council, and to articulate in the Plan how it specifically strives to achieve this growth. Seattle has seen tremendous economic success in recent years, but it has also seen significant public safety challenges and post-COVID vacancy in the Downtown core. We believe that Downtown Seattle should continue to be the region’s economic engine, and the City must articulate its long-range strategy on how to support this in the Plan.

10-3

- 3. *Eliminating Parking Minimums is a Sensible Policy Shift Which Will Support the Development of a More Transit-Oriented Seattle.*

We support the elimination of parking minimums contemplated in the DEIS and Draft Plan. DEIS at 1-17, 2-20; Draft Plan at 43, LU 5.3. We pride ourselves on creating sustainable, socially connected places that are near job centers and promote walkability and use of public transportation. Consequently, we believe that the policy shift away

10-4



from parking minimums is essential for future, dense development, that reduces the cost of construction by meeting the market demand for parking. This approach has already existed in much of the City, and it has proven to be a workable policy that allows projects to right-size parking; we encourage the City to continue to expand it through the Plan.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Raymond Connell', is written over a light blue horizontal line.

Raymond Connell  
Managing Director, Holland Partner Group

10-4  
cont



# ALEXANDRIA®

*Building the Future of Life-Changing Innovation*

May 6, 2024

Michael Hubner  
Long Range Planning Manager  
One Seattle Plan Project Manager  
Office of Planning & Community Development  
P.O. Box 94788  
Seattle, WA 98124

(OneSeattleCompPlan@seattle.gov; PCD\_CompPlan\_EIS@seattle.gov)

Re: *Comments on Draft One Seattle Comprehensive Plan (“Draft Plan”) and its Draft Environmental Impact Statement (“DEIS”).*

Dear Michael and OPCD staff:

Alexandria Real Estate Equities (“ARE”) is a publicly traded Real Estate Investment Trust. ARE was founded in 1994 as the first real estate company uniquely focused on delivering the buildings and infrastructure needed to support the work of the life science industry. Today, we create and grow life science ecosystems and clusters that ignite and accelerate the world’s leading innovators in their work to advance human health by curing disease and improving nutrition. We have a proven record of effectively creating, nurturing, managing, and growing life science ecosystems and clusters across the country by bringing our mission-critical real estate together with scientific innovation, and Seattle is one of our seven selected cluster, mega campus locations.<sup>1</sup> Active in the Greater Seattle region as a long-term owner and occupier since 1996, ARE’s operating portfolio represents over three million square feet regionally, including 1.5 million square feet of specialized Class A laboratory space in Seattle centered around South Lake Union, Fred Hutch, the University of Washington and the Bill & Melinda Gates Foundation. In addition, ARE currently has more than 3 million square feet in the development pipeline.

Informed by our long-term investment in and commitment to supporting Seattle’s life sciences institutions and industries through real estate development, we are pleased to provide the following comments on the draft One Seattle Plan (“Draft Plan”) and accompanying Draft Environmental Impact Statement (“DEIS”).

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<sup>1</sup> Other selected clusters for our life science ecosystems include Greater Boston, the San Francisco Bay Area, New York City, San Diego, Maryland, and the Research Triangle.



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## **1. The Mayor’s Recommended Plan and Final EIS Should Prioritize and Incentivize Life Sciences Investment.**

The Draft Plan was disappointing in its lack of attention to life sciences. This industry is not only an engine that creates all manner of good, highly specialized and compensated jobs, but is also an engine for providing treatments and cures to some of the most troubling health issues that humanity faces. Although life sciences was identified as a key industry cluster, only general policies were identified to support it in the Plan.<sup>2</sup> Instead, the Plan and the EIS should articulate support for the unique space needs of life science users. Fortunately, many opportunities for improvement are available.

- *The Final Plan and FEIS should propose and study development standards (or flexibility in development standards) to accommodate the unique needs of the life-sciences industry, such as allowances for additional rooftop mechanical equipment, electrical system redundancies, and flexibility in energy code requirements.*
- *The Final Plan and FEIS should study and identify policies supporting significant revisions to the City’s entitlement processes to deliver life science projects faster. The design review program must be overhauled consistent with HB 1293 (RCW 36.70A.630) to reduce the number of design review meetings and project risk. The City should also extend and expand the current design review holiday proposed for Downtown and South Lake Union, and it should create a program to expedite life science projects and tenant improvements similar to successful steps taken by San Diego.<sup>3</sup>*
- *The Final Plan and FEIS should acknowledge that laboratory processes can be uniquely sensitive to even the tiniest vibration impacts. As Sound Transit expands, the availability of vibration-free land is expected to decrease. Zoning and development standards should acknowledge and prepare for these effects on the industry, and the FEIS should study the effects of and appropriate mitigation measures for a decrease in vibration-free land capacity.*

11-1  
cont

## **2. The final Plan and EIS Must Include More Detailed Analysis of Impacts Under A Range of Different Scenarios for Employment and the Economy, and Should Articulate a Bold Life Sciences Economic Development Strategy.**

The Draft Plan and DEIS take a cursory approach to employment growth over the planning period, both as a factor in commercial built density (including life-sciences space) that will be needed, and as a critical contributing factor in our region’s economic success. Both the Draft Plan and EIS appear to assume that job growth in Seattle will exactly match the regional targets set by King County without

11-2

<sup>2</sup> See, e.g., Plan at 130 (“Examples of Examples of Seattle’s industry clusters include manufacturing, maritime, biotech and life sciences, global health and health care, clean technology, information technology, tourism, and film and music.”); 133 (“employers often face challenges finding qualified job applicants . . . to fill jobs in certain engineering, computer, and life science fields, as well as traditional industries”).

<sup>3</sup> See <https://www.sandiego.gov/development-services/news-programs/life-science-industry-pilot-program>



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any analysis of how net job growth across the City might actually differ between the different Alternatives studied, or as a result of different economic strategies that could be articulated in the Plan. We are further concerned that the 159,000 jobs (less than 8,000 a year) identified in the Draft Plan and DEIS is a significantly lower target than is actually needed for the City to thrive economically.

The Final Plan and FEIS should provide further quantification for job estimates based on actual economic trends and data to identify a healthy job growth level for the City, and these documents should also articulate specific strategies to achieve such growth. Policymaking should be aspirational in its targets, but also must articulate actionable strategies. Life science users are attracted to Seattle because of our world-class existing institutions, but Seattle is competing with considerably bigger markets who also have world-class institutions. Other cities and states are providing meaningful incentives to competitively attract companies and users—like research and development tax credits, sales tax exemptions, and guaranteed utility supplies—and Seattle should do the same. Policies aimed at incenting life science sector development articulated in the final Plan can be a first step to support these initiatives to compete successfully for new life science opportunities. A specific policy to incentivize locating life science companies in Seattle should be added to the “Business and Industry Retention and Growth” section of the Plan.

### **3. The Final Plan and FEIS Should Support Life Sciences by Providing Greater Clarity in its Approach to Additional Density Regional Centers and Urban Centers.**

The Draft Plan’s new taxonomy of Regional Centers, Urban Centers, and Neighborhood Centers is well-considered. ARE’s life-sciences end-users will depend on these centers both for new lab space to conduct their critical work and for the housing needed to accommodate researchers and their support staff in sustainable, equitable and transit-oriented communities here in Seattle.

For Regional and Urban Centers, however, the Draft Plan contains limited information about what development standards will actually be modified as a result of this process. For example, proposed height limit changes in Regional Centers – the engines of our economy – are studied only as “height varies, high-rise allowed.” See DEIS at 3.6-172. Urban Centers are likewise *studied* up to a height change of 145 feet, but the Draft Plan does not provide information on what heights are actually proposed. This is a tremendous range of potential growth, but also includes the possibility of no upward growth at all. Similarly, but even more problematically, the Draft Plan does not specify what (if any) increases in permissible floor area ratio are contemplated in Regional and Urban Centers, and the DEIS does not appear to include study of the adverse environmental impacts of a failure to provide enough new floor area ratio to keep pace with the job growth necessary for a healthy economy in our City. The City should

clarify the contemplated density increases in the Final Plan and FEIS, and it should also advance baseline density changes ahead of any future subarea plans for Regional Centers.

At minimum, the City should allow heights of 180 feet in Regional Centers to support building forms necessary for life science research and development. Likewise, the City should adjust the height at which buildings are designated “towers” for under the land use code from 160 feet to 180 feet to allow

11-2  
cont

11-3



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flexibility for 180-foot life science buildings without additional modulation, floorplate size, and tower separation standards that undercut essential building functions.

#### 4. Conclusion

Through the One Seattle Plan, the City has a once-in-a-generation opportunity to infuse new energy, opportunity, and industry into the fundamental fabric of Seattle. ARE hopes to contribute to this work not only in the planning process, but in the post-plan buildout, by continuing to bring world-class life science spaces into service here in the Seattle.

We appreciate your consideration of these comments, and look forward to working with you to continue building a Seattle that brings the world new cures, treatments, and other innovations.

Sincerely,

CHRISTIAN GUNTER  
Senior Vice President - Development  
Alexandria Real Estate Equities, Inc.  
400 Dexter Avenue North Suite 200  
Seattle, WA 98109

11-3  
cont



PO Box 25803, Seattle, WA 98165

CrescentCollab.org

May 20, 2024

City of Seattle Office of Planning and Community Development  
 Attn: Director Rico Quirindongo, Michael Hubner, Jim Holmes, Brennon Staley  
 P.O. Box 94788, Seattle, WA 98124-7088  
[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)  
[OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

**Subject: One Seattle Comprehensive Plan Update Draft EIS Comments and One Seattle Comprehensive Plan: Draft for Public Review Comments**

Dear Director Quirindongo and OPCD Staff,

We write to you on behalf of the Crescent Collaborative: a coalition of community-based organizations working to support equity within the urban neighborhoods of Chinatown-International District-Little Saigon (Asian-Pacific Islander, Southeast Asian), the Central Area (African-American/Black), Yesler Terrace (home to generations of new immigrants), First Hill, and Capitol Hill (LGBTQ) that lie adjacent to downtown Seattle. Our neighborhoods face ongoing challenges resulting from historical and systemic racism, impacts from the COVID-19 pandemic, and ongoing residential and commercial displacement pressures. Our goal is to counter gentrification in these significant historic neighborhoods that are cultural anchors for marginalized and low-income communities as we foster social equity, economic opportunity and great educational and health outcomes for residents and BIPOC small businesses.

Thank you for the opportunity to comment on the “One Seattle Comprehensive Plan Update Draft EIS” (DEIS) and the “One Seattle Comprehensive Plan: Draft for Public Review” (Draft Plan). Please see below for comments from the Crescent Collaborative. Our comments are intended to convey our concerns that the Draft Plan will not effectively combat displacement or support equitable development. Additionally, the Draft Plan does not represent the original round of community feedback conducted by OPCD.

**Growth Strategy**

Replace the Draft Plan Growth Strategy with Alternative 5.

- Alternative 5 plans to accommodate a higher housing unit target than the other action alternatives and the DEIS finds that this alternative will produce the most affordable housing units on net, lowest ratio of physical displacements to affordable housing units built, greatest reduction to economic displacement pressure, and greatest benefit for low-income renter households
- Include Alternative 5 in the Growth Strategy Element of the Mayor’s Recommended Plan.

## Housing

### Build more family sized housing.

- In the Draft Plan, the City concludes, after examining census data and community feedback, that the scarcity of affordable homes with multiple bedrooms contributes to Seattle's lower average housing size compared to the rest of the country.
- Planning for the next two decades of growth based on the current average household size assumes that the City will remain unaffordable for larger households and families.
- Recommendations:
  - Use an average household size that anticipates a future in which the City retains larger households, especially families with children and seniors.
  - Expand middle housing for family-sized homes: Increase the development capacity for fourplexes and sixplexes and allow for 3+ bedroom homes to be built.
  - Expand the affordable housing density bonus.

12-2

### Identify and mitigate current zoning regulations with discriminatory effects and racially disparate impacts.

- The history of racial segregation is still reflected in the current development patterns, housing conditions, and access to opportunity. Through zoning regulations like minimum lot size and prohibition on multifamily housing, white and wealthy neighborhoods are shielded from denser development.
- Recommendations:
  - Clarify what actions are being taken to mitigate the historic and current racially discriminatory effects of these zoning regulations.
  - Plan for more housing production in low-displacement risk areas to address racial disparities.
    - This includes adding all Neighborhood Centers that were included in the August 2023 Draft Plan to the Growth Strategy.
    - Add the Corridor place type as described in the August 2023 Draft Plan to allow for midrise development capacity in low-displacement risk areas.

## Anti-Displacement Framework

### Add to and expand anti-displacement strategies in collaboration with impacted communities.

- The anti-displacement framework does not introduce new methods or expand existing tools. BIPOC communities are being displaced from Seattle. It is concerning to hear that under the current anti-displacement framework, the City of Seattle is not shifting the development paradigm to retain BIPOC residents.
- Potential improvements to the suite of strategies could include increasing support for affordable housing, strengthening tenant protections, endorsing state-level rent stabilization laws, assisting homeowners involved in equitable housing development, promoting land banking, and more.
  - These strategies were shared by communities who are impacted by displacement or leading policy efforts to address displacement in their communities.
- Recommendations:

12-3



- Include a better comprehensive approach reflecting new and stronger strategies that reflect what community members - particularly those from marginalized communities - shared during 2023 engagement efforts.
- Include stronger tools to ensure that growth is equitable such as increasing support for affordable housing, strengthening tenant protections, endorsing state-level rent stabilization laws, assisting homeowners involved in equitable housing development, promoting land banking, and more.

We look forward to continuing to work with you in advancing this important plan for our entire city and ensuring that all residents can thrive. If you have any questions, please contact Sarah Tran, Lead Consultant, at [sarah@samaprxaxis.org](mailto:sarah@samaprxaxis.org).

Thank you,

**Crescent Collaborative Board**

Andrea Caupain Sanderson (President)	BIPOC ED Coalition
Jamie Lee (Vice-President)	SCIDpda
Quynh Pham (Treasurer)	Friends of Little Saigon
Michelle Merriweather	Urban League



Futurewise c/o WeWork  
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May 6, 2024

City of Seattle Office of Planning and Community Development  
Attn: Director Rico Quirindongo, Michael Hubner, Jim Holmes, Brennon Staley  
P.O. Box 94788, Seattle, WA 98124-7088  
[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)  
[OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

**Subject: Futurewise Comments on the One Seattle Comprehensive Plan Update Draft EIS Comments and the One Seattle Comprehensive Plan: Draft for Public Review Comments**

Sent via email to:

[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov), [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

Dear Director Quirindongo and Staff of the Office of Planning and Community Development,

Thank you for the opportunity to review the One Seattle Comprehensive Plan Update Draft EIS ("DEIS") and the Draft Plan for Public Review ("Draft Plan"). We appreciate that the City of Seattle ("the City") has requested public comments to be submitted for the DEIS by 5pm May 6, 2024. Please find our comment on these documents, and their related appendices, listed below. Although we specify which document each comment relates to, any comment that may be applicable to both the DEIS and the Draft Plan should be considered as a comment on each.

13-1

**Futurewise Mission Statement**

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State, including in Seattle.





## Draft Plan & DEIS Comments

### Growth Strategy

<u>Document</u>	<u>Comment</u>
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Draft Plan	<b>Ensure Adequate Public Services and Facilities for Seattle's Growth Targets</b>
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The Draft Plan and DEIS identifies the following growth targets 2024-2044 period: 80,000 housing units and 159,000 jobs.<sup>1</sup> However, Seattle is assigned net housing and job targets of 112,000 housing units and 169,000 jobs between 2019-2044.<sup>2</sup> The Draft One Seattle Plan Housing Appendix explains the City's rationale and method for prorating the King County targets to match the 20-year planning period of the plan.<sup>3</sup> While Futurewise agrees that it is reasonable to deduct the net housing units produced between 2019 and 2023 from the target total for housing-related planning purposes, the growth targets *apply to all growth-related needs*. These needs include public facilities and services such as parks, schools, transportation, utilities, and others. If the City intends to prorate the growth targets that it has been assigned, it must demonstrate that it has provided adequate services and facilities to meet the needs of the people living in housing units built between 2019-2023.

13-1  
cont

The City should:

- > Demonstrate sufficient public services and facilities to meet the expected population growth associated with the housing and employment growth targets assigned to Seattle in the 2021 King County Countywide Planning Policies ("CPPs") for the full planning period of 2019-2044.
- > If a prorating method is used to adjust the housing targets, the City should disaggregate the net unit production between 2019-2023 by the housing needs categories provided in RCW 36.70a.070(2)(a)(i)-(ii), including "moderate, low, very low, and extremely low-income households; and emergency housing, emergency shelters, and permanent supportive housing."

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<sup>1</sup> See City of Seattle. "One Seattle Plan—Draft for Public Review," p. 16, March 2024.

<sup>2</sup> See King County. "2021 King County Countywide Planning Policies," Table DP-1: King County Jurisdiction Growth Targets 2019-2044 ,p. 23, March 2023

<sup>3</sup> See City of Seattle. "Draft One Seattle Plan Housing Appendix", p. 10, April 2024.





Draft Plan,  
Draft  
Housing  
Appendix,  
DEIS

## **Adopt a Goal-Oriented Approach for Converting Housing Units to Population**

Seattle’s growth target of 112,000 housing units is calculated based on the median population projection for King County. A formula incorporating three variables—group housing, vacancy rates, and household size—is employed to determine the housing unit requirement from the projected population. For metropolitan cities like Seattle and Bellevue, the formula utilizes an average household size of 2.12. While this is higher than Seattle’s average household size in 2020, which was 2.05, it is substantially lower than both the 2.66 average for the rest of King County and the national average of 2.55.<sup>4</sup> Both the Draft Plan and DEIS use an average household size of 2.05 to convert housing units into population growth, which itself is used to forecast employment growth, level of service for parks, solid waste production, and per capita greenhouse gas emissions.

13-2

The City concludes, after examining census data and community feedback, that the scarcity of affordable, multi-bedroom homes contributes significantly to Seattle's lower average household size compared to the rest of the county.<sup>5</sup> Planning for the next two decades of growth based on the current average household size assumes that the city will remain unaffordable for larger households. However, this assumption contradicts the first of the Draft Plan's four key moves, which explicitly states that the City “must align [its] housing plans to meet this specific need and ensure that homes that meet the needs of families”.<sup>6</sup>

The City should:

- > When calculating the population from the projected 2044 housing unit target, use an average household size that anticipates a future in which the City successfully attracts and retains larger households, especially families with children and/or seniors.
- > Target an average household size that strikes a balance between Seattle and the rest of the county by calculating the mean of two. This approach would yield a target of 2.35 people per housing unit, on average.

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<sup>4</sup> See *Ibid.*, p. 45.

<sup>5</sup> See *Ibid.*, p. 45.

<sup>6</sup> See City of Seattle. "One Seattle Plan—Draft for Public Review," p. 3, March 2024.





Draft Plan,  
Draft  
Housing  
Appendix

**Identify and Take Steps to Mitigate Current Zoning Regulations with Discriminatory Effects and/or Racially Disparate Impacts**

RCW 36.70a.070(2)(e) provides that cities such as Seattle must “[Identify] local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including: (i) Zoning that may have a discriminatory effect.” In an unreleased draft of the Draft Housing Appendix, staff wrote the following sentence:

After [using zoning to segregate neighborhoods explicitly on the basis of race] was ruled unconstitutional in 1917, city officials substituted ostensibly race-neutral standards like minimum lot size and prohibitions on multifamily housing — both still present in Seattle’s zoning today — as covert ways to shield white neighborhoods from lower-income residents and people of color.<sup>7</sup>

13-2  
cont

This finding is supported by peer-reviewed science.<sup>8</sup> Furthermore, the King County CPPs require jurisdictions, including Seattle, to “[e]xplain the extent to which that history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity.”<sup>9</sup> and to “Adopt intentional, targeted actions that repair harms to Black, Indigenous, and other People of Color households from past and current racially exclusive and discriminatory land use and housing practices. Promote equitable outcomes in partnership with communities most impacted.” Given the importance of such a finding in informing changes to policies and regulations, it should be included in both the Mayor’s Recommended Plan and its Housing Appendix.

The City should:

- > Include the finding the following sentence in both the Mayor’s Recommended Plan and its Housing Appendix: “... city officials substituted ostensibly race-neutral standards like minimum lot size and prohibitions

<sup>7</sup> See Attachment B: Draft Housing Appendix August 2023, p. 4.;

Also see Barnett, Erica. “Mayor’s Office Removed All New Anti-Displacement Proposals from Draft ‘Anti-Displacement Framework’”. Published April 23, 2024.

<https://publicola.com/2024/04/23/mayors-office-removed-all-new-anti-displacement-proposals-from-draft-anti-d>isplacement-strategy/

<sup>8</sup> See Bronin, Sara C. “Zoning by a Thousand Cuts.” *Pepperdine Law Review* 50 (2023): 719-784.

<sup>9</sup> See King County. “2021 King County Countywide Planning Policies,” Table DP-1: King County Jurisdiction Growth Targets 2019-2044 ,p. 43, March 2023





on multifamily housing — both still present in Seattle’s zoning today — as covert ways to shield white neighborhoods from lower-income residents and people of color.”

- > Clarify what actions are being taken to mitigate the historic and current racially discriminatory effects and disparate impacts.

13-2  
cont

Draft Plan, DEIS **Quantify the Relationship Between Zoning and Racial Demographics for Current and Proposed Growth Strategies**

Addressing the racially disparate impacts of zoning is required by the state’s Growth Management Act and King County’s CPPs.<sup>10</sup> The City acknowledges that practices of racial exclusion and discrimination have resulted in lasting segregation across Seattle<sup>11</sup> and that low-density zoning is “perpetuating patterns of racial and economic exclusion and contributing to market pressures that cause displacement and gentrification.”<sup>12</sup> It indicates its intent to address this pattern of segregation in Growth Strategy Goal 1 and Growth Strategy Policy 1.2, which states that it is a policy to “encourage and plan for a variety of housing types in all neighborhoods to provide opportunities for a diverse population to live throughout the city and to allow people to stay in their neighborhoods as their needs change.”<sup>13</sup>

13-3

However, the City fails to provide a quantitative assessment of the relationship between its zoning policies and racial demographics. This makes it difficult to determine the likelihood that the proposed changes will have their intended effect. Providing a quantitative measurement of this relationship would provide valuable guidance on the degree to which it aligns with its own goals. This approach has been undertaken by numerous studies, including one that focused on number-of-unit zoning in Connecticut<sup>14</sup>, and another that assessed minimum lot size regulations in Massachusetts<sup>15</sup>. Applying such a method to

<sup>10</sup> See RCW 36.70a.070(2)(f); see also King County. “2021 King County Countywide Planning Policies,” Table DP-1: King County Jurisdiction Growth Targets 2019-2044 ,p. 45, March 2023

<sup>11</sup> City of Seattle. "One Seattle Plan—Draft for Public Review," p. 91, March 2024.

<sup>12</sup> *Ibid.* p. 15

<sup>13</sup> *Ibid.* p. 17

<sup>14</sup> See Freemark *et al.* “Bringing Zoning into Focus: A Fine-Grained Analysis of Zoning’s Relationships to Housing Affordability, Income Distributions, and Segregation in Connecticut”, June 2023.

<https://www.urban.org/sites/default/files/2023-06/Bringing%20Zoning%20into%20Focus.pdf>

<sup>15</sup> See Resseger, Matthew. “The Impact of Land Use Regulation on Racial Segregation: Evidence from Massachusetts Zoning Borders”, October 2022. Mercatus Research Paper, <https://ssrn.com/abstract=4244120>





Seattle’s growth strategy would provide important information that is missing from the Draft Plan and DEIS.

The City should:

- > Quantify the statistical relationship between zoning and racial demographics in the current growth strategy and each DEIS alternative. Specifically, we suggest measuring the association of the following variables: share of each major US census racial and ethnic category ; and presence of residential zoning that prohibits building types generally affordable to households earning 50-80% of AMI. Racial demographics should also be compared with the low-density residential areas that are not transit-served and therefore under the current draft are not eligible for the increased affordable housing bonus program. <sup>16</sup>
- > Use the coefficient of this statistical model as a metric for comparison. Explain how each DEIS alternative compares with the current baseline. Use this comparative analysis to inform the preferred alternative in the FEIS and the growth strategy described in the Mayor’s Recommended Plan.

13-3  
cont

Draft Plan **Plan for Substantially More Housing Production in Low-Displacement Risk Areas to Address Racial Disparities**

The GMA’s Housing Element now requires cities, including Seattle, to “address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions.”<sup>17</sup> Additionally, King County CPP H-5 requires local jurisdictions, including Seattle, to “[d]emonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices” while H-9 directs them to “[a]dopt intentional, targeted actions that repair harms to Black, Indigenous, and other People of Color households from past and current racially exclusive and discriminatory land use and housing practices.”<sup>18</sup>

13-4

The Draft Plan growth strategy proposes to address racial disparities with the following two changes: concentrating Neighborhood Centers in

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<sup>16</sup> The City finds that “Zones with 50 to 85 ft. height limits (Multifamily flats in buildings between 5 and 8 floors)” are viable for serving households earning 0-80% AMI, see City of Seattle. “Draft One Seattle Plan Housing Appendix”, Table 32, p. 119, April 2024.

<sup>17</sup> See RCW 36.70a.070(2)(f)

<sup>18</sup> See King County. “2021 King County Countywide Planning Policies,” pp. 43-44,, March 2023





low-displacement-risk areas; and limiting development capacity to three units per lot in high-displacement-risk Urban Neighborhood areas. Although it is difficult to assess the potential impact of these changes on racial disparities without a quantitative metric (see our previous comment), it is clear that there are several ways that the City could improve the likelihood of success.

The first is to allow the development of midrise, multifamily buildings in low-displacement-risk areas. Midrise buildings are approximately five to eight stories in height, and are the building type most likely to be financially accessible to households earning 50-80% of AMI.<sup>19</sup> While market-rate, midrise apartment buildings will not be affordable to every individual Person of Color, they are much more likely to serve this population than detached single-unit homes or “middle housing” typology buildings.

The second is to allow sixplex development by right in all low-displacement-risk Urban Neighborhood areas. This will further concentrate development opportunities in low-displacement-risk areas, reducing development pressure on high-displacement-risk areas and providing time for additional anti-displacement policies to be put into place.

The City should:

- > Add all Neighborhood Centers included in the August 2023 Draft Plan (see Attachment A) to the growth strategy. This includes a total of 50 Neighborhood Centers, the vast majority of which are located in areas of the city with low displacement risk. See Attachment B for a graphic showing the 2023 Draft Plan Neighborhood Centers overlaid on the 2022 Displacement Risk Index.
- > Add the Corridor place type, as described in the August 2023 Draft Plan (see Attachment A) to the growth strategy. This will add a significant amount of midrise development capacity in low-displacement-risk areas throughout the city. See Attachment C for a graphic showing the 2023 Draft Plan Corridors overlaid on the 2022 Displacement Risk Index. Of particular importance, the corridor place type should include areas near major park entrances (as in the DEIS, but not in the draft plan) to balance out the racially disparate impacts of a corridor strategy that focuses solely on

13-4  
cont

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<sup>19</sup> See Draft One Seattle Plan Housing Appendix”, Table 32, p. 119, April 2024.







existing frequent transit corridors.

- > Increase the baseline maximum unit count in low-displacement-risk Urban Neighborhood areas to six units and increase the base maximum floor area ratio to 1.6 to align with Washington Department of Commerce’s Middle Housing Model Ordinance.<sup>20</sup> Increase the baseline maximum unit count in low-displacement-risk areas near frequent transit service to eight units.

13-4  
cont

Draft Plan, DEIS **Increase the Ability of All Residents to Live in the Neighborhood of their Choice**

Countywide planning policy H-18 requires that cities “Adopt inclusive planning tools and policies whose purpose is to increase the ability of all residents in jurisdictions throughout the county to live in the neighborhood of their choice, reduce disparities in access to opportunity areas, and meet the needs of the region’s current and future residents by:

- a) Providing access to affordable housing to rent and own throughout the jurisdiction, with a focus on areas of high opportunity;
- b) Expanding capacity for moderate-density housing throughout the jurisdiction, especially in areas currently zoned for lower density single-family detached housing in the Urban Growth Area, and capacity for high-density housing, where appropriate, consistent with the Regional Growth Strategy; Chapter: HOUSING 46 2021 King County Countywide Planning Policies
- c) Evaluating the feasibility of, and implementing, where appropriate, inclusionary and incentive zoning to provide affordable housing; and
- d) Providing access to housing types that serve a range of household sizes, types, and incomes, including 2+ bedroom homes for families with children and/or adult roommates and accessory dwelling units, efficiency studios, and/or congregate residences for single adults.

13-5

To better show how the city is complying with these requirements the city should:

- > Expand the missing middle affordable housing incentive program to the

<sup>20</sup> See Washington Department of Commerce. “TIER 1 AND 2 CITIES MIDDLE HOUSING MODEL ORDINANCE”, p. 13, January 2024. <https://deptofcommerce.app.box.com/s/2l4yetpanyztkjbpumdfdadghh2rfag7>





high opportunity areas that are currently not part of the frequent transit service area.

- > Ensure that the distribution of new neighborhood centers furthers the opportunities for affordability and housing choice throughout the city, especially in areas currently zoned for lower density.

13-5  
cont

Draft Plan,  
DEIS

### **Plan for Centers Near New Light Rail Stations**

VISION 2050, the long-range growth strategy for the four-county Puget Sound region, directs Metropolitan Cities, including Seattle, to focus growth in their Regional Centers and high-capacity transit areas.<sup>21</sup> MPP-RGS-8 specifically directs jurisdictions, including Seattle, to “[a]ttract 65% of the region’s residential growth and 75% of the region’s employment growth to the regional growth centers and high-capacity transit station areas to realize the multiple public benefits of compact growth around high-capacity transit investments.”<sup>22</sup> VISION 2050 identifies the 130th Street and 145 Street light rail stations as a high-capacity transit station areas<sup>23</sup>, a term that it explicitly defines as an area “within ½ a mile of existing or planned light rail”.<sup>24</sup>

The City should:

- > Designate the residential area within a half mile of the 145th Street light rail station as Neighborhood Center. This area is west of Interstate 5 and south of the jurisdiction boundary that separates Seattle from Shoreline.
- > Plan for transit-oriented development in all areas within a half mile of the 130th Street light rail station. Replace all Lowrise 1, Lowrise 2, and Lowrise 3 zones with Midrise Multifamily within this high-capacity transit station area.

13-6

Draft Plan,  
DEIS

### **Plan for Regional Centers in South Seattle and West Seattle**

There are currently no Regional Centers in either South Seattle or West Seattle, and none are planned to be added in the Draft Plan. As Seattle City Councilmember Tammy Morales observed at a council briefing in March 2024,

<sup>21</sup> See Puget Sound Regional Council. “VISION 2050”, MPP-RGS-8, p. 31, October, 2020.

<sup>22</sup> *Ibid.*, MPP-RGS-8, p. 43, October, 2020.

<sup>23</sup> *Ibid.*, p. 72

<sup>24</sup> *Ibid.* p. 128





it is inequitable to concentrate employment opportunities in the central and northern parts of the city.<sup>25</sup> While there are certain criteria that must be met in order for a center to qualify as an Urban Growth Center under King County's CPPs<sup>26</sup>, there is an opportunity to plan for enough housing and employment activity in several South Seattle centers to meet these criteria. According to DEIS Exhibit 3.6-112 Future Activity Units (AU)—Alternative 5, both Mt. Baker and West Seattle Junction meet the criteria for existing activity unit (AU) density and size. While these two centers do not currently meet planned activity unit density minimum<sup>27</sup>, the City has the ability to adjust the planned density in this comprehensive plan update.<sup>28</sup>

The City should:

- > Increase development capacity in both the Mt. Baker and West Seattle Junction centers to exceed King County's minimum planned activity unit density of 60 AU/acre.
- > Add Mt. Baker and West Seattle Junction to the list of Regional Centers described in the Growth Strategy—Area Planning subsection.
- > Add Mt. Baker and West Seattle Junction to the list of Regional Centers described in the Regional Center Subarea Plans section on p. 194.
- > Update the Growth Strategy maps to show Mt. Baker and West Seattle Junction as Regional Centers instead of Urban Centers.

13-6  
cont

Draft Plan, DEIS **Amend Alternative 5 and Replace the Draft Plan Growth Strategy with the Amended Version**

Based on the information provided, we believe that DEIS Alternative 5: Combined ("Alternative 5") is most likely to meet the goals and responsibilities of the City of Seattle provided it fully complies with the Growth Management

13-7

<sup>25</sup> See Seattle City Council. "Council Briefing, Inf 2419, One Seattle Comprehensive Plan - Draft Plan Overview and Rollout", March 11, 2024. Video recording accessible at:

<https://www.seattlechannel.org/CouncilBriefings/?videoid=x155383&Mode2=Video>

<sup>26</sup> See King County. "2021 King County Countywide Planning Policies," Appendix 6: King County Centers Designation Framework, pp. 106-111, March 2023

<sup>27</sup> In DEIS Alt. 5, the planned density of Mt. Baker and West Seattle Junction are 47.1 and 59.9, respectively; the minimum planned activity unit density for an Urban Growth Center in King County is 60.

<sup>28</sup> See Attachment E: DEIS Alt 5 and Growth Center Designation Criteria Tables for a side-by-side comparison of future AU density and King County's Center Designation Framework criteria.





Act (“GMA”), Puget Sound Regional Council (“PSRC”) VISION 2050, multicounty planning policies, and King County Countywide Planning Policies (“CPP”) requirements, goals, and objectives. Alternative 5 plans to accommodate a higher housing unit target than the other action alternatives (120,000 and 100,000 respectively).

The DEIS finds that Alternative 5 will produce the most affordable housing units on net<sup>29</sup>, the lowest ratio of physical displacements to affordable housing units built, the greatest reduction to economic displacement pressure<sup>30</sup>, the greatest benefit for low-income renter households<sup>31</sup>, the lowest greenhouse gas emissions per capita<sup>32</sup>, and the lowest vehicle-miles traveled (“VMT”) per capita<sup>33</sup>.

13-7  
cont

The City should:

- > Amend Alternative 5 to reflect all relevant changes suggested in this comment letter
- > Designate the amended version of Alternative 5 as the preferred alternative in the Final EIS (“FEIS”)
- > Include the amended Alternative 5 growth strategy in the Growth Strategy Element of the Mayor’s Recommended Plan

## **Transportation**

<u>Document</u>	<u>Comment</u>
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Draft Plan	<b>Prioritize Carbon-Neutral Transportation Modes</b>
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13-8

The City should:

- > Keep the following transportation and environmental goals: net-zero citywide emissions by 2050 (see T 4.1), 20% reduction in VMT by 2044 (see T

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<sup>29</sup> City of Seattle. “Draft EIS: One Seattle Comprehensive Plan Update”, Exhibit 3.8-47. Comparison of Demolished Units to New Affordable Housing from MHA and MFTE, March 2024

<sup>30</sup> *Ibid.* p. 3.8-54

<sup>31</sup> *Ibid.* p. 3.8-61

<sup>32</sup> *Ibid.* p. 3.2-23

<sup>33</sup> *Ibid.* p. 3.10-103





4.2), and a 37% reduction in VMT by 2044.

- > Eliminate parking minimum requirements for all land uses types citywide.
- > Plan to prioritize street right of way differently in different contexts: within centers and neighborhoods, streets should prioritize active transportation that is safe and sustainable; between centers and neighborhoods, streets should prioritize public transit; and within and between Manufacturing and Industrial Centers, streets should safely accommodate the reliable movement of goods.

13-8  
cont

## **Housing**

<u>Document</u>	<u>Comment</u>
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Draft Plan, Draft Housing Appendix	
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	<b>Revise the Regulatory Barrier Analysis, Follow Department of Commerce Guidance</b>
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RCW 36.70A.070(2)(d) requires cities planning under the GMA, such as Seattle, to include in their comprehensive plan a housing element that “[m]akes adequate provisions for existing and projected needs of all economic segments of the community, including... (ii) [d]ocumenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations.”

The Department of Commerce provides guidance on how to identify barriers to housing production, including development regulations and process obstacles. Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist lists ten types of development regulations and six types of process obstacles that jurisdictions should assess.<sup>34</sup>

The Draft Housing Appendix identifies only three regulatory barriers to housing production: zoning, development standards, and permitting times.

13-9

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<sup>34</sup> See Washington Department of Commerce. “Guidance for Updating Your Housing Element: Updating your housing element to address new requirements”, Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist, pp. 117-118, October 2023.





The document provides a single paragraph description of each, without identifying specific types of each and addressing them in turn. This approach fails provide a detailed analysis of how different regulatory policies<sup>35</sup> affect housing production and what actions may be needed to address each barrier.

The City should:

- > Complete the Barrier Review Checklist provided in Exhibit B2 of the Department of Commerce’s “Guidance for Updating Your Housing Element: Updating your housing element to address new requirements” report.
- > The regulatory barrier analysis should also include a review of specific barriers to a variety of household sizes for those affordability levels including 2+ bedroom homes for families and congregate residences for individuals as specified in Countywide Planning Policy H-18.

13-9  
cont

Draft Plan, DEIS **Summarize Development Capacity by Projected Housing Need Category for the FEIS Preferred Alternative**

The City should:

- > Include a table that summarizes zoned land development capacity analysis and projected housing needs for the FEIS preferred alternative and the growth strategy described in the Growth Strategy Element of the Mayor’s Recommended Plan. The table should disaggregate housing unit development by AMI band, following the guidance provided by the Department of Commerce<sup>36</sup>, in order to ensure we are providing sufficient capacity for housing affordable to low-income people and demonstrate that the plan will comply with the Growth Management Act’s Housing Element requirements provided in RCW 36.70a.070(2)(c)-(d). Table 34 in the Draft Housing Appendix provides an excellent template for this information.

13-10

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<sup>35</sup> Examples of regulatory barriers to housing production include prohibition of moderate-density housing types, high minimum lot sizes, low maximum FAR, etc. See Washington Department of Commerce. “Guidance for Updating Your Housing Element: Updating your housing element to address new requirements”, Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist, pp. 117-118, October 2023.

<sup>36</sup> See Washington Department of Commerce. “Guidance for Updating Your Housing Element: Updating your housing element to address new requirements”, October 2023.  
<https://deptofcommerce.app.box.com/s/1d9d517g509r389f0mjpowh8isjpirlh>





Draft Plan,  
Updating  
Seattle's  
Neighborhood  
Residential  
Zones

### **Increase FAR Maximum in Neighborhood Residential Zones to Meet or Exceed Middle Housing Model Ordinance**

The table titled “Key standards in updated Neighborhood Residential zones” on p. 12 of “Updating Seattle's Neighborhood Residential Zones” states that the baseline maximum floor area ratio (FAR) will be 0.9. This is less than the suggested development intensity included in Department of Commerce’s Middle Housing Model Ordinance, which is designed to meet the *minimum* criteria in HB 1110 and stipulates 1.2 FAR for 4-unit developments and 1.6 FAR for 6-unit developments. Limiting FAR will result in small homes that are unlikely to meet the needs of large households, especially families with children and/or seniors.

13-10  
cont

The City should:

- > Increase the allowed FAR for middle housing to feasibly allow for family-sized two, three, and four bedroom homes to be built throughout the city. At a minimum, the City should align standards with the Department of Commerce’s model ordinance. We recommend no less than 1.4 FAR for fourplexes and no less than 1.6 FAR for six-plexes.
- > Retain the FAR incentives retaining existing structures and consider additional FAR incentives for retaining large and culturally significant trees.

### **Draft Plan Expand Mandatory Housing Affordability Program to Include All Centers and Corridors**

Housing Policy H 3.14 includes inclusionary zoning as one of tools used to create affordable housing. Seattle's inclusionary zoning program, known as Mandatory Housing Affordability (“MHA”), was launched in 2017. Since then, it has generated \$246.1 million to support affordable housing development in Seattle. However, MHA would not automatically extend to areas outside the current Urban Centers and Urban Villages that experience significant increases in development capacity. If the program isn't expanded in line with proposed growth strategy changes, the City risks losing a substantial amount of funding for affordable housing.

The City should:





- > State that MHA will be applied to all areas within Region Centers, Urban Centers, Neighborhood Centers, and Corridors.
- > Explore the implications of implementing inclusionary zoning fees in middle housing zones and propose MHA adjustments that balance the objectives of increasing middle housing production and generating funds for publicly-subsidized affordable housing.
- > Identify financing, payment schedule, and on-site compliance challenges that small developers face and incorporate strategies to address those challenges without completely excluding MHA from middle housing zones

13-10  
cont

Draft Plan,  
Draft Anti-  
Displacement  
Framework

### **Add to and Expand Anti-Displacement Strategies, in Collaboration with Impacted Communities**

The Draft Anti-Displacement Framework does not introduce new methods or expand existing tools to prevent displacement. However, an earlier, unpublished draft of this document included many ways that Seattle’s anti-displacement “toolkit” could be improved.<sup>37</sup> These improvements included increasing support for affordable housing, strengthening tenant protections, endorsing state-level rent stabilization laws, assisting homeowners involved in housing development, promoting land banking, community land trust development, and Public Development Authority-led development, and introducing a Community Opportunity to Purchase Act, among others.

According to the draft report, many of these ideas were shared with the city by community members who have experienced displacement and/or are working on solutions to displacement.<sup>38</sup> Despite engaging with these community members, the City did not incorporate any of their proposals in the final Draft Plan or Anti-Displacement Framework. This omission raises concerns about the City’s compliance with King County CPP H-8, which directs jurisdictions (including Seattle) to “*Collaborate* with populations most disproportionately impacted by housing cost burden in developing, implementing, and

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<sup>37</sup> See Barnett, Erica C. “Mayor’s Office Removed All New Anti-Displacement Proposals from Draft ‘Anti-Displacement Framework’”, April 23, 2024. <https://publicola.com/2024/04/23/mayors-office-removed-all-new-anti-displacement-proposals-from-draft-anti-d-ispacement-strategy/>; also see Attachment D: Draft Anti-Displacement Framework August 2023

<sup>38</sup> See City of Seattle. “One Seattle Plan Anti-Displacement Framework – DRAFT NOT FOR DISTRIBUTION”, p. 10, August, 2023.







monitoring strategies that achieve the goals of this chapter. *Prioritize the needs and solutions articulated by these disproportionately impacted populations* [emphasis added].”

The City should:

- > Add the new and expanded anti-displacement strategies listed in the August 2023 draft of the Anti-Displacement Framework to the Mayor’s Recommended Plan and final version of the Anti-Displacement Framework.
- > Conduct additional focused engagement with populations disproportionately impacted by housing cost burden to receive feedback on the anti-displacement strategies

13-10  
cont

Thank you for considering our comments. If you require additional information, please contact Tiernan Martin (tiernan@futurewise.org).

Sincerely,

Tiernan Martin, Director of Research  
Futurewise



**future  
wise** 





## **Attachments**

This comment incorporates the following attachments by reference, and we ask that they be added into the public record as a part of these comments:

Attachment A. Draft One Seattle Plan August 2023

Attachment B. Displacement Risk Index with Neighborhood Centers from August 2023 Draft Plan

Attachment C. Displacement Risk Index with Corridors from August 2023 Draft Plan

Attachment D. Draft Anti-Displacement Framework August 2023

Attachment E. DEIS Alt 5 and Growth Center Designation Criteria Tables

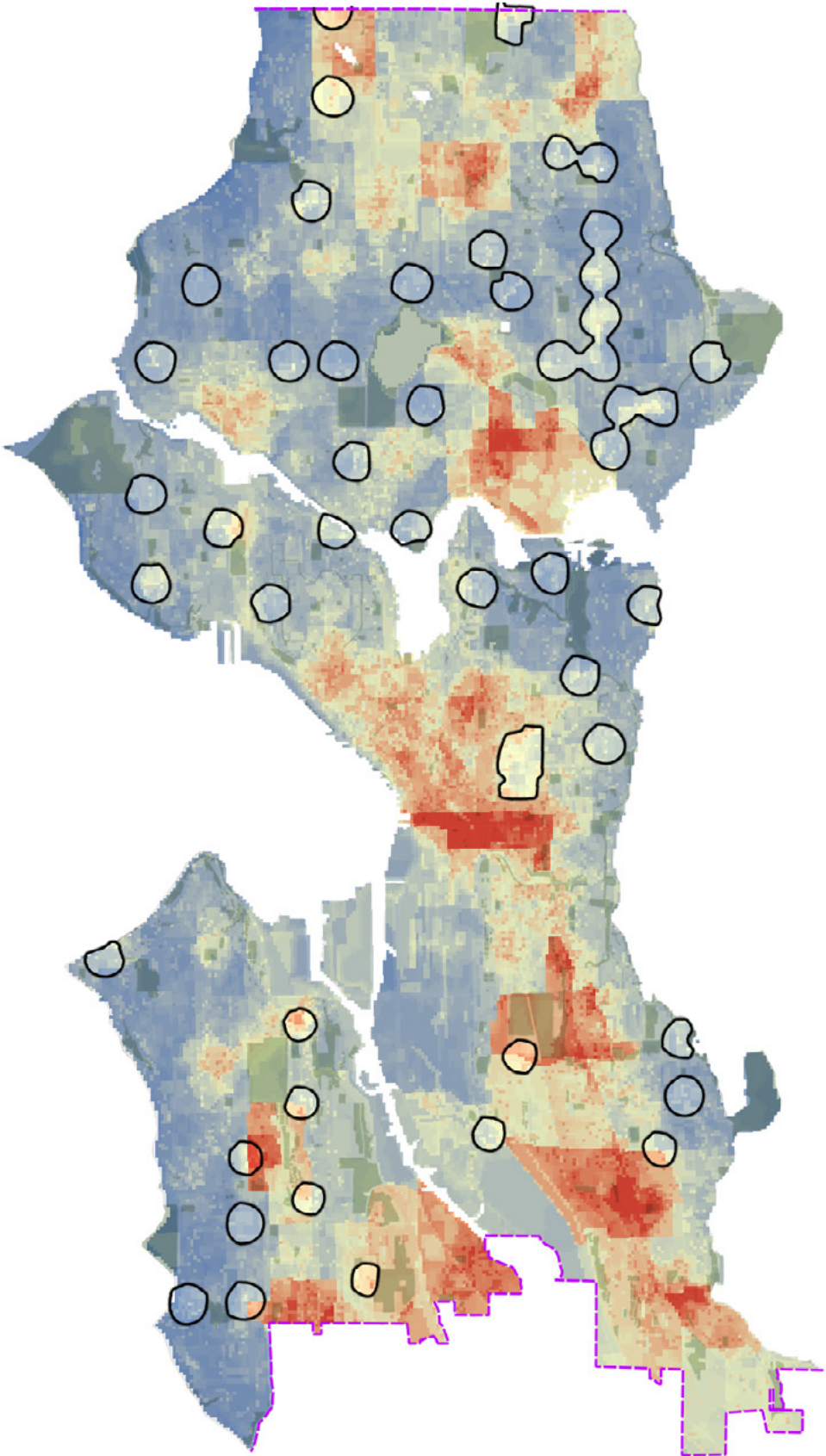


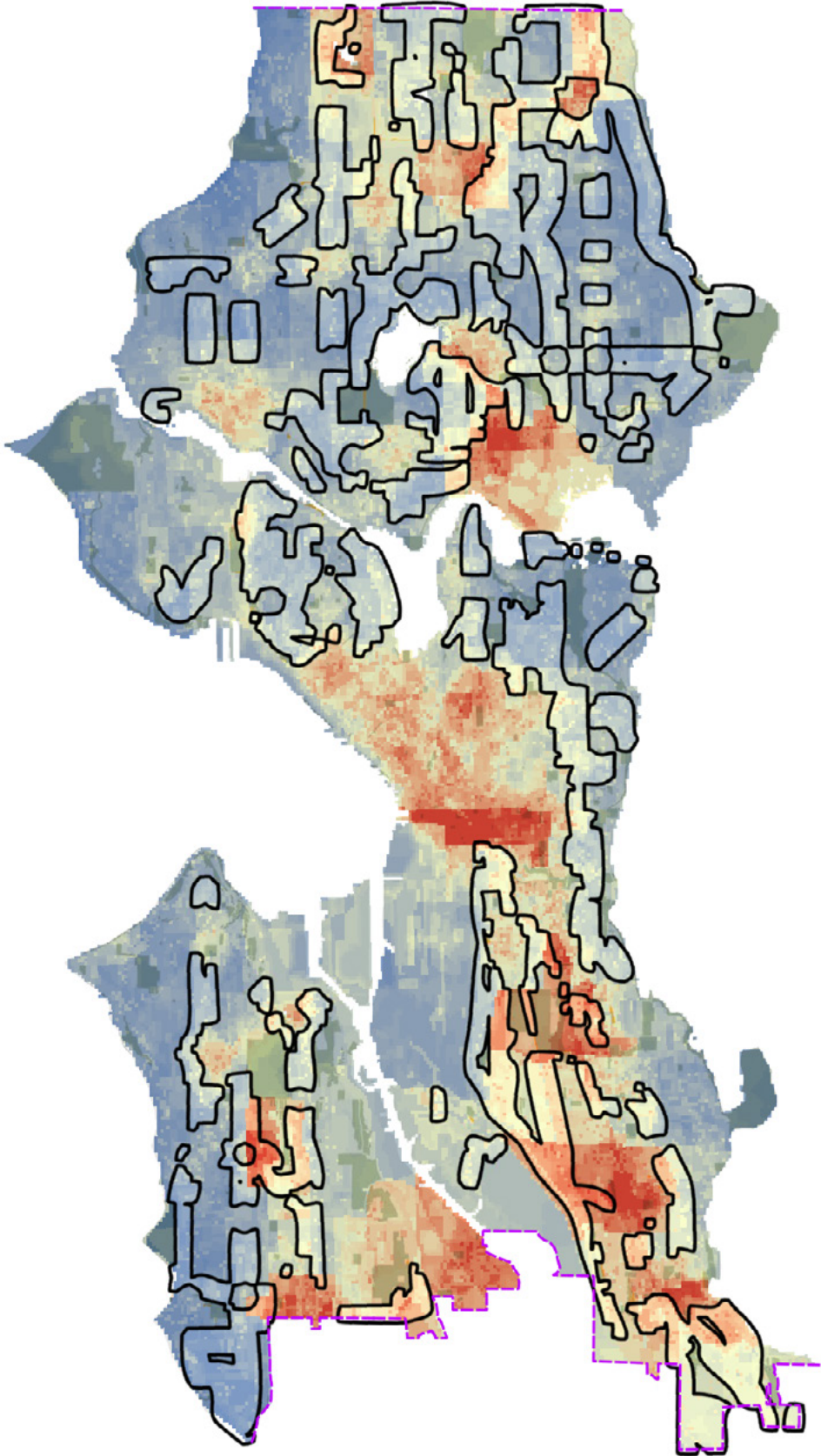


The Futurewise requests the City of Seattle to include the following document in the public record:

City of Seattle. “One Seattle Comprehensive Plan: Public Review Draft”, June 2023. Accessible for download at: [https://futurewiseorg.sharepoint.com/:b:/g/EYK\\_mzhgGw9CgVMoSvva-jtwB1eTJkbe2RZ7UPQ-01Py57g?e=keRHuq](https://futurewiseorg.sharepoint.com/:b:/g/EYK_mzhgGw9CgVMoSvva-jtwB1eTJkbe2RZ7UPQ-01Py57g?e=keRHuq)









The Futurewise requests the City of Seattle to include the following document in the public record:

City of Seattle. “Draft Anti-Displacement Framework”, August 2023. Accessible for download at: [https://futurewiseorg.sharepoint.com/:b:/g/EYp7Go9C-pZDmqO27INDoQwBvGtOWpWD-mql\\_FfcP\\_eyRuQ?e=CWxkMB](https://futurewiseorg.sharepoint.com/:b:/g/EYp7Go9C-pZDmqO27INDoQwBvGtOWpWD-mql_FfcP_eyRuQ?e=CWxkMB)





Environment, Impact, & Mitigation Measures • Land Use Patterns & Urban Form

Exhibit 3-6-112. Future Activity Units (AU) – Alternative 5

Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 5 Acres	Alt. 5 AU	Alt. 5 AU/Ac.
<b>Regional Centers<sup>1</sup></b>					
Downtown	377.4	473.2	952	447,351	469.9
First Hill/Capitol Hill	139.5	163.4	916	149,578	163.3
University Community	54.5	70.2	753	52,695	69.9
South Lake Union	236.7	344.1	340	115,612	340.2
Uptown <sup>2</sup>	131.3	161.3	391	53,723	137.2
Northgate	57.3	75.1	412	30,803	74.7
Ballard <sup>2</sup>	67.7	96.9	495	50,047	101.0
<b>Hub Urban Centers<sup>1</sup></b>					
Bitter Lake Village	44.0	55.4	364	20,044	55.1
Fremont	71.9	88.1	214	18,877	88.0
Lake City	57.6	75.4	142	10,688	75.1
<b>MT Baker</b>	<b>36.0</b>	<b>47.4</b>	<b>491</b>	<b>23,135</b>	<b>47.1</b>
<b>West Seattle Junction<sup>2</sup></b>	<b>70.4</b>	<b>100.2</b>	<b>449</b>	<b>26,934</b>	<b>59.9</b>
<b>Residential Urban Centers<sup>1</sup></b>					
130th Street <sup>2</sup>	18.4	20.7	218	7,733	35.5
23rd & Union/Jackson	38.9	46.5	625	29,046	46.5
Admiral <sup>1</sup>	49.2	60.4	288	6,886	23.9
Aurora-Lickon Springs	44.1	51.4	327	16,775	51.3
Columbia City	33.9	46.1	335	15,390	46.0
Crown Hill	25.3	31.4	271	8,492	31.3
Eastlake	70.2	82.0	199	16,323	81.9
Green Lake	70.6	87.4	109	9,492	87.3
Greenwood-Plumery Ridge <sup>2</sup>	84.5	101.6	315	9,579	30.4
Madison-Miller	65.3	85.1	145	12,349	85.0
Morgan Junction <sup>1</sup>	34.1	41.6	281	7,169	25.5
North Beacon Hill	28.1	34.5	267	9,161	34.3
Oheloh <sup>1</sup>	23.7	29.0	584	17,894	30.6
Rainier Beach	23.0	26.0	346	12,893	37.3
Roosevelt	61.4	81.2	170	13,801	81.1
South Park	14.7	18.5	263	7,951	30.2
Upper Queen Anne <sup>1</sup>	89.5	110.5	329	5,857	17.8
Wallingford	42.2	51.5	258	13,248	51.4
Westwood-Highland Park	27.9	32.6	275	9,386	34.1

1 See Exhibit 2.1.1 in Chapter 2 for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under Alternatives 2-5.  
 2 Proposed new center, redesignated center, or boundary expansion.  
 Note: Activity units (AU) is the sum of residential population and jobs. Assumes an average household size of 2.05 per the King County Growth Management Planning Council. Highlighted urban villages fall outside King County's countywide center designation criteria of 160-500 acres or below the minimum 18 existing AU or 30 future AU per acre. MIC designation criteria from PSRC does not include an AU density threshold.  
 Sources: City of Seattle, 2023; BERK, 2023.

2021 King County Countywide Planning Policies

	Metro Growth Centers	Urban Growth Centers	Countywide Growth Centers
3. Freight access	Yes	To be addressed in subarea plan	To be addressed in subarea plan
<b>PART 3: CENTER CRITERIA</b>			
A. Purpose			
1. Compatibility with VISION centers concept, Regional Growth Strategy and Multicounty Planning Policies	Yes	Yes	Yes
B. Activity level/Zoning <sup>20</sup>			
1. existing activity <sup>21</sup>	60 activity unit density	30 activity unit density (AUs refer to combined jobs and population)	18 activity unit density
2. Planned activity	Above 120 activity unit density	60 activity unit density	30 activity unit density
3. Sufficient zoned capacity	Yes. Should be higher than target and supports a compact, complete, and mature urban form.	Yes. Should be higher than target.	Should have capacity and be planning for additional growth
4. Planning mix of housing types and employment types	Planning for at least 15% residential and 15% employment activity	Planning for at least 15% residential and 15% employment activity	Planning for at least 20% residential and 20% employment, unless unique circumstances make these percentages not possible to achieve
C. Geographic Size			
1. minimum size	320 acres	200 acres	160
2. maximum size	640 acres (larger if internal HCT)	640 acres (larger if internal HCT)	500 acres
D. Transit			

20 PSRC's 2015 guidance on Transit Supportive Densities and Land Uses cites an optimal level of 56-116 activity units per acre to support light rail, dependent on transit cost per mile. The guidance indicates an optimal threshold of at least 17 activity units per acre to support bus rapid transit. Note: the existing threshold in the CPP is roughly equivalent to 85 AUs existing activity for King County Urban Centers.  
 21 For existing centers, not meeting existing activity unit thresholds is not grounds for de-designation or re-designation by the Growth Management Planning Council.





May 6, 2024

VIA EMAIL

Rico Quirindongo, Director  
Jim Holmes, Strategic Advisor  
Office of Planning and Community Development  
600 4th Ave, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Email: [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov), [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**Re:** Draft Environmental Impact Statement One Seattle Comprehensive Plan Support for Alternative 5

Mr. Quirindongo and Mr. Holmes:

Thank you for the opportunity to comment on the draft One Seattle Comprehensive Plan (“Draft Plan”) and Draft Environmental Impact Statement (“DEIS”).

On behalf of NAIOP Washington State, the Commercial Real Estate Development Washington State (NAIOPWA) and our more than 1,000 members, we write to encourage the City of Seattle to continue to be bold in its approach to the One Seattle Comprehensive Plan to achieve the City’s most important policy goals over the next 20 years. In our view, the focus of the Plan should be economic recovery and revitalization, sustained investment, housing affordability and jobs growth. To that end, we are supportive of Alternative 5, including added development capacity in the “new place types,” and there are a few areas where the City should go farther in a “Preferred Alternative” to achieve the City’s goals. Given the economic environment and housing affordability crisis, we encourage you to consider the suggestions below in order to maximize growth potential that is supportive of housing and jobs creation.

**Land Use**

In general we support Alternative 5, Combined Growth Strategy, that seeks to add the greatest amount of new housing units and zoned capacity through combined place types. The City should focus on maximizing development capacity and removing zoning barriers where the most units are likely to materialize over the next decade, in Regional Centers and Urban Centers. Specifically, we support the following:



- Regional Centers. The City should continue to be ambitious in allowing for the highest levels of density within Regional Centers, as shown in Alternative 5. We support designation of Ballard as a Regional Center and expansion of Uptown Regional Center. We also support the expansion of regional centers (formally urban centers) to include the ½ mile walkshed from their central point and from any light rail station. Further, the City should increase zoned height and density for all land within Regional Centers. At minimum, the allowed heights should be 85’ with a commensurate 5.75+ Floor Area Ratio (“FAR”), and all areas of Downtown and South Lake Union should have a minimum zoned height of 240’ with unlimited residential FAR. The City should also study high-rise typology on the blocks surrounding existing and contemplated future lightrail, including height up to 240 feet in the blocks surrounding the Northgate lightrail station and future Ballard station. Since the DEIS contemplates that the vast majority of growth potential will continue to be in the Regional Centers, the City should implement the baseline zoning changes identified above as part of Plan implementation, then use the future identified Subarea planning process to identify opportunities for further upzones within the Regional Centers, including Downtown, but those future processes shouldn’t foreclose necessary changes now. Alternatively, if the City does not implement the Regional Center upzones with the One Seattle Plan, the City should expedite the subarea planning process for all Regional Centers to be completed by 2025. The Ballard Regional Center should be among those priority subarea plans because without clarity regarding implementing zoning, the uncertainty will discourage investment and development activity in Ballard until there is clear zoning. Waiting to start the Ballard subarea plan zoning process until 2027 will result in years of missed opportunity for housing in Ballard.
- Corridors. We support the Corridors concept articulated in the Draft EIS and as shown in Alternative 5, Exhibit 2.4-22. The City should study increased height that accommodates up to eight stories (85 feet) for the width of a full block along major transit corridors (including any BRT lines), with priority near frequent transit stops. This allows for parking below grade, and additional unit yield contributes to housing affordability. The City should additionally study a range of five to seven stories (75 feet) for an additional block width along major transit arterials, especially near rapid transit stops.
- Neighborhood Centers. We support the Neighborhood Centers concept with 75 feet in height as articulated in Alternative 5, especially on the main streets for such Centers. Opportunities for multifamily in these locations supported by service-oriented commercial supports the City’s goals to reduce vehicle trips and expand housing options where they have been historically limited. In particular, we support the Neighborhood Centers nearest the Regional Centers and well-connected by transit, because we believe they are most

likely to contain viable housing development opportunities. We support the Neighborhood Centers identified in the Draft Plan, and would support the inclusion of a few additional Centers, especially those that are immediately adjacent to an existing Urban Center (formerly Urban Village).

- Bonuses. We support the study of bonuses for affordable housing City-wide, as stated in Alternative 5. Exhibit 2.4-26. There is no reason to limit this incentive to certain parts of the City in a housing crisis.
- Mass Timber. We encourage the City to adopt a bonus incentive for use of all mass timber, especially mass timber sourced from regional sources, similar to the Living Building Pilot Program. This will help the City meet its sustainability and climate goals, and spur the market adoption of mass timber product for new housing construction. All properties within Seattle Mixed zoning should be able to achieve a maximum of 160 feet height through the use of all mass timber construction. In the commercial zones, all properties should be able to achieve a maximum height of 95 feet through mass timber incentives.
- Manufacturing Industrial Centers. The DEIS studies no further changes within the MICs under any alternative. The City should study the following limited changes within the MIC in the FEIS (or through the industrial subarea plans):
  - Allow residential uses in “catalyst” sites such as WOSCA, the Armory property in Interbay, the Stadium District, and around the Lander Street light rail station.
  - Remove areas outside of the MICs from industrial designation, such as the isolated blocks of industrial commercial in the Fremont Urban Center and northeast Ballard.

Additionally, the Council should continue to decline any proposal to apply Mandatory Housing Affordability fees in all industrial zones. As you know, the City and stakeholders have worked over the course of years to craft zoning policy that renews and strengthen our industrial lands; additional fees should not be allowed to undermine this effort. Application of MHA fees would offset the potential investment incentives provided by the new II zoning and would only undermine the overarching policy goals of this rezone. In particular, the current investment climate does not support additional development fees. Likewise, the City should resist any requests to apply design review to industrial zones.

## Downtown Revitalization

As the City begins its study of the Downtown Regional Center, we encourage you to implement the following:

- Flexible street-level uses. Much of the existing street-level retail in Downtown is currently vacant. The City should study flexible street-level requirements and uses within Downtown to ease regulatory barriers to conversions and redevelopment. We support passage of the interim flexible use ordinance the Mayor has transmitted to Council, and the City should study in the FEIS extending this framework to other Regional and Urban Centers.
- Interim MHA fee exemption. The City should evaluate any tool that would facilitate adaption of existing buildings to the current market, or facilitate new development downtown. This includes a temporary exemption for any new development or change of use in downtown from MHA fees, especially if it includes residential uses. The City should study the deferral of MHA fee collection to certificate of occupancy, not at permit issuance.

14-2

## Jobs

The Draft Plan identifies 159,000 jobs over the next 20 years, consistent with the identified growth target, yet the City grew 175,000 jobs in the 10 years between 2010 and 2020. The DEIS likewise studied this level of job growth, despite varied zoning changes. The City should identify not just the assigned growth target—but the level of economic growth necessary for a successful economy—and it should plan for that. We are concerned that neither the Draft Plan nor the DEIS appear to do this or appear to articulate a specific economic development strategy. At minimum, a “Preferred Alternative” in the FEIS should articulate the higher level of job growth necessary for Seattle to maintain a robust economy, and the Final Plan should reflect specific economic development strategies to achieve this.

14-3

## Simplify Entitlements

Land use entitlements for development City-wide should be simplified and shortened.

- Design Review Reform and Exemptions. Consistent with HB 1293 (RCW 36.70A.630) design review may not include more than one public meeting, and may not reduce the density, height, bulk or scale of a development below applicable zoning. Further, all design guidelines must be clear and objective. These state law requirements apply to more than just the City’s design review program, but they also apply to the historic and Design Commission reviews, as well, and warrant significant overhaul of current systems. We encourage the City to think beyond just the state law mandates for reform and embrace change in these review programs. We’d specifically suggest widespread exemptions from design review for all housing projects, or at minimum, those within Regional and Urban Centers. For those projects still undergoing design review, we recommend a single public

14-4

meeting at the “Early Design Guidance” stage, and reconstitution of the Design Review Boards with additional training and professional experience requirements for members.

- SEPA. As required by state law, any development including residential uses should continue to be exempt from SEPA review city-wide. We applaud the City for including this as part of the EIS process with the One Seattle Plan and agree that the current regulatory framework is sufficient mitigation. The SB 5412 exemption has been in effect for nearly one year and, as anticipated, it has been working well to produce infill housing without adverse environmental impacts. Likewise, the FEIS should be sufficiently detailed to increase non-residential SEPA thresholds. The City should not create any additional historic review layer for SEPA-exempt projects; no additional historic resources mitigation is warranted.

14-4  
cont

### Costs and Fees

- Mandatory Housing Affordability. The City should decline any proposal to raise MHA fees in the short-term. The existing MHA fee levels are a hinderance to development in many areas outside the urban centers. For the Neighborhood Centers and Corridors concepts to yield results, MHA fees should be recalibrated in these areas. All implementing zoning changes as part of this process should be exempt from MHA fee increases (i.e., in areas where MHA already applies, the City should not increase the “tier” of MHA application with any upzones). The City should study the deferral of MHA fee collection to certificate of occupancy, not at permit issuance, for all projects subject to MHA going forward.
- Other impact fees. The City should continue to decline any proposal for other types of impact fees, including transportation impact fees. The current financing and economic environment does not support increased costs on housing development.

14-5

We are looking forward to continued dialogue on the City’s Comprehensive Plan update and future zone. Thank you for all your work on the Plan to date. Please do not hesitate to contact us with any questions about the above.

Sincerely,



Danielle Duvall  
Executive Director, NAIOP Washington State



**BELLWETHER**  
H O U S I N G

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes; Rico Quirindongo  
[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

May 6, 2024

**Re: Support for Additional Residential Capacity Downtown**

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”), as well as the Draft One Seattle Plan.

Established in 1980, Bellwether Housing has been a pioneering force in Seattle's affordable housing landscape. As the largest nonprofit affordable housing provider in Seattle, Bellwether Housing manages over 3,000 apartments across 35 buildings, serving over 5,000 residents. Our mission is to create stable and equitable communities by developing and managing affordable homes for individuals and families with low incomes. We commend the commitment to affordable housing and the other values articulated in the draft One Seattle Comprehensive Plan.

Given our mission, we are eager to see allowances for additional residential development across Seattle – particularly in downtown areas, where many of our buildings are located. We firmly believe that increasing housing capacity in the downtown core is essential for addressing Seattle's housing affordability crisis and fostering a more inclusive urban environment.

Accordingly, we are writing to urge that you move forward with the completion and implementation of the Downtown Subarea Plan as quickly as possible. As one of the most densely populated and economically vital areas in the city, downtown Seattle presents a unique opportunity to significantly expand housing options and create more affordable units. Expediting the completion of the plan for this neighborhood will help accommodate the urgent and growing demand for affordable housing.

In addition, we encourage you to study and support plans for additional height and density allowances throughout Seattle, particularly in downtown, during the remainder of the comprehensive planning and subarea planning

15-1

processes. We note that all alternatives of the DEIS direct the most jobs to downtown, but not necessarily the most housing. An alternative should be studied that creates a better balance between new jobs and new housing units in downtown Seattle. Specifically, areas of Belltown and the Downtown Retail Core zone should be targeted for additional height and mixed-use density. The challenges posed by the recent Covid-19 pandemic have underscored the importance of a robust residential community to a thriving downtown. Maintaining focus on increased housing capacity and affordability will facilitate the creation of vibrant, diverse, and equitable neighborhoods.

15-1  
cont

We would be pleased to collaborate with your department as may be helpful to ensure that the One Seattle and Downtown Subarea plans reflect a strong emphasis on residential capacity and affordability, including greater height and density allowances. Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'SBoyd'.

Susan Boyd, Chief Executive Officer  
Bellwether Housing

**From:** [Dan Bertolet](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Sightline comments on the One Seattle Plan DEIS  
**Date:** Monday, May 6, 2024 11:01:07 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[Sightline Institute Comments on the One Seattle Plan DEIS 5-6-24.pdf](#)

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**CAUTION: External Email**

Hello –

Please find attached Sightline’s comments on the One Seattle Plan DEIS in the form of an article we published on our website.



The article can be briefly summarized as follows:

1. Get the zoning details right for middle housing to ensure that its feasible to build and can provide family-size and accessible homes
2. Boost allowances for bigger apartment buildings throughout the city to create more homes more people can afford in places with access to opportunity and transportation options
3. Eliminate requirements for off-street parking citywide to end the wasteful, costly overbuilding of parking and make housing less expensive and more abundant

16-1

Thank you,  
Dan



Dan Bertolet | Director, Housing & Urbanism Program | [he/him](#)  
Sightline Institute | [www.sightline.org](http://www.sightline.org) |   

*I live and work on the traditional lands of the Coast Salish peoples, including the dx<sup>w</sup>daw?abš (Duwamish) People, both past and present.*

*Sightline Institute is a nonpartisan, nonprofit think tank working to make [Cascadia](#)—from Alaska to Oregon and from the Pacific to the northern Rockies—a global model of sustainability. [Subscribe](#) to our email newsletters for policy analysis focused on housing, democracy, energy, and forest solutions, and [support](#) our work.*



## SEATTLE DESERVES A BETTER COMP PLAN

The city can make three critical fixes to its 20-year growth plan: Let middle housing be bigger, allow apartment buildings in more places, and legalize car-free homes everywhere.



Author: **Dan Bertolet**  
 (@danbertolet) on April 18, 2024 at 7:00 am



### Sightline Institute Research

Seattle Deserves a Better Comp Plan



0:00 / 22:56 1X

Find audio versions of Sightline articles on any of your favorite podcast platforms, including [Spotify](#), [Google](#), and [Apple](#).

*Editor's note: Have your say as Seattle leaders collect community input. We've [drafted a note for you to edit to your liking](#), and the Seattle Office of Planning Community Development is accepting comments until May 6 at [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov).*

Seattle is in the process of [updating its Comprehensive Plan](#), its 20-year roadmap for growth. Chief among the policies it charts is, of course, housing. Seattle's chronic shortage of homes and the [harm](#) that has [done](#) to lower-income residents and communities is no secret to anyone.

Unfortunately, the [draft plan](#) falls far short of what's necessary to create a Seattle that welcomes households of all incomes. In short, it doesn't make enough room for more homes.

If adopted as proposed, more and more people will continue to be priced out of the city for decades to come. And the city will also fall further behind on goals to reduce [climate pollution](#) and sprawl.

The critical fix is straightforward: loosen zoning rules to allow more homes of all shapes and sizes. And Seattle can improve its draft Comprehensive Plan to make that happen in three key ways. (I cover them briefly in the numbered sections below, then expand on each in the rest of the article.)



# 1. LET MIDDLE HOUSING WITH MORE HOMES BE BIGGER

*Allowing middle housing—small-scale homes like fourplexes—in places once reserved for detached houses is an imperative for creating more homes that more people can afford in lower-density neighborhoods.*

The good news is that the 2023's Washington state bill [HB 1110](#) requires Seattle to legalize middle housing in areas currently reserved for single-detached houses. Three-quarters of Seattle's residential land will be opened up to more housing, creating the potential for [tens of thousands](#) of new homes.

The bad news is that just allowing more homes per lot doesn't by itself guarantee anything will get built. That's because middle housing construction is usually not financially feasible unless zoning rules allow the buildings to add indoor space as their unit count goes up. Seattle's proposed Comprehensive Plan (Comp Plan, for short) doesn't do that, and instead would impose the same cap on buildable capacity as what currently applies to single-detached houses with accessory dwellings. This limitation would not only suppress the construction of middle housing but would also prevent any feasible projects from having family-sized homes.

The solution is to emulate Spokane's [best-in-the-US middle housing zoning](#), which grants generous development capacity and flexibility. Or, at minimum, implement the middle housing [capacity recommendations](#) of Washington's Department of Commerce, which stipulate workable increases in capacity. [More below.](#)

# 2. ALLOW LARGER APARTMENT BUILDINGS IN MORE OF THE CITY

*Apartment buildings five stories and up, near job centers, transit hubs, mixed-used nodes, schools, and parks, are essential for providing the level of density that both reduces cost and adds homes at the scale needed to address Seattle's shortage. Large multifamily buildings in compact, walkable, low-carbon neighborhoods also yield the biggest dividends on [reducing climate pollution](#) and sprawl.*

Seattle's draft Comp Plan proposes only a modest amount of upzoning for apartment buildings. It recommends four- to six-story buildings in 24 newly designated "[neighborhood centers](#)" confined to just an 800-foot radius, and eight stories in a new urban center at the 130th Street light rail station. Otherwise, it proposes no apartment upzones anywhere else, excepting some slivers of land currently zoned for low density in designated centers, and possibly some 1/2-block strips along arterials.

Seattle's plan could rise to the moment by allowing highrise towers in all regional centers and near all light rail stations, eight-story buildings in all urban centers, and six-story buildings near frequent transit stops and other community amenities like parks. It could also designate more and larger neighborhood centers with apartment zoning.

That may sound like a lot of change, but it's still not European-caliber density, to say nothing of Asian standards. It's not even as ambitious as what neighboring [British Columbia adopted in November](#)—and not just in the biggest city of Vancouver but provincewide. [More below.](#)

### 3. LEGALIZE CAR-FREE HOMES EVERYWHERE

*Requiring new housing to come with parking prioritizes storage for cars over homes for people. Parking reduces the amount of housing that can be built, while at the same time increasing its cost.*

In 2012, Seattle eliminated parking mandates in its designated centers and reduced them near transit. But the city still requires off-street parking on large fraction of its residential land, especially in areas that will be zoned for middle housing, which is particularly vulnerable to **death by parking mandate**.

There couldn't be a simpler solution for avoiding the lose-lose outcome of more unneeded parking and less housing: Seattle can eliminate parking mandates citywide. This reform would not ban parking. Home builders could still include parking if they wanted to, and many no doubt would. Ending mandates only ensures that our laws no longer force the overbuilding of parking, and that translates to *more* new homes and *less expensive* new homes.

Already, Portland, Anchorage, Buffalo, Minneapolis, Austin, San Jose, Raleigh, Hartford, and 60 other North American cities have **completely eliminated off-street parking requirements**, freeing space for more homes. Seattle would do well to join this forward-thinking group of cities. **More below.**

### WHY SEATTLE LEADERS NEED TO DO (A LOT) MORE WITH THE COMP PLAN

In a housing crisis caused by a shortage of homes, policymakers should do everything they can to allow more homes. Before I detail the three key fixes named above, some words about why Seattle leaders need to be bolder in their housing vision for the city's future.

#### The draft plan's target numbers are weak

Seattle's draft plan is based on a target of 100,000 new homes over the next 20 years. First, that's only 20,000 more homes than status quo projections expected, even with **no changes** to existing zoning. Second, an average rate of 5,000 new homes per year is far lower than the housing growth that has actually occurred in recent years. For example, from 2013 to 2023, Seattle added an average of nearly **8,500 new homes per year**.

#### Zoned capacity ≠ built reality

Seattle planners estimate that current zoning has capacity for **168,000 more housing units**, which may lead one to ask: why, then, does the city need to loosen zoning at all? The reason is that zoned capacity is a theoretical number that overstates reality. What I **wrote in 2016** is even truer today:

*Zoned capacity is not plentiful in Seattle. If it were, housing prices wouldn't be going through the roof. The fact that housing prices are skyrocketing is the smoking gun of our severe shortage. If vacancy rates are low and rents and housing prices are rising, then a city needs to remove zoning-code barriers so that builders can construct more homes.*

## Go big, so more people can go home

There is no downside to erring on the side of too much upzoning that comes anywhere close to the catastrophic downsides of maintaining restrictive zoning that worsens Seattle's housing shortage. Today, far too many Seattleites face crushing housing insecurity caused by the zoning status quo. The strongest predictor of homelessness rates is **high rents and low vacancy rates**—both of which are caused by a scarcity of homes.

Are Seattle's leaders worried that they might let *too much* housing get built in a housing crisis? If not, then they should put their money where their mouth is and ensure that their next Comp Plan sets zoning policies to boost home building in every way possible.

Okay, back to the details for each of the three key improvements I named in the introduction.



Small apartment buildings like this one in Seattle's Capitol Hill neighborhood were once allowed almost everywhere in the city. Photo by Dan Bertolet.

## GET THE DETAILS RIGHT FOR MIDDLE HOUSING

Zoning reforms in other parts of the US have demonstrated that even when middle housing is legalized, not much will be built unless the rules allow the buildings to be larger than single-detached houses.

Developing middle housing on small lots tends to be a money-losing proposition unless zoning allows more development capacity for projects that incorporate more homes.

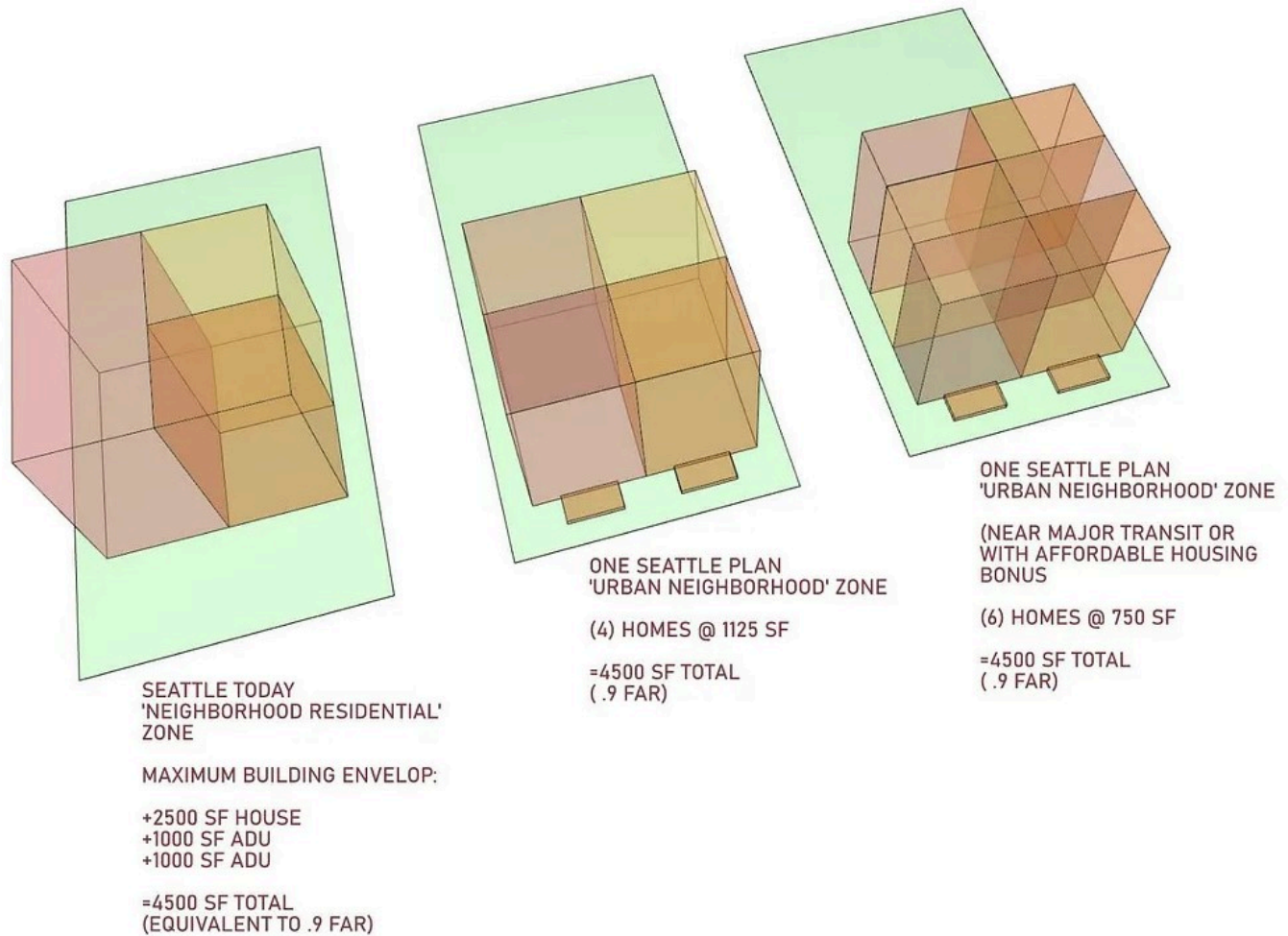
The earliest example is Minneapolis' 2019 legalization of triplexes, where **only a handful have been built** because the zoning caps their size at the same as standalone houses. **Analysis of Portland's middle housing zoning** showed that its incremental increases in capacity for more homes was still not enough to make construction feasible in most cases.

Washington's Department of Commerce took this into account when developing its **middle housing model code** (see **Sightline's comments** on the draft). It recommends granting an increasing amount of **floor area ratio** (FAR), starting at FAR 0.8 for duplexes and rising stepwise to FAR 1.6 for sixplexes.

## Increase the FAR, especially to allow family-sized middle homes

Seattle's draft plan caps FAR at 0.9 for all middle housing, regardless of the number of units. That's the same FAR currently allowed for a house and two accessory dwellings on a standard 5,000-square-foot lot. It's a formula for an anemic pace of middle housing construction.

It's also a formula for essentially banning middle housing with family-sized homes. On a 5,000-square-foot house lot, FAR 0.9 means 1,125-square-foot units (on average) in a fourplex, or 750 square feet in a sixplex. If they are typical townhouses, the staircases eat up a large fraction of that already limited living space. For comparison, under the Commerce model code, a sixplex's units could be 1,333 square feet, enough for a three-bedroom apartment.



Seattle's draft Comp Plan proposes to cap FAR at 0.9 for all middle housing, which forces smaller homes as the unit count goes up and compromises the financial feasibility of construction. Image by CAST Architecture, used with permission.

## Go beyond FAR, like Spokane

But Seattle's plan can aim even higher. Spokane set the bar for North America with the citywide **middle housing zoning** it adopted in late 2023. It limits building size not by FAR, but by lot coverage, setbacks, and height. It has no limit at all on the number of units on a lot. Its most restrictive tier would allow a four-story building with a FAR of just under 2.0. A typical 5,000-square-foot house lot could accommodate an eightplex with two approximately 1,200-square-foot apartments per floor, in a building covering half of the lot.

Enabled by Spokane's new zoning, the "**Spokane Six**" (see image above) currently in development demonstrates a sixplex prototype that Seattle's next-generation zoning should be **tailored to allow**. It would be impossible under Seattle's paltry proposed limit of FAR 0.9.



The “Spokane Six,” a sixplex currently in development, enabled by Spokane’s best-in-nation middle housing rezone. Image by CAST Architecture, used with permission.

## Boost stacked flats > townhouses, especially for accessibility

Townhouses—attached homes divided vertically from each other and sold separately with the land underneath them (“fee simple”)—are by far the most common type of middle housing built in Seattle today, and that will continue to be true under compliance with HB 1110 and under the city’s draft Comp Plan (see the [city’s illustrations](#)).

Townhouses work well for many households and provide an entry into ownership at a lower cost than detached houses. However, one major drawback is they are inaccessible to people who can’t use stairs. In contrast, stacked flats like the Spokane Six can provide accessible, single-level homes on the first floor, and on higher floors, too, if there’s an elevator.

In fact, federal law mandates that in multifamily buildings with four or more units, [every ground-floor home must be wheelchair-accessible](#)—good for people with disabilities and for the US’s [booming aging population, for whom aging-ready homes](#) are drastically undersupplied to meet future demand.

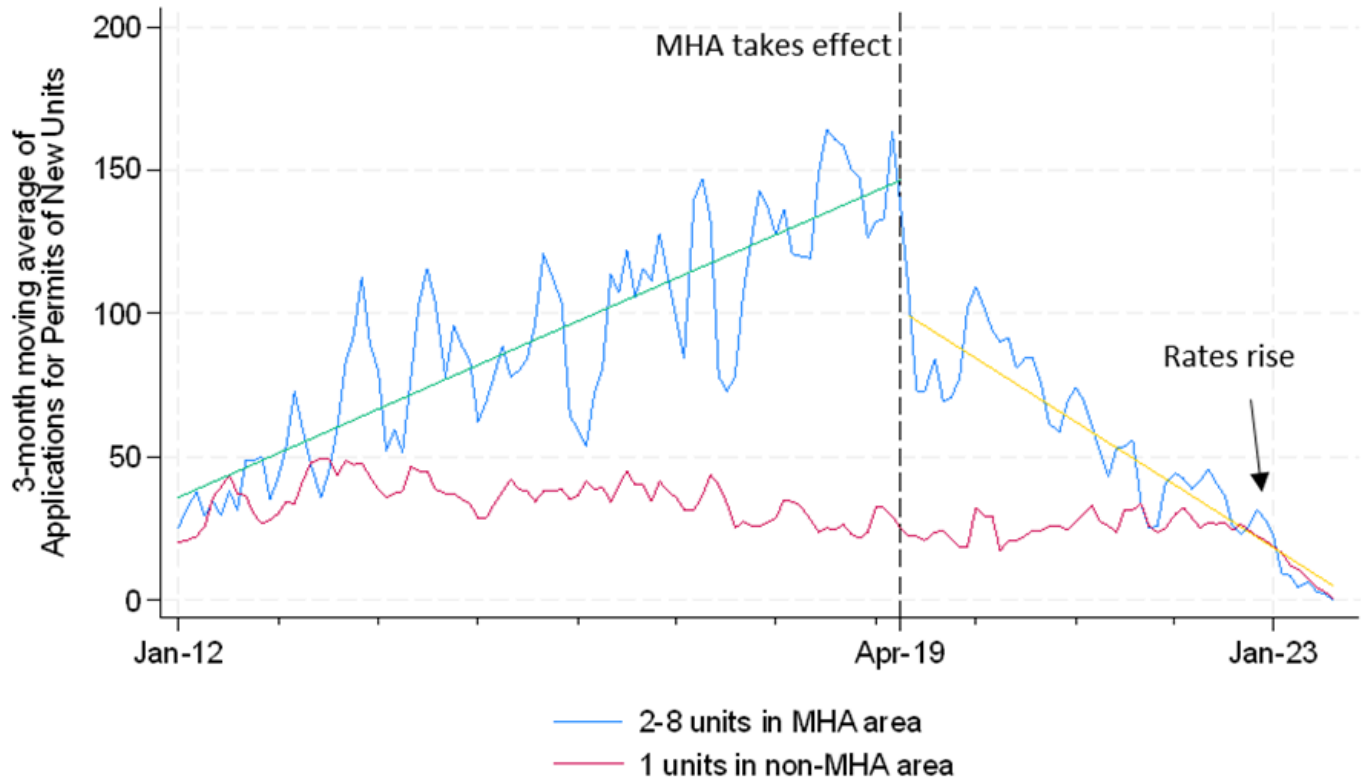
If Seattle hopes to see much stacked-flat middle housing construction, it will need to give it a leg up to overcome the inherent economics that favor townhouse development. Two good ways to do that:

- 1) Grant more FAR for stacked flats than for townhouses. The FAR of 1.6 recommended by Commerce would be sufficient.
- 2) Allow at least six units per lot for any stacked-flat development. Or better yet, remove the unit cap altogether, as Spokane did.

## Avoid the poison pill of affordability requirements

Seattle's brand of inclusionary zoning (IZ), called "mandatory housing affordability" (MHA), applies to middle housing where it is currently allowed, requiring builders to include below-market-rate homes or pay a "fee in lieu" into the city's affordable housing fund. The draft plan is mute on MHA, though it's safe to assume that it will be considered when rezones are implemented.

In 2017, Sightline's [analysis projected](#) that MHA would be particularly harmful to middle housing production. Since then, studies of [permit data](#) (see graph below) and [avoidance](#) support that conclusion.



Seattle permits for townhouse construction dropped after April 2019, when the city adopted its MHA program that requires affordable units or payment of an in-lieu fee. Interest rates rose in 2023, long after the decline in production began. Sources: City of Seattle data and American Enterprise Institute, used with permission.

It is [generally accepted](#) that affordability requirements are a bigger financial hurdle for small-scale home builders, and IZ programs in other cities commonly exempt small projects, say, with 10 units or fewer. The architects of Washington's middle housing bill, HB 1110, recognized this limitation and did not mandate affordability but instead granted the *option* to add more homes if a portion were set aside as affordable. The Pacific Northwest's leaders on middle housing reform, Portland and Spokane, do not require IZ for middle housing.

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**Best available evidence** indicates that imposing MHA with Seattle's future middle housing upzones would undermine the intent of the upzoning in the first place. It would suppress middle housing construction, depriving residents of less expensive housing choices and prolonging the city's dire housing shortage that harms those with the least, the most. Seattle policymakers can maximize **all the benefits of middle housing** with one simple move: *don't impose MHA on it.*



A six-story apartment building in Seattle's Queen Anne neighborhood. Photo by Dan Bertolet.

## CREATE APARTMENT BUILDING ABUNDANCE

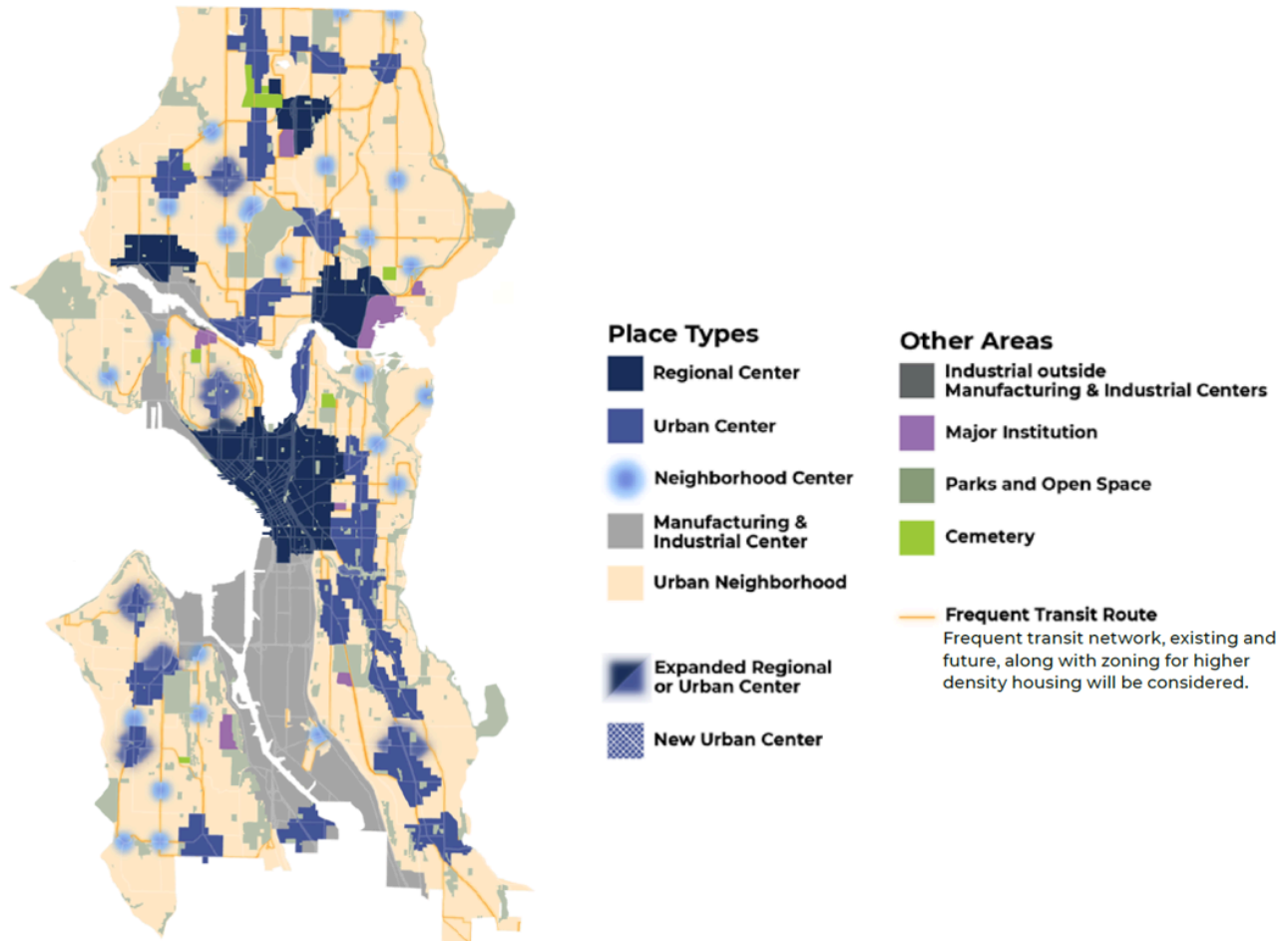
Over recent decades, the vast majority of Seattle's new housing has come in the form of apartment buildings, four stories and up. Seattle's past planners deserve credit for creating the multifamily zoning that largely enabled the city's population to grow from **563,000 to 779,000** between 2000 and 2023, a gain of 38 percent—while the population in Seattle's single-family areas **largely stagnated or even declined**.

### Allow apartments in more places

The catch is that Seattle's zoning for larger apartments is confined to a small fraction (**about 13 percent**, not including lowrise zones) of its residential land, located almost entirely in designated urban centers and villages and **along arterial streets**. Seattle's booming growth and robust job creation has rendered



that 30-year-old strategy of confinement insufficient for meeting the city's housing needs. Furthermore, the city's own study concluded this "urban village" strategy has **exacerbated racial segregation and inequity**.



Draft Seattle Comprehensive Plan future land use map and legend showing locations of newly designated neighborhood centers (faded light blue) and other types of centers. Source: City of Seattle.

As noted above in the intro, the draft Comp Plan proposes only a modest amount of upzoning for apartment buildings in new areas, and leaves zoning almost completely untouched in the limited places where they are now allowed. Seattle's plan can expand opportunities for apartments and condos in multiple contexts and scales by allowing (see map above for reference):

Highrise towers throughout all regional centers and within a quarter-mile of all light rail stations outside regional centers,  
 Eight stories throughout all urban centers, and  
 Six stories within a quarter-mile of all frequent transit stops, **schools, parks, libraries, and community centers.**

**Add more "neighborhood centers," and enlarge them**

The city can further expand apartment choices by designating more neighborhood centers and making them larger. The draft plan states that in these centers, “residential and mixed-use buildings of four to six stories would be appropriate.”

These two changes would be especially beneficial for creating opportunities for apartments located away from **dangerous, polluted, and noisy arterial roads**, where current apartment zoning is concentrated. Plentiful apartment zoning also supports the development of subsidized affordable housing, because its most common form is midrise apartment buildings.

An **earlier proposal** identified some 48 potential neighborhood centers, but only 24 made their way into the draft plan officially released last month after Mayor Bruce Harrell’s office scaled back changes (compare **this map from the earlier draft** with the one shown above). Also, the proposed size for neighborhood centers is only an 800-foot radius, which is just a few blocks. A quarter-mile radius would allow the critical mass for a functional center.



New highrise residential towers in Seattle's South Lake Union neighborhood. Photo by Dan Bertolet.

## Follow Portland's example, in apartments and in funded affordability mandates

Portland, Oregon, is poised to lead the US in allowing more apartments, the next logical step after that city's 2020 [legalization of middle housing citywide](#). An [advocate-led effort](#) proposes legalizing midrise apartment buildings throughout the city's Inner Eastside neighborhoods.

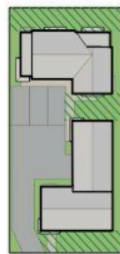
Seattle policymakers can also look to Portland for a better way to do IZ—namely, one that doesn't undermine its own intent by **suppressing construction**. Earlier this year, Portland modified its IZ program to ensure that the cost of providing the required affordable homes is fully offset by a property tax exemption and other fee reductions. That is, Portland **fully funds** its IZ. It's a win-win-win: apartment construction continues apace, every new apartment building includes some homes for lower-income residents, and the new building's property tax revenue pays for its new low-income units.

## SAY GOODBYE, ONCE AND FOR ALL, TO COSTLY PARKING MANDATES

Seattle's **draft Comp Plan** does a good job of summarizing how requiring off-street parking is bad policy because it "increases the cost of construction; reduces the amount of space available for housing, open space, and trees; increases hardscape and stormwater runoff; and encourages vehicle ownership and use."

The plan further explains that parking mandates are especially problematic for middle housing: "On small lots, driveways, maneuvering areas, and parking stalls can take up a substantial portion of the site and dictate the layout of everything else on the site." See the city diagram below for an example of how much space parking eats up on a standard lot.

Total units	4
Floor area ratio (FAR)	0.9
Average unit size	1,125 sq ft
Stories	2-3
Lot size	5,000 sq ft
Building coverage	35%
Usable open space	22%
Building plus paving	64%
Parking spaces	4



Street



Street

City of Seattle diagram of potential middle housing with four units per lot, illustrating the large portion of the site taken up by pavement for four parking spaces. Source: City of Seattle.

Sightline **has documented** in detail how parking mandates are a death knell for middle housing, concluding that "to unlock the full potential of small-scale homes, there is no policy debate: parking minimums have to go."

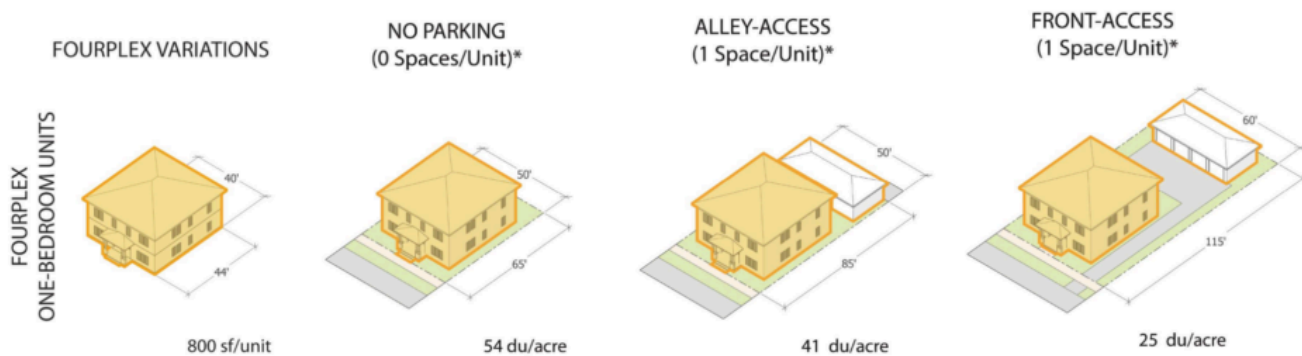
Meanwhile, the only benefits of off-street mandates offered by Seattle's draft plan are that they can "reduce competition for parking on the street" and "support goals like providing space for electric vehicle charging."

The plan's assessment is both clear and accurate: the benefits of ending mandates vastly outweigh the benefits of keeping them. Yet the plan takes no position, stating only that the city is "considering

whether to remove parking requirements in remaining areas where they are present today.”

Seattle’s current [rules for parking flexibility](#) apply within a quarter-mile of frequent transit stops. For residential parcels that are also located inside designated urban centers or villages, no parking is required. Otherwise, parcels with quarter-mile transit proximity get a 50 percent reduction from the city’s standard parking mandates.

This [map](#) shows all the land eligible for parking flexibility, but it doesn’t differentiate between areas with full elimination versus 50 percent. Urban centers and villages cover a small fraction of Seattle’s residential land, so a large portion of the dark areas in the map still require some parking. Even a mandate of one space for every two homes can be a [deal breaker for middle housing](#).



Requiring one parking space per home for a fourplex can reduce the density by one half. From *Missing Middle Housing* by Daniel Parolek, Chapter 5 *Missing Middle Housing Types*, pages 130-131. Copyright © 2020 Daniel Parolek. Reproduced by permission of Island Press, Washington, D.C.

## Complete HB 1110’s unfinished business on parking flexibility

Ideally, HB 1110 would have prohibited local parking minimums for middle housing, but it almost certainly would not have passed the legislature with that additional, politically controversial pre-emption.

The bill did, however, include a provision to make it easier for cities to remove their mandates. It exempts from [state environmental review](#) any actions local governments take to reduce parking requirements. Seattle, the biggest, most urban city in Washington, can complete the unfinished business of HB 1110 on parking and set an example for the entire state. Washington’s current leaders on parking reform are [Spokane](#), which nixed requirements on nearly all of its residential land, and [Port Townsend](#), which ended all mandates but with an ordinance that’s only temporary.

***If Seattle policymakers retain parking mandates, they are choosing to prioritize reducing competition for street parking over creating homes for people—in a housing crisis.***



Of course, many builders will opt to include parking with middle housing even if it's not required by law. But if it is required by law, many middle housing projects will become more expensive or will never get built at all.

If Seattle policymakers retain parking mandates, they are choosing to prioritize reducing competition for street parking over creating homes for people—in a housing crisis. Correcting that priority is easy: just use the delete key on Seattle's remaining off-street parking mandates, joining the wave of [hundreds of other American cities](#) making similar reforms.

## SEATTLE CANNOT AFFORD TO MISS THIS OPPORTUNITY

Seattle updates its Comprehensive Plan only once every [eight to ten years](#), and the new housing it shapes will be around for 50 to 100 years. The housing security of thousands—tens of thousands—of current and future residents depends on the city embracing a plan to allow enough new homes, in all shapes and sizes, over the coming decades. Seattle's crisis of spiralling rents and prices, caused by a shortage of homes, calls for policymakers to take every action possible to undo that shortage.

Sadly, the city's current draft plan does not do this. It proposes some positive steps, but overall, it fails to move much beyond the status quo that created Seattle's housing problems in the first place. An earlier, unpublished version of the draft plan put forward by the planning department did propose more aggressive changes to allow more housing, but [Mayor Harrell's office scaled it back](#) before it was officially released.

Seattle's plan can meet the moment with three key improvements:

- 1) **Get the zoning details right for middle housing** to ensure that its feasible to build and can provide family-size and accessible homes
- 2) Boost allowances for **bigger apartment buildings throughout the city** to create more homes more people can afford in places with access to opportunity and transportation options
- 3) **Eliminate requirements for off-street parking citywide** to end the wasteful, costly overbuilding of parking and to make housing less expensive and more abundant

With these reforms and the abundant housing they help create, Seattleites for decades to come will benefit from greater affordability and environmental sustainability.



Dan Bertolet

*Senior Director, Housing and Cities*

**From:** [Eugenia Woo](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Holmes, Jim](#)  
**Subject:** DEIS comments One Seattle Plan  
**Date:** Monday, May 6, 2024 5:01:37 PM

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**CAUTION: External Email**

Hi Jim,

On behalf of Historic Seattle, I am submitting these comments on the DEIS for the Comprehensive Plan update (One Seattle Plan), focused on the historic preservation and cultural resources section and mitigation measures of the DEIS.

I have one correction:

-Regarding "Exhibit 3.9-13. Area 2: NE Seattle—NRHP- and WHR-Listed Architectural Districts and Properties," I have a correction. The Nuclear Reactor Building at UW was listed in the National Register but it was demolished by the UW in 2016.

17-1

Under Potential Mitigation Measures, I would like to know more about "Modifying demolition review process so that historic review occurs even if SEPA thresholds are increased."

17-2

Thank you!

Eugenia

Eugenia Woo  
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May 6, 2024

City of Seattle Office of Planning and Community Development  
P.O. Box 94788, Seattle, WA 98124-7088

[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)  
[OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

Attn: Director Rico Quirindongo, Michael Hubner, Jim Holmes, Brennon Staley

**Subject: One Seattle Comprehensive Plan Update Draft EIS Comments  
and One Seattle Comprehensive Plan: Draft for Public Review  
Comments**

Dear Director Quirindongo and OPCD staff,

Thank you for the opportunity to comment on the “One Seattle Comprehensive Plan Update Draft EIS” (DEIS) and the “One Seattle Comprehensive Plan: Draft for Public Review” (“Draft Plan”). Please find the comments of the Complete Communities Coalition listed below. We have included section headers to indicate the document to which each comment pertains.

The Complete Communities Coalition is an alliance of affordable housing advocates, community-based organizations, nonprofit developers, urbanists, environmentalists, the local business community, and more. Our coalition is dedicated to fostering an affordable, equitable, and sustainable Seattle through a transformational 2024 Comprehensive Plan Update. We seek to guide Seattle towards a future with abundant housing and inclusive growth.

We appreciate the Department of Planning and Community Development’s (OPCD) work that produced the Draft Plan. We strongly share the values expressed in the Draft Plan and we concur with much of the Department’s analysis of the challenges facing the city and their root causes. However, we are concerned that the plan will not achieve its desired goals because many of the policies are too similar to the City’s current policies to create significant change. To truly make housing more affordable, advance racial equity, mitigate displacement, and meet our climate goals, we believe the Mayor’s Recommended Plan and the Final Environmental Impact Statement (“FEIS”) should incorporate the following revisions:



**Steering Committee**

Jesse Simpson, Co-Chair  
Housing Development Consortium

Tiernan Martin, Co-Chair  
Futurewise

Scott Berkley,  
Tech 4 Housing

Cliff Cawthon,  
Habitat For Humanity  
Seattle-King & Kittitas Counties

Sarah Clark,  
Seattle Metropolitan  
Chamber of Commerce

Joshua Friedmann,  
Hillis Clark Martin & Peterson  
P. S. & NAIOP Washington

Tiffani McCoy,  
House Our Neighbors

Rian Watt,  
The Urbanist

18-1





## EIS Preferred Alternative

We recommend that the FEIS designate a “preferred alternative.” While FEIS documents prepared pursuant to SEPA are not required to designate a preferred alternative, there is a sound reason why doing so has become common practice among lead agencies over the years. As the Department of Ecology has explained, designation of a preferred alternative gives public reviewers more awareness of which alternative the professional staff members within the lead agency feel is best, or which appears most likely to be approved. In the high-profile, contentious and complex instance of the One Seattle Plan, identification of a preferred alternative in the FEIS would be an especially useful step. Not only has the DEIS discussed and analyzed five different alternatives, but two different complex alternative proposals have also entered public discussion in the form of the Mayor’s Draft Plan and the August 2023 OPCD staff recommended plan (“OPCD Draft Plan”, see Attachment A).<sup>1,2</sup> Given the sprawling and complex interrelated impacts that the One Seattle Plan will have on the future of our City, the FEIS will be best positioned to inform productive discussion and understanding if it clearly designates a preferred alternative.

- The growth strategy described by OPCD staff in their August 2023 proposal should be the basis for the preferred alternative. The OPCD Draft Plan is the boldest growth strategy presented to date. It responds to the overwhelming community feedback provided during scoping, and we believe it will best meet the city’s needs over the next decades.
- If the FEIS does not designate the growth strategy from the OPCD Draft Plan (or an updated version) as its preferred alternative, it should adopt a modified version of the DEIS’s Alternative 5. Preferably, modifications to the DEIS Alternative 5 would incorporate as many attributes of the OPCD Draft Plan as possible, and as many of the policy positions requested in this letter as possible.
- If the FEIS adopts the Draft Mayor’s Recommended Plan growth strategy as a preferred alternative, it should adopt many of the features of the OPCD Draft Plan or DEIS’s Alternative 5, together with the additions requested by this letter.
- The FEIS should include a table that summarizes zoned land development capacity analysis and projected housing needs for the Preferred Alternative. The table should disaggregate housing unit development by area median income (“AMI”) band,

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<sup>1</sup> See The Urbanist. “Planners Proposed Bigger Upzones Before Harrell’s Team Intervened, Records Show”, April 16, 2024.  
<https://www.theurbanist.org/2024/04/16/planners-proposed-bigger-upzones-before-harrells-team-intervened-records-show/>

<sup>2</sup> Also see PubliCola. “Mayor’s Office Edited Ambitious Growth Plan for Seattle to Preserve the Status Quo”, April 16, 2024.  
<https://publicola.com/2024/04/16/original-version-of-growth-plan/>

following the guidance provided by the Department of Commerce, in order to ensure we are providing sufficient capacity for housing affordable to low-income people and demonstrate that the plan will comply with the Growth Management Act's Housing Element requirements provided in RCW 36.70a.070(2)(c)-(d). Table 34 in the [Draft Housing Appendix](#) provides an excellent template for this information.<sup>3</sup>

18-1  
cont

## Urban and Regional Centers

Regional and Urban Centers have been and will continue to be the areas where the most new housing is built in the city. Currently, the City is proposing very little change within existing centers, minor expansion of the smallest centers, and only one new center at NE 130th Street. The City should expand the potential for growth in Urban and Regional Centers by both increasing the area they cover and the intensity of development allowed. The City should also seek to undo the past harms of the Urban Village strategy<sup>4</sup>, which is the basis of our centers-based growth framework, by allowing more intense development near public facilities such as parks, water ways, and high performance schools. The City should also take this opportunity to address the inequitable distribution of Regional Centers, none of which are currently located in South Seattle.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative Should:

- Continue to include the addition of Ballard as a Regional Growth Center and 130th Street Station as an Urban Center.
- Continue to include the expansions of existing Urban Centers such as the Greenwood-Phinney Ridge, Queen Anne, and West Seattle Junction Urban Centers.
- Expand the University District Regional Center to include University Village and lands adjacent to Seattle Children's Hospital, or create a new Urban Center to incorporate these areas.
- Create additional Urban Centers at all future Link stations, excepting areas within Manufacturing and Industrial Centers.

18-2

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<sup>3</sup> See City of Seattle. "Draft Housing Appendix", p.122.

<https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanDraftHousingAppendix.pdf>

<sup>4</sup> See PolicyLink. "Advancing Racial Equity as part of the 2024 Update to the Seattle 2035 Comprehensive Plan and Urban Village Strategy", April, 2021.

<http://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/Seattle'sComprehensivePlan/ComprehensivePlanPolicyLinkFinalRecommendations.pdf>

- Allow high rise zoning in all Regional Centers and within all Urban Centers adjacent to Link Stations.
- Allow eight-story residential construction on the majority of the land within all Urban Centers. Explore allowing greater height with the use of mass timber, to incentivize low carbon construction.
- Designate Mt. Baker and West Seattle Junction Urban Centers as future Regional Centers, include them in the list of Centers to receive updated subarea plans, and plan for combined jobs and housing unit density that exceed King County's Urban Growth Center threshold for both centers.<sup>5</sup>

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the maximum possible expansion of all existing Urban and Regional Centers.
- Study additional Urban Centers near all proposed Link Stations and adjacent to our greatest parks, including Discovery and Magnuson.
- Study increasing the zoning capacity of all Regional and Urban Center to maximize the productions of housing.
- Study the impacts of designating Mt. Baker and West Seattle Junction Urban Centers as Urban Growth Centers, using the definition provided in the 2021 King County Countywide Planning Policies.

18-2  
cont

## Neighborhood Centers

The One Seattle Plan's proposed "Neighborhood Center" model presents dramatic opportunities for our City. If fully realized, this could lead to increased housing supply and affordability, enhanced economic opportunities, improved walkability, and better environmental outcomes for more of Seattle's neighborhoods and a broader segment of the city's population. We request the following actions to bring the Council's request for a "fifteen minute city" and the Mayor's vision of "One Seattle" closer to reality.

18-3

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Allow for the development of all Neighborhood Centers studied under EIS Alternative 5 and proposed under the OPCD Draft Plan. The total number of Neighborhood

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<sup>5</sup> The current activity unit density minimum is 30 units/acre and the planned activity unit density is 60 units/acre. See Attachment B: DEIS Alt 5 and Growth Center Designation Criteria Tables

Centers should not be less than 50. Additional Neighborhood Centers should include (but not be limited to): Alki, High Point, Seward Park, South Beacon Hill, Gas Works, North Magnolia, Roanoke Park (North Broadway), Nickerson (North Queen Anne), and Upper Fremont.<sup>6</sup>

- Expand the radii of Neighborhood Centers to ¼ mile to create enough land to support a small cluster of mixed-use development.
- Increase permitted Floor Area Ratio (FAR) to no less than 2.0 for multifamily housing in all Neighborhood Centers.
- Increase height limits to 85 feet throughout all Neighborhood Centers.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study expanding all Neighborhood Centers up to a ten-minute walkshed and 2.5 maximum FAR, for all multifamily housing across those areas.
- Be sure to thoroughly study any potential adverse environmental impacts of these actions, as well as the probable significant adverse environmental impacts of failing to take such measures.

## Corridors

The DEIS studies a “Corridor” growth strategy (Alternative 4) that would focus new housing in areas near transit and amenities. Increasing access to frequent transit and parks is one of our coalition’s goals, and it will help the City reduce cost of living while improving quality of life. While the DEIS includes this strategy, the Draft Plan significantly reduces the amount of area where such flexibility and walkable density would be possible. This is inconsistent with the Mayor’s One Seattle goals for housing, transportation, the environment and the climate. By restoring multifamily housing to the parcels off of arterials, the Mayor’s Recommended Plan can avoid disproportionately exposing renter households to environmental harms caused by high-traffic roadways. This would be more consistent with the City’s One Seattle values of racial and environmental justice.

To facilitate immediate progress, the Mayor’s Recommended Plan and any Preferred Alternative should:

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<sup>6</sup> The Neighborhood Center names listed in this comment refer to the names provided in City of Seattle, “Additional Detail on Location of Neighborhood Anchors”, 2023. <https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/LocationsNeighborhoodAnchorsStudiedAlternative2.pdf>

18-3  
cont

18-4

- Add a Corridor place type that allows mid rise housing up to 85 feet in height. This place type should include all parcels currently zoned Neighborhood Residential that are:
  - a. within 0.5 miles (roughly a 10-minute walk) of light rail or bus rapid transit; or
  - b. within 0.25 miles (roughly a 5-minute walk) of frequent bus stops.
- Where appropriate, add the Corridor place type to policies that reference the three centers (Regional, Urban, and Neighborhood).
- Impose a maximum FAR no lower than 2.0 for multifamily development in Corridor areas.
- Allow mixed-use residential development in Corridor areas.

18-4  
cont

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study all Corridor areas contemplated by EIS Alternative 5 or the OPCD Draft Plan up to a ten-minute walkshed, and no less than 2.5 maximum FAR for all multifamily housing across those areas.
- Be sure to thoroughly study the probable significant adverse environmental impacts of failing to take such measures.

## **Urban Neighborhoods & Middle Housing**

This section focuses on the One Seattle plan's implementation of HB 1110 (2023) in Neighborhood Residential Areas and throughout the city. Full implementation of the state law needs to be planned to ensure we encourage a diversity of housing types, including backyard cottages, co-housing, townhouses, and stacked flats. Urban Residential zones need to be planned to help us meet our equity, environmental, and affordability goals.

18-5

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Increase the allowed FAR for middle housing to feasibly allow for family-sized two, three, and four bedroom homes to be built throughout the city. At a minimum, the city should align standards with the Department of Commerce's model ordinance. We recommend no less than 1.4 FAR for fourplexes and no less than 1.6 FAR for six-plexes.
- Create a 0.2 FAR bonus for stacked flats in middle housing, to incentivize the creation of physically accessible housing.

- Create a 0.1 FAR bonus for each Multifamily Tax Exemption (MFTE) unit, along with increasing height to 40 feet if two or more MFTE units are included.
- Encourage the development of housing for large households, including families with children and elders, by providing a development incentive of 0.05 additional FAR for two-bedroom homes and 0.1 additional FAR for three- or four-bedroom homes.
- Create a 0.2 FAR bonus for housing that satisfies defined passive house, living building, or LEED specifications.
- Allow for a full range of middle housing types in Neighborhood Residential areas throughout the city, including allowing for six-plexes by right in all areas with low displacement-risk.
- Align the Draft Plan with HB 1110, by ensuring any alternative density requirements in high-displacement risk areas are temporary. Create a plan for implementing appropriate anti-displacement policies by the next implementation progress report. Partner with BIPOC-led community organizations to engage neighborhood and community residents, both present and former, to better understand how to accommodate their housing needs and improve community resilience.
- Eliminate requirements for side and front setbacks, to allow for more of the lot to be usable open space and accommodate trees.
- When calculating minimum density, do not include ADUs and DADUs in the unit density metric.
- Allow subdivision of lots into lots less than 1,000 square feet.
- Ensure that middle housing is not subject to more restrictive land use or other code requirements than single family housing, as required under HB 1101.
- Expand the “corner store” concept to allow greater flexibility for commercial uses to be introduced to neighborhoods that are currently primarily residential. Examples of greater flexibility include: non-residential uses that meet the daily needs of residents (e.g., health care, small grocers, “third place” leisure activities, etc.), ability to locate on off-corner lots, and increased height and FAR limits to facilitate the development of ground floor commercial units.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the impacts of removing side setback requirements in all areas, to allow for more of the lot to be usable open space and accommodate trees.

## **Affordable Housing and Social Housing**

The City of Seattle is facing a housing crisis in terms of scarcity and affordability. One of the goals of the One Seattle Plan, which we strongly support, is to achieve housing abundance:

*“When housing is safe, affordable, and abundant, we can fulfill many of our goals for the future....Achieving housing abundance is fundamental to addressing our homelessness crisis, redressing historical patterns of segregation and exclusion, and creating opportunities for displaced residents to return to their communities.”*

18-6

We appreciate the inclusion of the affordable housing bonus to address this pressing need, by allowing for additional development capacity for income-restricted affordable housing in neighborhood residential areas that are within ¼ mile of frequent transit. Though we have not seen a detailed proposal for the income restrictions and set aside requirements, it is our understanding that this bonus is intended for use by non-profits and others building wholly affordable housing projects. This will blunt the impact of the proposed density bonus, as any developments benefiting from the bonus will need to compete for limited public funds available for affordable housing.

To facilitate immediate progress, the Mayor’s Recommended Plan and any Preferred Alternative should:

- Revise the proposed affordable housing bonus to ensure it is usable by a broad range of developers—including private, nonprofit, and social housing developers—without needing scarce public funding. This could look like a requirement for no less than 20% of the homes to be affordable at 60% AMI for rental or 80% AMI for ownership.
- Increase the proposed FAR limit from 1.8 to no less than 2.2.
- Increase the proposed lot coverage from 60% to 70%.
- Allow the proposed affordable housing bonus to be used outside of frequent transit areas.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the impacts of allowing up to 80% lot coverage for developments using the affordable housing bonus.

## Equitable Development and Anti-Displacement Strategies

The City currently provides support to communities disproportionately impacted by displacement pressure, economic exclusion, and disinvestment through a variety of different equitable development programs and anti-displacement policies. We support the continuation of all existing equitable development and anti-displacement tools, notably the Equitable Development Initiative. However, it is not enough for the City to simply continue its current programs; the tools and policies need to be expanded based on feedback from communities disproportionately impacted by discrimination and displacement pressure.

18-7

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Expand the City's land banking strategy to support affordable rental, affordable ownership, and social housing projects.
- Create incentives and provide technical assistance for small community-based organizations to partner with larger developers in Equitable Development Initiative projects.
- Facilitate generational wealth building, by providing a way for low-income and fixed-income families to sell their home and gain a new high-quality home on the site of the new development.
- Collaborate with the Seattle school district to plan for affordable, family-sized housing near schools, pursuant to City Ordinance 124919.<sup>7</sup>
- Provide information to support the development of Community Opportunity to Purchase Act (COPA) legislation, which would allow qualified non-profit organizations the first opportunity to make an offer on real estate sales involving multifamily buildings with low-income residents.<sup>8</sup>
- Incentivize the use of affirmative marketing and community preference policies for private developments not receiving public subsidy. Continue to incentivize such policies for publicly-funded projects.

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<sup>7</sup> City Ordinance 124919 states: "WHEREAS, a 2015 amendment to the Countywide Planning Policies approved by the Growth Management Planning Council of King County requires coordination between local land use plans and school districts" and Section 3.14.990 Office created---Functions, Section B.5., "In coordination with the Department of Education and Early Learning and in partnership with the Seattle School District No.1, OPCD will develop planning strategies that support the District's public school facility needs for anticipated student population consistent with adopted comprehensive plan policies and growth forecasts."

<sup>8</sup> This is supported by the 2021 Racial Equity Analysis, which advocated for land value capture tools after upzoning.



- Continue to explore and support the expansion of short-term rental assistance programs.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the impact of displacement and lack of affordable housing on school enrollment and ensuing school budget constraints and create incentives for family-sized units near schools.

18-7  
cont

### **Multifamily Housing Mapping Error**

The Draft Plan appears to include an unintentional mapping oversight which, if not corrected, would likely result in a loss of *existing* zoned housing capacity and a reduction in the fifteen-minute walkable neighborhoods envisioned by the Mayor’s One Seattle policies and championed by the City Council. This loss would be found in neighborhoods that are today designated for “Multifamily Housing” future land uses *under the currently effective Comprehensive Plan*, but erroneously have been proposed to transition into Urban Neighborhood status under the Draft Plan.<sup>9</sup> This change would replace a designation in the current Comprehensive Plan where “you might find duplexes or townhouses, walk-up apartments or highrise towers,” with a new place type that “would primarily allow housing types within a three-story scale, such as detached homes, duplexes, triplexes, fourplexes and stacked flats.”<sup>10</sup> A ceiling of stacked flats in the proposed designation is much reduced from a ceiling of highrise towers in the existing designation. In particular, this issue would impact the proposed redevelopment of Fort Lawton with affordable housing, which is a major priority of the City of Seattle and Mayor’s Office.

18-8

To preserve affordability, walkability and environmental progress made over the last ten years, the Mayor’s Recommended Plan should:

- Ensure that all areas that are currently designated as Multifamily Residential on today’s future land use map be redesignated as a Corridor, Neighborhood Center, Urban Center or Regional Center, rather than Urban Neighborhood.

### **Transportation**

Safe, accessible, and frequent transportation is a key element to the success of any city. We strongly support Goal TG 1 in the Draft Plan, which states, “Transportation decisions,

18-9

<sup>9</sup> See Attachment C: Urban Neighborhood Areas Overlaid by FLUM 2035 Multi-Family Residential Areas for a graphic depiction of the multifamily housing mapping error.

<sup>10</sup> Compare Seattle 2035 Comprehensive Plan (Amended December 2022) at p. 53 with One Seattle Plan Draft EIS at 1-8 and 2-3.

strategies, and investments support the growth strategy for the City and the region and are coordinated with this Plan’s land use goals.” In order to achieve this, Seattle should prioritize *proximity*-based strategies over mobility-based ones.<sup>11</sup> One example of this approach would be to plan for far more Neighborhood Centers than are included in the Draft Plan—especially in low-density, car-dependent neighborhoods (see the Neighborhood Centers section of this letter). In its mobility strategy, Seattle should prioritize carbon-neutral transportation modes such as walking, rolling, and cycling, and carbon-light modes such as mass transit and carpooling. Transportation infrastructure that primarily serves personal automobiles, including parking, should be deprioritized in relation to these other modes.

To facilitate immediate progress, the Mayor’s Recommended Plan and any Preferred Alternative should:

- Plan to accommodate housing and job growth in a manner that will enable the City to achieve the following transportation and environmental goals: net-zero citywide emissions by 2050 (see T 4.1), 20% reduction in VMT by 2044 (see T 4.2), and a 37% reduction in VMT by 2044.
- Eliminate parking minimum requirements for all land uses types citywide.
- Plan to serve all Neighborhood Centers with frequent bus service.
- Add the Corridor place type to the lists of places described in T 1.2, T 3.1, and T.2.12; for example, “all centers (Regional, Urban, and Neighborhood) and corridors”.
- Clarify that T 4.4, which describes neighborhood-scale strategies to reduce carbon emissions and pollution, applies to all types of neighborhoods—including neighborhoods with high-traffic arterial streets with frequent transit service.
- Use a racial equity lens when prioritizing sidewalk and pedestrian infrastructure construction in areas that currently lack it (see T 3.20).
- Plan to prioritize street right of way differently in different contexts: within centers and neighborhoods, streets should prioritize active transportation that is safe and sustainable; between centers and neighborhoods, streets should prioritize public transit; and within and between Manufacturing and Industrial Centers, streets should safely accommodate the reliable movement of goods.

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<sup>11</sup> See Todd Litman. “Planning for Accessibility: Proximity is More Important than Mobility”, Planetizen, April 14, 2024.  
<https://www.planetizen.com/blogs/128363-planning-accessibility-proximity-more-important-mobility>

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the environmental impacts of maximum parking requirements for residential and commercial uses in frequent transit service areas.

18-9  
cont

## Climate & Environment

The City is preparing to comply with new climate requirements that will be required by state law in 2029. We support the City's decision to get ahead of these upcoming requirements, and we applaud the goal of 58% reduction in greenhouse gas emissions from 2008 levels. We also support the City's study of the environmental impacts of planning for additional density within Seattle, which found that DEIS Alternative 5 would produce the lowest GHG emissions per capita. We particularly support the following statement in the DEIS:

*While each [EIS] alternative would generate GHG emissions from growth and development within the city, the benefit of channeling development to targeted areas that might otherwise occur in peripheral areas of the city or region could serve to offset these impacts. (DEIS, p.3.2-51)*

We encourage the City to set additional specific climate goals that will allow for progress to be accurately assessed throughout the next twenty years.

To facilitate immediate progress, the Mayor's Recommended Plan and any preferred alternative should:

- Prioritize supporting transportation mode shift toward active mobility options over automobile electrification.
- Define specific anti-displacement strategies that meet the needs of communities most likely to be impacted by climate change.
- Set goals for building de-carbonization that can inform future revisions to the energy code.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Provide additional explanation for the conclusion that Alternative 1: No Action would have no significant adverse impacts on greenhouse gas emissions or air quality. Given the anticipated impacts that this strategy would have on greenfield development and increased vehicle-miles traveled, particularly by commuters, explain why these impacts would not be significant.

18-10

Thank you for considering our comments. If you require additional information, please contact Complete Communities Coalition Steering Committee co-chairs Tiernan Martin ([tiernan@futurewise.org](mailto:tiernan@futurewise.org)) and Jesse Simpson ([jesse@housingconsortium.org](mailto:jesse@housingconsortium.org)).

Sincerely,



Tiernan Martin and Jesse Simpson  
Co-Chairs, Complete Communities Coalition Steering Committee

18-10  
cont

### **Attachments**

This comment incorporates the following attachments by reference, and we ask that they be added into the public record as a part of these comments:

Attachment A: One Seattle Comprehensive Plan: Public Review Draft, August 2023

Attachment B: DEIS Alt 5 and Growth Center Designation Criteria Tables

Attachment C: Neighborhood Centers by Name and Location

Attachment D: Urban Neighborhood Areas Overlaid by FLUM 2035 Multi-Family Residential Areas

The Complete Communities Coalition requests the City of Seattle to include the following document in the public record:

City of Seattle. "One Seattle Comprehensive Plan: Public Review Draft", June 2023. Accessible for download at: [https://futurewiseorg.sharepoint.com/:b:/g/EYK\\_mzhgGw9CgVMoSvajtWb1eTjkbe2RZ7UPQ-01Py57g?e=keR-Huq](https://futurewiseorg.sharepoint.com/:b:/g/EYK_mzhgGw9CgVMoSvajtWb1eTjkbe2RZ7UPQ-01Py57g?e=keR-Huq)

Complete Communities Coalition Comments on the Draft One Seattle Plan and Draft Environmental Impact Statement Attachment B: DEIS Alt 5 and Growth Center Designation Criteria Tables

Environment, Impacts, & Mitigation Measures • Land Use Patterns & Urban Form

Exhibit 3-6-112. Future Activity Units (AU)—Alternative 5

Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 5 Acres	Alt. 5 AU	Alt. 5 AU/Ac.
<b>Regional Centers<sup>1</sup></b>					
Downtown	377.4	473.2	952	447,351	469.9
First Hill/Capitol Hill	139.5	163.4	916	149,578	163.3
University Community	54.5	70.2	753	52,695	69.9
South Lake Union	236.7	344.1	340	115,612	340.2
Uptown <sup>2</sup>	131.3	161.3	391	53,723	137.2
Northgate	57.3	75.1	412	30,803	74.7
Ballard <sup>2</sup>	67.7	96.9	495	50,047	101.0
<b>Hub Urban Centers<sup>1</sup></b>					
Bitter Lake Village	44.0	55.4	364	20,044	55.1
Fremont	71.9	88.1	214	18,877	88.0
Lake City	57.6	75.4	142	10,688	75.1
<b>Mc Baker</b>	36.0	47.4	491	23,135	47.1
<b>West Seattle Junction<sup>2</sup></b>	70.4	100.2	449	26,934	89.9
<b>Residential Urban Centers<sup>1</sup></b>					
130th Street <sup>2</sup>	18.4	20.7	218	7,733	35.5
23rd & Union-Jackson	38.9	46.5	625	29,046	46.5
Admiral <sup>1</sup>	49.2	60.4	288	6,886	23.9
Aurora-Licton Springs	44.1	51.4	327	16,775	51.3
Columbia City	33.9	46.1	335	15,390	46.0
Crown Hill	25.3	31.4	271	8,492	31.3
Eastlake	70.2	82.0	199	16,323	81.9
Green Lake	70.6	87.4	109	9,492	87.3
Greenwood-Phinney Ridge <sup>2</sup>	84.5	101.6	315	9,579	30.4
Madison-Miller	65.3	85.1	145	12,349	85.0
Morgan Junction <sup>2</sup>	34.1	41.6	281	7,169	25.5
North Beacon Hill	28.1	34.5	267	9,161	34.3
Othello <sup>2</sup>	23.7	29.0	584	17,894	30.6
Rainier Beach	23.0	26.0	346	12,893	37.3
Roosevelt	61.4	81.2	170	13,801	81.1
South Park	14.7	18.5	263	7,951	30.2
Upper Queen Anne <sup>2</sup>	89.5	110.5	329	5,857	17.8
Wahingrad	42.2	51.5	258	13,248	51.4
Westwood-Highland Park	27.9	32.6	275	9,386	34.1

1 See Exhibit 2.1.1 in Chapter 2 for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under Alternatives 2-5.  
 2 Proposed new center, redesignated center, or boundary expansion.  
 Note: Activity units (AU) is the sum of residential population and jobs. Assumes an average household size of 2.05 per the King County Growth Management Planning Council. Highlighted urban villages fall outside King County's countywide center designation criteria of 160-500 acres or below the minimum 18 existing AU or 30 future AU per acre. MLC designation criteria from PSRC does not include an AU density threshold.  
 Sources: City of Seattle, 2023; BERK, 2023.

2021 King County Countywide Planning Policies

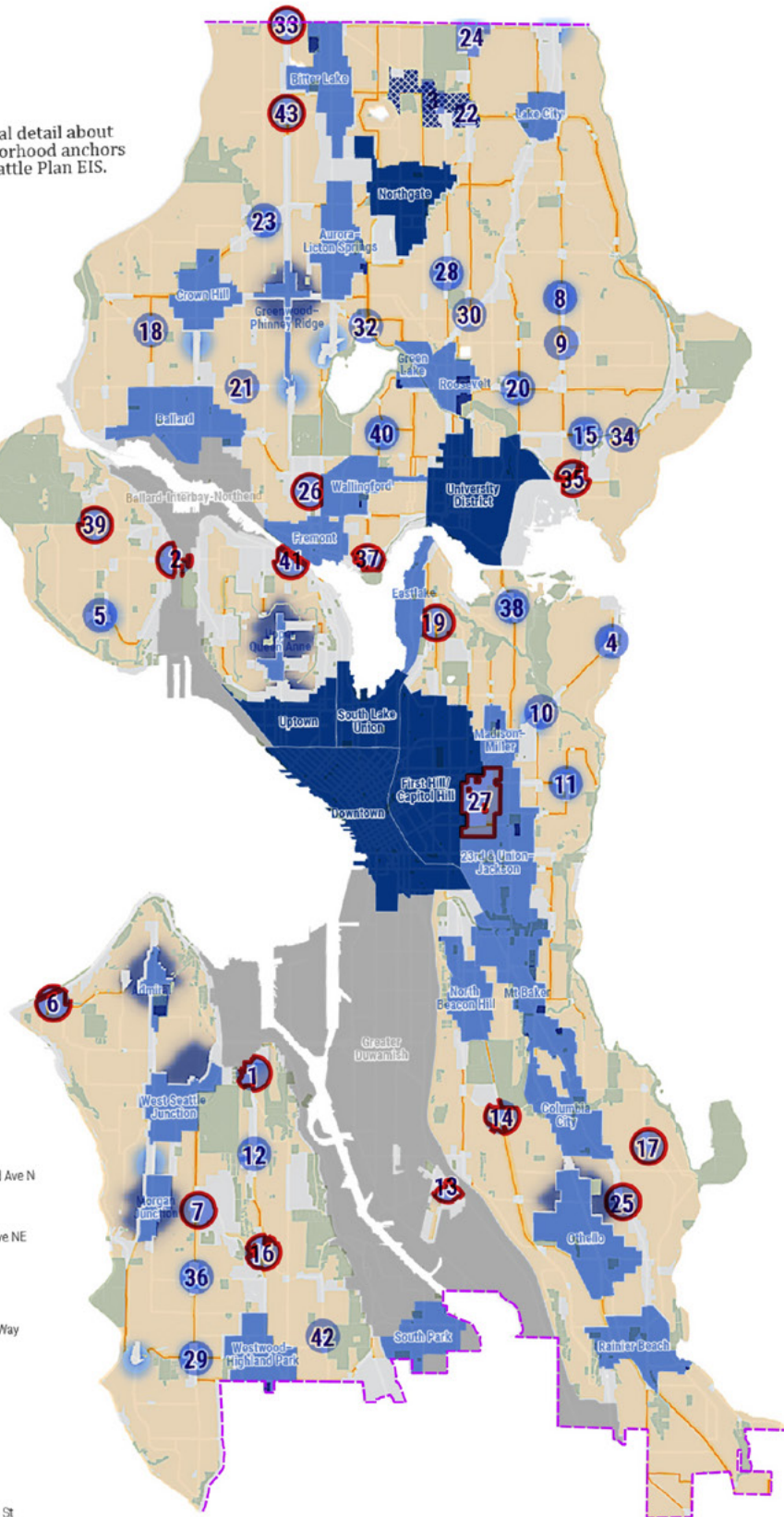
	Metro Growth Centers	Urban Growth Centers	Countywide Growth Centers
3. freight access	Yes	To be addressed in subarea plan	To be addressed in subarea plan
<b>PART 3: CENTER CRITERIA</b>			
A. Purpose			
1. Compatibility with VISION centers concept, Regional Growth Strategy and Multicounty Planning Policies	Yes	Yes	Yes
B. Activity level/Zoning <sup>20</sup>			
1. existing activity <sup>21</sup>	60 activity unit density	30 activity unit density (AUs refer to combined jobs and population) 60 activity unit density	18 activity unit density
2. planned activity	Above 120 activity unit density	60 activity unit density	30 activity unit density
3. sufficient zoned capacity	Yes. Should be higher than target and supports a compact, complete, and mature urban form.	Yes. Should be higher than target.	Should have capacity and be planning for additional growth
4. planning mix of housing types and employment types	Planning for at least 15% residential and 15% employment activity	Planning for at least 15% residential and 15% employment activity	Planning for at least 20% residential and 20% employment, unless unique circumstances make these percentages not possible to achieve.
C. Geographic Size			
1. minimum size	320 acres	200 acres	160 acres
2. maximum size	640 acres (larger if internal HCT)	640 acres (larger if internal HCT)	500 acres
D. Transit			

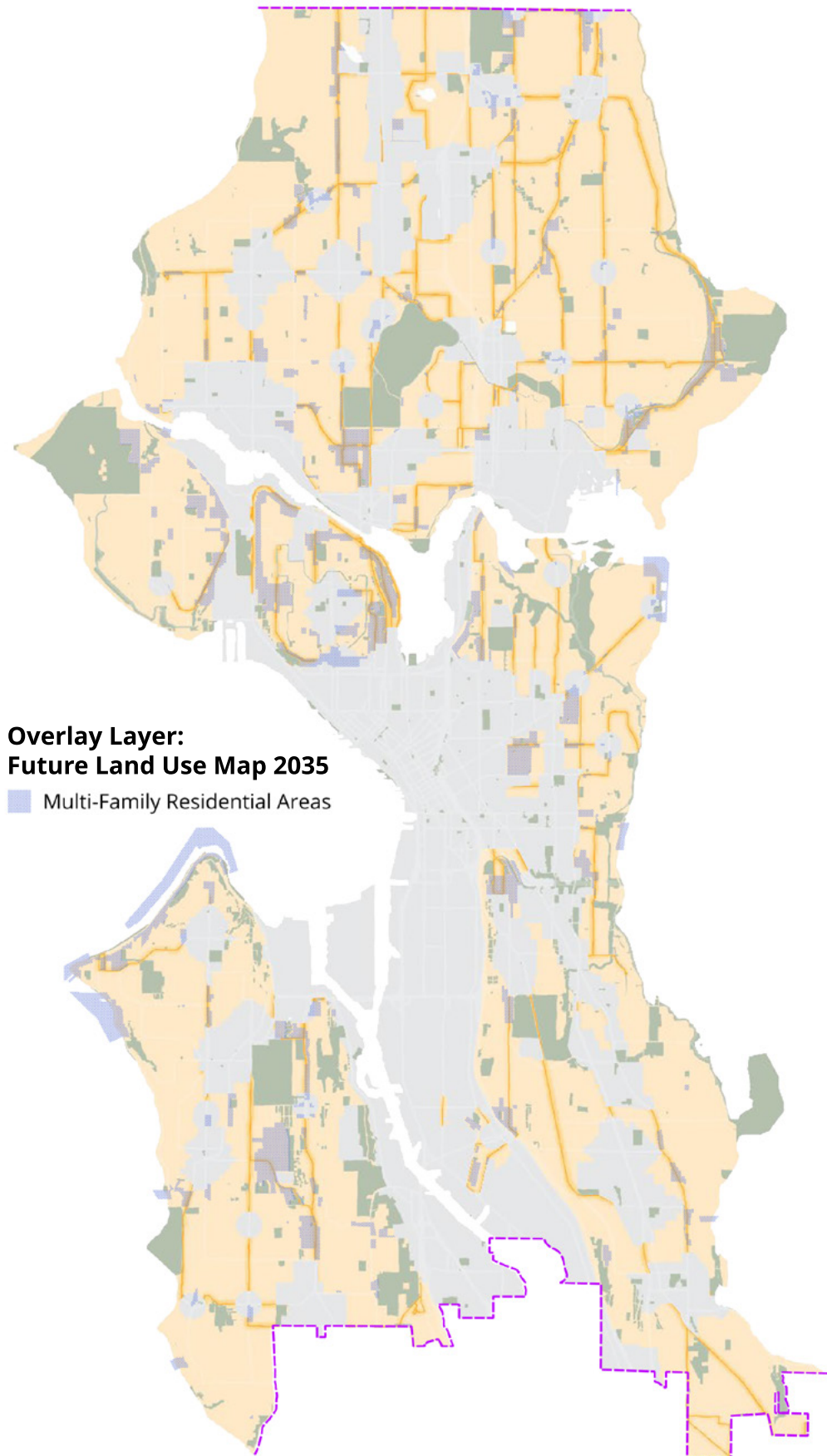
20 PSRC's 2015 Guidance on Transit-Supportive Densities and Land Uses cites an optimal level of 56-116 activity units per acre to support light rail, depending on transit costs per mile. The guidance indicates an optimal threshold of at least 17 activity units per acre to support bus rapid transit. Note: the existing threshold in the CPDs is roughly equivalent to 85 AUs existing activity for King County Urban Centers.  
 21 For existing centers, not meeting existing activity unit thresholds is not grounds for de-designation or re-designation by the Growth Management Planning Council.

## Alternative 2 Focused

This map provides additional detail about location of potential neighborhood anchors being studied in the One Seattle Plan EIS.

- 1 **North Delridge / Youngstown**  
Delridge Way SW & SW Dakota St
- 2 **Interbay / Dravus**  
W Dravus St & 24th Ave W
- 3 **NE 130th Street**  
NE 130th St & NE Roosevelt Way
- 4 **Madison Park**  
E Madison St & 42nd Ave E
- 5 **Magnolia**  
33rd Ave W & W McGraw St
- 6 **Alki**  
SW Stevens St & 61st Ave SW
- 7 **High Point**  
35th Ave SW & SW Morgan St
- 8 **Wedgwood (85th)**  
35th Ave NE & NE 85th St
- 9 **Wedgwood (75th)**  
35th Ave NE & NE 75th St
- 10 **Madison Valley**  
E Madison St & 29th Ave E
- 11 **Madrona**  
E Union St & 34th Ave
- 12 **Brandon Junction**  
Delridge Way SW & SW Brandon St
- 13 **Georgetown**  
12th Ave S & S Harney St
- 14 **South Beacon Hill**  
Beacon Ave S & S Columbia Way
- 15 **Bryant**  
NE 55th St & 40th Ave NE
- 16 **Sylvan Junction**  
Delridge Way SW & SW Orchard St
- 17 **Dawson / Seward Park**  
Wilson Ave S & S Dawson St
- 18 **Loyal Heights**  
NW 77th & 24th Ave NW
- 19 **Roanoko Park**  
10th Ave E & E Boston St
- 20 **Ravenna**  
NE 65th St & 25th Ave NE
- 21 **West Phinney Ridge**  
NW 65th St & 8th Ave NW
- 22 **Pinehurst**  
NE 125th St & 15th Ave NE
- 23 **Holman Road**  
Holman Rd NW & 3rd Ave NW
- 24 **15th & 145th**  
15th Ave NE & NE 145th St
- 25 **Rainier & Graham**  
Rainier Ave S & S Graham St
- 26 **Upper Fremont**  
Fremont Ave N & N 43rd St
- 27 **Squire Park**  
E Marion St & 18th Ave
- 28 **Maple Leaf**  
Roosevelt Way NE & NE 90th St
- 29 **Fauntleroy**  
35th Ave SW & SW Barton St
- 30 **Lake City Way**  
Lake City Way and 15th Ave NE
- 32 **North Green Lake**  
E Green Lake Dr N and Wallingford Ave N
- 33 **Greenwood & 145th**  
Greenwood Ave N & N 145th St
- 34 **Windermere**  
Sand Point Way NE & Princeton Ave NE
- 35 **Sand Point Way**  
NE 45th St & 38th Ave NE
- 36 **Gatewood**  
35th Ave SW & SW Holden St
- 37 **Gas Works**  
Wallingford Ave N & N Northlake Way
- 38 **Montlake**  
24th Ave E & E Calhoun St
- 39 **North Magnolia**  
34th Ave W & W Emerson St
- 40 **Tangletown**  
Keystone Pl N and N 56th St
- 41 **Nickerson**  
Nickerson St and Warren Ave N
- 42 **Highland Park**  
9th Ave SW and SW Trenton St
- 43 **Broadview**  
Greenwood Ave N and NW 125th St







# Identifying Potentially Development-Threatened Tree Canopy in Environmental Justice Priority Areas

Draft April 8, 2024

Joshua Morris, Urban Conservation Manager at Birds Connect Seattle

Email: joshm@birdsconnectsea.org

## INTRO

Environmental Justice priority areas in Seattle are census tracts with Racial and Social Equity Index scores that fall within the two highest quintiles.

These communities tend to have lower overall tree canopy cover than whiter and wealthier neighborhoods (2016 Seattle Tree Canopy Assessment) and have experienced higher rates of tree canopy loss in recent years (2021 Seattle Tree Canopy Assessment). Given the important role trees play in community and climate resilience and the benefits they provide to mental and physical health, working with EJ communities to preserve and enhance tree canopy should be a priority for the City.

At the same time, increased demand for housing is driving land use changes and infill development. Parcels on which development occur experience significant canopy loss, 40% on average according to the 2021 Seattle Tree Canopy Cover Assessment.

The City uses Zoned Development Capacity models to identify parcels where redevelopment could occur to increase housing density. These parcels have fewer housing units than would be allowed under their current zoning class. These parcels also often support a significant number of established trees.

In Lowrise, Midrise, Commercial, and Seattle Mixed Zones, development footprint may occupy 85-100% of the lot area, and tree removal in downtown and industrial zones is not regulated under the tree protection ordinance. Trees in these zones on revdevelopable lots, then, are potentially highly threatened by future development.

Understanding the distribution of development-threatened trees and planning to maximize their retention during development is important if the City is to meet its canopy equity goals.

## METHODS

**Analysis objective:** Find tree canopy in Environmental Justice Priority Areas and on private property on underdeveloped parcels in Lowrise, Midrise, Commercial, and Seattle Mixed zones, where 85-100 lot coverage allowed under the new tree protection ordinance, or on Downtown and Industrial zones which are “silent zones” not regulated by the tree protection ordinance.

## Datasets

Dataset	Source	Last Updated
Seattle_Tree_Canopy_2016_2021_RSE_Census_Tracts	<a href="https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::environmental-justice-priority-areas/about">https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::environmental-justice-priority-areas/about</a>	Jan 26, 2024
Tree_Canopy_2021_Seattle	<a href="https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::seattle-tree-canopy-2021/about">https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::seattle-tree-canopy-2021/about</a>	Jan 26, 2024
Zoned Development Capacity by Development Site Current	<a href="https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::zoned-development-capacity-by-development-site-current/about">https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::zoned-development-capacity-by-development-site-current/about</a>	Jan 27, 2024
Unofficial neighborhood boundaries	<a href="https://www.arcgis.com/home/item.html?id=8adffd6b8fba4a84966fa7471afd0d6c">https://www.arcgis.com/home/item.html?id=8adffd6b8fba4a84966fa7471afd0d6c</a>	Nov 29, 2023

### Defining and mapping development-threatened tree canopy procedure:

- Set definition query on Zoned Development Capacity Layer:  
 PUB\_OWN\_TY = 'PRIVATE' And (REDEVSTATU = 'REDEV' Or REDEVSTATU = 'VACANT') And (CLASS = 'MR' Or CLASS = 'C' Or CLASS = 'L' Or CLASS = 'NC' Or CLASS = 'SM' Or CLASS = 'D' Or CLASS = 'I')  
 Intersect tree canopy, EJ priority areas, and zoned development capacity layers called "Development Threatened Tree Canopy 2021 in EJ Priority Areas"
- Add new field to "Development Threatened Tree Canopy 2021 in EJ Priority Areas" called "DTTC\_Acres" (double).
- Calculate geometry of DTTC\_Acres  
 Property = Area (geodesic)  
 Area Unit = Acres  
 Coordinate system = default
- Intersect Development Threatened Tree Canopy 2021 in EJ Priority Areas with Neighborhoods layer. Call it DTTC\_Neighborhoods\_Intersect
- Add new field to "DTTC\_Neighborhoods\_Intersect" called "DTTC\_Hood\_Acres" (double).
- Calculate geometry of DTTC\_Hood\_Acres  
 Property = Area (geodesic)

Area Unit = Acres  
Coordinate system = default

#### Estimating street tree canopy contribution to DTTC

1. Dissolve DTTC\_Neighborhoods\_Intersect on "gridcode" field (=1 for all records). Default settings (create multipart features). Output aggregates the many thousands of DTTC canopy polygons into a single, multipart feature. Call it DTTC\_Dissolve
2. Create new point feature class using Create Random Points tool. Constrain the output to DTTC\_Dissolve, create 500 points. Output is 500 random points distributed within the boundaries of DTTC\_Dissolve. Call new feature class "Random\_Point\_Assessment"
3. Create new field in Random\_Point\_Assessment called "Street\_Tree" (short, numeric).
4. Set basemap to satellite imagery.
5. Zoom to each random point to determine if the canopy it is associated with is from a tree planted in the public right of way or is rooted on private property. If street tree, assign value "1", else "0"
6. Where determination cannot be made from satellite imagery, use Google Street View.
7. Where determination is uncertain, assume street tree and assign value "1".

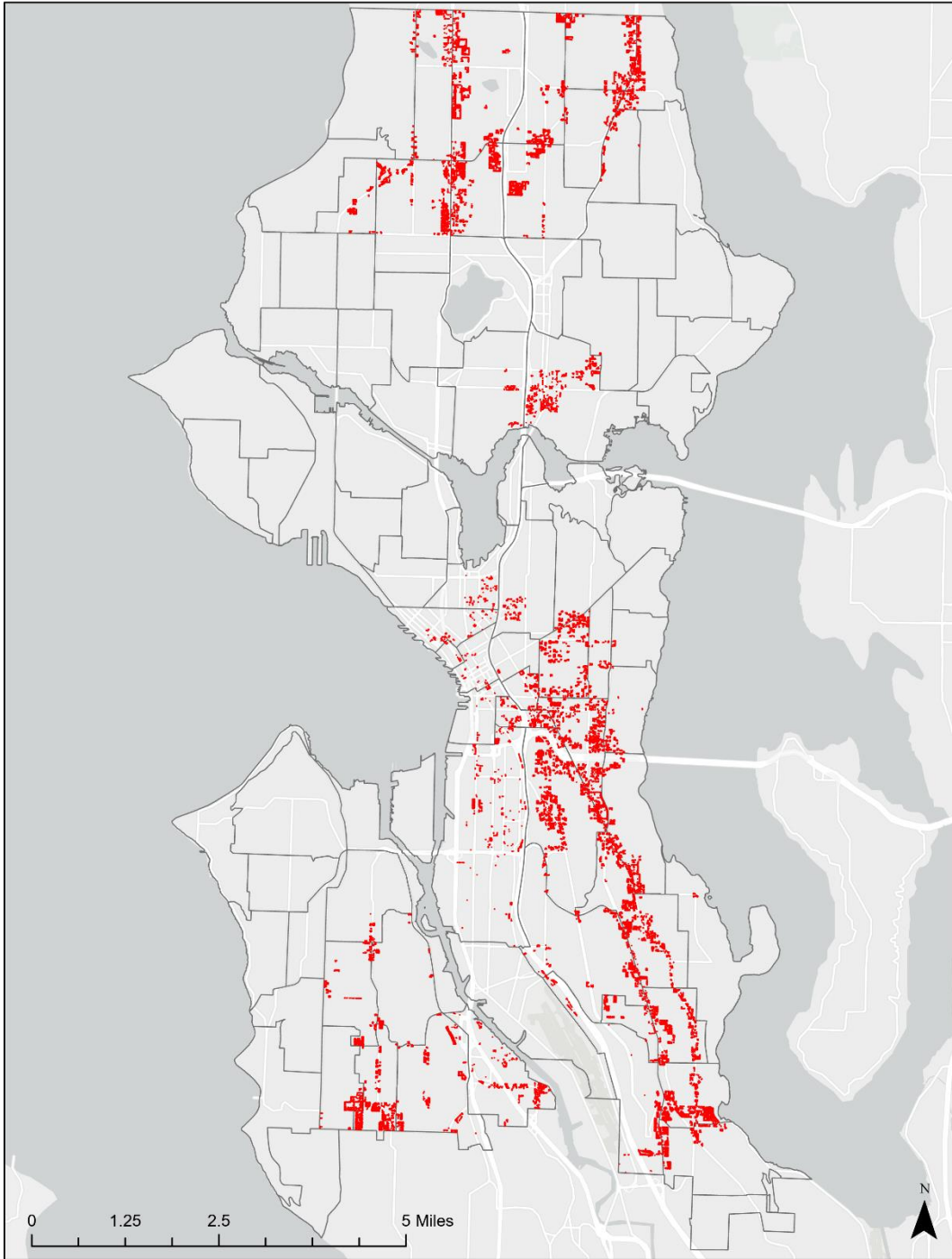
## RESULTS

There is a total of 226.7 acres of tree canopy overhanging redevelopable parcels in EJ priority areas. Some of this tree canopy is contributed by street tree canopy spreading from the right of way over private property. Street trees are governed by different regulations than trees on private property and are not the focus of this analysis.

Of a random assessment of 500 points within tree canopy on redevelopable parcels in EJ priority areas, 33 were determined to fall within tree canopy contributed by street trees. I estimate the mean canopy contribution from street trees to be 6.6% (95% Confidence Interval 4.4% to 8.8%).

**Therefore, I estimate there are between 207 to 217 acres of development-threatened tree canopy on private property in Environmental Justice Priority Areas.**

**Map of distribution of development-threatened tree canopy in EJ Priority Areas (red) with unofficial neighborhood outlines.**



19-1  
cont

## Results by neighborhood

Neighborhood	Acres of Development-threatened Tree Canopy in EJ Priority Areas		
	Mean Estimate	Lower 95% CI Estimate	Upper 95% CI Estimate
North Beacon Hill	15.60	15.24	15.97
Atlantic	13.92	13.59	14.25
Columbia City	13.86	13.53	14.18
Dunlap	13.79	13.46	14.11
Haller Lake	11.36	11.10	11.63
Rainier Beach	11.13	10.87	11.39
North College Park	9.00	8.79	9.21
South Delridge	8.80	8.59	9.01
Greenwood	7.79	7.60	7.97
Brighton	7.74	7.56	7.92
Minor	7.47	7.29	7.65
South Beacon Hill	7.42	7.24	7.59
Highland Park	7.23	7.06	7.40
Olympic Hills	6.44	6.28	6.59
Mid-Beacon Hill	6.18	6.03	6.32
Maple Leaf	5.91	5.77	6.05
Pinehurst	5.46	5.33	5.58
University District	5.41	5.28	5.54
Cedar Park	5.14	5.02	5.26
Mount Baker	4.97	4.85	5.08
High Point	4.20	4.10	4.30
South Park	3.65	3.56	3.73
Industrial District	3.06	2.99	3.13
Meadowbrook	2.88	2.81	2.94
Bitter Lake	2.69	2.63	2.75
Riverview	2.66	2.60	2.72
International District	2.40	2.35	2.46
Roxhill	2.06	2.01	2.11
Crown Hill	1.68	1.64	1.72
Yesler Terrace	1.53	1.49	1.56
Victory Heights	1.34	1.31	1.37
Leschi	1.29	1.26	1.32
Stevens	1.26	1.23	1.29
Broadway	0.94	0.92	0.96
Holly Park	0.91	0.89	0.93
Mann	0.83	0.81	0.84
Broadview	0.80	0.78	0.82

Wallingford	0.73	0.71	0.75
South Lake Union	0.56	0.55	0.57
North Delridge	0.48	0.47	0.49
Belltown	0.41	0.40	0.42
Pioneer Square	0.22	0.21	0.22
Madrona	0.18	0.17	0.18
Seward Park	0.10	0.10	0.10
Central Business District	0.08	0.07	0.08
First Hill	0.06	0.05	0.06
Ravenna	0.05	0.05	0.05
Pike-Market	0.03	0.03	0.03
<b>TOTAL</b>	<b>211.65</b>	<b>206.66</b>	<b>216.63</b>

**Results by zone class**

Zone Class	Acres of Development Threatened Canopy in EJ Priority Areas		
	Mean Estimate	Lower 95% CI Estimate	Upper 95% Estimate
Lowrise	100.23	97.87	102.59
Neighborhood Commercial	47.33	46.21	48.44
Commercial	26.46	25.84	27.08
Industrial	14.04	13.71	14.37
Midrise	11.20	10.94	11.46
Seattle Mixed	8.78	8.58	8.99
Downtown	3.60	3.52	3.68
<b>TOTAL</b>	<b>211.65</b>	<b>206.66</b>	<b>216.63</b>

**From:** [Josh Morris](#)  
**To:** [PCD CompPlan EIS](#); [PCD OneSeattleCompPlan](#)  
**Cc:** [Claire Catania](#); [Christine Scheele](#); [ConCom](#)  
**Subject:** Birds Connect Seattle comments on draft One Seattle Plan and DEIS  
**Date:** Monday, May 6, 2024 4:45:43 PM  
**Attachments:** [image003.png](#)  
[FINAL BCS Comments Draft 2024 Comprehensive Plan Update and DEIS.pdf](#)

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**CAUTION: External Email**

Dear Department of Planning and Community Development,

Please find Birds Connect Seattle’s feedback and recommendations on the draft One Seattle Plan DEIS attached. **Comments on the DEIS begin on page 11.**

Please let me know if you have any questions or would be interested in discussing.

Sincerely,

**Joshua Morris**  
Urban Conservation Manager  
pronouns: [he/him](#)  
desk: (206) 523-8243 ext. 113  
[joshm@birdsconnectsea.org](mailto:joshm@birdsconnectsea.org)

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8050 35<sup>th</sup> Ave NE Seattle, WA 98115 | [birdsconnectsea.org](http://birdsconnectsea.org)  
Birds Connect Seattle, formerly Seattle Audubon, advocates and organizes for cities where people and birds thrive. [Join us!](#)

Found a dead or injured bird? Submit a report at [dbird.org](http://dbird.org).



# BIRDS CONNECT SEATTLE

May 6, 2024

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Ave  
Seattle, WA 98104

*Submitted via email to [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov) & [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)*

**RE: Birds Connect Seattle comments on One Seattle Plan (Comprehensive Plan Update) draft for public review**

Dear Office of Planning and Community Development,

Hello from Birds Connect Seattle, Seattle's local bird conservation organization since 1916. We envision cities that value and integrate nature, protect habitat, and minimize hazards to birds. The draft One Seattle Plan is an exciting, once-in-a-decade opportunity for Seattle to evaluate and improve its progress toward a just city where people and birds can thrive.

**High-level summary of our comments on the draft One Seattle Plan:**

We appreciate and recommend maintaining these sections, goals, and policies specifically:

- Integration of climate mitigation, adaptation, and resilience throughout the plan;
- Incorporation of landscaping techniques to improve environmental health (e.g., LU 2.6)
- Planning for green jobs and a sustainable economy (e.g., ED G7)
- Greater integration of tree canopy policies throughout the plan (e.g., LU 2.7, LU 4.8,
- Addition of nature-based solutions and ecological restoration as important tools for addressing climate impacts and environmental hazards (e.g., CE 10.3, CE 10.4, CE 11.2, CE 11.4);
- Addition of goals and policies for Tribal consultation and supporting Indigenous communities. (e.g., CI G4 and related policies; CE 13.7, CE 14.3, P 4.6)
- Consideration for wildlife and nature appreciation in parks and recreation planning (e.g., PG3, P 1.13, P 2.4)

**We recommend strengthening the draft One Seattle Plan by:**

- Acknowledging the global extinction crisis and establishing equitable biodiversity conservation as a goal;
- Integrating and increasing ambition and specificity of goals and policies related to biodiversity conservation throughout the plan; and
- Expanding conception and expectations of sustainable operations and building design to include wildlife safety.

Please see our specific feedback and recommendations on the following pages. **Note: DEIS comments begin on page 11.**

20-1



Our specific observations, feedback, and recommendations on the draft One Seattle Plan are:

**OBSERVATION 1. The draft One Seattle Plan does not acknowledge that we are in the midst of a global extinction crisis on the same scale as climate change.** Both crises pose existential threats to human futures and must be urgently addressed together. Goals and policies for holistic stewardship of Seattle’s urban biodiversity are entirely absent from the draft Comprehensive Plan.

While the draft update reflects the City’s evolving and improving understanding and responsibility for managing for and mitigating impacts of climate change, it does not reflect a similar understanding of the City’s role in addressing biodiversity loss.

**RECOMMENDATION 1: Revise the “Climate and Sustainability” element to become the “Climate, Biodiversity, and Sustainability” element.**

We recommend elevating and integrating biodiversity conservation in the same way climate change has been elevated and integrated. We recommend adding “Biodiversity” in the element title and adding a new “Equitable Biodiversity Conservation” section, with discussion, goal, and policies. We submit the following draft language for your consideration:

### **EQUITABLE BIODIVERSITY CONSERVATION**

#### **DISCUSSION**

##### **Seattle’s biodiversity provides services and benefits to people.**

We love living and working in Seattle. The landscape is beautiful. The culture is vibrant. And the diversity of life we can experience every day is wild. Orca off Alki, Bald Eagles over Ballard, Long-toed Salamanders at Camp Long, our neighborhoods and waterways are peopled with more than people: at least 3,000 species of plants, fungi, birds, and other wildlife have been documented to-date within Seattle’s municipal boundaries (iNaturalist Community, 2024).

The plants, fungi, and animals we share our neighborhoods with make up our urban biodiversity. This biodiversity underpins the function of our urban ecosystem and provides foundational services to the people who live in and visit Seattle—including food production, air purification, pest control, reduced need for cooling and heating, opportunities for recreation, and more. Nature also promotes human health and wellbeing (see Hartig et al., 2014 for a review).

For many of us in Seattle, our daily contact with nature occurs right in our neighborhoods. The degree to which the nature of our neighborhoods can provide us with physical and psychological benefits depends on many attributes, including location, tree canopy, general quality, and amenities like bathrooms and benches (Konijnendijk et al., 2013). Experiences in environments with higher levels of biodiversity also play a role in reducing stress and promoting feelings of restoration and wellbeing (Fuller et al., 2007; Wood et al., 2018, Schebella et al., 2019, Houlden, Jani & Hong, 2021, Hammoud et al. 2024).

##### **The benefits of Seattle’s biodiversity are not equitably distributed and may be declining.**

The benefits of nature, biodiversity, and ecosystem services are not equitably distributed across Seattle. Generally, more affluent neighborhoods and those with predominantly white residents have greater vegetation cover, tree canopy cover, and biodiversity (Schell et al., 2020). This did

not happen by accident. Redlining and other racist policies determined not only where people can live, work, and play, but also how vegetation is planted and maintained. This, in turn, affects the distribution and movement of other living things in the city. We have the opportunity and responsibility to address these inequities.

Like all ecosystems, cities change. In the last decade, we experienced the greatest average annual population growth since the Klondike Gold Rush. We've set new weather records for high temperatures, days without precipitation, and smoke storms. Our urban biodiversity is changing, too. Some species, like Yellow-faced Bumblebees are becoming more common. But populations of many others are in decline, including 52 percent of bird species that regularly occur in King County (Rosenburg et al., 2019, supplemental data). The capacity of Seattle's natural systems to support a wide diversity of life may be deteriorating.

We urgently need an integrated policy to halt both climate change and biodiversity loss. Climate change and biodiversity loss are the two most urgent environmental challenges of our times (Pörtner et al., 2021).

Biodiversity loss, which has potential consequences for humanity that rival climate change (Cardinale et al., 2012), yet has received much less attention by the City of Seattle. We have no citywide strategy for managing biodiversity. We have no city ordinances or resolutions with "biodiversity loss" in the title. Our Climate Action Strategy does not reference biodiversity or wildlife. And while the current version of the Comprehensive Plan (November 2020) contains goals and policies for protecting and restoring the natural environment, biodiversity is not defined or used as a concept.

The scientific community is calling for decision makers to integrate climate change and biodiversity on policy agendas (Roberts, O'Leary & Hawkins, 2020; Pettorelli et al., 2021; Pörtner et al., 2021). With "environmental stewardship" as a core value of the 2024 Comprehensive Plan update, the City of Seattle intends to begin building an integrative policy framework for addressing both climate change and biodiversity loss.

## **GOAL**

Seattle's biodiversity is valued, conserved, restored, and wisely used, maintaining ecosystem services, sustaining healthy ecosystems, and delivering benefits essential for all people. (Adapted from Secretariat of the Convention on Biological Diversity, 2020)

## **POLICIES**

1. Recognize, fund, and support Indigenous-led environmental conservation and nature stewardship.
2. Fund and support learning-focused urban experiments with Indigenous communities for climate action, nature stewardship, and appreciation.
3. Integrate biodiversity values into planning processes and reporting systems.
4. Aggressively seek new financing mechanisms for conservation, natural space management, urban forestry, etc.
5. Ensure equity in actions to address climate change, biodiversity loss, and the use of benefits of biodiversity, including:

- Accounting for the needs of children, youth, and future generations.
  - Sharing the benefits and burdens of biodiversity in a way that is equitable, transparent, and accountable.
  - Collaborating with communities to co-create and implement plans for climate action and biodiversity conservation that are in accessible languages, provide for public participation, and that prioritize removing the barriers faced by Black, Indigenous, and People of Color, children, people with disabilities, and other systemically under-resourced people.
6. Protect, maintain, and enhance biodiversity in natural areas, parks, and open spaces.
  7. Explicitly plan for open spaces and natural habitats during new development.
  8. Use a variety of arrangements of built and open space to meet a diversity of ecological requirements.
  9. Encourage enhancement of habitat quality within the entire matrix of urban land uses, including private property.
  10. Reduce urban hazards to biodiversity, including pesticides, reflective glass, plastic pollution, and from harmful impacts of human-associated species like free-ranging, outdoor cats.
  11. Embrace the novelty of urban habitats and species composition to create ecosystems that meet the needs of people, biodiversity, and are adaptive to climate change.
  12. Celebrate urban biodiversity to foster connections between people and the natural heritage of their local ecosystems.
  13. Determine the status and trends of biodiversity within Seattle's jurisdiction, including:
    - Documenting the richness and distribution of currently existing biodiversity.
    - Identifying rare or limited habitat types, such as native prairies, oak woodlands, bogs and other wetlands, intertidal and marine habitats, etc.
    - Identifying existing and potential habitat corridors that facilitate safe movement of organisms between natural areas, parks, open spaces, and other habitat areas.
    - Selecting established indicators of urban biodiversity, such as the City Biodiversity Index.
    - Monitoring and evaluating changes in Seattle's biodiversity indicators over time.
  13. Confront and address human-nature conflict in cities, including:
    - Examining both the services and disservices of biodiversity to understand how, when, where, and why urban biodiversity can be viewed as unpleasant, dangerous, or destructive.
    - Cataloging effective solutions to conflicts.
    - Planning, designing, and communicating to address conflicts or reduce fears.
  14. Create resilient landscapes by:
    - Considering the needs of biodiversity early in urban planning and development projects, rather than as "add-ons" if space or budget allow.
    - Monitoring and managing climate related impacts on biodiversity, including new pests and pathogens.
    - Testing and evaluating new designs of nature-based solutions across urban typologies, together with their financing models and policy mechanisms.
  15. Reconnect people with biodiversity in cities through community science and engagement programs.

16. Evaluate government-provided incentives and eliminate or reform those that are harmful to biodiversity.
17. Reform industrial, economic, and business practices to reduce negative impacts on biodiversity.
18. Encourage all people to take measurable steps toward just and sustainable consumption levels and lifestyles, taking into account individual, cultural, and socioeconomic conditions.

20-2  
cont

*[the above adapted from United Nations Environment Programme, 2021; Secretariat of the Convention on Biological Diversity, 2020; Marzluff & Rodewald, 2008; and Oke et al., 2021]*

**OBSERVATION 2:** Goals and policies for tree canopy, shorelines, environmentally critical areas, and other important urban habitat features are weak and lack solid foundation on which to evaluate progress or success.

**RECOMMENDATION 2:** Increase ambition and specificity of goals and policies related to urban biodiversity. Specific recommendations follow.

## LAND USE ELEMENT

### Urban Design

- **We recommend LU 2.1 be revised to read:** “Encourage the protection, restoration, and celebration of Seattle’s natural features and landforms such as bluffs, beaches, streams, and forests and trees.”

20-3

### Multifamily Zones

Development on multifamily zones takes a heavy toll on the trees that grow there. The 2021 Tree Canopy Assessment found that on average 50% of tree canopy was lost on multifamily lots that had undergone development. Multifamily zones also already tend to have less canopy cover and many of these zones are in Environmental Justice Priority Areas where tree canopy loss has been experienced disproportionately. The updated version of SMC 25.11 passed in 2023 allows developers to hardscape up to 85% of the developable lot area in multifamily zone, leaving little room for trees. Planning for tree preservation and planting in these zones is critical for meeting the city’s climate resilience and environmental equity goals.

- **We recommend revising policy LU 10.4 (p 48) to read:** “Design multifamily zones to be appealing residential communities with high-quality housing and development standards that promote livability and a sense of community, including equitable tree canopy, appropriately scaled landscaping, street amenities, and, in appropriate locations, limited commercial uses that serve the neighborhood’s residents.”

### Historic Preservation and Cultural Resources

The wild things we share our city with are links to Seattle’s past and important cultural resources. Yet the Historic Preservation and Cultural Resources section does not specifically identify natural heritage as a subject of preservation.

- **We recommend revising the first sentence of the discussion on page 58 to read:** “Historic preservation recognizes and protects aspects of our shared cultural heritage—buildings, districts, designed landscapes, natural features, and areas long used by Indigenous communities—that link to Seattle’s past.”
- **Add a policy under Goal LU G16 (p. 59) to read:** “Support the preservation and celebration of natural landscapes, features, and species, that contribute to Seattle’s unique sense of place and connect us to its past.”

20-3  
cont

### Environmentally Critical Areas

Regulations for environmentally critical areas should not just seek to protect ecological functions and values of wetlands and fish and wildlife conservation areas, they should also seek to *enhance* them. Our regulations should also protect the health and safety of both people and wildlife.

- **We recommend that LU G17 (pp. 60-61) be revised to read:**

“Environmentally critical areas regulations seek to:

  - protect and enhance the ecological functions and values of wetlands and fish and wildlife conservation areas;
  - prevent erosion on steep slopes;
  - protect public health, safety, and welfare in areas subject to landslides, liquefaction, floods, or peat settlement;
  - inform the public by identifying seismic and volcanic hazard areas; and
  - minimize harm to people, wildlife, property, public resources, or the environment”
- **We recommend adding a new policy under the Fish and Wildlife Conservation Areas section (p 62) to read:** “Seek to increase both the number and area of fish and wildlife conservation areas.”

## TRANSPORTATION ELEMENT

### Streets Designed for Everyone

Changing how we design and use the public right of way is an exciting opportunity to achieve multiple benefits—increased tree canopy, greater urban food production, improved access between parks for people, and increased wildlife supporting capacity in the city to name a few. Birds Connect Seattle and partners at the Capitol Hill EcoDistrict have been developing this concept for years through the Nature of Your Neighborhood Project (see [natureofyourneighborhood.org](http://natureofyourneighborhood.org)).

- **We recommend adding a new policy under goal TG 2 (p. 68) to read:** “Identify streets and other public rights-of-way that could potentially serve as corridors between parks and open spaces to prioritize vegetation and amenity enhancements to improve people’s access to public space and to facilitate movement of wildlife.”
- **We recommend revising policy T 2.17 (p. 69) to read:** “Create vibrant public spaces in and near the right-of-way that foster social interaction, promote access to walking,

20-4

bicycling, and transit options, [support birds and other wildlife](#), and enhance the public realm.

## ECONOMIC DEVELOPMENT ELEMENT

### Build and Invest in the Green Economy

We support living-wage green jobs and a just transition to a decarbonized economy.

- **We recommend revising policy ED 7.1 (p. 136) to read:** “Establish partnerships to build workforce capacity to advance completion of city-wide decarbonization and climate adaptation efforts, including through electrification, construction, conservation, [urban forestry](#), and other new green technology programs.”
- **We recommend revising policy ED 7.3 (p. 136) to read:** “Support business partnerships and models which are centered on climate mitigation, climate adaptation, [biodiversity conservation](#), and/or a shift toward sustainable operational models within established industries, including incubator and accelerator funding of new sustainable businesses.”

20-4  
cont

## CLIMATE AND ENVIRONMENT: HEALTHY RESILIENT COMMUNITIES AND ENVIRONMENT ELEMENT

### Tree Canopy

Trees are among the most important natural features in urban areas. But the urban forest is more than a tree canopy: it is a layered system including soil, understory plants, and the epiphytes that live on the trees themselves. Seattle’s urban forest is amazingly diverse (Jacobson 2006) and in decline (Seattle Office of Sustainability and Environment 2023). Additional investment and attention will be needed to reverse losses and address inequities.

- **We recommend revising the title of this section (p. 149) to read:** “[Urban Forest and Tree Canopy](#)”.
- CE G12 (p. 150) establishes a goal for tree canopy cover, but its ambition and specificity were reduced from that in our current plan. Why? We also question if determining the maximization of benefits of the urban forest is possible. **We therefore recommend revising CE G12 to read:** “Seattle has a healthy urban forest with a tree canopy that covers at least 30% of the land by [2037, and 40% over time](#), which [meets the needs of people and wildlife. \(\(maximizes the environmental, economic, social, and climate-related benefits of trees.\)\)](#)”
- **We recommend revising policy CE 12.1 (p. 150) to read:** “Consider [and prioritize](#) the needs of frontline communities in all urban forestry actions.”
- **We recommend revising policy CE 12.5 (p. 150) to read:** “Reach out to, educate, and partner with the community to help care for, [preserve, and celebrate](#) Seattle’s urban forest. ~~((and preserve our tree canopy.))~~”
- Care and maintenance for most street trees is the responsibility of the adjacent property owner. Tree care can be expensive, which creates disincentives for tree planting and preservation. This has contributed to the current inequity in tree canopy cover we observe across the city. **We therefore recommend adding a new policy under CE G12 (p. 150) to read:** “[Explore opportunities through subsidies or other](#)

mechanisms to reduce inequities and disincentives associated with the cost of tree care.”

- We need measurable goals to ensure we are delivering on canopy and nature access equity goals. We ask you to consider the 3-30-300 rule (Browning et al. 2023). **We recommend adding a new policy under CE G12 (p. 150) to read:** “Strive to equitably distribute the benefits of trees by advancing measurable policies such as the 3-30-300 rule: three (3) significant trees (at least 20’ wide crown) from their dwelling, have 30% tree canopy in their neighborhood, and live within 300 meters (3-4 blocks) of a high-quality green space.”

20-4  
cont

## PARKS AND OPEN SPACE ELEMENT

Seattle’s parks, open spaces, and natural areas are the city’s largest reservoirs of urban biodiversity, supporting thousands of species. Our urban biodiversity provides foundational services to people who live, work, and play in Seattle, and consideration for the needs of the biodiversity in our parks and open space must be considered as we plan for expanding public access to open space.

- **We recommend strengthening the final sentence to the first paragraph of the Parks and Open Space Introduction (p. 154):** “Open spaces also support an amazing diversity of life—thousands of species of plants and animals have been documented in Seattle’s natural areas. Our incredible urban biodiversity provides foundational ecosystem and cultural services that help make Seattle a great place to live. ((~~provide valuable wildlife and vegetation habitat that might otherwise be scarce in the city.~~))”

### Access to Public Space

Sea-level rise threatens Seattle’s beaches and other coastal habitats, especially since most of our shoreline is armored, which prevents habitats from transgressing inland in response to rising seas.

- **We recommend revising policy P1.14 (p. 157) to read:** “Provide sustainable public access to shorelines by improving shoreline street ends, applying shoreline regulations, ((~~and~~)) acquiring waterfront land, removing shoreline armoring, and restoring coastal habitat.”
- Human presence and non-consumptive recreation in natural areas can negatively impact wildlife (see Dertien et al. 2021 for a review). **We recommend revising policy P 1.12 (p. 157) to read:** “Provide areas to preserve or restore important natural or ecological features and only allow people to access these spaces by building or expanding trail systems through greenbelts and other natural areas if it will not diminish habitat quality or negatively impact wildlife.”
- Has the City of Seattle entered into agreement with local Tribes and Indigenous communities regarding the use of Indigenous ecological knowledge? If not, it may be inappropriate to attempt to integrate Indigenous ecological knowledge in open space design and interpretive elements. **We therefore recommend revising policy P 1.29 (p. 158) to read:** “Recognize and support Tribal leadership in conservation, restoration, and design of open space, plant selection, and interpretive elements.”

~~((Incorporate Indigenous ecological knowledge and culture in open space design, plant selection, and interpretive elements.))~~

### Recreation, Activation, and Programming

As an organization that organizes outdoor recreation and wildlife watching, we support responsible and respectful recreation, activation, and programming in Seattle’s green and open spaces. Our green spaces are home to thousands of species of plants, animals, and fungi, we need to be respectful of their needs as well. We would advise against promoting activities that could degrade habitat quality, especially near our limited natural area spaces.

- We recommend adding a new policy under Goal P G2 to read: “Consider the needs of biodiversity in Seattle’s parks and open spaces while developing recreation, activation, and programming, so that impacts may be minimized.”

### Climate Resilient Open Space

Our public open spaces will serve a key role in our city’s climate adaptation. Their relatively high tree canopy cover will reduce heat island impacts, manage stormwater, and improve air quality. They will serve as social spaces to build community cohesion. And they will provide respite and refuge from urban stressors. Our parks and green spaces may also serve as refugia for wildlife species in ways that we may not foresee (McDonnell 2013). Creating climate resilient open spaces is indeed an important goal.

- As Goal P G5 is written, it is unclear to us what is meant by “healthy environment”, why only shorelines are to be resilient, and how public spaces are meant to do the big job of mitigating the impacts of climate change. **We therefore recommend revising Goal P G5 to read:** “Public spaces meet community needs, maintain ecosystem functions and support healthy levels of biodiversity, and are resilient to and help ~~((support a healthy environment and resilient shorelines and))~~ mitigate the impacts of climate change.”
- **We recommend adding a new policy to under Goal P G5 (p. 162) to read:** “Promote removal of shoreline armoring, coastal restoration, and managed retreat of structures away from areas at high risk of erosion, flooding or submersion due to sea-level rise.”
- **We recommend adding a new policy under Goal P G5 to read:** “Assess vulnerability of Seattle parks—including park access, facilities, habitats, and wildlife—to climate change and develop proactive plans to manage for resilience.”

**Observation 3:** Sustainable Design and Construction discussions do not reflect current understanding of the hazards to wildlife posed by built environment. Buildings that maximize use of natural light often incorporate large areas of reflective or transparent glass, which can have the unintended consequence of increasing risk of bird-window collisions unless the surface of the glass has been treated to be visible to birds. Birds Connect Seattle estimates that at least 40,000



wild birds die each year in Seattle due to bird window collisions (Birds Connect Seattle, 2024). Artificial light at night is also a serious environmental and public health concern.

**RECOMMENDATION 3:** Expand conception and expectations of sustainable buildings and City operations to include wildlife safety.

## LAND USE ELEMENT

### Urban Design

- **We recommend revising LU 2.3 (p. 37) to read:** “Encourage design that recognizes natural systems, ~~((and))~~ integrates ecological functions such as stormwater filtration or retention, increases the wildlife supporting capacity of our city by improving habitat resources, and that reduces hazards to wildlife from the built environment.”
- **We recommend revising LU 2.14 (p. 38) to read:** “Consider the value of designing buildings and public spaces that maximize use of natural light and provide protection from inclement weather while also considering how to mitigate potential hazards to wildlife from such designs.”

20-5

### General Development Standards

- **We recommend revising Goal LU G4 (p. 40) to read:** “Development standards effectively guide building design to serve each zone’s function; produce the scale and building forms desired; protect public health, safety, and welfare; minimize hazards to wildlife and the environment; and address the need for new housing and commercial space.
- **We recommend revising policy LU 4.18 (p. 42) to read:** “Seek excellence in new development through a design review process that encourages multiple perspectives on design issues and that complements development regulations, allowing for flexibility in the application of development standards to achieve quality design that:
  - enhances the design quality of the city;
  - responds to the surrounding neighborhood context, including historic resources;
  - enhances and protects wildlife and the natural environment;
  - allows for variety and creativity in building design and site planning;
  - furthers community design objectives;
  - achieves desired intensities of development; and
  - responds to the increasingly diverse social and cultural character of the city.”

### Telecommunication Facilities

Collisions with telecommunication towers kill millions of wild birds each year in the US (Loss et al. 2015). The risk can be substantially reduced by swapping steady-burning lights on towers for flashing lights (Gehring 2009).

- We recommend adding a new policy under goal LU G7 (p. 45) to read: “Require communication utilities to be developed and operated in ways that minimize hazards to wildlife and limit impacts on the environment.”

Capital Facilities

- **We recommend including “wildlife safety” in goal CF G2 (p. 111) so that it reads:** “Capital facility projects are designed to achieve resiliency, sustainability, wildlife safety, high levels of environmental performance, zero carbon pollution, and minimal environmental impacts consistent with principles of environmental justice.”
- **We recommend adding a new policy under goal CF G2 to read:** “Support City of Seattle biodiversity stewardship goals by employing design and operational strategies that reduce the risk of bird-window collisions.”

Public School Facilities

Educational buildings often have many design characteristics that increase the risk of bird-window collisions, such as large surface area of reflective / transparent glass, and proximity to quality habitat. We encourage the city to consider how it can reduce this risk at public schools.

- We recommend revising policy CF 6.8 (p. 118) to read: “Encourage SPS to preserve and improve open space and to reduce hazards to wildlife when redeveloping school sites.”

20-5  
cont

**PARKS AND OPEN SPACE ELEMENT**

Operations and Maintenance

We appreciate Goal P G3 (p. 160) and would like to see it maintained in the final draft. However, we notice that hazards to wildlife from public space operations are not considered.

- **We recommend adding a new policy under P G3 to read:** “Evaluate and adjust open space operations and management practices to reduce hazards to wildlife.”

**Birds Connect Seattle submits the following critiques and recommendations on the draft Environmental Impact Statement:**

**CRITIQUE 1**

On page 3.3-2, the DEIS establishes the following threshold of significance for plants and animals:

- Impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild, compared to the No Action alternative;

This threshold of significance is vague, not ecologically meaningful, and not set at appropriate scale to reasonably evaluate impacts.

**RECOMMENDATION, RATIONALE, & SUPPORTING EVIDENCE 1**

**We recommend establishing the threshold of significance for plants and animals as**

- **Impacts that would reduce the likelihood that locally occurring populations of native or naturalized species would persist compared to the No Action alternative.**

20-6

The impacts of Seattle’s growth strategy will be most acutely experienced by the plant and animal communities within Seattle’s boundaries. A regional or global unit of analysis, as proposed in the

DEIS, is inappropriately large and does not serve as a meaningful threshold of significance against which to evaluate alternative growth strategies.

At such a scale, impacts on many, but not all, of our plants and animals may indeed appear negligible. (There are more rare, sensitive, and imperiled species within city boundaries than described in the DEIS; see later section.) However, it is likely, as has occurred many times in Seattle's history already, that species that currently maintain natural populations in Seattle will be locally extirpated without consideration and mitigation for the impacts of the city's growth.

For example, the Northwestern Pond Turtle's historic range extended from California into British Columbia. They are now rare or absent around the entire Puget Sound region, there have been no observations in Seattle for decades (Washington Herp Atlas 2009; iNaturalist Community 2024). Similar stories could be told for dozens of other organisms.

There are several species still present but on the cusp of local extirpation in Seattle. For example, Western Screech-owls, once relatively common year-round residents in Seattle, are almost gone (Figure 1). Marbled Murrelets still visit Elliott Bay and other marine habitats off the coast of Seattle, but their numbers have dropped so precipitously (Figure 2) over the last few decades they are now Endangered in the State of Washington.

20-6  
cont

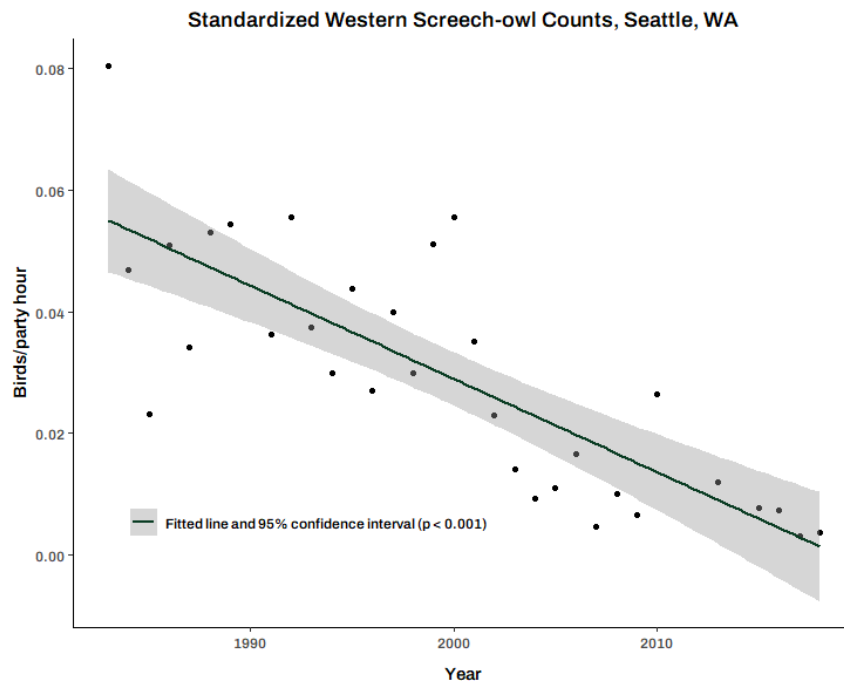


Figure 1: Number of Western Screech-owls counted each winter in Seattle, Washington, as part of the National Audubon Society's Christmas Bird Count. Counts are standardized by observer effort, which varies annually, by dividing the total number of birds counted by total observation time (party hours). Christmas Bird Count observations of Western Screech-owls have been declining since the 1980s. A simple linear model of Birds/party hour around scaled year is statistically significant ( $p < 0.001$ ) with a regression coefficient of  $-0.016$ .

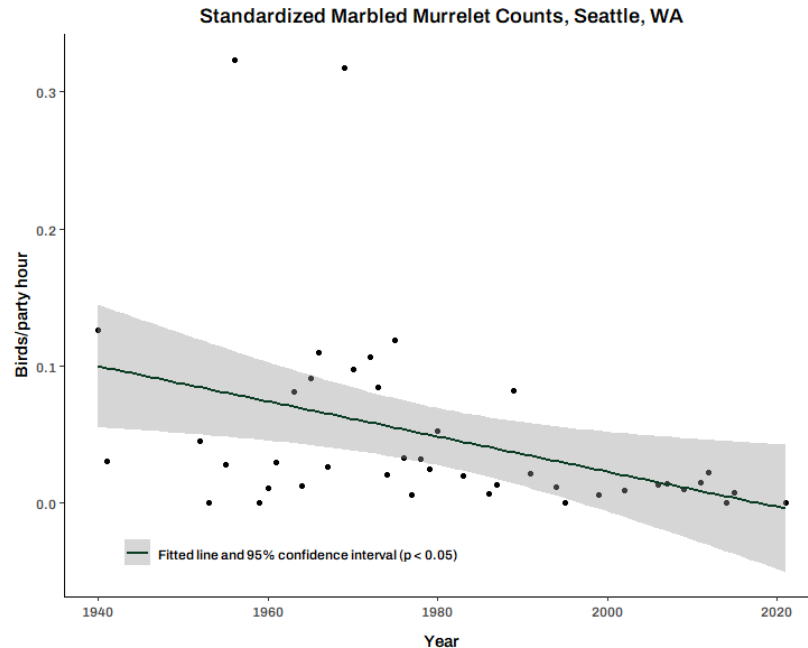


Figure 2: Number of Marbled Murrelets counted each winter in Seattle, Washington, as part of the National Audubon Society's Christmas Bird Count. Counts are standardized by observer effort, which varies annually, by dividing the total number of birds counted by total observation time (party hours). Christmas Bird Count observations of Marbled Murrelets have been declining for decades. A simple linear model of Birds/party hour around scaled year is statistically significant ( $p = 0.01$ ) with a regression coefficient of  $-0.027$ .

Many more species that occur in Seattle have populations in overall population decline. **We recommend the final DEIS incorporate analyses of impacts to species in decline. Supplemental data from Rosenberg et al. 2019 may be useful for estimates of North American bird species population trends.**

Urban biodiversity provides foundational services and benefits to people, so potential significant losses of local populations—those occurring within city boundaries—must be evaluated and mitigated. The final EIS analysis should include the consideration of developing and adopting a biodiversity conservation strategy as a form of mitigation as some other cities already have done (see Toronto City Planning and Parks 2019).

This improved threshold of significance and expanded scope of analysis would allow a more meaningful examination of urbanization's impacts within city limits and species and habitats that are still considered common but whose global or local populations are in decline.

## CRITIQUE 2

On page 3.3-3, the DEIS states, "The plant and animal species found in Seattle are widespread in the region; some are globally abundant. Areas in the city limits represent a very small proportion of the total amount of habitat for any given species. The only ESA-listed or state-listed species are fish (steelhead and Chinook salmon).

This broad generalization is not factual. It fails to acknowledge two additional listed species (Southern Resident Orca and Marbled Murrelet) that use the waters adjacent to Seattle and over which it has jurisdiction and one candidate species for listing (Sunflower Sea Star). The

statement also fails to consider the range of rare, sensitive, and imperiled species and habitat types that occur in Seattle and its adjacent waters and how species populations are trending.

**RECOMMENDATION, RATIONALE & SUPPORTING EVIDENCE 2**

**We recommend updating the DEIS discussion and analyses to reflect true occurrence information about rare, sensitive, and imperiled species and habitat types.**

Common Name	Federal Conservation Status	Washington State Conservation Status	Occurs in Seattle
Southern Resident Orca	Endangered		Yes
Marbled Murrelet	Threatened		Yes
Sunflower Sea Star	Candidate		Yes
Oregon White Oak Woodland		Critically Imperiled	Yes
Old-growth Lowland Conifer Forest		Imperiled	Yes

20-6  
cont

RCW 35.21.160 establishes Seattle’s jurisdiction over its adjacent waters:

**Jurisdiction over adjacent waters.**

The powers and jurisdiction of all incorporated cities and towns of the state having their boundaries or any part thereof adjacent to or fronting on any bay or bays, lake or lakes, sound or sounds, river or rivers, or other navigable waters are hereby extended into and over such waters and over any tidelands intervening between any such boundary and any such waters to the middle of such bays, sounds, lakes, rivers, or other waters in every manner and for every purpose that such powers and jurisdiction could be exercised if the waters were within the city or town limits. In calculating the area of any town for the purpose of determining compliance with the limitation on the area of a town prescribed by RCW [35.21.010](#), the area over which jurisdiction is conferred by this section shall not be included.

Given the jurisdiction of adjacent waters established by RCW 35.21.160, Seattle is responsible for analyzing impacts of its growth on adjacent marine and aquatic species and habitats in Puget Sound and Lake Washington.

The Southern Resident Orca population is federally protected as Endangered under the Endangered Species Act. The municipal waters of Puget Sound to the west of Seattle are a hotspot for the endangered Southern Resident Orca (Olson et al. 2018, Figure 3). The DEIS should include analysis of impacts on this protected population.

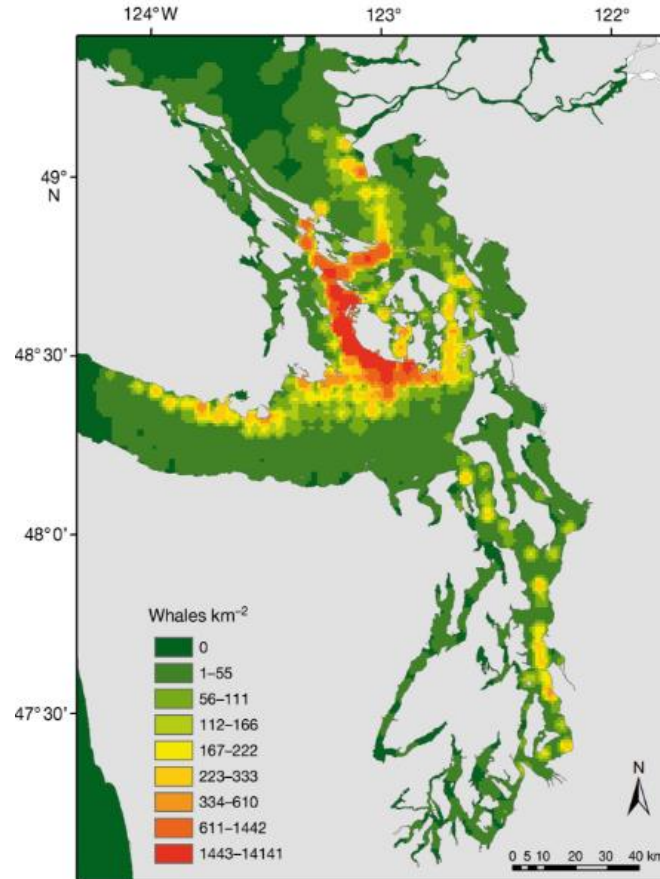


Figure 3: Southern Resident Orca density (number of whales  $\text{km}^{-2}$ ) based on effort-corrected data in the Salish Sea from 1976-2014. Note that waters adjacent to Seattle are a hotspot of Orca sightings. Map from Olson et al. 2018.

Marbled Murrelets (*Brachyramphus marmoratus*) are federally protected as a Threatened species under the Endangered Species Act and state protected as an Endangered Species under the Washington State Endangered Species Act. They occur in Elliott Bay and elsewhere in Puget Sound adjacent to Seattle. As of May 5, 2024, there were at least five locations along the Seattle coast from which Marbled Murrelets had been observed in the last thirty days (eBird 2024, Figure 4). The DEIS does not mention their occurrence in Seattle's waters. The final EIS should include analysis of impacts on this protected species.

20-6  
cont

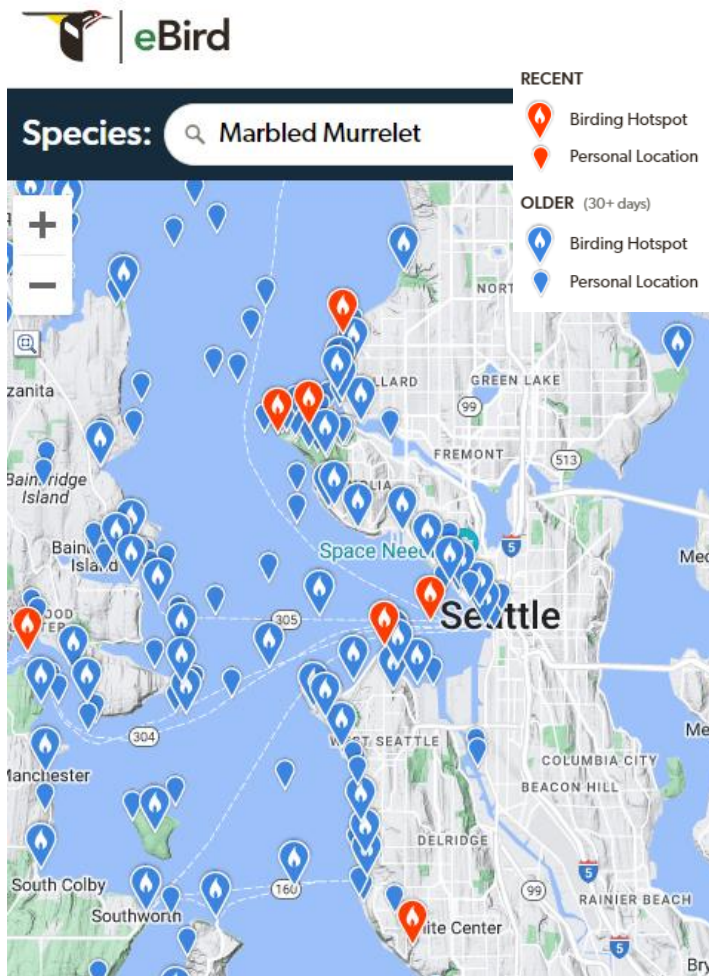


Figure 4: Birding hotspot locations around Seattle from which Marbled Murrelets have been observed. Those in red have observed Marbled Murrelet in the previous 30 days as of May 4, 2024. Visualization from eBird.org.

20-6  
cont

The Sunflower Sea Star (*Pycnopodia helianthoides*) occurs in Puget Sound, with dozens of observations in intertidal areas around Seattle (Figure 5). Its population was devastated by sea star wasting syndrome. The National Atmospheric and Oceanic Administration proposed the species for protection as a Threatened species under the Endangered Species Act in 2023 (NOAA 2023). The DEIS does not mention this candidate species. This should be addressed in the final EIS.

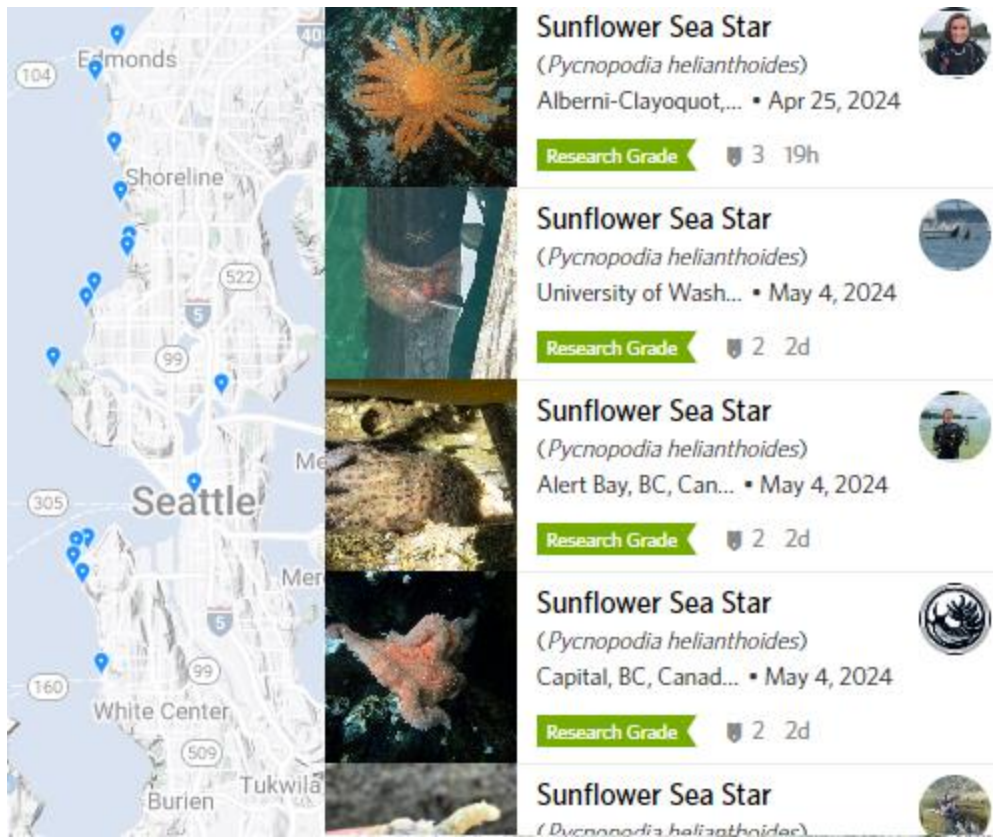


Figure 5: Map showing locations of observations of Sunflower Sea Star along Seattle coast. Visualization from iNaturalist.org.

## RARE SPECIES

Lincoln Park supports a population of native Phantom Orchids (*Cephalanthera austiniiae*). It is the only such population known in Seattle and one of just a few in all of King County (*Burke Herbarium, 2024; GBIF.org 2024*). Consideration for rare species should be given in the final EIS.

## RARE, SENSITIVE, AND IMPERILED HABITATS

Seattle harbors patches of relatively rare, declining, even imperiled, habitat types. These include

- Old-growth lowland conifer forest, notably at Schmitz Creek Preserve and Seward Park. These ancient forests once covered vast areas of the Pacific Northwest. Most has been lost. Old-growth forests are identified by Washington Department of Fish and Wildlife (2015) as **imperiled and declining**.
- Oregon White Oak Woodlands at Martha Washington Park. Oregon White Oak Woodlands have been identified as **critically imperiled** and declining by Washington Department of Fish and Wildlife (2015).

The final EIS should provide consideration for rare, sensitive, and imperiled habitats in Seattle.



### CRITIQUE 3

On pages 3.3-14 through 3.3-15, the DEIS provides a qualitative analysis of impacts to tree canopy based on the expectation that a “higher value in the “New place types” row in Exhibit 3.3.4 indicates a higher potential for development-related impacts to vegetation.” The DEIS concludes, then, that Alternative 5 is likely to have the greatest potential for development-related impacts, followed by Alternatives 3, 4, 2, and 1.

### RECOMMENDATION, RATIONALE AND SUPPORTING EVIDENCE 3

**We recommend improving the rigor of analysis and re-examining assumptions to avoid overly optimistic projections of tree retention during development.**

The city and public have access to recent, high-resolution spatial datasets for tree canopy as well as urban planning datasets like development capacity, land use, and equity categories. It is straightforward to overlay these datasets to quantify how many acres of tree canopy lie within private, redevelopable parcels in different place types and to compare those across alternatives.

For example, with easily available datasets, we identified and quantified the acreage of tree canopy on private property on lots that have been classified as “Redevelopable” through development capacity analysis. We could also quantify the amount of tree canopy on each place type under the different alternatives and by equity categories.

Because the development capacity data is the same for all alternatives, the total amount of canopy in private, redevelopable parcels remains the same (Tables 1 and 2). However, **Alternative 5 would change the place type on parcels on which more than 700 acres of tree canopy would be at elevated risk of removal due to land use changes. About thirty of these acres are from high-risk equity categories. It would unreasonable to claim, as the DEIS currently does, that increased likelihood of 700 acres of tree canopy loss is not a significant impact that needs to be mitigated for.**

This type of analysis will be critical to see in the final EIS.

We have included a write-up of a similar canopy analysis. We recommend some type of similar, quantitative and spatial approach like that described in Exhibit A at the end of this document in the final EIS.

20-6  
cont

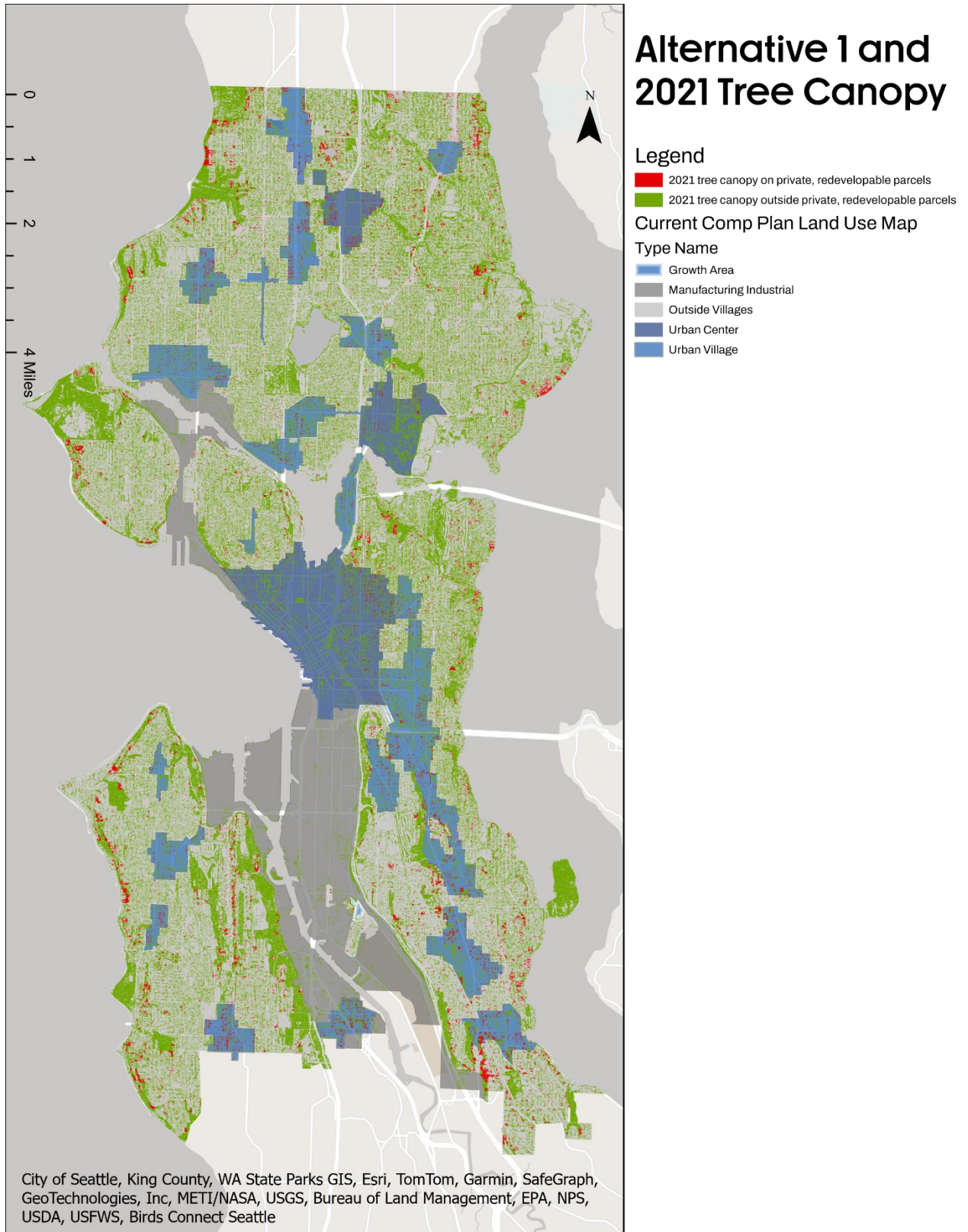


Figure 6: Tree canopy and land use (current Comprehensive Plan)

20-6  
cont

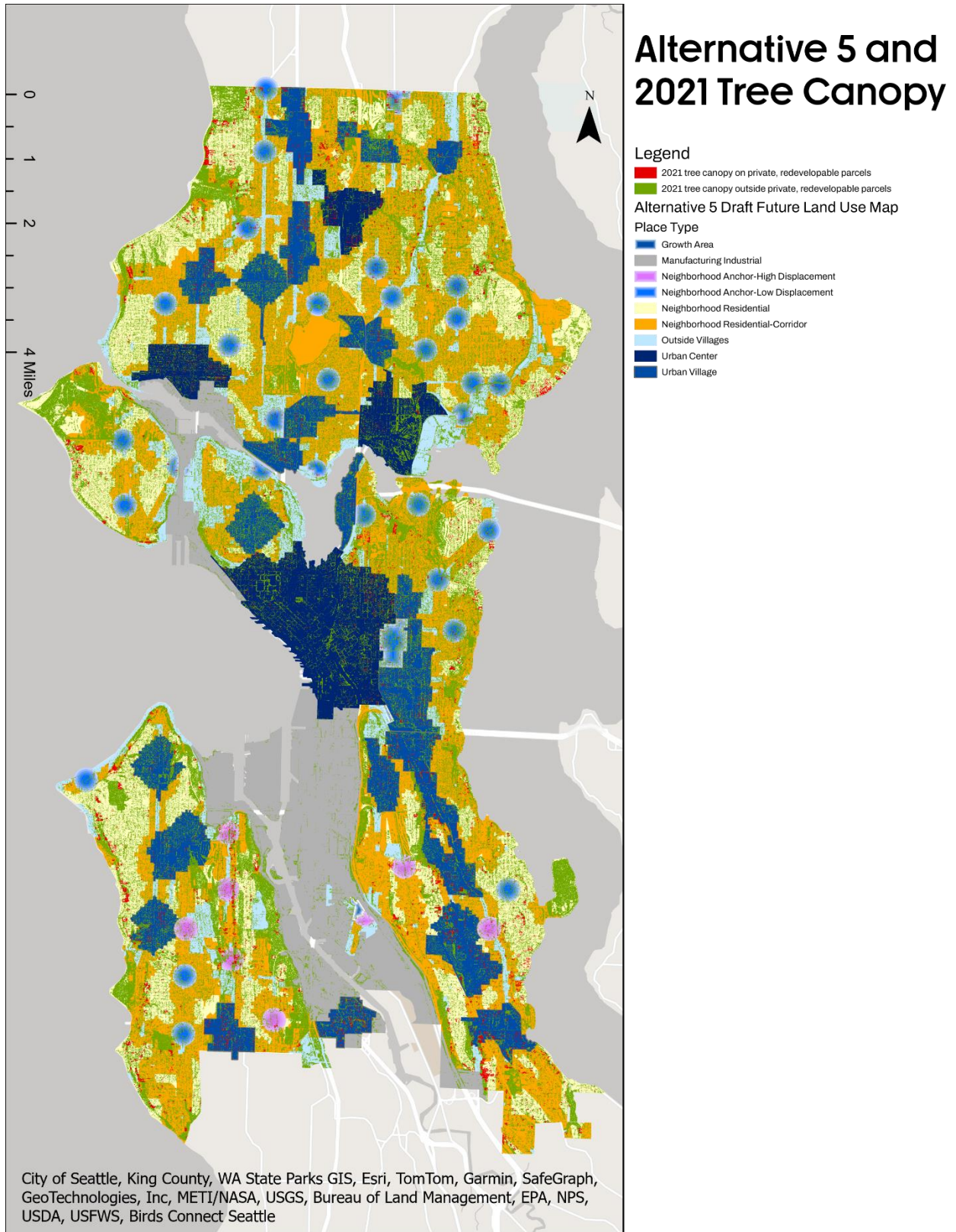


Figure 7: Tree canopy and land use under Alternative 5

20-6  
cont

Table 1: Comparison of area in acres of tree canopy by place type and equity category between Alternatives 1 and 5. Alternative 1 does not have four of the same place types as Alternative 5; values in those cases are NA.

Place type	Equity Category / Alternative					
	High Risk		Low Risk		NA	
	Alt 5	Alt 1	Alt 5	Alt 1	Alt 5	Alt 1
<b>Manufacturing Industrial</b>	0	0	2.05	2.05	0	0
<b>Neighborhood Anchor-High Displacement</b>	21.00	NA	0	NA	0	NA
<b>Neighborhood Anchor-Low Displacement</b>	0	NA	32.32	NA	0	NA
<b>Neighborhood Residential</b>	0	NA	0	NA	336.18	NA
<b>Neighborhood Residential-Corridor</b>	0	NA	0	NA	290.81	NA
<b>Outside Villages</b>	0	0	0	0	76.53	771.90
<b>Urban Center</b>	45.14	45.14	19.20	5.21	0	
<b>Urban Village</b>	185.00	177.94	86.63	92.63	0	

20-6  
cont

Table 2 Showing the difference in tree canopy area in acres between Alternatives 5 and 1 by equity category and in total. All told, more than 700 acres of tree canopy would change place types between Alternative 1 and Alternative 5, with a corresponding increased risk of removal.

	<b>Delta High Risk (Alt 5-Alt 1)</b>	<b>Delta Low Risk (Alt 5-Alt1)</b>	<b>Delta NA (Alt 5-Alt 1)</b>	<b>Total Delta</b>
<b>Manufacturing Industrial</b>	0	0	0	0
<b>Neighborhood Anchor-High Displacement</b>	21	0	0	21
<b>Neighborhood Anchor-Low Displacement</b>	0	32.32	0	32.32
<b>Neighborhood Residential</b>	0	0	336.18	336.18
<b>Neighborhood Residential-Corridor</b>	0	0	290.81	290.81
<b>Outside Villages</b>	0	0	-695.38	-695.38
<b>Urban Center</b>	0	13.99	0	13.99
<b>Urban Village</b>	7.06	-6.0	0	1.06

**CRITIQUE 4**

Page 3.3-5 states “Notably, most canopy loss was not associated with development activities; only 15% of the canopy loss occurred on parcels that underwent development during that period.”

The analysis cited is insufficient to support the claim and may lead to false conclusion about the development’s impact on tree canopy.

**RECOMMENDATION, RATIONALE AND SUPPORTING EVIDENCE 4**

The authors of the 2021 Tree Canopy Assessment defined “redeveloped parcels” as sites that began and completed construction of new buildings that added residential units or new commercial buildings within the identified timeframes.”

This restricted definition of development-associated tree loss does not capture the full impact from development, including tree loss from development activities that started within but ended after the identified timeframe, or that started before but ended in the identified timeframe. This limited analysis has supported a misleading narrative that development is an insignificant driver of canopy decline in Seattle.

Even with the restricted definition, the 2021 tree canopy assessment found that development activity on the 1% of parcels that met the criteria to be defined as “redeveloped” accounted for 14% of canopy loss. That is a disproportionate impact, and the true impact from all development activities is certainly higher.

A more complete assessment of all development activities’ impacts on tree canopy needs to be incorporated in the final EIS to avoid making overly optimistic projections about the impact of development.

**REFERENCES**

Birds Connect Seattle. (2024). Seattle Bird Collision Monitoring Project [unpublished data]. Birds Connect Seattle, Seattle, Washington, USA.

Browning, M. H. E. M., Locke, D. H., Konijnendijk, C., Labib, S. M., Rigolon, A., Yeager, R., ... & Nieuwenhuijsen, M. (2023). Measuring the 3-30-300 rule to help cities meet nature access thresholds. *Science of The Total Environment*, 167739.

Burke Museum Herbarium (n.d.). *Cephalanthera Austiniae* - Phantom Orchid. Burke Herbarium Image Collection. University of Washington. Accessed 4 May 2024 from <https://burkeherbarium.org/imagecollection/taxon.php?Taxon=Cephalanthera+austiniae>

De Groot, K. L., Porter, A. N., Norris, A. R., Huang, A. C., & Joy, R. (2021). Year-round monitoring at a Pacific coastal campus reveals similar winter and spring collision mortality and high vulnerability of the Varied Thrush. *The Condor*, 123(3), duab027.

Dertien, J. S., Larson, C. L., & Reed, S. E. (2021). Recreation effects on wildlife: a review of potential quantitative thresholds. *Nature Conservation*, 44, 51-68.

eBird. (2024). eBird: An online database of bird distribution and abundance [web application]. eBird, Cornell Lab of Ornithology, Ithaca, New York. Accessed 5 May 2024 from <http://www.ebird.org>

GBIF.org (05 May 2024) GBIF Occurrence Download <https://doi.org/10.15468/dl.j3wrq7>

Gehring, J., Kerlinger, P., & Manville, A. M. (2009). Communication towers, lights, and birds: successful methods of reducing the frequency of avian collisions. *Ecological Applications*, 19(2), 505-514.

Hammoud, R., Tognin, S., Smythe, M., Gibbons, J., Davidson, N., Bakolis, I., & Mechelli, A. (2024). Smartphone-based ecological momentary assessment reveals an incremental association between natural diversity and mental wellbeing. *Scientific Reports*, 14(1), 7051.

iNaturalist community. (2024). Verifiable, research-grade observations from Seattle, USA, observed between 1 January 2015 to 6 May 2024. Accessed from <https://www.inaturalist.org> on 6 May 2024.

Jacobson, Arthur Lee. (2006). *Trees of Seattle* (second edition). Arthur Lee Jacobson, Seattle, Washington, USA.

Loss, S. R., Will, T., & Marra, P. P. (2015). Direct mortality of birds from anthropogenic causes. *Annual Review of Ecology, Evolution, and Systematics*, 46, 99-120.

Marzluff, J. and Rodewald, A., 2008. Conserving biodiversity in urbanizing areas: nontraditional views from a bird's perspective. *Cities and the Environment (CATE)*, 1(2), p.6.

McDonnell, Mark. (2013). *Cities as Refugia for Threatened Species*. The Nature of Cities, New York, New York, USA. <https://www.thenatureofcities.com/2013/10/02/cities-as-refugia-for-threatened-species/>

National Audubon Society. (2024). The Christmas Bird Count Historical Results [Online] for Western Screech-owl and Count Circle "WASE" (Seattle, Washington). Accessed 5 May 2024 from <https://netapp.audubon.org/CBCObservation/Historical/ResultsBySpecies.aspx?1>

NOAA. (2023). NOAA Fisheries Proposes Listing Sunflower Sea Star as Threatened under Endangered Species Act. <https://www.fisheries.noaa.gov/feature-story/noaa-fisheries-proposes-listing-sunflower-sea-star-threatened-under-endangered-species>

Oke, C., Bekessy, S.A., Frantzeskaki, N., Bush, J., Fitzsimons, J.A., Garrard, G.E., Grenfell, M., Harrison, L., Hartigan, M., Callow, D. and Cotter, B. (2021). Cities should respond to the biodiversity extinction crisis. *Npj Urban Sustainability*, 1(1), pp.1-4.

Olson, Jennifer K., et al. "Sightings of southern resident killer whales in the Salish Sea 1976–2014: the importance of a long-term opportunistic dataset." *Endangered Species Research* 37 (2018): 105-118.

Pettorelli, N., Graham, N. A., Seddon, N., Maria da Cunha Bustamante, M., Lowton, M. J., Sutherland, W. J., ... & Barlow, J. (2021). Time to integrate global climate change and biodiversity science- policy agendas. *Journal of Applied Ecology*, 58(11), 2384-2393.

Pörtner, H.O., Scholes, R.J., Agard, J., Archer, E., Arneth, A., Bai, X., Barnes, D., Burrows, M.,...& Ngo, H.T. (2021). IPBES-IPCC co-sponsored workshop report on biodiversity and climate change; IPBES and IPCC, DOI:10.5281/zenodo.4782538

Rosenberg, K. V., Dokter, A. M., Blancher, P. J., Sauer, J. R., Smith, A. C., Smith, P. A., ... & Marra, P. P. (2019). Decline of the North American avifauna. *Science*, 366(6461), 120-124.

Seattle Office of Sustainability and Environment. (2023). 2021 City of Seattle Tree Canopy Assessment Final Report. Seattle Office of Sustainability and Environment, Seattle, Washington, USA.

Secretariat of the Convention on Biological Diversity. (2020). Zero Draft of the Post-2020 Global Biodiversity Framework. <https://www.cbd.int/article/2020-01-10-19-02-38>

Shin, Y. J., Midgley, G. F., Archer, E. R., Arneth, A., Barnes, D. K., Chan, L., ... & Smith, P. (2022). Actions to halt biodiversity loss generally benefit the climate. *Global change biology*, 28(9), 2846-2874.

Toronto City Planning and Parks.(2019). Wild, Connected, and Diverse: A Biodiversity Strategy for Toronto. Toronto City Planning and Parks, Toronto, Ontario, Canada. <https://www.toronto.ca/legdocs/mmis/2019/ie/bgrd/backgroundfile-136906.pdf>

RCW 35.21.161. Jurisdiction over adjacent waters.

United Nations Environment Programme. (2021). “States have these 13 duties when it comes to biodiversity and human rights.” Accessed August 22, 2022 from <https://www.unep.org/news-and-stories/story/states-have-these-13-duties-when-it-comes-biodiversity-and-human-rights>

Washington Department of Fish and Wildlife. (2015). Washington’s State Wildlife Action Plan: 2015 Update. Washington Department of Fish and Wildlife, Olympia, Washington, US

# EXHIBIT A

## Identifying Potentially Development-Threatened Tree Canopy in Environmental Justice Priority Areas

Draft April 8, 2024

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### INTRO

Environmental Justice priority areas in Seattle are census tracts with Racial and Social Equity Index scores that fall within the two highest quintiles.

These communities tend to have lower overall tree canopy cover than whiter and wealthier neighborhoods (2016 Seattle Tree Canopy Assessment) and have experienced higher rates of tree canopy loss in recent years (2021 Seattle Tree Canopy Assessment). Given the important role trees play in community and climate resilience and the benefits they provide to mental and physical health, working with EJ communities to preserve and enhance tree canopy should be a priority for the City.

At the same time, increased demand for housing is driving land use changes and infill development. Parcels on which development occur experience significant canopy loss, 40% on average according to the 2021 Seattle Tree Canopy Cover Assessment.

The City uses Zoned Development Capacity models to identify parcels where redevelopment could occur to increase housing density. These parcels have fewer housing units than would be allowed under their current zoning class. These parcels also often support a significant number of established trees.

In Lowrise, Midrise, Commercial, and Seattle Mixed Zones, development footprint may occupy 85-100% of the lot area, and tree removal in downtown and industrial zones is not regulated under the tree protection ordinance. Trees in these zones on revdevelopable lots, then, are potentially highly threatened by future development.

Understanding the distribution of development-threatened trees and planning to maximize their retention during development is important if the City is to meet its canopy equity goals.

### METHODS

**Analysis objective:** Find tree canopy in Environmental Justice Priority Areas and on private property on underdeveloped parcels in Lowrise, Midrise, Commercial, and Seattle Mixed zones, where 85-100 lot coverage allowed under the new tree protection ordinance, or on Downtown and Industrial zones which are "silent zones" not regulated by the tree protection ordinance.

### Datasets

Dataset	Source	Last Updated
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Seattle_Tree_Canopy_2016_2021_RSE_Census_Tracts	<a href="https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::environmental-justice-priority-areas/about">https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::environmental-justice-priority-areas/about</a>	Jan 26, 2024
Tree_Canopy_2021_Seattle	<a href="https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::seattle-tree-canopy-2021/about">https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::seattle-tree-canopy-2021/about</a>	Jan 26, 2024
Zoned Development Capacity by Development Site Current	<a href="https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::zoned-development-capacity-by-development-site-current/about">https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::zoned-development-capacity-by-development-site-current/about</a>	Jan 27, 2024
Unofficial neighborhood boundaries	<a href="https://www.arcgis.com/home/item.html?id=8adffd6b8fba4a84966fa7471afd0d6c">https://www.arcgis.com/home/item.html?id=8adffd6b8fba4a84966fa7471afd0d6c</a>	Nov 29, 2023

### Defining and mapping development-threatened tree canopy procedure:

- Set definition query on Zoned Development Capacity Layer:  
PUB\_OWN\_TY = 'PRIVATE' And (REDEVSTATU = 'REDEV' Or REDEVSTATU = 'VACANT') And (CLASS = 'MR' Or CLASS = 'C' Or CLASS = 'L' Or CLASS = 'NC' Or CLASS = 'SM' Or CLASS = 'D' Or CLASS = 'I')  
Intersect tree canopy, EJ priority areas, and zoned development capacity layers called "Development Threatened Tree Canopy 2021 in EJ Priority Areas"
- Add new field to "Development Threatened Tree Canopy 2021 in EJ Priority Areas" called "DTTC\_Acres" (double).
- Calculate geometry of DTTC\_Acres  
Property = Area (geodesic)  
Area Unit = Acres  
Coordinate system = default
- Intersect Development Threatened Tree Canopy 2021 in EJ Priority Areas with Neighborhoods layer. Call it DTTC\_Neighborhoods\_Intersect
- Add new field to "DTTC\_Neighborhoods\_Intersect" called "DTTC\_Hood\_Acres" (double).
- Calculate geometry of DTTC\_Hood\_Acres  
Property = Area (geodesic)  
Area Unit = Acres  
Coordinate system = default

Estimating street tree canopy contribution to DTTC

1. Dissolve DTTC\_Neighborhoods\_Intersect on "gridcode" field (=1 for all records). Default settings (create multipart features). Output aggregates the many thousands of DTTC canopy polygons into a single, multipart feature. Call it DTTC\_Dissolve
2. Create new point feature class using Create Random Points tool. Constrain the output to DTTC\_Dissolve, create 500 points. Output is 500 random points distributed within the boundaries of DTTC\_Dissolve. Call new feature class "Random\_Point\_Assessment"
3. Create new field in Random\_Point\_Assessment called "Street\_Tree" (short, numeric).
4. Set basemap to satellite imagery.
5. Zoom to each random point to determine if the canopy it is associated with is from a tree planted in the public right of way or is rooted on private property. If street tree, assign value "1", else "0"
6. Where determination cannot be made from satellite imagery, use Google Street View.
7. Where determination is uncertain, assume street tree and assign value "1".

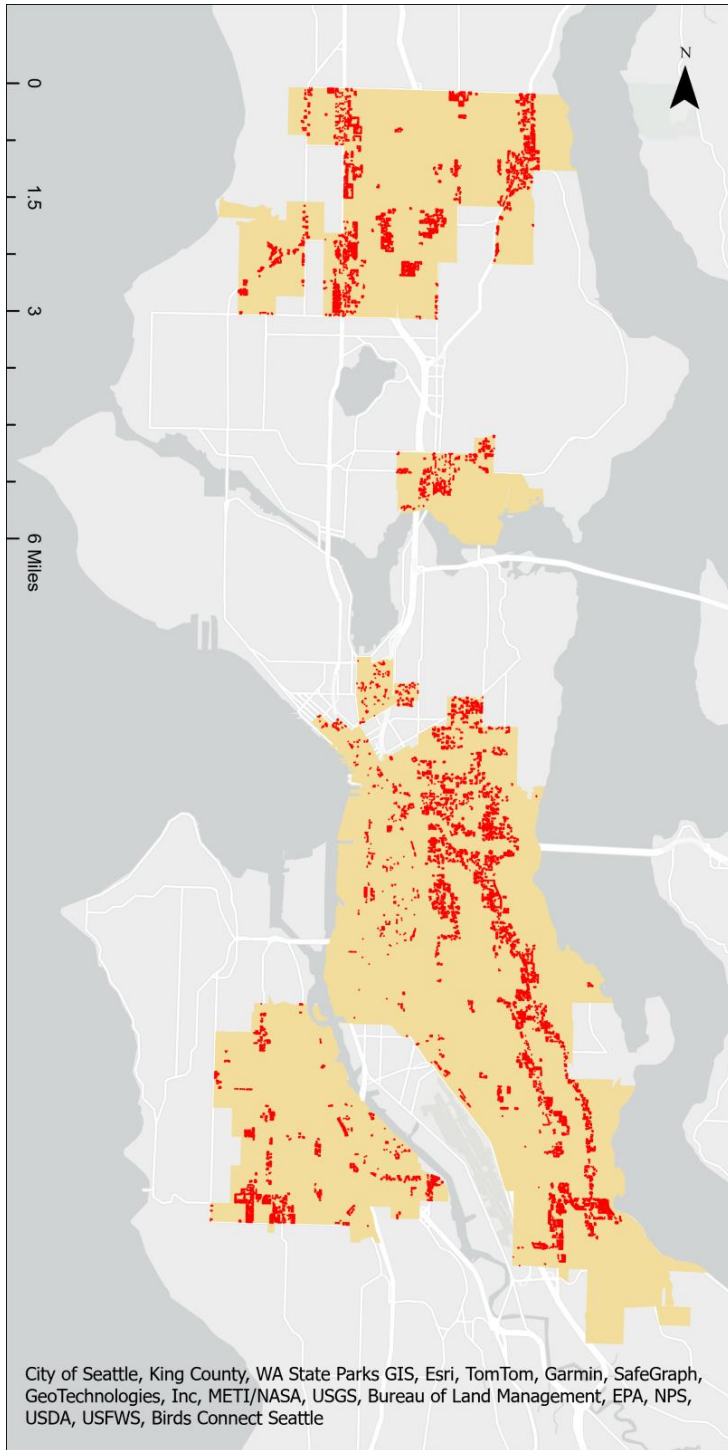
## RESULTS

There is a total of 226.7 acres of tree canopy overhanging redevelopable parcels in EJ priority areas. Some of this tree canopy is contributed by street tree canopy spreading from the right of way over private property. Street trees are governed by different regulations than trees on private property and are not the focus of this analysis.

Of a random assessment of 500 points within tree canopy on redevelopable parcels in EJ priority areas, 33 were determined to fall within tree canopy contributed by street trees. I estimate the mean canopy contribution from street trees to be 6.6% (95% Confidence Interval 4.4% to 8.8%).

**Therefore, I estimate there are between 207 to 217 acres of development-threatened tree canopy on private property in Environmental Justice Priority Areas.**

## Map of distribution of development-threatened tree canopy in EJ Priority Census Tracts



## Development-threatened Tree Canopy in Seattle's Environmental Justice Priority Census Tracts

### Legend

- Development-threatened Tree Canopy in EJ Census Tracts
- Environmental Justice Priority Census Tracts

City of Seattle, King County, WA State Parks GIS, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, USFWS, Birds Connect Seattle

### Results by neighborhood

Neighborhood	Acres of Development-threatened Tree Canopy in EJ Priority Areas
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	<b>Mean Estimate</b>	<b>Lower 95% CI Estimate</b>	<b>Upper 95% CI Estimate</b>
North Beacon Hill	15.60	15.24	15.97
Atlantic	13.92	13.59	14.25
Columbia City	13.86	13.53	14.18
Dunlap	13.79	13.46	14.11
Haller Lake	11.36	11.10	11.63
Rainier Beach	11.13	10.87	11.39
North College Park	9.00	8.79	9.21
South Delridge	8.80	8.59	9.01
Greenwood	7.79	7.60	7.97
Brighton	7.74	7.56	7.92
Minor	7.47	7.29	7.65
South Beacon Hill	7.42	7.24	7.59
Highland Park	7.23	7.06	7.40
Olympic Hills	6.44	6.28	6.59
Mid-Beacon Hill	6.18	6.03	6.32
Maple Leaf	5.91	5.77	6.05
Pinehurst	5.46	5.33	5.58
University District	5.41	5.28	5.54
Cedar Park	5.14	5.02	5.26
Mount Baker	4.97	4.85	5.08
High Point	4.20	4.10	4.30
South Park	3.65	3.56	3.73
Industrial District	3.06	2.99	3.13
Meadowbrook	2.88	2.81	2.94
Bitter Lake	2.69	2.63	2.75
Riverview	2.66	2.60	2.72
International District	2.40	2.35	2.46

Roxhill	2.06	2.01	2.11
Crown Hill	1.68	1.64	1.72
Yesler Terrace	1.53	1.49	1.56
Victory Heights	1.34	1.31	1.37
Leschi	1.29	1.26	1.32
Stevens	1.26	1.23	1.29
Broadway	0.94	0.92	0.96
Holly Park	0.91	0.89	0.93
Mann	0.83	0.81	0.84
Broadview	0.80	0.78	0.82
Wallingford	0.73	0.71	0.75
South Lake Union	0.56	0.55	0.57
North Delridge	0.48	0.47	0.49
Belltown	0.41	0.40	0.42
Pioneer Square	0.22	0.21	0.22
Madrona	0.18	0.17	0.18
Seward Park	0.10	0.10	0.10
Central Business District	0.08	0.07	0.08
First Hill	0.06	0.05	0.06
Ravenna	0.05	0.05	0.05
Pike-Market	0.03	0.03	0.03
<b>TOTAL</b>	<b>211.65</b>	<b>206.66</b>	<b>216.63</b>

### Results by zone class

Zone Class	Acres of Development Threatened Canopy in EJ Priority Areas		
	Mean Estimate	Lower 95% CI Estimate	Upper 95% Estimate
Lowrise	100.23	97.87	102.59

Neighborhood Commercial	47.33	46.21	48.44
Commercial	26.46	25.84	27.08
Industrial	14.04	13.71	14.37
Midrise	11.20	10.94	11.46
Seattle Mixed	8.78	8.58	8.99
Downtown	3.60	3.52	3.68
<b>TOTAL</b>	<b>211.65</b>	<b>206.66</b>	<b>216.63</b>

## DEIS StoryMap Comment

Name: Tiffani McCoy

Organization: House Our Neighbors

Email: tiffani@houseourneighbors.org

Date: 4/22/2024

## Comment:

**Allow for More Family-Sized Homes in Middle Housing:** Increase the Floor Area Ratio (FAR) for fourplexes and sixplexes, to make it possible to build more family-sized homes. The proposed FAR would limit development of three- and four-bedroom homes, which are essential to meet the diverse needs of our growing city, accommodate families, and create new homeownership options.

**Allow More Homes Near Transit:** Allow midrise and mixed-use housing within a 5-minute walk of frequent buses. Building homes near transit gives people more choices in how they get around their neighborhoods and makes transit a convenient option for more people. And building those homes off arterials but still near transit gives people the opportunity to live in quiet, low-pollution, and car-light neighborhoods.

21-1

**Expand Neighborhood Centers:** Enhance the proposed Neighborhood Centers, to create lively, walkable community hubs throughout Seattle. We suggest increasing the radius of Neighborhood Centers from 800 feet to ¼ mile and adding in all the Neighborhood Centers studied in the DEIS (but not implemented in the Draft Plan). This would equitably balance growth across the city, increase access to communities like Alki, Seward Park, North Broadway, North Magnolia, and Northlake, and allow more people to meet their daily needs by walking or biking.

**Promote Equitable Development and Address Displacement:** Ensure density bonuses, development regulations, and other tools, allow a broad range of developers, including the social housing developer, to build affordable housing for sale and for rent without relying on scarce public funding.

21-2

**Allow for Tall and Green Homes in Centers:** Increase height limits to 12-18 stories in Regional Centers such as Capitol Hill, the U District, Northgate, and Ballard, to allow more people to live in some of Seattle's most vibrant neighborhoods. Additionally, allow midrisers up to 85 feet in transit corridors and Neighborhood Centers, to maximize the potential of wood-frame construction.

## DEIS StoryMap Comment

Name: Bambi Chávez

Organization: Black Home Initiative (BHI) Network

Email: bambi@housingconsortium.org

Date: 5/6/2024

Comment:

To Whom It May Concern:

Black Home Initiative (<https://www.blackhomeinitiative.org/>) is a regional effort that seeks to target the racial inequities at the core of the housing ecosystem in an effort to increase the number of BIPOC households who successfully secure homeownership. Our initial emphasis is on Black households; within five years, the goal is to make the opportunity to own a home, and the potential benefits of that asset, available to 1,500 new low- and moderate-income Black homeowners. The ultimate impact we aspire to is the reduction of inequity and an increase in intergenerational household wealth.

22-1

With these aspirations in mind, we have developed the list of suggestions below for your consideration as you revise your One Seattle Plan draft and delineate what will be examined in the final environmental impact study. We want to thank you for the careful and diligent work you have done to produce the current One Seattle Plan draft and DEIS. Much of the language in the draft plan document aligns with our values, but we ask that you go bolder in your plan to ensure that our shared vision of an equitable Seattle can be realized. Our suggestions are an invitation to further dialogue, and we look forward to connecting with you as this process of vision setting continues.

Black Home Initiative (BHI) Comp Plan Draft & DEIS Comments:

1. Density bonuses, development regulation flexibility, land incentives, and technical assistance should be studied in the FEIS and included in the final comp plan to support:

- a. affordable homeownership and rental production
- b. affordable family-sized 3+ bedroom middle housing homeownership and rental units
- c. affordable homeownership and rental units within a stacked flat building typology
- d. permanently affordable homeownership opportunities through community land trusts and limited equity cooperatives
- e. community-based organizations to create, or partner in the creation of, community-led and community-owned affordable homes and third space developments
- f. legacy homeowners in redeveloping their property to create affordable housing units for themselves, their families, and current and past legacy residents
- g. non-legacy homeowners in redeveloping their property to create permanently affordable housing units with preference to current and past legacy residents
- h. legacy homeowners who would like to develop corner stores

2. Displacement pressures are reduced when there is an abundance of affordable housing options throughout the city. To achieve this goal, would like to see the following studied in the FEIS and included in the final comp plan:

- a. all neighborhood centers that were in the DEIS
- b. neighborhood centers defined as inclusive of a ¼ mile radius
- c. midrise and mixed-use housing within a 5-minute walk of frequent transit

22-2



- d. midrise housing up to 85' in transit corridors and urban centers
- e. highrise housing of 12-18 stories in regional centers

3. Eliminate parking mandates citywide.

4. At minimum, align Seattle's middle housing standards with the Department of Commerce model ordinance to ensure middle housing can be feasibly built throughout the city.

5. We support the anti-displacement intention of the triplex development standards you are proposing for high displacement risk areas. However, we are concerned about the unintended consequences of this restriction. We request that you provide more information about the potential impacts of the triplex standard as written and engage in conversations with current and past residents of high displacement risk areas to inform any zoning language. We would also recommend that you study a triplex standard that exempts projects that will have owner-occupied units, affordable units, or units developed by a community-based organization, or in partnership with a community-based organization. As stated in item #1 above, we believe that the city should be incentivizing the development of owner-occupied, affordable, and community-led-&-owned units through density bonuses, development regulation flexibility, land incentives, and technical assistance. Such assistance is particularly pertinent in areas at high risk of displacement where development should reflect the will of current and past residents of these areas.

6. Study in the FEIS, and include in the final comp plan, a city land banking and land disposition process to support community-based development orgs to create, or partner in the creation of, community-led and community-owned affordable home and third space developments.

7. In the FEIS, please disaggregate projections about the number of housing units per AMI group from the city-level to a neighborhood or district-level scale for comparative analysis.

8. OPCD visited community groups to inform their comprehensive plan draft and we would like to see OPCD revisit these community groups to present the FEIS and zoning changes and request their feedback.

22-2  
cont

22-3



## FRIENDS OF RAVENNA-COWEN

May 4 2024

To: [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

To: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

cc: [Bruce.Harrell@seattle.gov](mailto:Bruce.Harrell@seattle.gov) , [maritza.rivera@seattle.gov](mailto:maritza.rivera@seattle.gov)

The Friends of Ravenna–Cowen submit our comments below on the One Seattle Plan and the DEIS for the One Seattle Plan.

The Friends of Ravenna–Cowen (FORC) is a not-for-profit neighborhood group established to “*preserve and protect the history and natural environment of the Ravenna-Cowen neighborhood as a shared community resource for all, and to support other like-minded neighborhood and not-for-profit groups.*” With this mission in mind, we are providing our comments, focusing primarily on historical/cultural resources, land use/housing, and plants/animals. We acknowledge the need for affordable housing and increased density in some areas of the City, but this must be done in concert with protection of our natural and historical resources. While many of our comments may reference specific issues for the Ravenna-Cowen area, these also generally apply to many areas within Seattle.

23-1

### **Background:**

FORC was organized in 2016 to celebrate and raise awareness of the neighborhood to the north and west of Ravenna and Cowen parks. This area includes many examples of historically significant architecture, numerous heritage trees, and the incomparable public resources of Ravenna and Cowen Parks.

In 2018, thanks to thousands of hours of volunteer work, the Ravenna-Cowen North Historic District was listed in the National Historic Register of Historic Places, as well as the Washington State Register of Historic Places, where it joins other districts which contribute to the rich cultural heritage of Washington State. Our neighborhood is architecturally intact and represents a fascinating period in the development of the City of Seattle. Ravenna's architectural resources highlight a period of rapid growth in the early 20th century, encompassing the history of Ravenna and Cowen Parks; the Olmsted legacy; the streetcar era; development of the University of Washington's environs (along with the 1909 Alaska Yukon Pacific Exposition); and the rise of a “bungalow” style that provided homes for working families and university staff. Following the NHD designation, FORC has been organizing various public events, including several different walking tours that focus on the history, architectural elements, and natural environment of the NHD; these have been very well received and have had a positive effect. Many people from various parts of our city come to the RCN NHD to learn more about our city and to walk in an interesting historic neighborhood.

The proposed One Seattle Plan Land Use Goal LU G16 (page 59) identifies three important reasons to preserve, maintain, and celebrate historical and cultural resources. The RCN NHD fulfills all of these.



## FRIENDS OF RAVENNA-COWEN

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*The RCN NHD will be adversely affected by all alternatives detailed in the One Seattle Plan unless sufficient, meaningful mitigation is developed, as detailed below.*

### 1. Historic/Cultural Resources.

The proposed changes to the Neighborhood Residential Zone create an impetus for redevelopment of historic homes within the RCN NHD that is incompatible with the historical architectural context and reduce the number of contributing resources to a point that the NHD will completely lose its significance and status as a nationally-recognized historic district. This will be an irreversible loss and no protection nor special review of the NHD is provided. [This was a shortcoming of E2SHB 1110.] This adverse impact affects historical/cultural resources (known and unknown) and historic districts throughout Seattle. Meaningful, and adequate mitigation must be provided for *all* NHDs within Seattle or these resources will be lost.

While the DEIS acknowledges these losses as “significant unavoidable adverse impacts” for all alternatives, this is reprehensible because Preservation of historical/cultural resources is promoted as a goal (Goal LU G16) and stronger mitigation must be developed and implemented if this goal is to be taken seriously. Specifically:

- Policy LU 16.1 talks about maintaining a comprehensive survey and inventory of Seattle’s historic and cultural resources, but this inventory is very incomplete and still needs significant development! This inadequacy must be addressed or resources will be lost due to lack of knowledge/recognition. This is where “advance planning” can actually work (see DEIS page 3.9-121, last paragraph) because it would help *avoid* adverse impacts on historic/cultural resources.
- Policy LU 16.3 talks about supporting designation of areas as historic, cultural, and special review districts, but NHDs are not recognized as special review districts or exemptions. Recognition of NHDs must be added here! Recognition and protection for NHDs must be part of mitigation or these will be lost due to redevelopment related to upzoning and the One Seattle Plan.
- Policy LU 16.4 talks about tailoring development standards for a special review district, but this policy needs to include NHDs or they will be degraded and lose their historical/cultural integrity and ability to interpret Seattle’s history

23-1  
cont



## FRIENDS OF RAVENNA-COWEN

- Policy LU 16.5 talks about encouraging adaptive reuse of designated landmark structures by allowing uses in these structures that might not otherwise be allowed under the applicable zoning. This policy should also be applied for structures in historic districts and NHDs in cases where this approach could help the district retain its architectural integrity.
- Policy LU 16.6 talks about incentives to restore or reuse designated landmark structures and specified structures within designated districts. While this policy is fairly narrow, it should be *broadened to include additional incentives for restoration and reuse of historic structures and should also apply to NHDs* but fails to include them. These incentives should also apply to NHDs and/or contributing structures within NHDs to avoid or mitigate adverse impacts and to prevent loss of the NHD's integrity.
- Policy LU 16.7 talks about protecting the scale and character of the established development pattern in historic districts, while encouraging compatible and context-sensitive infill development. This is a very important policy! However, it fails to include NHDs. These incentives should also apply to NHDs to avoid or mitigate adverse impacts.

23-1  
cont

The DEIS provides a list of "Potential Mitigation Measures (see pages 3.9-119 and 3.9-120). While many of these can be helpful and/or are already required under other regulations, mitigation for historic/cultural resources and NHDs needs to incorporate these measures more substantially.

Also, please consider that mature trees and landscape are elements of RCN NHD, as well as many other historic/cultural districts. Protection of these not only provides part of the context for NHD, but recognition of the NHD reciprocally can help protect these elements of the environment.

### 2. Land Use/Housing.

For Regional Centers, GS 3.2, p. 22 has the language "Recognize and plan for the unique role and character of different neighborhoods within large regional centers." ***We request that the same language apply, and that the same language be added for Urban Centers (GS 4, p. 24 and 25) and Neighborhood Centers.*** The Roosevelt Urban Center (p. 25) is a mix of commercial, high rise and "craftsman."

23-2



## FRIENDS OF RAVENNA-COWEN

### 3. *With regard to GS 4 and related LU policies:*

LU 2.9 (p.38) states: *Encourage the preservation of characteristics and features that contribute to communities' multiple identities, including in areas of historic, architectural, cultural, or social significant.*" This is a very important policy and it needs to be taken seriously.

To help facilitate this, LU Policies should be added to recognize and plan for the unique role and character of different neighborhoods:

- Note that the definition of middle housing in E2SHB 1110, p. 5, para (21) (lines 32- 35), "means buildings that are compatible in scale, form, and character with single-family houses ... ["single family" is defined at p.7, para.32, lines 32-34.]

Add a new LU \_ that states the same language as above – *Middle housing means buildings that are compatible in scale, form, and character with single-family houses.*

- Add the italicized language to LU 4.1 (p.40). Allow for flexibility in development standards so existing structures, *trees and green space* can be maintained and improved and new development can respond to site-specific conditions. As an example, this link shows how a DADU was built to preserve the tree:  
<https://nwgreenhometour.org/ghtoursite/matthews-beach-cottage-2024/>
- LU 4.18 (p.48), second bullet, add italicized language – responds to the surrounding neighborhood, *character*, and context, including historic resources. Thus, for the RCN NHD and any other NHD, the type of housing built should preserve the character of the NHD.

#### ***With regard to housing/displacement:***

The proposed upzoning will increase the tax base for properties in the RCN NHD that will continue to displace owners from our neighborhood (this has been happening since the last rezone) as property taxes have become unaffordable for homeowners. This trend shifts ownership of these historic homes and many historic properties to developers and lessors, thus consolidating the trend of land ownership. This applies to any other NHD or historic district, and LU policies to prevent this are inadequate.

Another type of housing that exists in our neighborhood and the RCN NHD, which is located close to the University of Washington, is the group home, usually a historic home that has been rented to a group of unrelated people who often are college students and/or people with jobs in Seattle. This type of housing offers an often more affordable alternative for housing groups of people, as well as for people who prefer older buildings and garden areas.



## FRIENDS OF RAVENNA-COWEN

This type of housing will be displaced by redevelopment. As discussed under Natural Environment below, many existing Seattle homes can be subdivided or use a “community” model with four bedrooms with the other spaces for the shared use within the structure. Adding policies to further protect this type of use increases housing flexibility and can help protect historic housing.

***Still of concern is that while the One Seattle Plan would create additional housing units per the directive of E2SHB 1110, increasing the number of units will not bring affordability; the “trickle-down effect/Reaganomics notion” does not work. Thus, the proposed impacts on displacement and historic preservation caused by the proposed upzoning would occur without bringing enough benefit to justify the losses.*** This was largely the basis behind the recent Los Angeles County Superior Court ruling that overturned CA Senate Bill 9, which had overturned single-family housing in five California cities. See: <https://www.latimes.com/homeless-housing/story/2024-04-29/law-that-ended-single-family-zoning-is-struck-down-for-five-southern-california-cities> .

23-2  
cont

### 3. Plants and Animals/Natural Environment.

A stated goal of the Comprehensive Plan is to “protect and enhance” the natural environment (p.36). This document includes some positive goals and policies but falls short in several areas.

***Furthermore, the DEIS falls short:***

The DEIS, 3.1.3, states that “*Projects that entail vegetation clearing would likely reduce the diversity and/or abundance of plants and animals on and near the affected parcels. These impacts would be expected to diminish over time as vegetation regrows in temporarily disturbed areas.*” Most projects that are moving forward are maximizing lot coverage, with little setbacks or vegetative areas around them. This general statement is misleading and implies a no problem exists when developments occur. Mitigation must address this issue.

23-3

The DEIS, p. 3.3-7, states, “*In 2023,... the city’s tree ordinance was updated. It is anticipated that these updates will decrease the rate of canopy loss associated with residential and commercial development.*” Many urban forest practitioners, including Seattle’s Urban Forestry Commission, do not share the expectation that the new tree protection ordinance will decrease the rate of canopy loss associated with residential and commercial development, especially on Multifamily, Commercial, and Seattle Mixed Zones. The combination of high hardscape allowances, rigid delineation method for tree protection areas, and reduced authority by departments to request alternate designs to accommodate tree preservation make it likely that any sizeable, regulated tree on these lots would be permitted for removal.



## FRIENDS OF RAVENNA-COWEN

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### *The DEIS conclusions are hypothetical, not fact-based:*

The DEIS concludes, “Action alternatives would tend to increase regional tree canopy by focusing growth in urban areas and preventing sprawl.” “[D]evelopment within the urban environment of Seattle could indirectly benefit the tree canopy pressure in less-developed areas outside the city.” (Emphasis added.) The DEIS does not identify any data supporting an indirect benefit that regional tree canopy would increase, not even the acreage currently remaining that is less developed. Sprawl continues, with suburban areas with lawns that do not provide needed habitat for birds and other wildlife. Nor does the DEIS identify the reasons people seek housing outside Seattle. And, apparently, no one at OPCD has bothered to traverse the “region.” King County is rapidly becoming one big sprawl as people search for more affordable housing options outside of Seattle. Moreover, state law (E2SHB 1110) now requires most municipalities to increase density, which could mean more tree cutting region-wide. The DEIS conclusions are fictitious, unsupported hypotheses and pure fantasy.

The reality is that if real mitigation to preserve Seattle’s tree canopy is not implemented immediately, Seattle will be a polluted, heated environment impacting its residents, other animals and native flora. One only has to look at the Roosevelt Urban Village, parts of which transformed within four years to a heat island.

### *With regard to the tree canopy:*

On p. 150, Goal CE G12 refers to the tree canopy goals and lists several related policies. The following goals/policies should be added:

- Strengthen and enforce tree protections throughout the City to ensure Seattle's current canopy tree policies and goals continue. The Seattle One Plan would inexplicably reduce that policy’s goals.

The 2035 Seattle Comprehensive Plan includes Policy EN 1.2 (p. 133) which states, “Seek to achieve citywide tree canopy coverage to **30 percent by 2037, and 40 percent eventually**, which maximizes the environmental, economic, social, and climate-related benefits of trees.” This is **current Seattle policy**. Current Seattle Policy also includes Policy EN 1.7 which states, “Promote the care and retention of trees and groups of trees that enhance Seattle’s historical, cultural, recreational, environmental, and aesthetic character.” **Both policies should be retained.**

*However*, for unexplained reasons, without discussing the adverse implications of this major reduction in tree canopy, the Seattle One Plan changes **current policy to a goal of 30 percent with no increase over time**. Moreover, the goal, CE G12 (p.151) *makes a false statement of fact.* The actual current tree canopy is 28 percent due to a loss of 235 acres, the size of Green



## FRIENDS OF RAVENNA-COWEN

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Lake. CE 12 maintains “Seattle has a healthy urban forest with a tree canopy that covers at least 30% of the land [FALSE]...

It is critical that the Seattle One Plan maintain the 2035 Comp Plan Policies EN 1.2 and EN 1.7, for multiple reasons:

- The more trees, the better. Trees absorb and mitigate water run-off. Trees absorb pollution. Trees reduce carbon. Trees reduce heat, which is why Seattle is trying desperately to plant more trees in underserved communities to prevent residents from dying. Currently, due to recent development in Neighborhood Residential areas, 19%, or more, tree canopy was lost. Seattle One Plan, Ex. 3.3-7. Neighborhood Residential has the highest percentage of trees in the city. The Ravenna-Cowen NHD is a green oasis with plentiful trees and green cover where Roosevelt residents now come to escape from their heat island high-rise homes. The NHD represents a historic era and embodies the reasons current Policy EN 1.7 should remain in effect.
- Trees also contribute to a personal sense of well-being and reduce crime. <https://www.motherjones.com/environment/2019/04/trees-crime-cincinnati-philadelphia-ida-b-wells-chicago/>.
- Adequate tree canopy is essential for birds and other wildlife. Among the 120+ birds tabulated city-wide by the annual Seattle Audubon Christmas Bird Count, tree-dependent species include: Pileated, Hairy, Downy, Northern Flicker and Red-breasted Sapsucker Woodpeckers; Barred, Western Screech, Great Horned and Saw-whet Owls; Cooper’s, Sharp-shinned, and Red-tailed Hawks; Black-throated Gray and Townsend’s Warblers, Pacific Wren, Brown Creeper, Red-breasted Nuthatch, and Varied and Swainson’s Thrush. These birds require a dense forest canopy in which to hunt, feed, nest and take cover. These birds become scarce when tree canopy cover falls below 20%. There is a direct relationship between bird abundance and tree canopy. Some might say, just develop everything except the designated parks and green spaces. ***As all major wildlife and bird organizations and conservation scientists will tell you, however, these “postage stamp” preserves are not viable unless green corridors connect them. The tree canopy in Seattle is critical to ensure these green corridors.***

The Ravenna-Cowen/Roosevelt community is keenly aware of the impact from tree reduction. Our naturalist conducted a bird count. From Ravenna Park north, the bird species decreased dramatically as the trees diminished. Due to development in Roosevelt, where high-rise apartment buildings developers bulldozed all the trees, within a few years that area became a heat island with few birds and few species.





## FRIENDS OF RAVENNA-COWEN

- Need for Additional Policies and Goals Due to Climate Change Impact on Tree Canopy. The Seattle One Plan contains two policies that address tree canopy and climate change, CE 12.2 and CE 12.3 (p. 150). Additional policies are needed to address this existential issue. Tree death from heat is acknowledged in the discussion, but the policies are vague. Communities around the world are emphasizing the use of native flora in landscapes and researching the use of species that would adapt readily to warmer climate. See: <https://www.discovermagazine.com/environment/cities-are-rethinking-what-kinds-of-trees-theyre-planting> If Seattle is to retain a healthy tree canopy, the Seattle One Plan must address this issue with more specificity, with specific goals, policies and time-tables. This issue requires research, knowledgeable staff, and funding.

### *With regard to the natural environment and urban wildlife:*

- The Climate and Environment Section beginning on p. 137, should include **more specific goals and policies regarding the significance of biodiversity and urban wildlife.**

This idea is reinforced by Professor John Marzluff, University of Washington Ornithology, who points out in his book Welcome to Subirdia, “When natural land cover measured across areas the size of neighborhoods, metropolitan areas or counties drops to less than one-third of its historical extent, its ability to sustain native biodiversity crumbles.” Marzluff warned that “...not considering the amount and arrangement of green spaces that connect urban people with nature is inefficient and dangerous.” He added, ***“To remember what biodiversity is, and why it is important, we must conserve nature close to where we live and work.”***

Neither the Seattle One Plan nor the Seattle Plan DEIS provide any base-line data as to the current bird count (by number and species) for indigenous and migratory birds and the impact of the Plan.

Specific policies regarding natural environment and urban wildlife should include the following:

- First, determine status and trends of biodiversity within Seattle;
- Recognize and support Indigenous-led conservation and environmental stewardship;
- Seek new financing mechanisms and incentives for conservation, natural space management, urban forestry, etc.;
- Protect and enhance habitat quality within natural areas, parks, and open spaces



## FRIENDS OF RAVENNA-COWEN

- Reduce urban hazards to biodiversity, including pesticides; reflective glass; plastic and other pollution; and negative impacts from certain human-associated and introduced species, such as outdoor cats and unleashed dogs.
- Encourage residents and visitors to learn about, celebrate, study, and conserve urban biodiversity.
- Maintain current trees and green cover on Neighborhood Residential and Multifamily lots.

### ***With regard to Mitigation:***

The DEIS mitigation options are incomplete and fail to consider substantive steps and regulations that would reduce loss of trees/wildlife habitat. The mitigation measures below will help preserve trees and green cover on Neighborhood Residential lots

- *Amend the Seattle Tree Ordinance as recommended by the Urban Forestry Commission.*
- *Retain current Neighborhood Residential setback requirements.* This will reduce the likelihood that tree canopy and green cover will be reduced.
- *Require developers to design projects that preserve trees, with oversight by professionals who know how to accomplish this.* While the DEIS sets out "green" alternatives, such as permeable driveways, solar panels, wood construction, limiting fossil fuels, it inadequately addresses the most valuable of our green resources, trees. There is technical knowledge on how to build and protect trees. Groups of architects now design buildings focusing on tree preservation. See, for example, Matthews Beach Cottage – NW Green Home Tour. To accomplish retention of as many trees and green space on Neighborhood Residential lots, the DEIS is deficient because it did not address solutions, such as requiring developers to identify the location of trees and species at the onset of the permitting process; requiring the developer to design the project to retain the maximum number of trees, with oversight by arborists and other professionals who understand how to accomplish tree retention.
- *Encourage, Provide Incentives for, and Assistance with the Repurposing of Existing Neighborhood Residential Housing, or Mandate Repurposing of Existing Structures and Building, and Mandate That New Construction Be Limited to the Original Footprint of the House.* These steps will help preserve existing trees, reduce tree loss and tree damage. While the DEIS mentions retrofitting, it does not apply or study the applicability and impact of retrofitting to Neighborhood Residential houses. Many



## FRIENDS OF RAVENNA-COWEN

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Neighborhood Residential houses can be retrofitted for four or more units (or three units plus a DADU), or converted to shared community housing (now authorized by state legislation), meaning residents have separate bedrooms but share other spaces. Examples include fraternities and sororities, multi-generation households, and group homes in high-density cities (e.g., New York City and others) where shared living is common and each tenants pays rent.

***With regard to Access to Public Open Space, p. 157:***

This section speaks to “Public Space” and uses this term to imply parks and natural areas. Public Space can be unfortunately be interpreted by some as a concrete plaza. This term should either be deleted or defined as a space that include a majority of natural landscaping similar to the definition of the “Open Space” (which is defined as containing elements of the natural environment). Courtyards and the like should be incentivized by the City for new developments, but again these must include natural landscaping.

If you need further information or would like to meet with the FORC Board, you can reach Larry Johnson at 206-406-8488 or [lejohnson@friendsofravennacowen.org](mailto:lejohnson@friendsofravennacowen.org).

Thank you for your consideration.

Larry E. Johnson, AIA, President, Friends of Ravenna-Cowen

Lori Cohen, Vice President and Secretary, Friends of Ravenna-Cowen

Judith Bendich, Secretary, Friends of Ravenna-Cowen

Lani Johnson, Boardmember, Friends of Ravenna-Cowen

Jackie Lum, Boardmember, Friends of Ravenna-Cowen

Francesca Renouard, Boardmember, Friends of Ravenna-Cowen

Darnell Samuelson, Boardmember, Friends of Ravenna-Cowen

23-3  
cont



May 6, 2024

VIA EMAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**Re: Comments on One Seattle Plan Draft Environmental Impact Statement**

Dear Mr. Quirindongo,

On behalf of the Ballard Alliance, we would like to thank you for meeting with our organization to discuss the City’s One Seattle Plan (“Plan”) and its potential impacts on our Ballard neighborhood.

The Ballard Alliance is a business and community development organization committed to ensuring that our Ballard community remains a unique, distinct, and economically vital area for its visitors, residents, businesses, and property owners. Through our programs and services, we strive to cultivate a vibrant and thriving environment in Ballard, focusing on urban design and transportation, economic development and business retention, marketing and promotions, and maintaining a clean, healthy, and safe neighborhood.

We share many of the goals expressed in the Plan and appreciate the City’s dedication to increased affordable housing and to healthy commercial areas. After reviewing the Draft Environmental Impact Statement (“DEIS”), we believe that several issues would benefit from additional attention and review.

We request that the Final Environmental Impact Statement (“FEIS”) and future planning processes reflect attention to the following issues:

1. **Expedite the subarea plan:** If Ballard is designated as a Regional Center but its subarea plan and implementing zoning is not completed until 2027, as the proposed current timeline suggests, the uncertainty around the potential zoning specifics may stifle investment in Ballard as owners wait for clarity. If Ballard is to be designated as a Regional Center, we encourage the City to prioritize the implementation of the subarea plan to be the first to be completed.

Additionally, as part of the subarea planning process, the City should ensure that the Ballard Alliance and our members, who have a deep commitment to the success of Ballard and the unique needs, character, history, and opportunities in our neighborhood, are represented on any further subarea planning initiatives, committees, and outreach. We encourage the City to study the unique needs of our retail stakeholders and the successes of our Ballard-specific design guidelines through additional urban design and retail studies in the subarea plan. Lastly, as we understand from our University District colleagues who implemented a similar effort

with the U-District rezone, this subarea planning effort will require significant time and commitment from Ballard Alliance staff and members. We encourage the City to explore grant and other financial support, as authorized by law, to compensate for highly active participation.

2. **Preserve existing density along the Market Street retail core:** Within the potential Regional Center, we encourage the City to focus the significant additional growth, height, and density near light rail and along the key north-south corridors above Market Street, such as 15<sup>th</sup> Avenue NW. While the potential Regional Center designation may support 160 foot (or taller) high-rise density near the light rail station, we encourage that highest density to be targeted. The unique retail core of Market Street – between 15<sup>th</sup> Avenue and 24<sup>th</sup> Avenue – should be carefully designed to support the vibrant, mixed-use retail and residential character of that area. Ballard Alliance members wish to avoid the potential for a “canyon” effect along Market Street.
3. **Perform a cumulative transportation analysis:** With the potential Regional Center designation, we also express concern about existing and planned projects that pose significant impacts on our community, such as the Route 40 bus-only lanes and Burke-Gilman Trail expansions, which will impede key arterials and threaten future growth and accessibility in Ballard. As part of the FEIS, the City should provide a more detailed cumulative analysis of potential Regional Center neighborhood transportation systems with includes planned SDOT projects within our neighborhood. We encourage this to be completed both at the FEIS stage so the City can understand the potential transportation related needs with a Regional Center designation, and if the City adopts the Regional Center, further analysis will likely be needed.

We urge that all City major transportation projects in Ballard be placed on hold until this cumulative impact analysis is complete to ensure cohesive and thoughtful development and policy-making. Future infrastructure programs must be grounded in data-driven analysis to justify their necessity and effectiveness, unlike the Route 40 project, which the Ballard Alliance strongly believes lacks sufficient justification and community input to proceed at this time.

4. **Foster an “18-hour city” environment:** We support approaches to planning that would prioritize job and retail growth in Ballard over additional population growth, consistent with the character of an 18-hour city. Ballard’s distinct retail character is essential to the neighborhood and must be preserved, including through zoning incentives.
5. **Support Ballard job growth:** Currently, the One Seattle Plan shows a roughly 3 to 1 ratio in the targeted net housing units to jobs projected for the future Ballard Regional Center. We encourage the City to adjust the housing to jobs ratio for the Ballard Regional Center. Additionally, as part of the subarea planning, the City should explore policies, programs, and incentives that will encourage more high-quality jobs to be created in or relocated to Ballard.
6. **Invest in public safety:** We advocate for a significant investment in public safety resources, including the establishment of a dedicated police precinct in Ballard. With Ballard poised to become a Regional Center, adequate utilities and infrastructure, including police and fire services, are imperative to support the anticipated growth and ensure the safety of our residents and businesses.
7. **Invest in livability:** We emphasize the need for increased green space and pedestrian amenities to enhance the livability and well-being of our community. These areas contribute to the physical and mental well-being of our residents, improve the environment, and complement active retail centers. As part of the Regional Center zoning standards, the City

should work with Ballard stakeholders to identify and adopt local zoning incentives and opportunities to encourage development of parks and open space with new construction.

Again, we appreciate the City's attention to these considerations and look forward to continued collaboration in achieving our shared goals of vitality and sustainability in Ballard. We look forward to working with the Mayor and City Council to implement a vibrant future for our Ballard community.

Sincerely,



Mike Stewart  
Executive Director  
Ballard Alliance

cc: Council President Sara Nelson  
Councilmember Dan Strauss  
Councilmember Tanya Woo

**From:** [Jay Lazerwitz](#)  
**To:** [PCD CompPlan EIS](#); [Hazelhoff, Aja](#)  
**Subject:** Roosevelt neighborhood Comp Plan Implications  
**Date:** Tuesday, March 26, 2024 5:35:19 PM

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**CAUTION: External Email**

As Chair of the Roosevelt Neighborhood Association (RNA) I am wondering what the implications of the Seattle Comp Plan will be in our area and adjacent neighborhoods?

How will the State Legislation HB1110 and the Comp plan affect the current single-family zoning within 1/4 mile of the light rail?

My understanding is that all properties zoned NR or RSL to be allowed 6 units on all residential lots located within a 1/4 mile of a major transit stop, and if not within 1/4 mile of a major transit stop can also have 6 units if at least two are affordable units.

What is the definition of a major transit stop?

Are there any other locations within or adjacent to the Roosevelt neighborhood besides the Light Rail station, that are considered major transit stops?

When the last zoning changes took place in 2019 in regard to the MHA program, the properties within the Ravenna-Cowen Historic District were excluded from zoning changes, going against the advocacy of the RNA. Will Historic District designation have any affect or consideration in the current Comp Plan proposal?

Are there any other issues that we should be aware of?

Thank you

**Jay Lazerwitz**  
Chair, Roosevelt Neighborhood Association  
206-335-8680

Thornton Creek Alliance  
Post Office Box 25690  
Seattle, Washington 98165-1190



May 6, 2024

Mr. Jim Holmes  
City of Seattle Office of Planning and Community Development  
PO Box 94788  
Seattle, WA 981240-7088

RE: Thornton Creek Alliance Comments on the Draft One Seattle Plan and Draft EIS

Dear Mr. Holmes:

26-1

Thornton Creek Alliance (TCA) has been dedicated to restoring an ecological balance in the Thornton Creek watershed since 1993. Thornton Creek, the largest creek system in both Seattle and Shoreline, drains NE Seattle and SE Shoreline to its Lake Washington outfall at Seattle’s Matthews Beach Park. Needless to say, we maintain a keen interest in planning and projects that impact the health of the watershed’s ecosystems.

We appreciate the work that the City has completed to date. We realize it is a balancing act to meet the many City interests which need to be accommodated in the Plan. While the Plan and the SEPA DEIS evaluating the Plan are comprehensive, they fall short in several areas. Attached are our comments to help improve the Plan and DEIS and address those areas that require additional attention. We hope our comments will help ensure that Seattle grows in a sustainable, thoughtful manner.

We thank you for your consideration of these comments and those of the attached letters. We look forward to learning your responses, as well as collaborating to create a healthy city for all. Please add us to your distribution list for further updates and materials pertaining to the One Seattle Plan and its EIS.

Sincerely,

Sandy Gurdewitz,  
Land Use Committee Co-chair

Ruth Williams,  
President

**THORNTON CREEK ALLIANCE** (TCA), founded in 1993, is an all-volunteer, grassroots, nonprofit organization of 175 members from Shoreline and Seattle dedicated to preserving and restoring an ecological balance throughout the Thornton Creek watershed. Our goal is to benefit the watershed by encouraging individuals, neighborhoods, schools, groups, businesses, agencies, and government to work together in addressing the environmental restoration of the creek system including: water quality, stabilization of water flow, flood prevention, and habitat improvement through education, collaboration, and community involvement.

<https://thorntoncreekalliance.info/>  
<https://www.facebook.com/Thornton.Creek.Alliance>



**Thornton Creek Alliance**  
**One Seattle Comp Plan DEIS Comments**  
**May 2024**

**General Comments**

- While the document includes much information and analysis, there are many areas of the DEIS where information and analyses are missing. Analyses of indirect and cumulative impacts are missing throughout the document. As a result, impacts are either underestimated or not identified making it impossible to fully compare alternatives. These studies need to be completed. Areas which we believe need additional information and analyses to evaluate impacts are listed in our comments on specific sections. 26-2
  
- Similarly, mitigation measures are missing in many sections. We do not believe that mitigation by development regulation alone is adequate protection in most instances. We have concerns, for instance, about the effectiveness of allowing developers to pay into City funds for affordable housing and replacing tree canopy, as opposed to requiring them to actually include affordable housing in multifamily buildings, or to retain mature trees on lots and plan around them. 26-3
  
- Regionally set growth targets include 80,000 homes and 158,000 jobs over the next 20 years. Why does the DEIS evaluate alternatives with greater housing needs of 100,000 and 120,000 while employment projections remain the same? An analysis or citation for the need for additional homes is missing. It is unclear where these additional numbers come from or why they are needed. Please explain (page 1-14). 26-4
  
- A number of assumptions used in evaluating impacts appear to be speculative. For example:
  - Where does the assumption that 15% of new jobs would be shifted to the location of new housing come from? 26-5
  
  - The DEIS assumes that replacing the existing canopy of older trees (particularly evergreens) with younger trees is equivalent. This is not true. The loss of function from tree removal and replacement has not been evaluated in the DEIS. Impacts from mature tree removal are underestimated. Loss of function from removal of mature trees would take decades to replace when planting seedlings or saplings to replace them. Benefits of mature trees include shading, cooling (these together benefit creek health, as well as benefitting the health of humans and wildlife by combatting heat island effects), wildlife habitat, carbon storage, and evapotranspiration (reduces flood risk). Mature trees also provide human psychological benefits. 26-6
  
- While the DEIS cites numerous federal regulations, it is unclear how it will comply with them. The DEIS discussion and analyses are inadequate. 26-7
  - Clean Water Act – How does the current City’s Stormwater Municipal Permit address future development? Will discharge limits as well as flow control need to be modified to accommodate growth?
  
  - Endangered Species Act – How will increased flow and pollutant load to surface water bodies from new development impact threatened and endangered aquatic species and their habitat?

**Thornton Creek Alliance  
One Seattle Comp Plan DEIS Comments  
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- Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act – How will the destruction of large trees, habitat for migratory birds - as part of proposed new development - impact birds protected under this act? How will trees and other wildlife habitat be protected for eagles and their prey species? 26-7  
cont
  
- Regulation as mitigation is inadequate. In the case of tree protection, often required mitigation measures for tree retention are ignored during planning – and permits are issued that allow removal of heritage trees. Currently, penalties and fines are small and enforcement lax. While the City has the ability to condition permits through its SEPA substantive authority – it is unclear if with the proposed comp plan changes, the City be able to do so. 26-8
  
- The growth concept presented in the One Seattle Plan and evaluated in the DEIS while mentioning meeting the objectives of the plan – prioritizes the built environment (housing, jobs, transportation) over the natural environment. One of the key issues noted is to approve development regulations that result in quality urban design and integrating the best available science to protect critical areas (ECAs). This stance is not protective of existing urban canopy as much tree canopy resides on residential lots outside an ECA. The highest tree loss across Seattle, as reported in the City’s 2021 Canopy Assessment, occurred in parks, natural areas, and neighborhood residential areas. 26-9

**Specific Comments**

**1. Earth and Water Quality (1.6.1 & 3.1)**

- Numerous significant direct impacts were identified for surface water for all alternatives:
  - Increase in the amount of hard surface (buildings, parking lots) – and subsequent loss of vegetation – increases the way rainwater runoff mixes with potential pollutants and is transported.
  - Runoff Increases: Increases in runoff flow volumes and durations to streams by magnitudes resulting in bank scour and erosion.
  - Surface Water Quality: Increases in amount of pollution to receiving waters that would impair their designated uses (such as human contact and fish habitat).
  - Groundwater Quality: Impervious surface expansions that would decrease groundwater recharge beyond designated limits and increases in amount of pollution discharged to levels that would contaminate groundwater supplies. 26-10

Yet, every alternative is considered to provide beneficial indirect impacts to earth and water resources because ‘focusing on growth in previously developed urban areas will result in less impact... than focusing the same growth in previously undeveloped areas outside of cities that add new impervious surfaces controlled under current standards.’ It is unclear how this applies to Seattle because there are relatively few undeveloped areas outside of the City. Sister cities near Seattle are slated to grow by 64 to over 100 percent over the next 20 years. So, this statement isn’t relevant anymore. Increasing water and earth impacts in Seattle does not reduce their impacts to surrounding areas. If anything, it increases them (2021 King County Urban Growth Capacity Report

**Thornton Creek Alliance**  
**One Seattle Comp Plan DEIS Comments**  
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June 2021, Ordinance 19369). Missing is an analysis of cumulative impacts from 20 years of growth on earth and water resources from the development of regional cities along with Seattle. Is it really better environmentally to increase density in already dense areas while increasing density in nearby communities? Additional study is needed to substantiate this assumption.

- Section 1.6.1 defines surface water quality only in terms of contaminant loading. It also must be evaluated for impacts regarding temperature, dissolved oxygen, sedimentation, bacterial loading (including fecal coliform), nutrients, and other factors that typically affect urban waters and human contact criteria therein.
- The planned extensive increase in impervious surfaces will increase runoff and stormwater. What measures will be taken to prevent flooding streets and buildings and the scouring of receiving creek beds? Mitigation measures are claimed to be addressed in Comprehensive Plan Policies (3.1-28), state, regional and federal regulations. However, without a cumulative impacts analysis it is impossible to know if maintaining the regulatory status quo is adequate.
- The DEIS states that each alternative could have increased impacts to water resources however, City code (ECA regulations, stormwater management, and building upgrades) can adequately avoid or minimize potential impacts to earth and water resources. Mitigation measures are claimed to be addressed in Comprehensive Plan Policies (3.1-28), state, regional and federal regulations. However, without a cumulative impacts analysis it is impossible to know if maintaining the regulatory status quo is adequate.
- Missing is an evaluation of the capacity for additional stormwater management in areas of the City that are already developed.
- Missing is an analysis or discussion of how or if the proposal will impact the City’s Municipal Stormwater Permit. Will regulations be changed or strengthened to accommodate growth?
- Green infrastructure is a means for stormwater management. In addition, recent studies have shown that a mature canopy as part of a stormwater management program, is a major component of green infrastructure. Where in the DEIS is this mentioned or evaluated? Protection of the mature tree canopy should be included as mitigation for stormwater management. (Berlalnd, Shiflett, Shuster, Garmestani, Goddard, Herrmann & Hopton, 2017, National Library of Medicine.  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6134866/>

26-10  
cont

**2. Air Quality & GHG Emissions (3.2)**

- Operations – Transportation-related air quality emissions (Page 3.2-22) are predicted to decrease despite the expected moderate increase in Vehicle Miles Traveled for all alternatives – this is because the DEIS assumes that all alternatives are expected to generate lower air pollutant emissions than in 2018 because projected improvements in fuel economy outweigh the projected increase in VMT for criteria pollutants. This is speculation. Provide citations and any studies supporting this conclusion.

26-11

**Thornton Creek Alliance  
One Seattle Comp Plan DEIS Comments  
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- Trees capture and store massive amounts of carbon, however all trees are not equal in their capacity to slow climate change. ‘Large trees play an inordinately large role in removing carbon from the atmosphere and storing it in long-lived tissues (Figure 1; Lutz et al., 2012; Leverett et al., 2021). Globally, studies have found that about half the aboveground carbon is concentrated in a small proportion of large trees (1%–5% of total stems) (Lutz et al., 2018) - <https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/csp2.12944> - society for Conservation Biology, Mildrexler, Berberm, Law, Birdsey & Moomaw, April 22, 2023). Missing is an evaluation of impacts from vegetation removal (particularly from removal of large mature trees which function differently than newly planted trees).
- Page 3.2-46- Mitigation. Incorporated Plan Features – How will the updated City Comprehensive Plan policies for land use, transportation and others provide an opportunity to increase residential compatibility in proximity to major air emission sources? What does this mean? What is the timing of this proposed mitigation?
- Page 3.2-47 – Greenhouse Gases & Climate Change – Add retention of large trees as mitigation for Greenhouse Gases
- Page 3.2-50 – Improved Air Filtration and mitigation – There is no section in the plan that discusses this. Please provide a reference.
- Mitigation referenced in the Plan? Where? Show us.
- Missing is an analysis and discussion of the preservation of mature trees as mitigation for climate change.
- Significant Unavoidable Adverse Impacts (page 3.2-51) – No cumulative impacts or indirect impacts analysis has been completed for air quality or GHG emissions for any alternative. The DEIS is incomplete/inadequate.
- Missing is an evaluation of heat islands and wind tunnels – a certain impact from adding impervious surface. Therefore, this section underestimates the impacts of additional development proposed in the plan. Also, it’s hard to pretend to be working against climate change while encouraging rampant demolition of useful homes and new construction with all new materials. The associated GHG output is enormous.
- The alternative in the Draft One Seattle Plan (Alt 5) has the highest impact on Expected Pollution and Runoff Increases (Exhibit 1.6-1] of all the alternatives. Note it was also reported to have the largest pollution indicator for daily single-occupancy vehicle trips as well. Why has this alternative been included in the Draft One Seattle Plan?

26-11  
cont

### 3. Plants and Animals (3.3)

**Thornton Creek Alliance**  
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- This section of the DEIS states that it evaluates impacts to plants or animals and whether they would reduce the likelihood of survival or recovery of a plant or animal species in the wild as compared to the No Action alternative. This is not a credible measure of impacts to animals or plants. The threshold of and criteria for significance in the DEIS do not meet the SEPA definition of significance as described in WAC 197-11-794, and the evaluation does not measure ‘the severity of an impact weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred’.
- All alternatives will impact plants and animals through habitat destruction. It is unclear which species will be impacted because there is no analysis. Which species are present, which will be impacted? How will survival or recovery be measured? Are there differences in different analysis zones? Differences by alternatives?

26-12

Also, it is unclear how this measure is consistent with requirements of the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act which protect numerous species. This does not measure potential taking, killing, possession of migratory birds or eagles or any parts, nests, or eggs of such birds.

- Missing is basic information that would be included in a lesser threshold determination of Determination of Non-significance (DNS), and the SEPA checklist is missing. Where is the list of birds and other animals observed on or near the site or known to be near the site? Where is the list of threatened and endangered species known to be on or near the site and where is their critical habitat shown? Many parts of the City are part of migration route for fish and birds - this is not included in the DEIS. Mitigation measures to preserve or enhance wildlife are not included. A list of invasive animal or plant species is not included. <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-5-animals>
- p. 3.3-3: “The only ESA-listed or state-listed species known or expected to use habitats in the city are fish (steelhead and Chinook salmon).” (Note they are both listed under the ESA as threatened.) The statement is true, but the loss of these species is part of a broad downward trend in several salmonid populations up and down the west coast of the US. Moreover, and very importantly, Chinook salmon are a major part of the diet of endangered southern-resident killer whales, which use Puget Sound. So, the general loss of Chinook from City waterways has had an adverse impact on those orcas and their critical habitat.
- The evaluation criteria make no sense and are inconsistent with other evaluations completed by the City. Why didn’t the DEIS use the same methodology for evaluating impacts on plants and animals as the Seattle Maritime Lands FEIS - another non project action EIS - that has been incorporated by reference? The One Seattle Plan will have a much greater impact on the City than the Maritime Lands Plan. Therefore, the One Seattle Plan DEIS should be at least as robust and include the following (excerpted from the Maritime Lands Plan FEIS):

26-13

Page 3-116 Data & Methods: “To characterize plants and animals for each alternative, the project team reviewed GIS data for the primary and secondary study areas identified for each alternative.

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Data sources included aerial imagery, national wetlands inventory, the City’s GIS data for environmentally critical areas (wetlands, streams, wildlife habitats and riparian corridors) and the Washington Department of Fish and Wildlife’s Priority Habitats and Species (PHS) information, as well as existing reports.”

This review is a general summary for the purposes of identifying plants and animals that could be affected by implementation of the program. As with most construction projects conducted in the city, projects proposed under the program would require site-specific analysis to determine the presence of sensitive or protected plants, habitats, fish, or wildlife.

Exhibit 3.4-4 Plants and Animals were identified - need to complete a study at least to this level. Include an Exhibit such as 3.4-4 Identifying Special Status Species and Habitat occurring in the Study Areas. In addition to stormwater runoff and species displacement - noise impacts were evaluated. Where is that analysis in the One Seattle DEIS?

Page 3-113 The study area is highly urbanized, but still provides habitat for numerous plant and animal species. Many of these are nonnative introduced species, and most of them are well-adapted to the urban environment and high levels of human disturbance.

Thresholds of significance used for this impact analysis include:

- The potential to reduce or damage rare, uncommon, unique, or exceptional benthic, marine, wetland, riparian, or fish and wildlife habitat.
- The potential to harass, harm, wound or kill any species listed as federally threatened or endangered.
- The potential to adversely affect critical habitat for any federally threatened or endangered species.
- The potential to block migration corridors for special status species.
- Terrestrial noise levels generated exceed any established injury thresholds for any special-status species.

Mitigation measures in the Maritime Land FEIS include - evaluating projects on a case-by-case basis. This should be obvious, but it is missing from the One Seattle Plan DEIS. Please identify where this mitigation measures are called out.

- 
- Each alternative will result in a loss of tree canopy. What is and how will ‘A substantial increase in potential for tree canopy cover loss’ be measured? Missing is an analysis of the loss of the function of large, older trees in reference to the function of newly planted trees.
  - This section of the DEIS is inconsistent with City SEPA policy SMC 25.05.675 N Plants and Animals which sets a high priority on minimizing or preventing the loss of wildlife habitat and other vegetation:

It is the City's policy to minimize or prevent the loss of wildlife habitat and other vegetation which have substantial aesthetic, educational, ecological, and/or economic value. A high

26-13  
cont

26-14

26-15

**Thornton Creek Alliance  
One Seattle Comp Plan DEIS Comments  
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priority shall be given to the preservation and protection of special habitat types. Special habitat types include, but are not limited to, wetlands and associated areas (such as upland nesting areas), and spawning, feeding, or nesting sites. A high priority shall also be given to meeting the needs of state and federal threatened, endangered, and sensitive species of both plants and animals.

- How does the SEPA mitigation policy per SMC 25.05.675N apply with proposed land use changes in the One Seattle Plan? Will these be modified? “

For projects that are proposed within an identified plant or wildlife habitat or travelway, the decisionmaker shall assess the extent of adverse impacts and the need for mitigation.

d. Mitigating measures may include but are not limited to:

- 1)Relocation of the project on the site;
  - 2)Reducing the size or scale of the project;
  - 3)Preservation of specific on-site habitats, such as trees or vegetated areas;
  - 4)Limitations on the uses allowed on the site;
  - 5)Limitations on times of operation during periods significant to the affected species (e.g., spawning season or mating season); and
  - 6)Landscaping and/or retention of existing vegetation.
- Tree canopy and vegetative cover on individual lots provide wildlife connections throughout the City. The DEIS (Page 3.3) concludes that “At the scale of an individual parcel, as the proportion of a lot that is occupied by buildings and impervious surfaces increases, the amount of vegetative cover—and, by extension, the lot’s capacity to help support diverse and abundant communities of plants and animals—typically decreases.”

Missing is information on urban wildlife corridors. Private vegetated lots provide wildlife corridors. They will be lost during implementation of the One Seattle Plan. Riparian corridors like Thornton Creek are perfect for enhancing such corridors. An analysis of the impacts of canopy and vegetation cover removal on wildlife connections is needed to understand the impacts of all alternatives, particularly on migratory birds. <https://changingnatureproject.weebly.com/green-links.html>  
<https://realgardensgrownatives.com/?p=4998>  
<https://www.smartcitiesdive.com/ex/sustainablecitiescollective/corridor-ecology-and-planning/18365/>

- “Broadly speaking, the areas with the greatest proportion of tree canopy cover are in and near parks and natural areas, particularly those near the shorelines of Lake Washington and Puget Sound (**Exhibit 3.3-2**). Forested areas are also present in ravines and along the steep slopes of the city’s major hills, such as Magnolia, Queen Anne Hill, Beacon Hill, Boeing Hill, and West Seattle. Tree

26-15  
cont

26-16

**Thornton Creek Alliance  
One Seattle Comp Plan DEIS Comments  
May 2024**

canopy is largely absent from Downtown and major industrial areas along the Duwamish Waterway and in Interbay. Figure 3.3-2 doesn't show this. Need additional information, e.g., labels on exhibit.

- “Tree Canopy Cover, Page 3.3-7 – Of the approximately 35 acres (14% of 256 acres) of canopy loss that occurred on parcels that underwent development, almost all (31 acres) happened on parcels in the Neighborhood Residential or Multifamily management units. In 2023 (i.e., after the tree canopy study was completed), the city’s tree ordinance was updated (see Section 3.3.3). It is anticipated that these updates will decrease the rate of canopy loss associated with residential and commercial development.”

This is an erroneous conclusion. How will the City’s tree ordinance decrease this rate? FAR will be reduced. The only regulations seem to apply are in ECAs and even there – the exemptions may rule. TCA can provide pictures of what lots look like when undergoing development. They are scraped clean of everything green and look more like a battlefield.

26-16  
cont

- Contaminated stormwater impacts other species. They drink the water too and eat contaminated fish. Has an analysis of degraded water on urban wildlife been completed? What is the overall Impact on wildlife?

## Other Comments

- P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals" and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.
- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts, but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur mean more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5-year periods consistent with the city's canopy studies) with increased development density in each alternative?
- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?
- Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have continued growing according to scientific articles?

26-17

What is the acreage available and suitable for planting trees in each of the following public areas- the city's Rights of Way, Natural Areas and Developed Parks?



**Thornton Creek Alliance  
One Seattle Comp Plan DEIS Comments  
May 2024**

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on housing lots?
- What is the available acreage available to plant trees on private property?
- When will it be possible to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?

What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?

- Canopy volume, especially of coniferous trees during our rainy season, is a critical factor in reducing stormwater runoff.
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

As to other tree potential mitigation measures, add:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SDCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas as Portland, Oregon has done with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require the ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

26-17  
cont



## Laurelhurst Community Club

Serving Seattle's Laurelhurst Community since 1920

May 5, 2024

Jim Holmes, Office of Planning & Community Development  
Mailing Address: P.O. Box 94788, Seattle, WA, 98124-7088  
[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

cc. Michael Hubner, Councilmember Maritza Rivera and Mayor Bruce Harrel

From: Laurelhurst Community Club

RE: One Seattle Comprehensive Plan 2040 Comments

Dear Mr. Holmes and the Seattle Office of Planning and Community Development:

The great cities of both the US and the World have experienced many of the same challenges in planning for future growth. The DRAFT One Seattle Plan document is lengthy but provides a good workable framework for the City to set goals and enact the policies to achieve them over the next 10-year planning cycle.

The Laurelhurst Community Club Council (LCC) represents over 5,000 residents and small businesses in north Seattle, and has examined the One Seattle draft, attended the OPCD outreach meetings and shared input from many non-profit organizations.

LCC has also studied how other large cities in a growth trajectory plan to supply housing units for a range of incomes amidst their housing stock of high cost of market rate homes. Solutions vary from New York City, Vienna, Singapore and Hong Kong in building maximum units on government owned land and/buildings, partnering with private developers to build affordable units within the city (Seattle's primary model), offering federal, State and local tax cut exemptions to build more affordable units and building efficient, low cost transportation systems to enable their City's work force to live outside city limits at a lower cost of land and housing.

In keeping with One Seattle's goals, the best example of transparency for planning and inclusion processes is the City-State of Singapore which does is publicly with a 3-D display of an updated master plan model of the entire city. As it updates development and planning, it delineates its old and new neighborhoods, location of subsidized units, and plans for "reclamation" of new land owned by the government added to its shores.

***How can Seattle's OPCD become a more open planning process to all?***

The One Seattle Comprehensive Plan contains noble goals and policies for the next 10+ years. ***However, many of them are very general and should be based upon the***

*effectiveness of the positive outcomes of policies of the past 15 years, as well as identify the unintended consequences, and better addressing emerging trends.*

Our comments below are focused on: General Goals, Growth Strategy, Land Use, Housing, Transportation, Climate and Environment, Parks and Open Space, Arts and Culture and Community Involvement:

### **Growth Strategy**

The GS G1 Goal of creating complete communities for the inclusive needs of all ages and abilities is the overarching One Seattle Comprehensive Plan.

GS 1.2 Encourages a variety of housing types is lofty to be inclusive and age-in-place but is not specific. *Has a real estate tax cap for seniors been studied to help predict and manage elders' tax bills so they can truly age in place?*

GS 1.3 Accommodate non-residential uses in neighborhoods seems counter-productive to building housing stock when many office and commercial buildings sit empty. *How would this policy prioritize and preserve housing units?*

LCC agrees with building density along existing transit routes, avoiding ECA areas and better planning for transportation, parks and recreation for new planned density areas.

*The 2015 Comp Plan was deficient in requiring adequate infrastructure support for density. How does One Seattle plan to finance the needed new infrastructure?*

*The U District area including the University Village now has over 4,000 new residents and receive almost no City amenity funds, the developments **and actually closed NE 41<sup>st</sup> St community center** nearest because it did not meet a body mass and racial profile. How can the City meet the increased facility needs with its plans for adding 100,000 more residents?*

LCC supports GS 1.4 and GS 1.9 which calls for the City policy to match dense housing in Regional and Urban centers with MORE public amenities.

LCC supports GS G2 Seattle's development pattern that results in a range of vibrant places that all play a role in housing and jobs.

*LCC supports GS 2.1 Use the FLUM to guide land use regulation (adding no exceptions)*

GS 2.2 Require FLUM amendments only intended to change the intended function.

*How can FLUM amendments be prohibited from piecemeal projects by developers looking for exceptions and departures that cause the overarching plan to disintegrate?*

LCC agrees with the description of the place types (page 19, figure 1). Renaming Urban Centers that serve the NW Region and State should be Regional Centers.

Urban Centers utilized by County and City residents and employees fit the new name. LCC strongly supports more Regional and Urban Centers proposed at Northgate and 130<sup>th</sup> adjacent to the new Light Rail stations and for future ones in West Seattle Junction and adjacent to Light Rail stations through the Rainier Valley. *Should Aurora Ave be a*

*designated Urban Center with a Master Plan for dense housing with commercial and support service amenities e.g grocery stores and pharmacies, that also retains its light industrial and commercial small businesses?*

LCC supports GS 4.3 allowing a wide range of housing types, and again would like to add: ***GS 4.6 Do Urban Centers require retaining or anchoring essential large grocers and a child care facility in these zones to make walkable neighborhoods?***

Neighborhood Centers (figure 7) would be a new zoning type option to add density and comply with State bill HB 1110 which requires “middle housing” type options with 4-6 units within 1/2-mile walking distance of a major transit center.

GS 5.1 “designate Neighborhood Centers with a commercial core, diverse housing options within walking distance to shops, services and transit”. LCC agrees that this best complies with HB 1110.

GS5.2 Allow all types of diverse housing types and services. LCC disagrees that it should be centered on *institutional* services. Larger-scale services should be in Urban Centers.

GS 5.3-Zoning heights 3-6 stories. ***Why are 5-6 stories the goal for Neighborhood Centers, which double the existing height limits? LCC suggests heights should be 2-4 stories maximum as suggested in HB 1110 to conform to existing heights. These denser units that would better transition to existing while doubling housing units.***

***Add: GS 5.6 Why isn't there an OPCD and/or SDCI code change that Neighborhood Centers require a “Master Plan” to ensure context sensitive scale and aesthetic compatibility to adjacent existing buildings, especially residences?***

Urban Neighborhoods- Seattle’s neighborhoods are the heart of the City. People ask “what’s your neighborhood” to start a fun conversation, and they support community building throughout the City.

GS 6.1 Designate Urban Neighborhoods primarily for residential development. LCC agrees that some areas need to be designated as quiet places to rest and enjoy, away from the noise and traffic in urban cities.

GS 6.2 Allow 4-6 stories near frequent transit. LCC disagrees and that is covered in all of the other zones, especially in Neighborhood Centers. ***Building 4-6 stories is out-of-scale and lacks the adequate infrastructure to build heavy density in this low density area. HB 1110 requires building more units in existing zoning to add “Middle housing” and does not call for adding heights or changing setbacks in those zones and better transitions at its edges.***

## **Major Institutions**

LCC agrees with using the Major Institutions GS 8 Master Plan processes for managing their growth and uses that are needed within those boundaries as approved.

## **Parks and Open Space**

Because the Park and open Space lands are not expanding with the rapid population growth.

GS 9.3 “Allow housing in the parks and open space ...only where it is located within a community center or pool”. *What statute in the City codes allow Seattle to change parklands to housing? LCC rejects this hijacking public open spaces and converting it to private residences, even if City owned. It is not compatible and removes limited public space when housing can be built elsewhere.*

GS 9.4 Allow limited commercial use to activate existing buildings. LCC supports this as operating some recreational uses require expertise from commercial operators.

### **Area Planning**

GS G10 .4 and GS 10.8 “Prioritize City resources for area planning for Regional and Urban Centers with a higher risk of displacement” *What policies in the City’s Land Use code provide long-term housing displacement for vulnerable elders, handicapped and low income residents? LCC agrees to protect existing residents from displacement whose housing costs could be now affordable, but later is too expensive.*

27-2  
cont

### **Annexation**

GS G11 “Seattle has established a process for potential annexation of three areas”.

GS 11.1 “Designate unincorporated land for potential annexation where it can be easily connected to City services”. *LCC agrees* but cautions that any new annexation should be in similar condition to the levels of Seattle so that annexation does not cause an excess outflow of resources from the City of Seattle.

Add: GS 11.2 *Is permanent affordable prioritized when creating “new land” from potential “lids” over transportation corridors? Singapore does with proportionally when “reclaimed” land is developed from the sea.*

### **Land Use**

LCC agrees with the statement that new zoning and development regulations intended to produce one result can *also have unintended consequences*, and in particular, displacement of existing residents and small businesses who can be “priced out” of existing locations that they call home.

*LCC supports* the lofty goals in LU G1, specifically *“create housing that works for various income levels, “encourage high quality, well designed and sustainable buildings, protect and enhance the natural environment and mitigate impacts of new construction.*

27-3

*These are similar to the lofty goals of the 2015 Comp Plan but policies were rarely enforced resulting in rapid infill and increased zoning “departures” from the planned Comp Plan and MHA policies. Many of those projects failed the “quality, sustainability enhancement of the natural environment and mitigating impacts of new construction”.*

*How will projects be considered “high quality” if SEPA and Design Review are not part of the regulatory process?*

*Many MHA titled housing units were built with no context to existing structures and zoning, displaced existing residents and small businesses, destroyed existing trees. Developers just wrote a check “in-lieu” into the affordable housing fund to build units far away from existing locations. “Stick trees” were planted onto right of ways and many died which deteriorated the City’s tree canopy. How can Seattle prevent these unintended outcomes and ensure “stewardship” practices for the replacement trees viability?*

The 2021 City of Seattle Tree Canopy Assessment (page 37) chart noted that in “**Citywide redeveloped parcels**”, there was a loss of **-39.8% in tree canopy**, ( and only a -1.4% in undeveloped parcels) which resulted in 33% of the City’s declining tree canopy of 1.7% from 2016-2021. **Which City policies in One Seattle will “protect and enhance the natural environment “? How will SDCI define “high quality” standards and mitigation goals?**

LCC supports:

LU 1.2 Neighborhood business variety nearer to residents

LU 1.3 Apply development standards to protect public health and safety **(NO WAIVING Design review)**

LU1.5 Balance development standards vs **preventing displacement.**

LU1.6 Develop residences **away from air pollutants.**

LU 1.7 **Protect displacement** in legislative re-zone policies, especially low income and marginalized populations.

*LCC has concerns about LU1.1 “a wide variety of housing types in all neighborhoods”. The infrastructure in the City was not built for all densities (eg width of streets, sewer) This was also mentioned as a concern in HB. 1110*

## **Urban Design**

*LCC strongly supports the goals and policies of the natural environment:*

**LU G2**” Seattle’s unique character and sense of place, etc and the policies that recognize the importance of retaining Seattle’s native vegetation, waterways, forests and visual public views of Mt Rainier, the Olympic Mountains and the Cascade Range, as well as lakes, waterways and public shoreline access points.

*What new regulatory land use codes will protect public view corridors as developers try to “outview the next one?”*

And LCC supports polices :LU2.1, LU2.2, LU2.3, LU 2.4, LU2.5. LU 2.6, LU 2.7, LU 2.8.

## **Built Environnement**

*LCC strongly supports:*

LU 2.9 Encourage preservation of characteristics and features that contribute to communities' multiple identities including areas of historic, architectural, cultural and social significance.

LU 2.10 creating walkable cultural scapes

*LU 2.12 Will the City SDOT have designated ownership and operating plans to develop highway lids and other pathways to reunite neighborhoods?*

LU 2.13 and LU 2.14 Design walkable connections and add natural lighting and rain protection.

LU 2.15 Rooftop production of fresh food is a terrific way to provide local food sources.

LU2.19. Plan to cascade heights to allow for more lower-to-higher views of water and mountains. This is a much better approach than SDCI continuing to allow view blocking with the newest buildings in the 2015 Com Plan.

LU 2.20 Prioritize not allowing negative impacts of tall buildings to block sun and views in public parks and spaces

**LCC does not support:**

LU 2.16-18. Clustering of tall buildings, which can create *"built mountains"* and block public views. *Which regulatory land use codes and agency define what is a good cluster of tall buildings?*

**Public Spaces**

**LCC supports** LU 2.21- LU 2.24 that encourages public spaces designed for a range of users.

**USES** Goal: LU G3 Allows every use everywhere

*Will the City require Master Plans for allowing a variety of uses and some defined use areas to prevent the "Aurora Ave" lack of character and confusing zoning mess?*

**LCC does not support policies LU 3.1, 3.3, 3.4, and 3.6** but supports 3.5 retaining existing nonconforming use.

**General Development standards**

LU G4 Development standards that match each zone's function, protect health and safety and add housing and commercial spaces.

*LCC Supports these policies:*

LU 4.2-Standards that provide predictability for each zoned

LU 4.3 -Control of massing for compatibility for planned scale and provide open space

LU 4.7 Use setbacks to allow for light air and sunlight

LU 4.8 Use tree preservation requirements to enhance aesthetics, prevent heat islands

LU 4.9-LU 4.14

*LU 4.15 LCC supports protecting the public views through setbacks and establishing zoning blocks that protects key City views.*

*LU 4.17 LCC supports Seismic retrofitting to minimize health risks and retain historic buildings.*

*LU 4.18 Can OneSeattle reinstate the use of Design Review to enhance the quality of City development by applying these best practices to “Middle Housing” and to “Affordable Housing” to minimize the stigma of “cheap housing” among its residents?*

LU 4.4 and 4.5 – allowing use of maximum heights in the name of limiting *view blockage*  
*How does this curb more view blocking throughout the city scape?*

LU 4.16 -*Why are higher heights required when current regulatory codes already provide land use code exceptions to preserve land marks?* Requirement for higher density to preserve landmarks-too broad and not necessarily commensurate with designating a landmark.

### **Off Street Parking**

LU G5 to *plan for alternative transportation modes*

The reality check is that an estimated 80% of Seattle’s residents own a car which is the second highest urban car owners in the US. While there has been a small decrease in car ownership as the City becomes more renters than home owners, the OneSeattle must plan for their existence, especially for attracting families..

LCC supports LU 5 5.4, LU 5.5, LU5.6, LU5.7, LU5.8, LU 5.9, and LU 5.11 (for bikes)

*LCC has concerns on the LU 5.1, LU 5.2 and LU 5.3 which set limits on parking. Has the City ‘s traffic improved due to fewer cars owned?* The free-market system will best sort it out and since it expensive to build, developers *will find the number of spaces to meet the needs of the residents of its housing and commercial users.*

### **Public Facilities and Small Institutions**

LCC supports LU G6 that public facilities and small institutions must grow to meet the needs of the population if their “mission is compatible with the function and scale of the surrounding area”.

LCC supports LU 6.1 through 6.4

*LU 6.5 What is the process for siting essential public facilities and a policy needs to be made in One Seattle as 6.5 is too general?*

### **Telecommunications Facilities**

LCC supports LU G7 that allows telecommunication utilities but also requires that they be vetted for public health issues.



*LCC supports LU G 7.1- LU 7.5 -restrictions on the location size, mitigation of visual, noise and proximity to communities, and prohibiting locating them in residential zones.*

### **Downtown Zones**

*LCC supports LU G8 to promote downtown Seattle as its densest neighborhood promoting vitality, tourism and arts and entertainment.*

*LCC supports all policies e.g. LU 8.4 to encourage a vital 24/7 environment.*

Seattle Mixed Zones

*LCC supports LU. G9 How will the policies of LU 9.1 and LU 9.2 promote density in mixed use zones outside of the downtown core?*

### **Multifamily Zones**

*LCC supports LU G 10 multifamily zones to provide a variety of scale of household with a mix of incomes and support local walkable neighborhoods where they are located.*

LCC supports LU 10.1 through 10.6, especially requiring “*high quality housing* and development standards that promote livability and a sense of community, including landscaping and amenities.”. This approach will enable Multifamily zones to be desirable and affordable in forming new desirable neighborhoods of the future.

### **Commercial Zones**

LCC supports LU G 11 -the creation of Commercial zones that support surrounding neighborhoods and encourage long term stable businesses. Robust businesses serve both residents and employees and add to the vibrancy and into the City’s tax coffers.

LU 11.1 In the statement “range of commercial zones”. *What is in the range of commercial activities? More clarity is needed to prevent incompatible development.*

LU11.4 Assigns outright height limits to commercial but then allows different height limits within the zone. **Are these lower height limits for transitions to existing 2-3 stories or does it mean grant higher height limits of 4-6 stories?**

LU 11.2, and 11.5 state “compatible blend” of housing and commercial and suggest Neighborhood commercial limits on size and heights but **does not require the necessary commercial anchor of a grocer with access to fresh produce and protein. How can access to fresh food be incentivized in OneSeattle?** *Over the past 10 years, NE Seattle has lost two QCF grocery stores (Roosevelt and Wedgwood), and a major Safeway on NE 45<sup>th</sup> Street while density in residential units exceeded 10,000 more residents with at least 4,000 more units awaiting permits at SDCI. Neighborhood Commercial should only occur where a significant food outlet is a key component because residents cannot live on coffee alone. Requiring a type of Master Plan for these new Neighborhood Centers would help to guide a balanced result in services.*

### **Neighborhood Residential Zones**

LU G 12 LCC agrees with this goal to have places in the City for residential zones, which contain various housing options and accommodate a variety of households and income.

LU 12.1, and LU 12.2

**LU 12.5 height limits of LR 2 -LR3 to this policy and require to be within 1/2 mile of frequent transit service.)**

LU 12.3 -LCC mostly supports these uses. *How does SDCI prevent and monitor adverse impacts from small institutions and at-home businesses to protect the livability of residential zones and avoid unintended consequences?* Dense residential areas should be primarily a refuge from loud City noise and traffic and must be the primary goal.

*LU12.4 LCC opposes this vague “development capacity allowance”* as it can create out-of-scale buildings with simply adding 4 units of somewhat affordable housing into a general affordable housing pool but leaves negative impacts from excess heights that change the entire character, sunlight and natural public views on existing residences who are compliant with the zone heights.

**Industrial Zones**

LU G13.1-LU G13.3 LCC supports all of the goals and policies (LU 13.1-LU 13 .39) in the Industrial zoning section, and especially agrees with LU 13.29 and LU 13.30 which **requires buffer zones and compatible scale along its edges**, particularly to neighborhoods.

LU 13.35 *How will new building heights should be limited to “protect distinct natural water views, shoreline areas and nearby neighborhoods?”*

**Local Specific Regulations**

LU G 14 Local regulations supporting unique conditions. LCC agrees with this goal to preserve the City’s character and support special areas of interest and special needs.

*LU 14.2 and LU 14.3 Can implementation of the Master Plan process help create a variety of residential and commercial development that “use a cohesive urban design and promote high levels of environmental sustainability, housing affordability and publicly available open space”?*

This approach is far superior to many of the piecemeal apartment projects that were surgically inserted into NE Seattle, on Union Bay and NE Blakeley streets. The “residential density” result is a row of cluttered market price housing units, with dumping cars on the two small side streets with no City safe and continuous sidewalks and no crosswalks for pedestrians. A “Master Plan” would have resulted in a less cluttered and poor-quality aesthetic, required developers to pay in for transportation impacts and perhaps provided better car storage, delivery truck access.

**Major Institutions**

LU G15 LCC agrees that the Major Institutions are regionally important, but *they must be regulated to avoid traffic, displacement and housing shortage impacts.*

LCC agrees with the policies LU 15.1- LU 15.10 which are the using the tools of the Major Institution Master Plans and Major Institution Overlays. The City of Seattle is a nexus of health care and education and its needs will grow as the surrounding populations grow.

*LU 15.3 LCC supports “Balance the need for the major institution to grow with the need to maintain the livability and vitality of neighboring areas”. LU 156 “ Locate major institutions where their activities are compatible with the surrounding land uses.. and where impacts associated with future development can be appropriately mitigated”.*

LU 15.10 addresses housing units. *LCC supports these recommendations not to allow any housing on, or nearby the institutions to be torn down and re-used for non-residential purposes.* The City allowed Seattle Childrens Hospital to demolish 136 units Laurelon Terrace garden condominiums with affordable rents, but allowed SCH to replace the family units with dorm room style units in the U District which went up to market price and alter divided into single room rentals and displaced families.

*In assesshe Major Institutions’ Master plans, will SDCI :Require the Major Institution to include an inventory of their space used in their facilities by hours used?.* The goal is to first identify surplus spaces already underutilized for every institution instead of continuing to add more buildings.

*Require Major Institutions to identify capacity for expansion in their satellite locations?* With enhanced technology, and virtual tools they could expand capacity using other locations linked to a main campus or medical center effectively and economically.

*Require Major Institutions to declare all of their facilities (research, housing, offices, billing, etc) inside or outside their Master Plan and quantify their total Seattle footprint as part of the Master Plan process?*

*Acknowledging that many Major Institutions are tax exempt, has the City considered imposing fees to support infrastructure or operational services provided to them?*

### **Historic Preservation and Cultural Resources**

LU G 16 *LCC supports the City’s goals to preserve its historic and cultural resources* and encourages adaptive use of its buildings and sites. The landmarks in Seattle tell the story (good and not-so good) of Seattle’s colorful history. *Cultural resources in conjunction with the City’s First Nations history are the rudder guiding all people today how to live in balance with the City’s natural surroundings.*

Policies LU 16.1- LU 16.18 are all *supported by LCC* with special emphasis on using outreach to educate all citizens about the preservation processes and why they add value to the city’s livability. .

*As the City grows in landmarks to preserve, how has it allocated adequate resources to adequately manage the current landmarked properties and future designations needing resources to approve any modifications?* Volunteers on these technical boards should have access to independent experts in historic architecture.

LCC supports LU 16.18 but would also add more incentives:  
For expensive landmarked buildings seismic retrofits, the *City should grant owners of a real estate tax credit or deferral to protect these vulnerable assets from earthquakes.*

LU 16.19 *How have the US Department of the Interiors' Standards for the Rehabilitation of Historic Properties been applied by the City to ensure that meet the guidelines for the Seattle Landmark Preservation Board's approval decisions for any major changes or demolition of any landmarked buildings or sites?*

27-3  
cont

### **Environmentally Critical Areas**

LU G17 LCC agrees that environmentally critical areas need regulations to protect the ecological functions, wetlands and fish and wildlife conservation.

*LCC supports most of the policies of LU 17.1-LU 17.17 with emphasis on LU 17.8, LU 17.9 and LU 17.9 requiring new development in liquefaction and peat settlement areas to be designed to limit damage during earthquake and the construction processes.*

LCC supports LU 17 .12-14 Wetland protection with no net loss to protect fish and wildlife habitat.

LCC *supports fish and wildlife regulations* in LU 17.15 as well as LU 17.16

*How does One Seattle incentivize the daylighting of streams that are now in pipes?*  
Specifically, Yesler Creek has been buried under the Battelle site in NE Seattle and it should be required to be daylighted with any new development on the landmarked site.

LU 17.18 Abandoned landfills. *Does SDCI prohibit development within 1000 feet of an abandoned landfill?* The Laurelhurst neighborhood borders such a landfill and has strong concerns about the proposed dense development within 1000 feet and its impact on the existing residential areas that border the landfill.

### **TRANSPORTATION**

T G.1 "Transportation decisions, strategies and investments support the growth strategy for the City and the Region". LCC agrees with this goal. The 2015 Comp Plan expected Light Rail to be developed more quickly and expansively than it delivered. In 2 years Light Rail will finally connect to major employment locations on the Eastside and later to other Seattle outer neighborhoods.

T 1.1 through T 1.4. LCC supports these policies which prescribe planning now for regional connectivity considering the long planning and execution timeline.

T 1.1 *Do transit facilities need to include public restroom access as travel times are lengthened by new service routes. In addition? Is Transit security planned and funded to make these regional systems safe to ride at all hours?*

TG 2 Street use including right-of-way use for community. *LCC opposes dedicating the ever-dieting Seattle streets for "inviting spaces for community" within the right of way. LCC has concerns that pedestrian safety is endangered with cars, and not safe. LCC has concerns that users will be exposed to vehicular emissions. Who decides which*

27-4

*City streets are “closed” and causes confusion and resentment of entitlement among neighbors?*

T 2.3 , T 2.7 ,T 2 .8 and T 2.9 LCC agrees that the City needs to plan for emerging delivery devices as residents often get 1-3 various types of food, and Amazon/UPS packages delivered daily. Freight mobility is critical to commercial use throughout the City

T 2 .11 Resolving conflicts with using right-of -way spaces. LCC agrees that some street frontage space needs to be dedicated for shorter duration use and use off street parking and transit layovers.

T 2.13 and T2 14 LCC supports enhancing boulevards and alleys for all transportation modes, and alleys may be utilized for public space is not heavily trafficked.

T 2 15 and T2 .17 LCC supports creating public space (if large enough) in right of ways for children and non-motorized egress (bikers, skaters).

**T2.18 *How and who decides to reallocate street space from parking for people ?*** People are intended to walk on the sidewalks rather than on the streets, and *SDOT routinely issues temporary “street closure” permits for special gatherings. Thus, the appropriate Transportation Policy here should be that SDOT promote the accessibility to these street closure permits, but not close the streets permanently?*

**T2.19 *Will SDOT build and maintain street use primarily for all forms of transportation modes or will the streets be designed or allocated as parks?***

## **TRANSPORTATION OPTIONS**

T G 3 Expand equitable access to multiple transportation options. *LCC agrees that “one size does not fit all” for a successful transportation system.*

The policies in this section are well thought out and LCC supports:

T 3.1- T 3.23, except T 3.9. “Prioritize transit Investments on the basis of current or potential ridership, etc”. *How will SDOT change its transportation resources within its regional transportation links to address the dramatic shift in commuter demand from 5 days a week to 3 days with heavy users on Tues/Weds/Thurs as employers continue to offer flexible work schedules for employees to be “in the office”?* While there may be a slow return of employees, Seattle should plan for varying capacity needs based upon the day of the week to ensure there is adequate space for transit users as well as other modes including trips via cars be they shared, electric, etc. this is why converting roads into “gathering places” would be in conflict.

***What plans are in place to install and maintain the missing and broken City sidewalks?***

T 3. 10 and T3.21 is supported by LCC. Potential users in the residential neighborhoods have a 40 minute walk to the Montlake Light Rail. The “last mile” or two is offered instead at another Light Rail station in the U District where most neighbors do not enjoy connecting there for safety reasons so they do not use it at all. These same issues are

important for bike and pedestrian safety for the “last mile” which really matter. Safe intermodal connectivity should be a top priority.

### **Building a Green Transportation System**

TG 4 LCC supports transportation systems that improves the environment and air quality

T4 .1- T4-12. *LCC supports these policies* for adding new electric vehicles, **adding public charging infrastructure, enhancing the street tree canopy and improving fish passage and better capturing of storm water.**

**T 4.3 *How does reducing general purpose lanes all day reduce drive alone cars?*** This really does not work because drivers will find other streets to use, or their vehicles will sit in traffic spewing out more emissions than they should due to squeezed capacity. ***Should SDOT restrict transit-only lanes during am and pm peak, then open them to all users after non-peak hours?***

### **Supporting a vibrant Economy**

TG 5The transportation system improves mobility ... and promotes economic opportunities throughout the City. LCC agrees that without reliable roads, freight will not be able to provide competitive services for residents and businesses.

T 5.1-through T 5.10 LCC supports these policies which support the movement of goods throughout Seattle and Region by vehicles, rail and connectivity to air and drone devices.

T 5.11 activating right of ways for the public is a departure from the core transportation goals and LCC does not support it.

### **Promoting Safe Travel for All**

TG 6 Ensure Seattle’s transportation is safe for all ages and abilities. LCC strongly supports this keystone goal. Without safety, SOV increases, and transit can fail.

T 6 .1-T6.9 Policies are good and LCC supports them, especially T 6.9 on improving lighting near transit stops.

***T6.12 How can the City of Seattle ensure and co-fund if necessary adequate Transit Police throughout the Light Rail system in Seattle and work with King County Metro for funding that provides King County security/police for its bus services?***

### **Connecting to the Region**

TG 7 LCC agrees that Seattle and Regional projects should be consistent among goals.

T 7.1 through T 7.11 are policies between local and regional entities and LCC supports these connectivity efforts that ensure the transportation corridors work seamlessly.

***LCC add:***

*T 7.12 How can the City of Seattle require WSOT to ensure that the Washington State Ferry System has adequate service and well maintained boats to service the work force commuters from Bremerton, Vashon, Bainbridge, Whidbey and the San Juan Islands?*

## **Operating and Maintaining the Transportation System**

TG 8 Transportation assets should be maintained and renewed is strongly supported by LCC especially bascule bridges, State and Federal highways and local bridges, roads.

T8.1 through T 8.7 work to operate a solid transportation system but falls short on maintenance.

**Add T 8.8 LCC proposes that the City utilizes the recent comprehensive audit of bridges and roads with the requirement it be used to prioritize their repairs and maintenance.**

## **Funding the Investment that we Need**

TG 9 states, “Transportation funding is sufficient to operate, maintain, and improve the transportation system that supports the City...”

*Since the public transportation system is an essential City service, how can its Budget's meet operating and capital budgets without relying on tax levies exclusively on property owners to fund all of its expenses? This can be applied to the T 9.9 policy.*

T 9.1, T 9.2, T 9.3, T9.4, T9.5 and T 9.6 discuss partnering with other local agencies and governments for inter-funding regional transportation and LCC agrees with that approach.

T 9.10 Considers use of transportation impact fees to fund the transportation needs.

*Should the City collect impact fees from all developers to pay for the Transportation Budget capital expenses to reduce the tax burden on property owners?*

T 9.12 Planning for 6-year capital improvements. *How will the City of Seattle Bridge and Road audits be used to prioritize projects?*

T 9.13 Identify alternative funding sources. *Which transportation priorities can be funded by federal, state and regional sources for its capital improvement projects?*

*Because all transportation modes have capital and operating expenses should users “pay a fair share” back to the City? Should everyone pay an affordable fare for bus service, Light Rail, ferries, shared bikes, scooters, and a portion of tolled roads into the Seattle and Regional transportation budgets?*

## **HOUSING**

The OneSeattle Plan notes that job growth in the City grew by 38%, its housing stock grew by only 19% which has led to supply/demand price increases for its residents. Of course, not all of the employees in Seattle want to live in the City, but the pricetag of regional housing has climbed as well. The King County Growth Management Council target for Seattle is to produce 112,000 units over 25 years (2018-2044) in each of the

Area Median Income (AMI) level, which translates to over 43,000 units of units for income earners below 30% of AMI. Because the costs of providing the land and structures also have climbed, subsidies from every source is essential.

H G1 and H G 2 Expand Seattle's housing supply to meet current and projected needs for all economic groups. **LCC agrees that more stock will help stabilize housing needs.**

H 2.1- H2.3-LCC *What percentages of the 112,000 units produced will be less than 69% of AMI for renters and less than 89% for owner occupied units?*

HG 2.1 through HG 2.2 LCC agrees expanding capacity of all types of housing are important, and monitoring the inventory by price and type is essential for planning.

HG 2.3 Removing regulatory "barriers" for less expensive housing. *LCC disagrees for 2 reasons. Even if units take longer and a bit more money to build, why don't affordable housing residents of all incomes deserve the benefit of Design Review, vegetation and saving trees? How can SDCI and the Office of Sustainability enforce existing tree preservation to prevent concrete "heat islands" in Settles' neighborhoods?*

HG 2.4 LCC agrees that small landlords can often produce less expensive housing units and should be supported. *What legislation passed by City Council should be re-evaluated as anti-landlord regulations which may be creating obstacles for small landlords from increasing small scale rental housing units?*

HG 3 Seattle should supply affordable housing to all who want to live there.

LCC questions whether the City can/should supply housing for all since its land value is high and people (e.g. with large families) may need/want to live somewhere else. This works when the City has a frequent and reliable transportation system network, and Seattle is just a few years away from the Light Rail extensions to the Eastside, Lynnwood and points north. This will open up greater land space for those who work in Seattle but can afford and want to live outside the City. *Should Seattle be the only entity to produce all of the types of housing to house everyone working within its City limits?* With improved Light Rail regional network, HB 1110 requires adjacent "bedroom communities to also build a "fair share" of housing for all income levels.

HG 3.1-*How can Seattle source more federal funding for permanent affordable housing? Seattle is a employment hub but high tax levies for housing and transportation have placed a heavy tax burden on property owners, leading to higher housing costs.*

HG 3.2 LCC agrees to expand more long term affordable (<30% AMI)

H 3.4 LCC agrees that the City should build in more affordable housing units near frequent transit to save total cost of living savings for low income residents

H3.6 LCC *"When and how will comprehensive "audits" be compiled for measuring the actual inventory of affordable housing and check on their health and safety compliance?"*

H 3.9 LCC *supports building long-term housing on publicly owned sites (not parkland)*



H 3.10 Waive development standards for affordable housing. *LCC objects to this because people with less income DESERVE trees, sidewalks and the other benefits of good urban planning , and it will enable these units to “fit in” and last longer, preventing future displacement..*

H 3 11- H 3.21 *What policies can be formed that lead to own ownership for residents and tax incentive saving for developers of lower income units especially < 60% and 30% of AMI?*

## **EQUITABLE ACCESS to HOUSING**

Goal H G 4 Housing should be available for all . LCC agrees

H 4.1 -H 4.5 LCC supports policies to promote access to housing of all types throughout the City

H 4.5 Remove zoning to add low income housing-*Why would Seattle add more building heights and setbacks as existing housing units when that is not required by HB 1110?.*

H G4.7-4.10 LCC supports open and educated process of finding appropriate housing

## **HOUSING SECURITY and STABLE COMMUNITIES**

H G 5 Residents should be able to remain in place and thrive without fear of displacement and housing discrimination

H 5.1 *LCC agrees that vulnerable populations, especially seniors from displacement.*

H 5.2 through H 5.12 *What city regulations can be added to prevent displacement of existing residents, and providing pathways for more home ownership?*

H 5.13 Property tax relief for low and fixed income residents. *What programs enable seniors to “age in place” without getting “taxed out” of their home?*

## **Diversity of Housing Types**

H G6- *Seattle can produce a full range of housing types that fit into existing heights. Should more duplexes, tri-plexes and small low rise muti unit apartments be encouraged rather than townhouses that are difficult for seniors and families?*

H 6.1-H 6 Policies that promote all types of housing units from small to large which accommodates multi-generational and large families,

H 6.7 Advocate for State legislation to encourage the production of *What changed in the State will incentivize production of more condominiums and co-ops? LCC supports this action to enable first time buyers to build equity as they pay for housing. This can lead to wealth building for individuals and families.*

## **HOUSING CONSTRUCTION, QUALITY and DESIGN**

H G7 LCC agrees that Seattle’s housing units should be carbon neutral healthy and safe

H 7.1 LCC agrees with regulations and enforcement of safe and healthy housing stock

H 7.2 *Why is the City incentivizing the use of CLT building material exclusively ?* While it is fast growing, the quality of this wood aging over time should be assessed before recommending it. (e.g. **Burke Museum use of CLT may not be the desired outcome**)

H 7.3- and H 7.9 and H 7.10 *Which policies are applied to affordable housing units making them more livable and using sustainable materials that reduce carbon footprint and are healthy with open space that promote light and social spaces?*

*To survive the potential rising temperatures of Climate Change what resources will the City retrofit HVAC systems to convert to provide air conditioning and more energy efficient systems that reduce use of carbon fuels?*

H 7.5 **LCC supports re-purposing historic buildings for residential uses**

H 7.6 *What criteria and incentives can the City provide for converting non-residential buildings to housing use, considering the overbuilt supply of office spaces?*

## **Homelessness**

The two main reasons for chronic homelessness are drug addiction and behavior health issues. Seattle has tried just about every type of approach to find permanent solutions for housing those who are unsheltered and has learned some things about what may work to achieve a reduction in homelessness.

H G 8 Homelessness is rare and brief, and there is a need for emergency housing as a step for permanent housing. *LCC agrees for the need for emergency housing but does not agree that it is necessarily brief, and rather can also be chronic.*

HG.8.1 -H 8.2 Implement programs to secure emergency housing units to meet needs. *LCC agrees. How many shelter beds will be available for drug users with services to detox? How will the State and County partner with Seattle to supply adequate behavioral health facilities for unhoused mentally ill individuals.*

HG 8.4 Collaborate with other jurisdictions to provide permanent housing and services LCC agrees that Seattle can/should provide resources for those who are homeless in the City, but other regional area governments can share in responding to emergency housing and services.

HG 8.7 *As a component of a solution for homelessness, do all services provide “a path home” to reunite families around the country for a permanent housing solution?*

H 8.6 “Remove regulatory barriers” to allow homes on properties for homeless people. *LCC does not know of any “regulatory barrier” that precludes occupation of housing units on owner occupied property.*

## **Climate and Environment**

Seattle aka, The Emerald City, has been impacted by rapid growth, Climate Changes in weather and the lack of City codes that have accelerated tree canopy loss since the 2015 Comprehensive Plan. Carbon Pollution Reduction has been helped by the Climate Action Plan of 2006, but much more needs to be implemented.

CE G1 *Which climate resiliency goals must be met to achieve carbon neutrality by 2050?* LCC strongly supports this goal to keep our City and world sustainable.

CE 1.1 -1.3 *LCC agrees that using data to track our actual GHG output and which City office will ensure that the targets are met?* Seattle needs to develop new policies and practices to meet the targets in partnership with the Green New Deal will enable Seattle to help reach a net neutral position by 2050.

CE 1.4 LCC supports partnerships with other local jurisdictions and academic institutions to build science-based programs to reduce GHG, and analyze actual data points to assess Seattle's position towards those goals.

## **Transportation**

CE G 2 LCC supports the goal of reducing GHG from transportation modes.

CE 2.1 through CE8. 5 *LCC agrees* with these policies to achieve lower emission by enabling more local services that are walkable in a City-wide equitable way.

*When and how can Seattle require all delivery vehicles to be carbon neutral by 2035?*

## **Extreme Heat and Wildfire Smoke**

CE G9 LCC supports the goal to be prepared for excess heat and wildfires

CE 9.2. Design and retrofit City capital facilities. LCC supports this and was pleased that the City libraries are being retrofitted for air conditioning as a refuge for extreme heat.

CE 8.5 and 8.5 Mitigate economic impacts of transitioning to carbon neutral on low-income individuals and fixed income seniors.

*When will the SPD North Precinct SPD be replaced with two new buildings -one near Ballard, and one near the U District to protect growing populations and the SPD officers to ensure adequate Public Safety coverage and a healthy facility for officers?*

CE 9.3 Expand tree canopy and greenspace. *When will a separate City Tree department be established to track the status of the state of the Tree Canopy policies to prior legislation which may have adverse outcomes on the tree canopy and open space preservation?*

CE 9.5-CE 9.7 *What City policies will protect urban critters, outdoor workers, and owners on how to protect all Seattleites from extreme heat in their buildings?*

## **Sea Level Rise and Flooding**

Seattle must be prepared to face the reality of rising sea levels due to ice melting from Global warming.

CE G10 LCC agrees that Seattle needs plans for adapting to rising sea levels

CE 10.1 through 10.4 *What are the City's planning and education policies to prepare for high sea levels and focus on restoration of resilient ecosystems, including an annual assessment of Seattle's Seawall condition?*

### **Tree Canopy**

LCC agrees with the overarching statement that the Tree Canopy is fundamental to Seattle's quality of life.

*Trees perform functions such as "cleaning the air" and removing carbon. Trees provide shelter for an intricate ecosystem of urban critters and provide shade for people on hot days, and mature trees "mother" other smaller or distressed trees to maintain their health. Tree clusters prevent "heat islands" from forming and absorb storm water run-off. Seattleites espouse to be tree protectionists, but the tree canopy shrunk from 2019-2021 by 1.7%, mainly from neighborhood residential developed lots and in its Parks natural areas. Together, those 2 categories caused 78% of the canopy reduction (data taken from the City of Seattle Tree Canopy Assessment Report published 2023)*

CE G 12 *Seattle has a goal of 30% tree canopy (used to be by 2030??) LCC agrees that increasing the tree canopy will buffer Seattle from the adverse impacts of Climate Change. The City unfortunately lost 1.7% from 2018-2021.*

LCC supports policies CE 12.1- CE 12. 9 to preserve and expand the tree canopy to 30%.LCC would also add:

*CE 12.10. When will the Seattle City Council review the tree canopy data yearly to evaluate if its tree protection ordinances are ensuring that mature trees are being preserved? If the City loses more tree canopy, the Council should amend tree regulations to better preserve and meet the City's tree canopy coverage of 30%,*

### **WATER**

CE G13 LCC agrees that water is an essential resource that must be sustainably managed. *How are the City's reservoirs being protected and maintained?*

CW 13.1-CE 13.9 *LCC supports all of the recommended policies to protect the pure water that Seattle has and find ways to clean contaminants and or reuse waste.*

**Healthy Food System** -Food is essential for the health and well-being of our communities and healthy food options must be available to all ages and income levels throughout the City.

CE G 14 Goal that Seattle has accessibility to healthy food. LCC agrees.

CE 14.2 Support convenient access to nutritious food from a variety of sources.

*What requirements and incentives will the City enact to incentivize the retention of grocery stores that supply fresh produce and protein?*

CE 14.3 Not clear about “settler colonialism and racism” concerning access to food”  
*“Can the City offer tax credits to maintain large grocers and add indigenous sources and public safety measures to prevent retail theft”?*

27-6  
cont

CE 14.4 through 14.8 LCC agrees with policies to increase food access and reduce food waste.

## **ARTS and CULTURE**

### **Cultural Spaces Place making and Place Keeping**

The description (p 166) states that by 2044 Seattle’s neighborhoods will have cultural spaces including theaters, galleries, cinemas, museums, music venues and art studios that reflect the rich cultural diversity in the City.

27-7

*AC G 1 LCC supports the goal for all neighborhoods to have affordable cultural spaces... for people of all ages and abilities. How will the City decide with be conflict between allocating surplus public land for cultural uses when the goal of more housing is paramount?*

AC 1.1-AC 1.3 LCC supports maintaining spaces for performing arts and artist studios and their housing.

AC 1.4, AC 15, AC 1.6 Encourage re-purposing of historic community buildings such as surplus schools to adapt for performance arts as well as in parks, libraries and community centers. LCC supports these policies for broad use for musicians, dance, etc., but cautions against the exclusive use of public recreational buildings exclusively dedicated long term for only one user.

AC 1.7 , AC 1.9, AC 1.10, AC 1.11, AC 1.12 and AC 1.13 LCC supports the City grants to help local communities to preserve their cultural arts, and encourage a sense of community with murals or artwork. As those funds grow, in 20 more years, more art will be funded to install in most neighborhoods.

### **Public Art**

Seattle was a forward-looking city and allocated 1% of its budget to support the arts including art installations.

AC G 2 LCC supports this goal of funding neighborhoods creative expression through its publicly displayed artwork to reflect a variety of cultural backgrounds.

LCC supports policies AC 2.4, 2.5, and 2.6 which encourages public participation in acquiring or commissioning artwork in the recipient communities. *How will this process of procuring public art be open to the general public for their comments and focus on pieces that is easily identified as an icon or artform that represents a significant place?*

### **Creative Economy**

Seattle’s downtown has a long-storied history offering a wide variety of performing arts, the Seattle Symphony, SIFF theaters, Climate Pledge Arena concerts, art galleries and

world class museums. The impact of these art and cultural businesses fuel a vital the downtown night life as well as attract tourists that fuel the City economy.

*AC G3 How can artists and performers who are vital to Seattle's economy be provided with affordable venue opportunities to thrive so the arts can also thrive?*

*AC3.1-through AC 3.11 When the City offers subsidized affordable housing units can several be allocated to provide housing and studio space for a wide range of artists?*

*AC 3.11 LCC supports the City's policies to reduce the risk of displacement of performers, artists and their venues as the City grows its developed footprint.*

### **Youth Development and Arts Education**

The access to all types of arts education is not guaranteed for Seattle's young students It is outreach, special parent PTA funding and City funding that makes it possible for the City's youth to participate in the arts. The seeds of creative performing expression and creating artwork is an important outlet for many students and LCC supports funding to make that accessible for EVERY child in Seattle.

*AC G 4 What financial resources from Seattle can support this policy to have arts and music education in every Seattle public school?*

AC 4.1, AC 4.2 and AC 4.3. LCC strongly supports forming partnerships within its resources to support access to arts for all youth.

### **PARKS and OPEN SPACE**

Seattle's residents often define their neighborhood and favorite activities by their favorite park or Public Space. *With the past 10 years growth of 38% in employment, and the 12- year population increase of 23.5% from 2010 to 2022, local residents are feeling the "squeeze"! Fortunately, the City owned park and recreation lands are protected from conversion and a new tax for parks in 2014 adds to the City's budget allocation to more than adequately funds their capital improvements and operations. Access to Parks and Recreation and Open Space saved the sanity of many residents during the Covid-19 pandemic and mitigates the impacts of Climate Change in the future.*

### **Equitable Provision of Public Space**

P G 1 LCC supports the goal of expansion and enhanced access to public spaces as the City grows, and provide residents access to a full range of recreation for all residents

P 1.1 through P 1.18 LCC supports these general policies to serve the many needs for all ages, abilities and locations throughout the City in an equitable way.

*P1 .116 "Consider the use of open space impact fees to support public space".*

*Who will pay these fees? It is not defined, and should developers pay for some amount as a public benefit when they displace natural open space with developments?*

*P!..17 How can SP& R continue and expand partnering with Seattle Public Schools to including use of after school gym facilities to be run by SP&R"?*

P1.19 Mitigate noise and pollution on public space is an excellent goal. *How can SPR prevent nuisance noise from Seattle parks and open spaces impacts onto residential neighborhoods from the SPR activities when changing uses? Specifically what SEPA process is utilized when siting pickleball courts which emit 70 decibels of noise onto nearby homes which detracts from the restorative quieting function of the parks?*

P 1.20-P1.25 LCC agrees -SP&R should restore contaminated spaces and develop new and weather protected covered spaces in an equitable way throughout the City.

P1.26 Joint use developments- *How can public use mixing housing with SP&R community centers ensure public access to facilities?*

### **Recreation, Activation and Programming**

P G2 LCC supports this goal to provide a wide variety of recreational, social, activities and events for all ages and abilities

P2.1 “develop activities based on the needs of each community they serve” LCC supports this general concept but “who decides” is unclear.

*When will the City re-establish “all-City” community representation using local 5- 8 person Advisory Boards with 7 city-wide District boards? Which groups now give feedback and are accountable for the recreational, social and events planned to be sure resources are distributed more equitably?*

P 2.4 and 2.5 LCC supports the use of parks for nature play and use for all ages.

P 2.6 *Why is the City even considering the sale of alcoholic beverages in the City’s parks and Open Spaces? The impact of marijuana use and smells is already detrimental, and adding alcohol will create drinking parties which can lead to untoward behaviors in the parks and discourage families use. Has the City considered expanding non-alcoholic drink sales such as bubble teas?*

*When will SP&R build more public pool access to support the City’s Initiative of “Swim Seattle”.? The City is surrounded by water and every person who lives here should know the basics of how to swim for their safety.*

### **Operations and Maintenance**

P G 3 LCC supports maintenance of public space operations with eco-friendly methodology.

P 3.1 -3.7 and P 4.4 Agree with environmental sustainability practices and use the positions to train youth and homeless in skilled employment.

### **Partnering with Communities**

P G 4 Empower community members and organizations to help shape facilities. LCC supports this as “part of design and use but prefers that there be a broader scale public input to design permanent public park facilities to include all ages and abilities.

P 5.1- 5.3 LCC agrees to enhance the parks' health and protect its trees, and mitigate the adverse effects of Climate Change.

## **COMMUNITY INVOLVEMENT**

### **Engaging all Seattle Residents Equitably**

CI G 1 . LCC supports the City has numerous boards for many aspects of City life from the formal Design and Planning Commission Boards to numerous advisory boards to specific historic preservation and transportation boards which represent a significant amount of community involvement in decision making. The process is open to the public and there is a vetting process for its members diversity and relevance.

CI 1.1- 1.1.6 LCC supports inclusion of community involvement in its decision making and planning. LCC adds these comments: *How does Seattle ensure transparency of access to broad community input and educate how "it works" for giving feedback in decision making. How did OPCD and SDOT "Move Seattle" proposed levy, and THIS OneSeattle Comp Plan, decide to do outreach only with the small eight groups who are all located in the south half of Seattle with one in West Seattle to shape it?*

**Which groups or non-profit organizations are being contacted in the explosive growth areas of downtown, South Lake Union and the dense Urban Villages north of the Ship Canal?**

*How can the City be more inclusive and "balance" its outreach approach to hear from more than the same "eight small group inputs" or street fair folks to capture the diverse input from all who live and work here?*

27-9

### **Engagement Partnerships**

CI G 2 LCC supports community engagement from community based partners.

LCC supports C1 2.1-CI 2.5 *and adds:*

*When will the City re-instate funding for the Department of Neighborhoods to establish inclusive community councils and/or City Council District advisory boards? What criteria should be required to ensure these councils be open and accountable to their membership to capture input from every part of the City as a sounding board?*

### **Building Community Capacity**

CI G3 LCC supports the goal of engaging all people in the community to participate in how their city is making decisions.

C 3 3.1through C 3 3.4 LCC supports developing skill sets for all community members to participate in the City's decision making, especially in underrepresented communities.

*How does City weigh "comment stuffing" as it reports about City project feedback from one-minded groups which can result in skewed influence on City policies. How does the City respect and report on the minority participants to consider the merit of all inputs?*



## Indigenous Engagement

CI G4 The City should include the Indigenous tribes in all major decisions about planning for the City's future needs and sustainability. LCC supports this relationship and wisdom.

CI 4.1- CI 4.9 *What systematic outreach maintains treaty rights and utilizes the Tribes best practices to keep the land and ecosystem viable for the future generations?*

Respectfully submitted,

Colleen McAleer

President of Laurelhurst Community Club

Exhibits:

Density with context sensitive design and respecting Seattle's neighborhood character can work, with **tree retention and natural materials and design standards:**



6- Plexes in traditional neighborhoods

NO-No vegetation but 24 garbage cans

Yes-retain mature trees and natural pallet



YES - Tri-plex with vegetation and natural community character



YES Townhomes and triplexes in traditional neighborhood with natural materials

May 5, 2024

Jim Holmes, Office of Planning & Community Development  
 Mailing Address: P.O. Box 94788, Seattle, WA, 98124-7088  
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From : Laurelhurst Community Club Council

RE: One Seattle Comprehensive Plan 2040 Comments

Dear Mr.Holmes and the Seattle Office of Planning and Community Development:

The great cities of both the US and the World have experienced many of the same challenges in planning for future growth. The DRAFT One Seattle Plan document is lengthy but provides a good workable framework for the City to set goals and enact the policies to achieve them over the next 10-year planning cycle.

The Laurelhurst Community Club Council (LCC) represents over 5,000 residents and small businesses in north Seattle, and has examined the One Seattle draft, attended the OPCD outreach meetings and shared input from many non-profit organizations.

LCC has also studied how other large cities in a growth trajectory plan to supply housing units for a range of incomes amidst their housing stock of high cost of market rate homes. Solutions vary from New York City, Vienna, Singapore and Hong Kong in building maximum units on government owned land and/buildings, partnering with private developers to build affordable units within the city (Seattle's primary model), offering federal, State and local tax cut exemptions to build more affordable units and building efficient, low cost transportation systems to enable their City's work force to live outside city limits at a lower cost of land and housing.

In keeping with One Seattle's goals, the best example of transparency for planning and inclusion processes is the City-State of Singapore which does is publicly with a 3-D display of an updated master plan model of the entire city. As it updates development and planning, it delineates its old and new neighborhoods, location of subsidized units, and plans for "reclamation" of new land owned by the government added to its shores.

***How can Seattle's OPCD become a more open planning process to all?***

The One Seattle Comprehensive Plan contains noble goals and policies for the next 10+ years. ***However, many of them are very general and should be based upon the effectiveness of the positive outcomes of policies of the past 15 years, as well as identify the unintended consequences, and better addressing emerging trends.***

Our comments below are focused on: General Goals, Growth Strategy, Land Use, Housing, Transportation, Climate and Environment, Parks and Open Space, Arts and Culture and Community Involvement:

### **Growth Strategy**

The GS G1 Goal of creating complete communities for the inclusive needs of all ages and abilities is the overarching One Seattle Comprehensive Plan.

GS 1.2 Encourages a variety of housing types is lofty to be inclusive and age-in-place, but is not specific. ***Has a real estate tax cap for seniors been studied to help predict and manage elders' tax bills so they can truly age in place?***

GS 1.3 Accommodate non-residential uses in neighborhoods seems counter-productive to building housing stock when many office and commercial buildings sit empty.. ***How would this policy prioritize and preserve housing units?***

LCC agrees with building density along existing transit routes, avoiding ECA areas and better planning for transportation, parks and recreation for new planned density areas.

***The 2015 Comp Plan was deficient in requiring adequate infrastructure support for density. How does One Seattle plan to finance the needed new infrastructure?***

*The U District area including the University Village now has over 4,000 new residents and receive almost no City amenity funds, the developments **and actually closed NE 41<sup>st</sup> St community center** nearest because it did not meet a body mass and racial profile. **How can the City meet the increased facility needs with its plans for adding 100,000 more residents?***

LCC supports GS 1.4 and GS 1.9 which calls for the City policy to match dense housing in Regional and Urban centers with MORE public amenities.

LCC supports GS G2 Seattle's development pattern that results in a range of vibrant places that all play a role in housing and jobs.

***LCC supports GS 2.1 Use the FLUM to guide land use regulation (adding no exceptions)***

GS 2.2 Require FLUM amendments only intended to change the intended function.

***How can FLUM amendments be prohibited from piecemeal projects by developers looking for exceptions and departures that cause the overarching plan to disintegrate?***

LCC agrees with the description of the place types (page 19, figure 1). Renaming Urban Centers that serve the NW Region and State should be Regional Centers.

Urban Centers utilized by County and City residents and employees fit the new name. LCC strongly supports more Regional and Urban Centers proposed at Northgate and 130<sup>th</sup> adjacent to the new Light Rail stations and for future ones in West Seattle Junction and adjacent to Light Rail stations through the Rainier Valley. ***Should Aurora Ave be a designated Urban Center with a Master Plan for dense housing with commercial and support service amenities e.g grocery stores and pharmacies, that also retains its light industrial and commercial small businesses?***

LCC supports GS 4.3 allowing a wide range of housing types, and again would like to add: ***GS 4.6 Do Urban Centers require retaining or anchoring essential large grocers and a child care facility in these zones to make walkable neighborhoods'?***

Neighborhood Centers (figure 7) would be a new zoning type option to add density and comply with State bill HB 1110 which requires “middle housing” type options with 4-6 units within 1/2-mile walking distance of a major transit center.

GS 5.1 “designate Neighborhood Centers with a commercial core, diverse housing options within walking distance to shops, services and transit”. LCC agrees that this best complies with HB 1110.

GS5.2 Allow all types of diverse housing types and services. LCC disagrees that it should be centered with *institutional* services. Larger scale services should be in Urban Centers.

GS 5.3-Zoning heights 3-6 stories . ***Why are 5-6 stories the goal for Neighborhood Centers, which double the existing height limits? LCC suggests heights should be 2-4 stories maximum as suggested in HB 1110 to conform to existing heights. These denser units that would better transition to existing while doubling housing units.***

***Add : GS 5.6 Why isn't there an OPCD and/or SDCI code change that Neighborhood Centers require a “Master Plan” to ensure context sensitive scale and aesthetic compatibility to adjacent existing buildings, especially residences?***

Urban Neighborhoods- Seattle’s neighborhoods are the heart of the City. People ask “what’s your neighborhood” to start a fun conversation, and they support community building throughout the City.

GS 6.1 Designate Urban Neighborhoods primarily for residential development. LCC agrees that some areas need to be designated as quiet places to rest and enjoy, away from the noise and traffic in urban cities.

GS 6.2 Allow 4-6 stories near frequent transit. LCC disagrees and that is covered in all of the other zones, especially in Neighborhood Centers. ***Building 4-6 stories is out-of-scale and lacks the adequate infrastructure to build heavy density in this low density area. HB 1110 requires building more units in existing zoning to add “Middle housing” and does not call for adding heights or changing setbacks in those zones and better transitions at its edges.***

### **Major Institutions**

LCC agrees with using the Major Institutions GS 8 Master Plan processes for managing their growth and uses that are needed within those boundaries as approved.

### **Parks and Open Space**

Because the Park and open Space lands are not expanding with the rapid population growth.

GS 9.3 “Allow housing in the parks and open space ...only where it is located within a community center or pool”. ***What statute in the City codes allow Seattle to change parklands use to housing? LCC rejects this hijacking public open spaces and converting it to private residences, even if City owned. It is not compatible and removes limited public space when housing can be built elsewhere.***

GS 9.4 Allow limited commercial use to activate existing buildings. LCC supports this as operating some recreational uses require expertise from commercial operators.

### Area Planning

GS G10 .4 and GS 10.8 “Prioritize City resources for area planning for Regional and Urban Centers with a higher risk of displacement” ***What policies in the City’s Land Use code provide long-term housing displacement for vulnerable elders, handicapped and low income residents? LCC agrees to protect existing residents from displacement whose housing costs could be now affordable, but later is too expensive.***

28-1  
cont

### Annexation

GS G11 “Seattle has established a process for potential annexation of three areas”.

GS 11.1 “Designate unincorporated land for potential annexation where it can be easily connected to City services”. ***LCC agrees*** but cautions that any new annexation should be in similar condition to the levels of Seattle so that annexation does not cause an excess outflow of resources from the City of Seattle.

Add: GS 11.2 ***Is permanent affordable prioritized when creating “new land” from potential “lids” over transportation corridors? Singapore does with proportionally when “reclaimed” land is developed from the sea.***

### Land Use

LCC agrees with the statement that new zoning and development regulations intended to produce one result can *also have unintended consequences*, and in particular, displacement of existing residents and small businesses who can be “priced out” of existing locations that they call home.

***LCC supports*** the lofty goals in LU G1, specifically ***“create housing that works for various income levels, “encourage high quality, well designed and sustainable buildings, protect and enhance the natural environment and mitigate impacts of new construction.***

28-2

*These are similar to the lofty goals of the 2015 Comp Plan but policies were rarely enforced resulting in rapid infill and increased zoning “departures” from the planned Comp Plan and MHA policies. Many of those projects failed the “quality, sustainability enhancement of the natural environment and mitigating impacts of new construction”.*

***How will projects be considered “high quality” if SEPA and Design Review are not part of the regulatory process?***

***Many MHA titled housing units were built with no context to existing structures and zoning, displaced existing residents and small businesses, destroyed existing trees. Developers just wrote a check “in-lieu” into the affordable housing fund to build units far away from existing locations. “Stick trees” were planted onto right of ways and many died which deteriorated the City’s tree canopy. How can Seattle prevent these***

***unintended outcomes and ensure “stewardship” practices for the replacement trees viability?..***

The 2021 City of Seattle Tree Canopy Assessment (page 37) chart noted that in **“Citywide redeveloped parcels”**, **there was a loss of -39.8% in tree canopy,** ( and only a -1.4% in undeveloped parcels) which resulted in 33% of the City’s declining tree canopy of 1.7% from 2016-2021. **Which City policies in One Seattle will “protect and enhance the natural environment “? How will SDCI define “high quality’ standards and mitigation goals?**

LCC supports:

LU 1.2 Neighborhood business variety nearer to residents

LU 1.3 Apply development standards to protect public health and safety **(NO WAIVING Design review)**

LU1.5 Balance development standards vs **preventing displacement.**

LU1.6 Develop residences **away from air pollutants.**

LU 1.7 **Protect displacement** in legislative re-zone policies, especially low income and marginalized populations.

***LCC has concerns about LU1.1 “a wide variety of housing types in all neighborhoods”. The infrastructure in the City was not built for all densities (eg width of streets, sewer) This was also mentioned as a concern in HB. 1110***

## **Urban Design**

***LCC strongly supports the goals and policies of the natural environment:***

**LU G2** "Seattle’s unique character and sense of place, etc and the policies that recognize the importance of retaining Seattle’s native vegetation, waterways, forests and visual public views of Mt Rainier, the Olympic Mountains and the Cascade Range, as well as lakes, waterways and public shoreline access points.

***What new regulatory land use codes will protect public view corridors as developers try to “outview the next one?***

And LCC supports polices :LU2.1, LU2.2, LU2.3, LU 2.4, LU2.5. LU 2.6, LU 2.7, LU 2.8.

## **Built Environnement**

*LCC strongly supports :*

LU 2.9 Encourage preservation of characteristics and features that contribute to communities multiple identities including areas of historic, architectural, cultural and social significance.

LU 2.10 creating walkable cultural scapes

***LU 2.12 Will the City SDOT have designated ownership and operating plans to develop highway lids and other pathways to reunite neighborhoods?***

LU 2.13 and LU 2.14 Design walkable connections and add natural lighting and rain protection

LU 2.15 Rooftop production of fresh food is a terrific way to provide local food sources.

LU2.19. Plan to cascade heights to allow for more lower-to-higher views of water and mountains. This is a much better approach than SDCI continuing to allow view blocking with the newest buildings in the 2015 Com Plan.

LU 2.20 Prioritize not allowing negative impacts of tall buildings to block sun and views in public parks and spaces

28-2  
cont

### **LCC does not support:**

LU 2.16-18. Clustering of tall buildings, which can create *“built mountains”* and block public views. *Which regulatory land use codes and agency define what is a good cluster of tall buildings?*

### **Public Spaces**

**LCC supports** LU 2.21- LU 2.24 that encourages public spaces designed for a range of users.

**USES** Goal: LU G3 Allows every use everywhere

*Will the City require Master Plans for allowing a variety of uses and some defined use areas to prevent the “Aurora Ave “ lack of character and confusing zoning mess?*

**LCC does not support policies LU 3.1, 3.3, 3.4, and 3.6** but supports 3.5 retaining existing nonconforming use.

### **General Development standards**

LU G4 Development standards that match each zone’s function, protect health and safety and add housing and commercial spaces.

*LCC Supports these policies:*

LU 4.2-Standards that provide predictability for each zoned

LU 4.3 -Control of massing for compatibility for planned scale and provide open space

LU 4.7 Use setbacks to allow for light air and sunlight

LU 4.8 Use tree preservation requirements to enhance aesthetics, prevent heat islands

LU 4.9-LU 4.14

**LU 4.15 LCC supports protecting the public views through setbacks and establishing zoning blocks that protects key City views.**

**LU 4.17 LCC supports Seismic retrofitting to minimize health risks and retain historic buildings**



***LU 4.18 Can OneSeattle reinstate the use of Design Review to enhance the quality of City development by applying these best practices to “Middle Housing” and to “Affordable Housing” to minimize the stigma of “cheap housing” among its residents?***

LU 4.4 and 4.5 – allowing use of maximum heights in the name of limiting ***view blockage***  
***How does this curb more view blocking throughout the city scape?***

LU 4.16 - ***Why are higher heights required when current regulatory codes already provides land use code exceptions to preserve land marks?*** Requirement for higher density to preserve landmarks-too broad and not necessarily commensurate with designating a landmark.

### **Off Street Parking**

LU G5 to ***plan for alternative transportation modes***

The reality check is that an estimated 80% of Seattle’s residents own a car which is the second highest urban car owners in the US. While there has been a small decrease in car ownership as the City becomes more renters than home owners, the OneSeattle must plan for their existence, especially for attracting families..

LCC supports LU 5 5.4, LU 5.5, LU5.6, LU5.7, LU5.8, LU 5.9, and LU 5.11 (for bikes)

***LCC has concerns on the LU 5.1, LU 5.2 and LU 5.3 which set limits on parking. Has the City ‘s traffic improved due to fewer cars owned?*** The free market system will best sort it out and since it expensive to build, developers *will find the number of spaces to meet the needs of the residents of its housing and commercial users.*

### **Public Facilities and Small Institutions**

LCC supports LU G6 that public facilities and small institutions must grow to meet the needs of the population if their “mission is compatible with the function and scale of the surrounding area”.

LCC supports LU 6.1 through 6.4

***LU 6.5 What is the process for siting essential public facilities and a policy needs to be made in One Seattle as 6.5 is too general ?***

### **Telecommunications Facilities**

LCC supports LU G7 that allows telecommunication utilities but also requires that they be vetted for public health issues.

***LCC supports LU G 7.1- LU 7.5 -restrictions on the location size, mitigation of visual, noise and proximity to communities, and prohibiting locating them in residential zones.***

### **Downtown Zones**

***LCC supports LU G8*** to promote downtown Seattle as its densest neighborhood promoting vitality, tourism and arts and entertainment.

LCC supports all policies e.g. LU 8.4 to encourage a vital 24/7 environment.

Seattle Mixed Zones

LCC supports LU. G9 ***How will the policies of LU 9.1 and LU 9.2 promoting density in mixed use zones outside of the downtown core?***

### **Multifamily Zones**

LCC supports ***LU G 10 multifamily zones to provide a variety of scale of household with a mix of incomes and support local walkable neighborhoods where they are located.***

LCC supports LU 10.1 through 10.6, especially requiring “***high quality housing*** and development standards that promote livability and a sense of community, including landscaping and amenities.”. This approach will enable Multifamily zones to be desirable and affordable in forming new desirable neighborhoods of the future.

### **Commercial Zones**

LCC supports LU G 11 -the creation of Commercial zones that support surrounding neighborhoods and encourage long term stable businesses. Robust businesses serve both residents and employees and add to the vibrancy and into the City’s tax coffers.

LU 11.1 In the statement “range of commercial zones”. ***What is in the range of commercial activities? More clarity is needed to prevent incompatible development.***

LU11.4 Assigns outright height limits to commercial but then allows different height limits within the zone. ***Are these lower height limits for transitions to existing 2-3 stories or does it mean grant higher height limits of 4-6 stories?***

LU 11.2, and 11.5 state “compatible blend” of housing and commercial and suggest Neighborhood commercial limits on size and heights but ***does not require the necessary commercial anchor of a grocer with access to fresh produce and protein. How can access to fresh food be incentivized in OneSeattle?*** *Over the past 10 years, NE Seattle has lost two QCF grocery stores (Roosevelt and Wedgwood), and a major Safeway on NE 45<sup>th</sup> Street while density in residential units exceeded 10,000 more residents with at least 4,000 more units awaiting permits at SDCI. Neighborhood Commercial should only occur where a significant food outlet is a key component, because residents cannot live on coffee alone. Requiring a type of Master Plan for these new Neighborhood Centers would help to guide a balanced result in services.*

### **Neighborhood Residential Zones**

LU G 12 LCC agrees with this goal to have places in the City for residential zones, which contain various housing options and accommodate a variety of households and income.

LU 12.1, and LU 12.2

***LU 12.5 height limits of LR 2 -LR3 to this policy and require to be within 1/2 mile of frequent transit service.)***

LU 12.3 -LCC mostly supports these uses. ***How does SDCI prevent and monitor adverse impacts from small institutions and at-home businesses to protect the livability of residential zones and avoid unintended consequences?*** Dense residential areas should be primarily a refuge from loud City noise and traffic and must be the primary goal.

***LU12.4 LCC opposes this vague “development capacity allowance”*** as it can create out-of-scale buildings with simply adding 4 units of somewhat affordable housing into a general affordable housing pool but leaves negative impacts from excess heights that change the entire character, sunlight and natural public views on existing residences who are compliant with the zone heights.

### **Industrial Zones**

LU G13.1-LU G13.3 *LCC supports all of the goals and policies (LU 13.1-LU 13.39) in the Industrial zoning section, and especially agrees with LU 13.29 and LU 13.30 which **requires buffer zones and compatible scale along its edges**, particularly to neighborhoods.*

LU 13.35 ***How will new building heights should be limited to “protect distinct natural water views, shoreline areas and nearby neighborhoods?”***

### **Local Specific Regulations**

LU G 14 Local regulations supporting unique conditions. *LCC agrees with this goal to preserve the City’s character and support special areas of interest and special needs.*

***LU 14.2 and LU 14.3 Can implementation of the Master Plan process help create a variety of residential and commercial development that “use a cohesive urban design and promote high levels of environmental sustainability, housing affordability and publicly available open space”?***

This approach is far superior to many of the piecemeal apartment projects that were surgically inserted into NE Seattle, on Union Bay and NE Blakeley streets. The “residential density” result is a row of cluttered market price housing units, with dumping cars on the two small side streets with no City safe and continuous sidewalks and no crosswalks for pedestrians. A “Master Plan” would have resulted in a less cluttered and poor-quality aesthetic, required developers to pay in for transportation impacts and perhaps provided better car storage, delivery truck access.

### **Major Institutions**

LU G15 *LCC agrees that the Major Institutions are regionally important, but they must be regulated to avoid traffic, displacement and housing shortage impacts.*

*LCC agrees with the policies LU 15.1- LU 15.10 which are the using the tools of the Major Institution Master Plans and Major Institution Overlays. The City of Seattle is a nexus of health care and education and its needs will grow as the surrounding populations grow.*

***LU 15.3 LCC supports “Balance the need for the major institution to grow with the need to maintain the livability and vitality of neighboring areas”. LU 156 “Locate***

***major institutions where their activities are compatible with the surrounding land uses.. and where impacts associated with future development can be appropriately mitigated”.***

LU 15.10 addresses housing units. ***LCC supports these recommendations not to allow any housing on, or nearby the institutions to be torn down and re-used for non-residential purposes.*** The City allowed Seattle Childrens Hospital to demolish 136 units Laurelon Terrace garden condominiums with affordable rents, but allowed SCH to replace the family units with dorm room style units in the U District which went up to market price and alter divided into single room rentals and displaced families.

***In assesshe Major Institutions’ Master plans , will SDCI :Require the Major Institution to include an inventory of their space used in their facilities by hours used?.*** The goal is to first identify surplus spaces already underutilized for every institution instead of continuing to add more buildings.

***Require Major Institutions to identify capacity for expansion in their satellite locations?*** With enhanced technology, and virtual tools they could expand capacity using other locations linked to a main campus or medical center effectively and economically.

***Require Major Institutions to declare all of their facilities (research, housing, offices, billing, etc) inside or outside their Master Plan and quantify their total Seattle footprint as part of the Master Plan process?***

***Acknowledging that many Major Institutions are tax exempt, has the City considered imposing fees to support infrastructure or operational services provided to them?***

### **Historic Preservation and Cultural Resources**

LU G 16 ***LCC supports the City’s goals to preserve its historic and cultural resources*** and encourages adaptive use of its buildings and sites. The landmarks in Seattle tell the story (good and not-so good) of Seattle’s colorful history. *Cultural resources in conjunction with the City’s First Nations history are the rudder guiding all people today how to live in balance with the City’s natural surroundings.*

Policies LU 16.1- LU 16.18 are all supported by LCC with special emphasis on using outreach to educate all citizens about the preservation processes and why they add value to the city’s livability. .

***As the City grows in landmarks to preserve, how has it allocated adequate resources to adequately manage the current landmarked properties and future designations needing resources to approve any modifications?*** Volunteers on these technical boards should have access to independent experts in historic architecture.

LCC supports LU 16.18 but would also add more incentives: For expensive landmarked buildings seismic retrofits, the ***City should grant owners of a real estate tax credit or deferral to protect these vulnerable assets form earthquakes.***

LU 16.19 ***How have the US Department of the Interiors’ Standards for the Rehabilitation of Historic Properties been applied by the City to ensure that meet the***

***guidelines for the Seattle Landmark Preservation Board's approval decisions for any major changes or demolition of any landmarked buildings or sites?***

### **Environmentally Critical Areas**

LU G17 LCC agrees that environmentally critical areas need regulations to protect the ecological functions, wetlands and fish and wildlife conservation.

*LCC supports most of the policies of LU 17.1-LU 17.17 with emphasis on LU 17.8, LU 17.9 and LU 17.9 requiring new development in liquefaction and peat settlement areas to be designed to limit damage during earthquake and the construction processes.*

LCC supports LU 17 .12-14 Wetland protection with no net loss to protect fish and wildlife habitat.

LCC ***supports fish and wildlife regulations*** in LU 17.15 as well as LU 17.16

***How does One Seattle incentivize the daylighting of streams that are now in pipes?***

Specifically, Yesler Creek has been buried under the Battelle site in NE Seattle and it should be required to be daylighted with any new development on the landmarked site.

LU 17.18 Abandoned landfills. ***Does SDCI prohibit development within 1000 feet of an abandoned landfill?*** The Laurelhurst neighborhood borders such a landfill and has strong concerns *about the proposed dense development within 1000 feet and its impact on the existing residential areas that border the landfill.*

### **TRANSPORTATION**

T G.1 "Transportation decisions, strategies and investments support the growth strategy for the City and the Region". LCC agrees with this goal. The 2015 Comp Plan expected Light Rail to be developed more quickly and expansively than it delivered. In 2 years Light Rail will finally connect to major employment locations on the Eastside and later to other Seattle outer neighborhoods.

*T 1.1 through T 1.4 . LCC supports these policies which prescribes planning now for regional connectivity considering the long planning and execution timeline.*

***T 1.1 Do transit facilities need to include public restroom access as travel times are lengthened by new service routes. In addition? Is Transit security planned and funded to make these regional systems safe to ride at all hours?***

TG 2 Street use including right-of-way use for community. ***LCC opposes dedicating the ever-dieting Seattle streets for "inviting spaces for community" within the right of way. LCC has concerns that pedestrian safety is endangered with cars, and not safe. LCC has concerns that users will be exposed to vehicular emissions. Who decides which City streets are "closed" and causes confusion and resentment of entitlement among neighbors?***

T 2.3 , T 2.7 ,T 2 .8 and T 2.9 LCC agrees that the City needs to plan for emerging delivery devices as residents often get 1-3 various types of food, and Amazon/UPS

packages delivered daily. Freight mobility is critical to commercial use throughout the City

T 2 .11 Resolving conflicts with using right-of-way spaces. LCC agrees that some street frontage space needs to be dedicated for shorter duration use and use off street parking and transit layovers.

T 2.13 and T2 14 LCC supports enhancing boulevards and alleys for all transportation modes, and alleys may be utilized for public space is not heavily trafficked.

T 2 15 and T2 .17 LCC supports creating public space (if large enough) in right of ways for children and non-motorized egress (bikers, skaters).

**T2.18 *How and who decides to reallocate street space from parking for people ?*** People are intended to walk on the sidewalks rather than on the streets, and ***SDOT routinely issues temporary “street closure” permits for special gatherings. Thus, the appropriate Transportation Policy here is should be that SDOT promote the accessibility to these street closure permits, but not close the streets permanently?***

**T2.19 *Will SDOT build and maintain street use as primarily for all forms of transportation modes or will the streets be designed or allocated as parks?***

## **TRANSPORTATION OPTIONS**

T G 3 Expand equitable access to multiple transportation options. ***LCC agrees that “one size does not fit all” for a successful transportation system.***

The policies in this section are well thought out and LCC supports:

T 3.1- T 3.23, except T 3.9. “Prioritize transit Investments on the basis of current or potential ridership, etc”. ***How will SDOT change its transportation resources within its regional transportation links to address the dramatic shift in commuter demand from 5 days a week to 3 days with heavy users on Tues/Weds/Thurs as employers continue to offer flexible work schedules for employees to be “in the office”?*** While there may be a slow return of employees, Seattle should plan for varying capacity needs based upon the day of the week to ensure there is adequate space for transit users as well as other modes including trips via cars be they shared, electric, etc. this is why converting roads into “gathering places” would be in conflict.

***What plans are in place to install and maintain the missing and broken City sidewalks?***

T 3. 10 and T3.21 is supported by LCC. Potential users in the residential neighborhoods have a 40 minute walk to the Montlake Light Rail. The “last mile” or two is offered instead at another Light Rail station in the U District where most neighbors do not enjoy connecting there for safety reasons so they do not use it at all. These same issues are important for bike and pedestrian safety for the “last mile” which really matter. Safe intermodal connectivity should be a top priority.

## **Building a Green Transportation System**

TG 4 LCC supports transportation systems that improves the environment and air quality

T4 .1- T4-12. **LCC supports these policies** for adding new electric vehicles, **adding public charging infrastructure, enhancing the street tree canopy and improving fish passage and better capturing of storm water.**

**T 4.3 How does reducing general purpose lanes all day reduce drive alone cars?** This really does not work because drivers will find other streets to use, or their vehicles will sit in traffic spewing out more emissions than they should due to squeezed capacity. **Should SDOT restrict transit-only lanes during am and pm peak, then open them to all users after during non-peak hours?**

### **Supporting a vibrant Economy**

TG 5The transportation system improves mobility ... and promotes economic opportunities throughout the City. LCC agrees that without reliable roads, freight will not be able to provide competitive services for residents and businesses.

T 5.1-through T 5.10 LCC supports these policies which support the movement of goods throughout Seattle and Region by vehicles, rail and connectivity to air and drone devices.

T 5.11 activating right of ways for the public is a departure from the core transportation goals and LCC does not support it.

### **Promoting Safe Travel for All**

TG 6 Ensure Seattle's transportation is safe for all ages and abilities. LCC strongly supports this keystone goal. Without safety, SOV increases, and transit can fail.

T 6 .1-T6.9 Policies are good and LCC supports them, especially T 6.9 on improving lighting near transit stops.

**T6.12 How can the City of Seattle ensure and co-fund if necessary adequate Transit Police throughout the Light Rail system in Seattle and work with King County Metro for funding that provides King County security/police for its bus services?**

### **Connecting to the Region**

TG 7 LCC agrees that Seattle and Regional projects should be consistent among goals.

T 7.1 through T 7.11 are policies between local and regional entities and LCC supports these connectivity efforts that ensure the transportation corridors work seamlessly.

#### **LCC add:**

**T 7.12 How can the City of Seattle require WSOT to ensure that the Washington State Ferry System has adequate service and well maintained boats to service the work force commuters from Bremerton, Vashon, Bainbridge, Whidbey and the San Juan Islands?**

### **Operating and Maintaining the Transportation System**

TG 8 Transportation assets should be maintained and renewed is strongly supported by LCC especially bascule bridges, State and Federal highways and local bridges, roads.

T8.1 through T 8.7 work to operate a solid transportation system but falls short on maintenance.

**Add T 8.8 LCC proposes that the City utilizes the recent comprehensive audit of bridges and roads with the requirement it be used to prioritize their repairs and maintenance.**

### **Funding the Investment that we Need**

TG 9 states, “Transportation funding is sufficient to operate, maintain, and improve the transportation system that supports the City...”

***Since the public transportation system is an essential City service, how can its Budget’s meet operating and capital budgets without relying on tax levies exclusively on property owners to fund all of its expenses? This can be applied to the T 9.9 policy.***

T 9.1, T 9.2, T 9.3, T9.4, T9.5 and T 9.6 discuss partnering with other local agencies and governments for inter-funding regional transportation and LCC agrees with that approach.

T 9.10 Considers use of transportation impact fees to fund the transportation needs. ***Should the City collect impact fees from all developers to pay for the Transportation Budget capital expenses to reduce the tax burden on property owners?***

T 9.12 Planning for 6-year capital improvements. ***How will the City of Seattle Bridge and Road audits be used to prioritize projects?***

T 9.13 Identify alternative funding sources. ***Which transportation priorities can be funded by federal, state and regional sources for its capital improvement projects?***

***Because all transportation modes have capital and operating expenses should users “pay a fair share” back to the City? Should everyone pay an affordable fare for bus service, Light Rail, ferries, shared bikes, scooters, and a portion of tolled roads into the Seattle and Regional transportation budgets?***

### **HOUSING**

The OneSeattle Plan notes that job growth in the City grew by 38%, its housing stock grew by only 19% which has led to supply/demand price increases for its residents. Of course, not all of the employees in Seattle want to live in the City, but the pricetag of regional housing has climbed as well. The King County Growth Management Council target for Seattle is to produce 112,000 units over 25 years (2018-2044) in each of the Area Median Income (AMI) level, which translates to over 43,000 units of units for income earners below 30% of AMI. Because the costs of providing the land and structures also have climbed, subsidies from every source is essential.

H G1 and H G 2 Expand Seattle’s housing supply to meet current and projected needs for all economic groups. **LCC agrees that more stock will help stabilize housing needs.**

H 2.1- H2.3-LCC ***What percentages of the 112,000 units produced will be less than 69% of AMI for renters and less than 89% for owner occupied units?***



HG 2.1 through HG 2.2 LCC agrees expanding capacity of all types of housing are important, and monitoring the inventory by price and type is essential for planning.

HG 2.3 Removing regulatory “barriers” for less expensive housing. ***LCC disagrees for 2 reasons. Even if units take longer and a bit more money to build, why don't affordable housing residents of all incomes deserve the benefit of Design Review, vegetation and saving trees? How can SDCI and the Office of Sustainability enforce existing tree preservation to prevent concrete “heat islands” in Settles’ neighborhoods?***

HG 2.4 LCC agrees that small landlords can often produce less expensive housing units and should be supported. ***What legislation passed by City Council should be re-evaluated as anti-landlord regulations which may be creating obstacles for small landlords from increasing small scale rental housing units?***

HG 3 Seattle should supply affordable housing to all who want to live there.

LCC questions whether the City can/should supply housing for all since its land value is high and people (eg with large families) may need/want to live somewhere else. This works when the City has a frequent and reliable transportation system network, and Seattle is just a few years away from the Light Rail extensions to the Eastside, Lynnwood and points north. This will open up greater land space for those who work in Seattle but can afford and want to live outside the City. ***Should Seattle be the only entity to produce all of the types of housing to house everyone working within its City limits?*** With improved Light Rail regional network, HB 1110 requires adjacent “bedroom communities to also build a “fair share” of housing for all income levels.

HG 3.1-***How can Seattle source more federal funding for permanent affordable housing? Seattle is a employment hub but high tax levies for housing and transportation have placed a heavy tax burden on property owners, leading to higher housing costs.***

HG 3.2 LCC agrees to expand more long term affordable (<30% AMI)

H 3.4 LCC agrees that the City should build in more affordable housing units near frequent transit to save total cost of living savings for low income residents

H3.6 LCC ***“When and how will comprehensive “audits” be compiled for measuring the actual inventory of affordable housing and check on their health and safety compliance?”***

H 3.9 LCC ***supports building long-term housing on publicly owned sites (not parkland)***

H 3.10 Waive development standards for affordable housing. ***LCC objects to this because people with less income DESERVE trees, sidewalks and the other benefits of good urban planning , and it will enable these units to “fit in” and last longer, preventing future displacement..***

H 3 11- H 3.21 ***What policies can be formed that lead to own ownership for residents and tax incentive saving for developers of lower income units especially < 60% and 30% of AMI?***

## EQUITABLE ACCESS to HOUSING

Goal H G 4 Housing should be available for all . LCC agrees

H 4.1 -H 4.5 LCC supports policies to promote access to housing of all types throughout the City

H 4.5 Remove zoning to add low income housing- ***Why would Seattle add more building heights and setbacks as existing housing units when that is not required by HB 1110?***

H G4.7-4.10 LCC supports open and educated process of finding appropriate housing

## HOUSING SECURITY and STABLE COMMUNITIES

H G 5 Residents should be able to remain in place and thrive without fear of displacement and housing discrimination

H 5.1 ***LCC agrees that vulnerable populations, especially seniors from displacement.***

H 5.2 through H 5.12 ***What city regulations can be added to prevent displacement of existing residents, and providing pathways for more home ownership?***

H 5.13 Property tax relief for low and fixed income residents. ***What programs enable seniors to "age in place" without getting "taxed out" of their home?***

### Diversity of Housing Types

H G6- ***Seattle can produce a full range of housing types that they fit into existing heights. Should more duplexes, tri-plexes and small low rise multi unit apartments be encouraged rather than townhouses that are difficult for seniors and families?***

H 6.1-H 6 Policies that promote all types of housing units from small to large which accommodates multi-generational and large families,

H 6.7 Advocate for State legislation to encourage the production of ***What changed in the State will incentivize production of more condominiums and co-ops? LCC supports this action to enable first time buyers to build equity as they pay for housing. This can lead to wealth building for individuals and families.***

## HOUSING CONSTRUCTION, QUALITY and DESIGN

H G7 LCC agrees that Seattle's housing units should be carbon neutral healthy and safe

H 7.1 LCC agrees with regulations and enforcement of safe and healthy housing stock

H 7.2 ***Why is the City incentivizing the use of CLT building material exclusively ?*** While it is fast growing, the quality of this wood aging over time should be assessed before recommending it. (e.g. **Burke Museum use of CLT may not be the desired outcome**)

H 7.3- and H 7.9 and H 7.10 ***Which policies are applied to affordable housing units making them more livable and using sustainable materials that reduce carbon footprint and are healthy with open space that promote light and social spaces?***

***To survive the potential rising temperatures of Climate Change what resources will the City to retrofit HVAC systems to convert to provide air conditioning and more energy efficient systems that reduce use of carbon fuels?***

H 7.5 LCC supports re-purposing historic buildings for residential uses

H 7.6 ***What criteria and incentives can the City provide for converting non-residential buildings to housing use, considering the overbuilt supply of office spaces?***

## **Homelessness**

The two main reasons for chronic homelessness are drug addiction and behavior health issues. Seattle has tried just about every type of approach to find permanent solutions for housing those who are unsheltered and has learned some things about what may work to achieve a reduction in homelessness.

H G 8 Homelessness is rare and brief, and there is a need for emergency housing as a step for permanent housing. *LCC agrees for the need for emergency housing but does not agree that it is necessarily brief, and rather can also be chronic.*

HG.8.1 -H 8.2 Implement programs to secure emergency housing units to meet needs. ***LCC agrees. How many shelter beds will be available for drug users with services to detox? How will the State and County partner with Seattle to supply adequate behavioral health facilities for unhoused mentally ill individuals.***

HG 8.4 Collaborate with other jurisdictions to provide permanent housing and services LCC agrees that Seattle can/should provide resources for those who are homeless in the City, but other regional area governments can share in responding to emergency housing and services.

HG 8.7 ***As a component of a solution for homelessness, do all services provide “a path home” to reunite families around the country for a permanent housing solution?***

H 8.6 “Remove regulatory barriers” to allow homes on properties for homeless people. *LCC does not know of any “regulatory barrier” that precludes occupation of housing units on owner occupied property.*

## **Climate and Environment**

Seattle aka, The Emerald City, has been impacted by rapid growth, Climate Changes in weather and the lack of City codes that have accelerated tree canopy loss since the 2015 Comprehensive Plan. Carbon Pollution Reduction has been helped by the Climate Action Plan of 2006, but much more needs to be implemented.

CE G1 ***Which climate resiliency goals must be met to achieve carbon neutrality by 2050?*** LCC strongly supports this goal to keep our City and world sustainable.

CE 1.1 -1.3 ***LCC agrees that using data to track our actual GHG output and which City office will ensure that the targets are met?*** Seattle needs to develop new policies and practices to meet the targets in partnership with the Green New Deal will enable Seattle to help reach a net neutral position.by 2050.

CE 1.4 LCC supports partnerships with other local jurisdictions and academic institutions to build science-based programs to reduce GHG, and analyze actual data points to assess Seattle's position towards those goals.

## Transportation

CE G 2 LCC supports the goal of reducing GHG from transportation modes.

CE 2.1 through CE8. 5 **LCC agrees** with these policies to achieve lower emission by enabling more local services that are walkable in a City-wide equitable way.

***When and how can Seattle require all delivery vehicles to be carbon neutral by 2035?***

## Extreme Heat and Wildfire Smoke

CE G9 LCC supports the goal to be prepared for excess heat and wildfires

CE 9.2. Design and retrofit City capital facilities. LCC supports this and was pleased that the City libraries are being retrofitted for air conditioning as a refuge for extreme heat.

CE 8.5 and 8.5 Mitigate economic impacts of transitioning to carbon neutral on low-income individuals and fixed income seniors.

***When will the SPD North Precinct SPD be replaced with two new buildings -one near Ballard, and one near the U District to protect growing populations and the SPD officers to ensure adequate Public Safety coverage and a healthy facility for officers?***

CE 9.3 Expand tree canopy and greenspace. ***When will a separate City Tree department be established to track the status of the state of the Tree Canopy policies to prior legislation which may have adverse outcomes on the tree canopy and open space preservation?***

CE 9.5-CE 9.7 ***What City policies will protect urban critters, outdoor workers, and owners on how to protect all Seattleites from extreme heat in their buildings?***

## Sea Level Rise and Flooding

Seattle must be prepared to face the reality of rising sea levels due to ice melting from Global warming.

CE G10 LCC agrees that Seattle needs plans for adapting to rising sea levels

CE 10.1 through 10.4 ***What are the City's planning and education policies to prepare for high sea levels and focus on restoration of resilient ecosystems, including an annual assessment of Seattle's Seawall condition?***

## Tree Canopy

LCC agrees with the overarching statement that the Tree Canopy is fundamental to Seattle's quality of life.

*Trees perform functions such as "cleaning the air" and removing carbon. Trees provide shelter for an intricate ecosystem of urban critters and provide shade for people on hot days, and*

mature trees “mother” other smaller or distressed trees to maintain their health. Tree clusters prevent “heat islands” from forming and absorb storm water run-off. Seattleites espouse to be tree protectionists, but the tree canopy shrunk from 2019-2021 by 1.7%, mainly from neighborhood residential developed lots and in its Parks natural areas. Together, those 2 categories caused 78% of the canopy reduction (data taken from the City of Seattle Tree Canopy Assessment Report published 2023)

**CE G 12 *Seattle has a goal of 30% tree canopy (used to be by 2030??) LCC agrees that increasing the tree canopy will buffer Seattle from the adverse impacts of Climate Change. The City unfortunately lost 1.7% from 2018-2021.***

LCC ***supports polices CE 12.1- CE 12. 9 to preserve and expand the tree canopy to 30%.***LCC would also add:

***CE 12.10. When will the Seattle City Council review the tree canopy data yearly to evaluate if its tree protection ordinances are ensuring that mature trees are being preserved? If the City loses more tree canopy, the Council should amend tree regulations to better preserve and meet the City’s tree canopy coverage of 30%,***

## **WATER**

CE G13 LCC agrees that water is an essential resource that must be sustainably managed. ***How are the City’s reservoirs being protected and maintained?***

CW 13.1-CE 13.9 ***LCC supports all of the recommended policies to protect the pure water that Seattle has and find ways to clean contaminants and or reuse waste.***

**Healthy Food System** -Food is essential for the health and well-being of our communities and healthy food options must be available to all ages and income levels throughout the City.

CE G 14 Goal that Seattle has accessibility to healthy food. LCC agrees.

CE 14.2 Support convenient access to nutritious food from a variety of sources.

***What requirements and incentives will the City enact to incentivize the retention of grocery stores that supply fresh produce and protein?***

CE 14.3 Not clear about “settler colonialism and racism” concerning access to food” ***“Can the City offer tax credits to maintain large grocers and add indigenous sources and public safety measures to prevent retail theft”?***

CE 14.4 through 14.8 LCC agrees with policies to increase food access and reduce food waste.

## **ARTS and CULTURE**

### **Cultural Spaces Place making and Place Keeping**

The description (p 166) states that by 2044 Seattle’s neighborhoods will have cultural spaces including theaters, galleries, cinemas, museums, music venues and art studios that reflect the rich cultural diversity in the City.

AC G 1 ***LCC supports the goal for all neighborhoods to have affordable cultural spaces... for people of all ages and abilities. How will the City decide with be conflict between allocating surplus public land for cultural uses when the goal of more housing is paramount?***

AC 1.1-AC 1.3 LCC supports maintaining spaces for performing arts and artist studios and their housing.

AC 1.4, AC 15, AC 1.6 Encourage re-purposing of historic community buildings such as surplus schools to adapt for performance arts as well as in parks, libraries and community centers. LCC supports these policies for broad use for musicians, dance, etc., but cautions against the exclusive use of public recreational buildings exclusively dedicated long term for only one user.

AC 1.7 , AC 1.9, AC 1.10, AC 1.11, AC 1.12 and AC 1.13 LCC supports the City grants to help local communities to preserve their cultural arts, and encourage a sense of community with murals or artwork. As those funds grow, in 20 more years, more art will be funded to install in most neighborhoods.

### **Public Art**

Seattle was a forward-looking city and allocates 1% of its budget to support the arts including art installations.

AC G 2 LCC supports this goal of funding neighborhoods creative expression through its publicly displayed artwork to reflect a variety of cultural backgrounds.

LCC supports policies AC 2.4, 2.5, and 2.6 which encourages public participation in acquiring or commissioning artwork in the recipient communities. ***How will this process of procuring public art be open to the general public for their comments and focus on pieces that is easily identified as an icon or artform that represents a significant place?***

### **Creative Economy**

Seattle's downtown has a long-storied history offering a wide variety of performing arts, the Seattle Symphony, SIFF theaters, Climate Pledge Arena concerts, art galleries and world class museums. The impact of these art and cultural businesses fuel a vital the downtown night life as well as attract tourists that fuel the City economy.

AC G3 How ***can artists and performers who are vital to Seattle's economy be provided with affordable venue opportunities to thrive so the arts can also thrive?***

AC3.1-through AC 3.11 ***When the City offers subsidized affordable housing units can several be allocated to provide housing and studio space for a wide range of artists?***

AC 3.11 ***LCC supports the City's policies to reduce the risk of displacement of performers, artists and their venues as the City grows its developed footprint.***

### **Youth Development and Arts Education**

The access to all types of arts education is not guaranteed for Seattle’s young students. It is outreach, special parent PTA funding and City funding that makes it possible for the City’s youth to participate in the arts. The seeds of creative performing expression and creating artwork is an important outlet for many students and LCC supports funding to make that accessible for EVERY child in Seattle.

28-6  
cont

**AC G 4 *What financial resources from Seattle can support this policy to have arts and music education in every Seattle public school?***

AC 4.1, AC 4.2 and AC 4.3. LCC strongly supports forming partnerships within its resources to support access to arts for all youth.

**PARKS and OPEN SPACE**

Seattle’s residents often define their neighborhood and favorite activities by their favorite park or Public Space. *With the past 10 years growth of 38% in employment, and the 12- year population increase of 23.5% from 2010 to 2022, local residents are feeling the “squeeze”! Fortunately, the City owned park and recreation lands are protected from conversion and a new tax for parks in 2014 adds to the City’s budget allocation to more than adequately funds their capital improvements and operations. Access to Parks and Recreation and Open Space saved the sanity of many residents during the Covid-19 pandemic and mitigates the impacts of Climate Change in the future.*

28-7

**Equitable Provision of Public Space**

P G 1 LCC supports the goal of expansion and enhanced access to public spaces as the City grows, and provide residents access to a full range of recreation for all residents

P 1.1 through P 1.18 LCC supports these general policies to serve the many needs for all ages, abilities and locations throughout the City in an equitable way.

P1 .116 ***“Consider the use of open space impact fees to support public space”.***

***Who will pay these fees? It is not defined and should developers pay for some amount as a public benefit when they displace natural open space with developments?***

P!..17 ***How can SP& R continue and expand partnering with Seattle Public Schools to including use of after school gym facilities to be run by SP&R”?***

P1.19 Mitigate noise and pollution on public space is an excellent goal. ***How can SPR prevent nuisance noise from Seattle parks and open spaces impacts onto residential neighborhoods from the SPR activities when changing uses? Specifically what SEPA process is utilized when siting pickleball courts which emit 70 decibels of noise onto nearby homes which detracts from the restorative quieting function of the parks?***

P 1.20-P1.25 LCC agrees -SP&R should restore contaminated spaces and develop new and weather protected covered spaces in an equitable way throughout the City.

P1.26 Joint use developments- ***How can public use mixing housing with SP&R community centers ensure public access to facilities?***

## Recreation, Activation and Programming

P G2 ***LCC supports this goal to provide a wide variety of recreational, social, activities and events for all ages and abilities***

P2.1 “develop activities based on the needs of each community they serve” LCC supports this general concept but “who decides” is unclear.

***When will the City re-establish “all-City” community representation using local 5- 8 person Advisory Boards with 7 city-wide District boards? Which groups now give feedback and are accountable for the recreational, social and events planned to be sure resources are distributed more equitably?***

P 2.4 and 2.5 LCC supports the use of parks for nature play and use for all ages.

P 2.6 ***Why is the City even considering the sale of alcoholic beverages in the City’s parks and Open Spaces? The impact of marijuana use and smells is already detrimental, and adding alcohol will create drinking parties which can lead to untoward behaviors in the parks and discourage families use. Has the City considered expanding non-alcoholic drink sales?***

***When will SP&R build more public pool access to support the City’s Initiative of “Swim Seattle”.***? The City is surrounded by water and every person who lives here should know the basics of how to swim for their safety.

## Operations and Maintenance

P G 3 LCC supports maintenance of public space operations with eco-friendly methodology.

P 3.1 -3.7 and P 4.4 Agree with environmental sustainability practices and use the positions to train youth and homeless in skilled employment.

## Partnering with Communities

P G 4 Empower community members and organizations to help shape facilities. ***LCC supports this as “part “of design and use, but prefers that there be a broader scale public input to design permanent public park facilities to include all ages and abilities.***

P 5.1- 5.3 LCC agrees to enhance the parks’ health and protect its trees, and mitigate the adverse effects of Climate Change.

## COMMUNITY INVOLVEMENT

### Engaging all Seattle Residents Equitably

CI G 1 . LCC supports the City has numerous boards for many aspects of City life from the formal Design and Planning Commission Boards to numerous advisory boards to specific historic preservation and transportation boards which represent a significant amount of community involvement in decision making. The process is open to the public and there is a vetting process for its members diversity and relevance.



CI 1.1- 1.1.6 LCC supports inclusion of community involvement in its decision making and planning. LCC adds these comments: ***How does Seattle ensure transparency of access to broad community input and educate how “it works” for giving feedback in decision making. How did OPCD and SDOT “Move Seattle” proposed levy, and THIS OneSeattle Comp Plan, decide to do outreach only with the small eight groups who are all located in the south half of Seattle with one in West Seattle to shape it?***

**Which groups or non-profit organizations are being contacted in the explosive growth areas of downtown, South Lake Union and the dense Urban Villages north of the Ship Canal?**

***How can the City be more inclusive and “balance” its outreach approach to hear from more than the same “eight small group inputs” or street fair folks to capture the diverse input from all who live and work here?***

### **Engagement Partnerships**

CI G 2 LCC supports community engagement from community based partners.

LCC supports C1 2.1-CI 2.5 ***and adds:***

***When will the City re-instate funding for the Department of Neighborhoods to establish inclusive community councils and/or City Council District advisory boards? What criteria should be required to ensure these councils be open and accountable to their membership to capture input from every part of the City as a sounding board?***

### **Building Community Capacity**

CI G3 LCC supports the goal of engaging all people in the community to participate in how their city is making decisions.

C 3 3.1through C 3 3.4 LCC supports developing skill sets for all community members to participate in the City’s decision making, especially in underrepresented communities.

***How does City weigh “comment stuffing” as it reports about City project feedback from one-minded groups which can result in skewed influence on City policies. How does the City respect and report on the minority participants to consider the merit of all inputs?***

### **Indigenous Engagement**

CI G4 The City should include the Indigenous tribes in all major decisions about planning for the City’s future needs and sustainability. LCC supports this relationship and wisdom.

CI 4.1- CI 4.9 ***What systematic outreach maintains treaty rights and utilizes the Tribes best practices to keep the land and ecosystem viable for the future generations?***

Respectfully submitted,

Colleen McAleer

President of Laurelhurst Community Club Council

## DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.com

Date: 5/6/2024

## Comment:

The 2015 Comp Plan was deficient in requiring adequate infrastructure support for density. How does One Seattle plan to finance the needed new infrastructure?

The U District area including the University Village now has over 4,000 new residents and receive almost no City amenity funds, the developments and actually closed NE 41st St community center nearest because it did not meet a body mass and racial profile. How can the City meet the increased facility needs with its plans for adding 100,000 more residents?

LCC supports GS 1.4 and GS 1.9 which calls for the City policy to match dense housing in Regional and Urban centers with MORE public amenities.

LCC supports GS G2 Seattle's development pattern that results in a range of vibrant places that all play a role in housing and jobs.

LCC supports GS 2.1 Use the FLUM to guide land use regulation (adding no exceptions)

GS 2.2 Require FLUM amendments only intended to change the intended function.

How can FLUM amendments be prohibited from piecemeal projects by developers looking for exceptions and departures that cause the overarching plan to disintegrate?

LCC agrees with the description of the place types (page 19, figure 1). Renaming Urban Centers that serve the NW Region and State should be Regional Centers.

Urban Centers utilized by County and City residents and employees fit the new name. LCC strongly supports more Regional and Urban Centers proposed at Northgate and 130th adjacent to the new Light Rail stations and for future ones in West Seattle Junction and adjacent to Light Rail stations through the Rainier Valley. Should Aurora Ave be a designated Urban Center with a Master Plan for dense housing with commercial and support service amenities e.g grocery stores and pharmacies, that also retains its light industrial and commercial small businesses?

LCC supports GS 4.3 allowing a wide range of housing types, and again would like to add: GS 4.6 Do Urban Centers require retaining or anchoring essential large grocers and a child care facility in these zones to make walkable neighborhoods'?

29-1

29-2

## DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.com

Date: 5/6/2024

## Comment:

Will the City require Master Plans for allowing a variety of uses and some defined use areas to prevent the "Aurora Ave " lack of character and confusing zoning mess?

LCC does not support policies LU 3.1, 3.3, 3.4, and 3.6 but supports 3.5 retaining existing nonconforming use.

## General Development standards

LU G4 Development standards that match each zone's function, protect health and safety and add housing and commercial spaces.

LCC Supports these policies:

LU 4.2-Standards that provide predictability for each zoned

LU 4.3 -Control of massing for compatibility for planned scale and provide open space

LU 4.7 Use setbacks to allow for light air and sunlight

LU 4.8 Use tree preservation requirements to enhance aesthetics, prevent heat islands

LU 4.9-LU 4.14

LU 4.15 LCC supports protecting the public views through setbacks and establishing zoning blocks that protects key City views.

LU 4.17 LCC supports Seismic retrofitting to minimize health risks and retain historic buildings

LU 4.18 Can OneSeattle reinstate the use of Design Review to enhance the quality of City development by applying these best practices to "Middle Housing" and to "Affordable Housing" to minimize the stigma of "cheap housing" among its residents?

LU 4.4 and 4.5 – allowing use of maximum heights in the name of limiting view blockage How does this curb more view blocking throughout the city scape?

LU 4.16 -Why are higher heights required when current regulatory codes already provides land use code exceptions to preserve land marks? Requirement for higher density to preserve landmarks-too broad and not necessarily commensurate with designating a landmark.

## Off Street Parking

LU G5 to plan for alternative transportation modes

The reality check is that an estimated 80% of Seattle's residents own a car which is the second highest urban car owners in the US. While there has been a small decrease in car ownership as the City becomes more renters than home owners, the OneSeattle must plan for their existence, especially for attracting families..

LCC supports LU 5 5.4, LU 5.5, LU5.6, LU5.7, LU5.8, LU 5.9, and LU 5.11 (for bikes)

LCC has concerns on the LU 5.1, LU 5.2 and LU 5.3 which set limits on parking. Has the City 's traffic improved due to fewer cars owned? The free market system will best sort it out and since it expensive to build, developers will find the number of spaces to meet the needs of the residents of its housing and commercial users.

## Public Facilities and Small Institutions

LCC supports LU G6 that public facilities and small institutions must grow to meet the needs of the population if their "mission is compatible with the function and scale of the surrounding area".

LCC supports LU 6.1 through 6.4

LU 6.5 What is the process for siting essential public facilities and a policy needs to be made in One Seattle as 6.5 is too general ?

Telecommunications Facilities

LCC supports LU G7 that allows telecommunication utilities but also requires that they be vetted for public health issues.

## DEIS StoryMap Comment

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Date: 5/6/2024

## Comment:

The 2021 City of Seattle Tree Canopy Assessment (page 37) chart noted that in “Citywide redeveloped parcels”, there was a loss of -39.8% in tree canopy,( and only a -1.4% in undeveloped parcels) which resulted in 33% of the City’s declining tree canopy of 1.7% from 2016-2021. Which City policies in One Seattle will “protect and enhance the natural environment “? How will SDCI define “high quality’ standards and mitigation goals?

LCC supports:

LU 1.2 Neighborhood business variety nearer to residents

LU 1.3 Apply development standards to protect public health and safety (NO WAIVING Design review)

LU1.5 Balance development standards vs preventing displacement.

LU1.6 Develop residences away from air pollutants.

LU 1.7 Protect displacement in legislative re-zone policies, especially low income and marginalized populations.

LCC has concerns about LU1.1 “a wide variety of housing types in all neighborhoods”. The infrastructure in the City was not built for all densities (eg width of streets, sewer) This was also mentioned as a concern in HB. 1110

Urban Design

LCC strongly supports the goals and policies of the natural environment:

LU G2 “Seattle’s unique character and sense of place, etc and the policies that recognize the importance of retaining Seattle’s native vegetation, waterways, forests and visual public views of Mt Rainier, the Olympic Mountains and the Cascade Range, as well as lakes, waterways and public shoreline access points.

What new regulatory land use codes will protect public view corridors as developers try to “outview the next one?

And LCC supports polices :LU2.1, LU2.2, LU2.3, LU 2.4, LU2.5. LU 2.6, LU 2.7, LU 2.8.

Built Environnement

LCC strongly supports :

LU 2.9 Encourage preservation of characteristics and features that contribute to communities multiple identities including areas of historic, architectural, cultural and social significance.

LU 2.10 creating walkable cultural scapes

LU 2.12 Will the City SDOT have designated ownership and operating plans to develop highway lids and other pathways to reunite neighborhoods?

LU 2.13 and LU 2 .14 Design walkable connections and add natural lighting and rain protection

LU 2.15 Rooftop production of fresh food is a terrific way to provide local food sources.

LU2.19. Plan to cascade heights to allow for more lower-to-higher views of water and mountains. This is a much better approach than SDCI continuing to allow view blocking with the newest buildings in the 2015 Com Plan.

LU 2.20 Prioritize not allowing negative impacts of tall buildings to block sun and views in public parks and spaces

LCC does not support:

LU 2 16-18. Clustering of tall buildings, which can create “built mountains” and block public views.

Which regulatory land use codes and agency define what is a good cluster of tall buildings?

Public Spaces

LCC supports LU 2.21- LU 2.24 that encourages public spaces designed for a range of users.

USES Goal: LU G3 Allows every use everywhere

LCC supports LU G 7.1- LU 7.5 -restrictions on the location size, mitigation of visual, noise and proximity to communities, and prohibiting locating them in residential zones.

Downtown Zones

LCC supports LU G8 to promote downtown Seattle as its densest neighborhood promoting vitality, tourism and arts and entertainment.

LCC supports all policies e.g. LU 8.4 to encourage a vital 24/7 environment.

Seattle Mixed Zones

LCC supports LU. G9 How will the policies of LU 9.1 and LU 9.2 promoting density in mixed use zones outside of the downtown core?

Multifamily Zones

LCC supports LU G 10 multifamily zones to provide a variety of scale of household with a mix of incomes and support local walkable neighborhoods where they are located.

LCC supports LU 10.1 through 10.6, especially requiring “high quality housing and development standards that promote livability and a sense of community, including landscaping and amenities.”. This approach will enable Multifamily zones to be desirable and affordable in forming new desirable neighborhoods of the future.

Commercial Zones

## DEIS StoryMap Comment

Name: Colleen McAleer

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Date: 5/6/2024

## Comment:

In assessing Major Institutions' Master plans, will SDCI require the Major Institution to include an inventory of their space used in their facilities by hours used? The goal is to first identify surplus spaces already underutilized for every institution instead of continuing to add more buildings.

Require Major Institutions to identify capacity for expansion in their satellite locations? With enhanced technology, and virtual tools they could expand capacity using other locations linked to a main campus or medical center effectively and economically.

Require Major Institutions to declare all of their facilities (research, housing, offices, billing, etc) inside or outside their Master Plan and quantify their total Seattle footprint as part of the Master Plan process?

Acknowledging that many Major Institutions are tax exempt, has the City considered imposing fees to support infrastructure or operational services provided to them?

## Historic Preservation and Cultural Resources

LU G 16 LCC supports the City's goals to preserve its historic and cultural resources and encourages adaptive use of its buildings and sites. The landmarks in Seattle tell the story (good and not-so good) of Seattle's colorful history. Cultural resources in conjunction with the City's First Nations history are the rudder guiding all people today how to live in balance with the City's natural surroundings.

Policies LU 16.1- LU 16.18 are all supported by LCC with special emphasis on using outreach to educate all citizens about the preservation processes and why they add value to the city's livability.

As the City grows in landmarks to preserve, how has it allocated adequate resources to adequately manage the current landmarked properties and future designations needing resources to approve any modifications? Volunteers on these technical boards should have access to independent experts in historic architecture.

LCC supports LU 16.18 but would also add more incentives:

For expensive landmarked buildings seismic retrofits, the City should grant owners of a real estate tax credit or deferral to protect these vulnerable assets from earthquakes.

LU 16.19 How have the US Department of the Interior's Standards for the Rehabilitation of Historic Properties been applied by the City to ensure that meet the guidelines for the Seattle Landmark Preservation Board's approval decisions for any major changes or demolition of any landmarked buildings or sites?

## Environmentally Critical Areas

LU G17 LCC agrees that environmentally critical areas need regulations to protect the ecological functions, wetlands and fish and wildlife conservation.

LCC supports most of the policies of LU 17.1-LU 17.17 with emphasis on LU 17.8, LU 17.9 and LU 17.9 requiring new development in liquefaction and peat settlement areas to be designed to limit damage during earthquake and the construction processes.

LCC supports LU 17.12-14 Wetland protection with no net loss to protect fish and wildlife habitat.

LCC supports fish and wildlife regulations in LU 17.15 as well as LU 17.16

How does One Seattle incentivize the daylighting of streams that are now in pipes? Specifically, Yesler

Creek has been buried under the Battelle site in NE Seattle and it should be required to be daylighted with any new development on the landmarked site.

**32-1  
cont**



## DEIS StoryMap Comment

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Date: 5/6/2024

Comment:

#### TRANSPORTATION OPTIONS

T G 3 Expand equitable access to multiple transportation options. LCC agrees that “one size does not fit all” for a successful transportation system.

The policies in this section are well thought out and LCC supports:

T 3.1- T 3.23, except T 3.9. “Prioritize transit Investments on the basis of current or potential ridership, etc”. How will SDOT change its transportation resources within its regional transportation links to address the dramatic shift in commuter demand from 5 days a week to 3 days with heavy users on Tues/Weds/Thurs as employers continue to offer flexible work schedules for employees to be “in the office”? While there may be a slow return of employees, Seattle should plan for varying capacity needs based upon the day of the week to ensure there is adequate space for transit users as well as other modes including trips via cars be they shared, electric, etc. this is why converting roads into “gathering places” would be in conflict.

What plans are in place to install and maintain the missing and broken City sidewalks?

T 3. 10 and T3.21 is supported by LCC. Potential users in the residential neighborhoods have a 40 minute walk to the Montlake Light Rail. The “last mile” or two is offered instead at another Light Rail station in the U District where most neighbors do not enjoy connecting there for safety reasons so they do not use it at all. These same issues are important for bike and pedestrian safety for the “last mile” which really matter. Safe intermodal connectivity should be a top priority.

Building a Green Transportation System

TG 4 LCC supports transportation systems that improves the environment and air quality

T4 .1- T4-12. LCC supports these policies for adding new electric vehicles, adding public charging infrastructure, enhancing the street tree canopy and improving fish passage and better capturing of storm water.

T 4.3 How does reducing general purpose lanes all day reduce drive alone cars? This really does not work because drivers will find other streets to use, or their vehicles will sit in traffic spewing out more emissions than they should due to squeezed capacity. Should SDOT restrict transit-only lanes during am and pm peak, then open them to all users after during non-peak hours?

Supporting a vibrant Economy

TG 5The transportation system improves mobility ... and promotes economic opportunities throughout the City. LCC agrees that without reliable roads, freight will not be able to provide competitive services for residents and businesses.

T 5.1-through T 5.10 LCC supports these policies which support the movement of goods throughout Seattle and Region by vehicles, rail and connectivity to air and drone devices.

T 5.11 activating right of ways for the public is a departure from the core transportation goals and LCC does not support it.

Promoting Safe Travel for All

TG 6 Ensure Seattle’s transportation is safe for all ages and abilities. LCC strongly supports this keystone goal. Without safety, SOV increases, and transit can fail.

T 6 .1-T6.9 Policies are good and LCC supports them, especially T 6.9 on improving lighting near transit stops.

T6.12 How can the City of Seattle ensure and co-fund if necessary adequate Transit Police throughout the Light Rail system in Seattle and work with King County Metro for funding that provides King County security/police for its bus services?

Connecting to the Region

TG 7 LCC agrees that Seattle and Regional projects should be consistent among goals.

T 7.1 through T 7.11 are policies between local and regional entities and LCC supports these connectivity efforts that ensure the transportation corridors work seamlessly.

LCC add:

T 7.12 How can the City of Seattle require WSOT to ensure that the Washington State Ferry System has adequate service and well maintained boats to service the work force commuters from Bremerton, Vashon, Bainbridge, Whidbey and the San Juan Islands?

Operating and Maintaining the Transportation System

TG 8 Transportation assets should be maintained and renewed is strongly supported by LCC especially bascule bridges, State and Federal highways and local bridges, roads.

T8.1 through T 8.7 work to operate a solid transportation system but falls short on maintenance.

Add T 8.8 LCC proposes that the City utilizes the recent comprehensive audit of bridges and roads with the requirement it be used to prioritize their repairs and maintenance.

Funding the Investment that we Need

TG 9 states, "Transportation funding is sufficient to operate, maintain, and improve the transportation system that supports the City..."

Since the public transportation system is an essential City service, how can its Budget's meet operating and capital budgets without relying on tax levies exclusively on property owners to fund all of its expenses? This can be applied to the T 9.9 policy

## DEIS StoryMap Comment

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Date: 5/6/2024

## Comment:

T 9.10 Considers use of transportation impact fees to fund the transportation needs. Should the City collect impact fees from all developers to pay for the Transportation Budget capital expenses to reduce the tax burden on property owners?

T 9.12 Planning for 6-year capital improvements. How will the City of Seattle Bridge and Road audits be used to prioritize projects?

T 9.13 Identify alternative funding sources. Which transportation priorities can be funded by federal, state and regional sources for its capital improvement projects?

Because all transportation modes have capital and operating expenses should users “pay a fair share” back to the City? Should everyone pay an affordable fare for bus service, Light Rail, ferries, shared bikes, scooters, and a portion of tolled roads into the Seattle and Regional transportation budgets?

## HOUSING

The OneSeattle Plan notes that job growth in the City grew by 38%, its housing stock grew by only 19% which has led to supply/demand price increases for its residents. Of course, not all of the employees in Seattle want to live in the City, but the pricetag of regional housing has climbed as well. The King County Growth Management Council target for Seattle is to produce 112,000 units over 25 years (2018-2044) in each of the Area Median Income (AMI) level, which translates to over 43,000 units of units for income earners below 30% of AMI. Because the costs of providing the land and structures also have climbed, subsidies from every source is essential.

H G1 and H G 2 Expand Seattle’s housing supply to meet current and projected needs for all economic groups. LCC agrees that more stock will help stabilize housing needs.

H 2.1- H2.3-LCC What percentages of the 112,000 units produced will be less than 69% of AMI for renters and less than 89% for owner occupied units?

HG 2.1 through HG 2.2 LCC agrees expanding capacity of all types of housing are important, and monitoring the inventory by price and type is essential for planning.

HG 2.3 Removing regulatory “barriers” for less expensive housing. LCC disagrees for 2 reasons. Even if units take longer and a bit more money to build, why don’t affordable housing residents of all incomes deserve the benefit of Design Review, vegetation and saving trees? How can SDCI and the Office of Sustainability enforce existing tree preservation to prevent concrete “heat islands” in Settles’ neighborhoods?

HG 2.4 LCC agrees that small landlords can often produce less expensive housing units and should be supported. What legislation passed by City Council should be re-evaluated as anti-landlord regulations which may be creating obstacles for small landlords from increasing small scale rental housing units?

HG 3 Seattle should supply affordable housing to all who want to live there.

LCC questions whether the City can/should supply housing for all since its land value is high and people (eg with large families) may need/want to live somewhere else. This works when the City has a frequent and reliable transportation system network, and Seattle is just a few years away from the Light Rail extensions to the Eastside, Lynnwood and points north. This will open up greater land space for those who work in Seattle but can afford and want to live outside the City. Should Seattle be the only entity to

produce all of the types of housing to house everyone working within its City limits? With improved Light Rail regional network, HB 1110 requires adjacent “bedroom communities to also build a “fair share” of housing for all income levels.

HG 3.1-How can Seattle source more federal funding for permanent affordable housing? Seattle is a employment hub but high tax levies for housing and transportation have placed a heavy tax burden on property owners, leading to higher housing costs.

HG 3.2 How can the City expand more long term affordable especially (<30% AMI)

H 3.4 Is there a way that excess Light Rail right of ways can be used by the City to build in more affordable housing units near frequent transit to save total cost of living savings for low income residents?

H3.6 LCC “When and how will comprehensive “audits” be compiled for measuring the actual inventory of affordable housing and check on their health and safety compliance?

H 3.9 LCC supports building long-term housing on publicly owned sites (not parkland)

H 3.10 Waive development standards for affordable housing. LCC objects to this because people with less income DESERVE trees, sidewalks and the other benefits of good urban planning , and it will enable these units to “fit in” and last longer, preventing future displacement..

H 3 11- H 3.21 What policies can be formed that lead to own ownership for residents and tax incentive saving for developers of lower income units especially < 60% and 30% of AMI?

## DEIS StoryMap Comment

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Date: 5/6/2024

## Comment:

## HOUSING SECURITY and STABLE COMMUNITIES

H G 5 Residents should be able to remain in place and thrive without fear of displacement and housing discrimination

H 5.1 LCC agrees that vulnerable populations, especially seniors from displacement.

H 5.2 through H 5.12 What city regulations can be added to prevent displacement of existing residents, and providing pathways for more home ownership?

H 5.13 Property tax relief for low and fixed income residents. What programs enable seniors to "age in place" without getting "taxed out" of their home?

## Diversity of Housing Types

H G6- Seattle can produce a full range of housing types that they fit into existing heights. Should more duplexes, tri-plexes and small low rise muti unit apartments be encouraged rather than townhouses that are difficult for seniors and families?

H 6.1-H 6 Policies that promote all types of housing units from small to large which accommodates multi-generational and large families,

H 6.7 Advocate for State legislation to encourage the production of What changed in the State will incentivize production of more condominiums and co-ops? LCC supports this action to enable first time buyers to build equity as they pay for housing. This can lead to wealth building for individuals and families.

## HOUSING CONSTRUCTION, QUALITY and DESIGN

H G7 LCC agrees that Seattle's housing units should be carbon neutral healthy and safe

H 7.1 LCC agrees with regulations and enforcement of safe and healthy housing stock

H 7.2 Why is the City incentivizing the use of CLT building material exclusively ? While it is fast growing, the quality of this wood aging over time should be assessed before recommending it. (e.g. Burke Museum use of CLT may not be the desired outcome)

H 7..3- and H 7.9 and H 7.10 Which policies are applied to affordable housing units making them more livable and using sustainable materials that reduce carbon footprint and are healthy with open space that promote light and social spaces?

## DEIS StoryMap Comment

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## Comment:

approach.

To survive the potential rising temperatures of Climate Change what resources will the City to retrofit HVAC systems to convert to provide air conditioning and more energy efficient systems that reduce use of carbon fuels?

H 7.5 LCC supports re-purposing historic buildings for residential uses

H 7.6 What criteria and incentives can the City provide for converting non-residential buildings to housing use, considering the overbuilt supply of office spaces?

## Homelessness

The two main reasons for chronic homelessness are drug addiction and behavior health issues. Seattle has tried just about every type of approach to find permanent solutions for housing those who are unsheltered and has learned some things about what may work to achieve a reduction in homelessness.

H G 8 Homelessness is rare and brief, and there is a need for emergency housing as a step for permanent housing. LCC agrees for the need for emergency housing but does not agree that it is necessarily brief, and rather can also be chronic.

HG.8.1 -H 8.2 Implement programs to secure emergency housing units to meet needs. LCC agrees. How many shelter beds will be available for drug users with services to detox? How will the State and County partner with Seattle to supply adequate behavioral health facilities for unhoused mentally ill individuals. HG 8.4 Collaborate with other jurisdictions to provide permanent housing and services LCC agrees that Seattle can/should provide resources for those who are homeless in the City, but other regional area governments can share in responding to emergency housing and services.

HG 8.7 As a component of a solution for homelessness, do all services provide "a path home" to reunite families around the country for a permanent housing solution?

H 8.6 "Remove regulatory barriers" to allow homes on properties for homeless people. LCC does not know of any "regulatory barrier" that precludes occupation of housing units on owner occupied property.

## Climate and Environment

Seattle aka, The Emerald City, has been impacted by rapid growth, Climate Changes in weather and the lack of City codes that have accelerated tree canopy loss since the 2015 Comprehensive Plan. Carbon Pollution Reduction has been helped by the Climate Action Plan of 2006, but much more needs to be implemented.

CE G1 Which climate resiliency goals must be met to achieve carbon neutrality by 2050? LCC strongly supports this goal to keep our City and world sustainable.

CE 1.1 -1.3 LCC agrees that using data to track our actual GHG output and which City office will ensure that the targets are met? Seattle needs to develop new policies and practices to meet the targets in partnership with the Green New Deal will enable Seattle to help reach a net neutral position by 2050.

CE 1.4 LCC supports partnerships with other local jurisdictions and academic institutions to build science-based programs to reduce GHG, and analyze actual data points to assess Seattle's position towards those goals.

## Transportation

CE G 2 LCC supports the goal of reducing GHG from transportation modes.

CE 2.1 through CE8. 5 LCC agrees with these policies to achieve lower emission by enabling more local services that are walkable in a City-wide equitable way.

When and how can Seattle require all delivery vehicles to be carbon neutral by 2035?

### Extreme Heat and Wildfire Smoke

CE G9 LCC supports the goal to be prepared for excess heat and wildfires

CE 9.2. Design and retrofit City capital facilities. LCC supports this and was pleased that the City libraries are being retrofitted for air conditioning as a refuge for extreme heat.

CE 8.5 and 8.5 Mitigate economic impacts of transitioning to carbon neutral on low- income individuals and fixed income seniors.

## DEIS StoryMap Comment

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Date: 5/6/2024

## Comment:

When will the SPD North Precinct SPD be replaced with two new buildings -one near Ballard, and one near the U District to protect growing populations and the SPD officers to ensure adequate Public Safety coverage and a healthy facility for officers?

CE 9.3 Expand tree canopy and greenspace. When will a separate City Tree department be established to track the status of the state of the Tree Canopy policies to prior legislation which may have adverse outcomes on the tree canopy and open space preservation?

CE 9.5-CE 9.7 What City policies will protect urban critters, outdoor workers, and owners on how to protect all Seattleites from extreme heat in their buildings?

## Sea Level Rise and Flooding

Seattle must be prepared to face the reality of rising sea levels due to ice melting from Global warming.

CE G10 LCC agrees that Seattle needs plans for adapting to rising sea levels

CE 10.1 through 10.4 What are the City's planning and education policies to prepare for high sea levels and focus on restoration of resilient ecosystems, including an annual assessment of Seattle's Seawall condition?

## Tree Canopy

LCC agrees with the overarching statement that the Tree Canopy is fundamental to Seattle's quality of life.

Trees perform functions such as "cleaning the air" and removing carbon. Trees provide shelter for an intricate ecosystem of urban critters and provide shade for people on hot days, and mature trees "mother" other smaller or distressed trees to maintain their health. Tree clusters prevent "heat islands" from forming and absorb storm water run-off. Seattleites espouse to be tree protectionists, but the tree canopy shrunk from 2019-2021 by 1.7%, mainly from neighborhood residential developed lots and in its Parks natural areas. Together, those 2 categories caused 78% of the canopy reduction (data taken from the City of Seattle Tree Canopy Assessment Report published 2023)

CE G 12 Seattle has a goal of 30% tree canopy (used to be by 2030??) LCC agrees that increasing the tree canopy will buffer Seattle from the adverse impacts of Climate Change. The City unfortunately lost 1.7% from 2018-2021.

LCC supports polices CE 12.1- CE 12. 9 to preserve and expand the tree canopy to 30%.LCC would also add:

CE 12.10. When will the Seattle City Council review the tree canopy data yearly to evaluate if its tree protection ordinances are ensuring that mature trees are being preserved? If the City loses more tree canopy, the Council should amend tree regulations to better preserve and meet the City's tree canopy coverage of 30%,

## WATER

CE G13 LCC agrees that water is an essential resource that must be sustainably managed. How are the City's reservoirs being protected and maintained?

CW 13.1-CE 13.9 LCC supports all of the recommended policies to protect the pure water that Seattle has and find ways to clean contaminants and or reuse waste.



Healthy Food System -Food is essential for the health and well-being of our communities and healthy food options must be available to all ages and income levels throughout the City.

CE G 14 Goal that Seattle has accessibility to healthy food. LCC agrees.

CE 14.2 Support convenient access to nutritious food from a variety of sources.

What requirements and incentives will the City enact to incentivize the retention of grocery stores that supply fresh produce and protein?

CE 14.3 Not clear about “settler colonialism and racism” concerning access to food” “Can the City offer tax credits to maintain large grocers and add indigenous sources and public safety measures to prevent retail theft”?

CE 14.4 through 14.8 LCC agrees with policies to increase food access and reduce food waste.

## DEIS StoryMap Comment

Name: Colleen McAleer

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Date: 5/6/2024

Comment:

ARTS and CULTURE

Cultural Spaces Place making and Place Keeping

The description (p 166) states that by 2044 Seattle's neighborhoods will have cultural spaces including theaters, galleries, cinemas, museums, music venues and art studios that reflect the rich cultural diversity in the City.

AC G 1 LCC supports the goal for all neighborhoods to have affordable cultural spaces... for people of all ages and abilities. How will the City decide with be conflict between allocating surplus public land for cultural uses when the goal of more housing is paramount?

AC 1.1-AC 1.3 LCC supports maintaining spaces for performing arts and artist studios and their housing.

AC 1.4, AC 15, AC 1.6 Encourage re-purposing of historic community buildings such as surplus schools to adapt for performance arts as well as in parks, libraries and community centers. LCC supports these policies for broad use for musicians, dance, etc., but cautions against the exclusive use of public recreational buildings exclusively dedicated long term for only one user.

AC 1.7 , AC 1.9, AC 1.10, AC 1.11, AC 1.12 and AC 1. 13 LCC supports the City grants to help local communities to preserve their cultural arts, and encourage a sense of community with murals or artwork. As those funds grow, in 20 more years, more art will be funded to install in most neighborhoods.

Public Art

Seattle was a forward-looking city and allocates 1% of its budget to support the arts including art installations.

AC G 2 LCC supports this goal of funding neighborhoods creative expression through its publicly displayed artwork to reflect a variety of cultural backgrounds.

LCC supports policies AC 2.4, 2.5, and 2.6 which encourages public participation in acquiring or commissioning artwork in the recipient communities. How will this process of procuring public art be open to the general public for their comments and focus on pieces that is easily identified as an icon or artform that represents a significant place?

Creative Economy

Seattle's downtown has a long-storied history offering a wide variety of performing arts, the Seattle Symphony, SIFF theaters, Climate Pledge Arena concerts, art galleries and world class museums. The impact of these art and cultural businesses fuel a vital the downtown night life as well as attract tourists that fuel the City economy.

AC G3 How can artists and performers who are vital to Seattle's economy be provided with affordable venue opportunities to thrive so the arts can also thrive?

AC3.1-through AC 3.11 When the City offers subsidized affordable housing units can several be allocated to provide housing and studio space for a wide range of artists?

AC 3.11 LCC supports the City's policies to reduce the risk of displacement of performers, artists and their venues as the City grows its developed footprint.

Youth Development and Arts Education

The access to all types of arts education is not guaranteed for Seattle's young students. It is outreach, special parent PTA funding and City funding that makes it possible for the City's youth to participate in the arts. The seeds of creative performing expression and creating artwork is an important outlet for many students and LCC supports funding to make that accessible for EVERY child in Seattle.

AC G 4 What financial resources from Seattle can support this policy to have arts and music education in every Seattle public school?

AC 4.1, AC 4.2 and AC 4.3. LCC strongly supports forming partnerships within its resources to support access to arts for all youth.

## DEIS StoryMap Comment

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Date: 5/6/2024

Comment:

PARKS and OPEN SPACE

Seattle's residents often define their neighborhood and favorite activities by their favorite park or Public Space. With the past 10 years growth of 38% in employment, and the 12- year population increase of 23.5% from 2010 to 2022, local residents are feeling the "squeeze"! Fortunately, the City owned park and recreation lands are protected from conversion and a new tax for parks in 2014 adds to the City's budget allocation to more than adequately funds their capital improvements and operations. Access to Parks and Recreation and Open Space saved the sanity of many residents during the Covid-19 pandemic and mitigates the impacts of Climate Change in the future.

Equitable Provision of Public Space

P G 1 LCC supports the goal of expansion and enhanced access to public spaces as the City grows, and provide residents access to a full range of recreation for all residents

P 1.1 through P 1.18 LCC supports these general policies to serve the many needs for all ages, abilities and locations throughout the City in an equitable way.

P1 .116 "Consider the use of open space impact fees to support public space".

Who will pay these fees? It is not defined and should developers pay for some amount as a public benefit when they displace natural open space with developments?

P!..17 How can SP& R continue and expand partnering with Seattle Public Schools to including use of after school gym facilities to be run by SP&R"?

P1.19 Mitigate noise and pollution on public space is an excellent goal. How can SPR prevent nuisance noise from Seattle parks and open spaces impacts onto residential neighborhoods from the SPR activities when changing uses? Specifically what SEPA process is utilized when siting pickleball courts which emit 70 decibels of noise onto nearby homes which detracts from the restorative quieting function of the parks?

P 1.20-P1.25 LCC agrees -SP&R should restore contaminated spaces and develop new and weather protected covered spaces in an equitable way throughout the City.

P1.26 Joint use developments- How can public use mixing housing with SP&R community centers ensure public access to facilities?

Recreation, Activation and Programming

P G2 LCC supports this goal to provide a wide variety of recreational, social, activities and events for all ages and abilities

P2.1 "develop activities based on the needs of each community they serve" LCC supports this general concept but "who decides" is unclear.

When will the City re-establish "all-City" community representation using local 5- 8 person Advisory Boards with 7 city-wide District boards? Which groups now give feedback and are accountable for the recreational, social and events planned to be sure resources are distributed more equitably?

P 2.4 and 2.5 LCC supports the use of parks for nature play and use for all ages.

P 2.6 Why is the City even considering the sale of alcoholic beverages in the City's parks and Open Spaces? The impact of marijuana use and smells is already detrimental, and adding alcohol will create

drinking parties which can lead to untoward behaviors in the parks and discourage families use. Has the City considered expanding non-alcoholic drink sales?

When will SP&R build more public pool access to support the City's Initiative of "Swim Seattle"? The City is surrounded by water and every person who lives here should know the basics of how to swim for their safety.

#### Operations and Maintenance

P G 3 LCC supports maintenance of public space operations with eco-friendly methodology.

P 3.1 -3.7 and P 4.4 Agree with environmental sustainability practices and use the positions to train youth and homeless in skilled employment.

#### Partnering with Communities

P G 4 Empower community members and organizations to help shape facilities. LCC supports this as "part "of design and use, but prefers that there be a broader scale public input to design permanent public park facilities to include all ages and abilities.

P 5.1- 5.3 LCC agrees to enhance the parks' health and protect its trees, and mitigate the adverse effects of Climate Change.

## DEIS StoryMap Comment

Name: Colleen McAleer

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Date: 5/6/2024

Comment:

#### COMMUNITY INVOLVEMENT

Engaging all Seattle Residents Equitably

CI G 1 . LCC supports the City has numerous boards for many aspects of City life from the formal Design and Planning Commission Boards to numerous advisory boards to specific historic preservation and transportation boards which represent a significant amount of community involvement in decision making. The process is open to the public and there is a vetting process for its members diversity and relevance.

CI 1.1- 1.1.6 LCC supports inclusion of community involvement in its decision making and planning. LCC adds these comments: How does Seattle ensure transparency of access to broad community input and educate how “it works” for giving feedback in decision making. How did OPCD and SDOT “Move Seattle” proposed levy, and THIS OneSeattle Comp Plan, decide to do outreach only with the small eight groups who are all located in the south half of Seattle with one in West Seattle to shape it?

Which groups or non-profit organizations are being contacted in the explosive growth areas of downtown, South Lake Union and the dense Urban Villages north of the Ship Canal?

How can the City be more inclusive and “balance” its outreach approach to hear from more than the same “eight small group inputs” or street fair folks to capture the diverse input from all who live and work here?

Engagement Partnerships

CI G 2 LCC supports community engagement from community based partners.

LCC supports C1 2.1-CI 2.5 and adds:

When will the City re-instate funding for the Department of Neighborhoods to establish inclusive community councils and/or City Council District advisory boards? What criteria should be required to ensure these councils be open and accountable to their membership to capture input from every part of the City as a sounding board?

Building Community Capacity

CI G3 LCC supports the goal of engaging all people in the community to participate in how their city is making decisions.

C 3 3.1through C 3 3.4 LCC supports developing skill sets for all community members to participate in the City’s decision making, especially in underrepresented communities.

How does City weigh “comment stuffing” as it reports about City project feedback from one-minded groups which can result in skewed influence on City policies. How does the City respect and report on the minority participants to consider the merit of all inputs?

Indigenous Engagement

CI G4 The City should include the Indigenous tribes in all major decisions about planning for the City’s future needs and sustainability. LCC supports this relationship and wisdom.

CI 4.1- CI 4.9 What systematic outreach maintains treaty rights and utilizes the Tribes best practices to keep the land and ecosystem viable for the future generations?

Respectfully submitted,

## DEIS StoryMap Comment

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Date: 5/6/2024

## Comment:

GS 1.2 Encourages a variety of housing types is lofty to be inclusive and age-in-place, but is not specific. Has a real estate tax cap for seniors been studied to help predict and manage elders' tax bills so they can truly age in place?

GS 1.3 Accommodate non-residential uses in neighborhoods seems counter-productive to building housing stock when many office and commercial buildings sit empty.. How would this policy prioritize and preserve housing units?

LCC agrees with building density along existing transit routes, avoiding ECA areas and better planning for transportation, parks and recreation for new planned density areas.

Neighborhood Centers (figure 7) would be a new zoning type option to add density and comply with State bill HB 1110 which requires "middle housing" type options with 4-6 units within 1/2-mile walking distance of a major transit center.

GS 5.1 "designate Neighborhood Centers with a commercial core, diverse housing options within walking distance to shops, services and transit". LCC agrees that this best complies with HB 1110.

GS5.2 Allow all types of diverse housing types and services. LCC disagrees that it should be centered with institutional services. Larger scale services should be in Urban Centers.

GS 5.3-Zoning heights 3-6 stories . Why are 5-6 stories the goal for Neighborhood Centers, which double the existing height limits? LCC suggests heights should be 2-4 stories maximum as suggested in HB 1110 to conform to existing heights. These denser units that would better transition to existing while doubling housing units.

Why isn't there an OPCD and/or SDCI code change that Neighborhood Centers require a "Master Plan" to ensure context sensitive scale and aesthetic compatibility to adjacent existing buildings, especially residences?

Urban Neighborhoods- Seattle's neighborhoods are the heart of the City. People ask "what's your neighborhood" to start a fun conversation, and they support community building throughout the City.

GS 6.1 Designate Urban Neighborhoods primarily for residential development. LCC agrees that some areas need to be designated as quiet places to rest and enjoy, away from the noise and traffic in urban cities.

GS 6.2 Allow 4-6 stories near frequent transit. LCC disagrees and that is covered in all of the other zones, especially in Neighborhood Centers. Building 4-6 stories is out-of-scale and lacks the adequate infrastructure to build heavy density in this low density area. HB 1110 requires building more units in existing zoning to add "Middle housing" and does not call for adding heights or changing setbacks in those zones and better transitions at its edges.

## DEIS StoryMap Comment

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Comment:

LU 11.1 In the statement “range of commercial zones”. What is in the range of commercial activities? More clarity is needed to prevent incompatible development.

LU11.4 Assigns outright height limits to commercial but then allows different height limits within the zone. Are these lower height limits for transitions to existing 2-3 stories or does it mean grant higher height limits of 4-6 stories?

LU 11.2, and 11.5 state “compatible blend” of housing and commercial and suggest Neighborhood commercial limits on size and heights but does not require the necessary commercial anchor of a grocer with access to fresh produce and protein. How can access to fresh food be incentivized in OneSeattle? Over the past 10 years, NE Seattle has lost two QCF grocery stores (Roosevelt and Wedgwood), and a major Safeway on NE 45th Street while density in residential units exceeded 10,000 more residents with at least 4,000 more units awaiting permits at SDCI. Neighborhood Commercial should only occur where a significant food outlet is a key component, because residents cannot live on coffee alone. Requiring a type of Master Plan for these new Neighborhood Centers would help to guide a balanced result in services.

#### Neighborhood Residential Zones

LU G 12 LCC agrees with this goal to have places in the City for residential zones, which contain various housing options and accommodate a variety of households and income.

LU 12.1, and LU 12.2

LU 12.5 height limits of LR 2 -LR3 to this policy and require to be within 1/2 mile of frequent transit service.)

LU 12.3 -LCC mostly supports these uses. How does SDCI prevent and monitor adverse impacts from small institutions and at-home businesses to protect the livability of

#### Local Specific Regulations

LU G 14 Local regulations supporting unique conditions. LCC agrees with this goal to preserve the City’s character and support special areas of interest and special needs.

LU 14.2 and LU 14.3 Can implementation of the Master Plan process help create a variety of residential and commercial development that “use a cohesive urban design and promote high levels of environmental sustainability, housing affordability and publicly available open space”?

This approach is far superior to many of the piecemeal apartment projects that were surgically inserted into NE Seattle, on Union Bay and NE Blakeley streets. The “residential density” result is a row of cluttered market price housing units, with dumping cars on the two small side streets with no City safe and continuous sidewalks and no crosswalks for pedestrians. A “Master Plan” would have resulted in a less cluttered and poor-quality aesthetic, required developers to pay in for transportation impacts and perhaps provided better car storage, delivery truck access.



## DEIS StoryMap Comment

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## Comment:

It is important to review the recent past policies that may not have achieved the expected outcomes and set a correction to achieve the goals over the next 10-year planning cycle., especially in producing more units for the lowest income AMI affordable housing residents.

The Laurelhurst Community Club Council (LCC) represents over 5,000 residents and small businesses in north Seattle, and has examined the One Seattle draft, attended the OPCD outreach meeting and shared input from many non-profit organizations.

LCC has also studied how other large cities in a growth trajectory plan to build more housing units for a range of incomes amidst their housing stock of high cost of market rate homes. Solutions vary from New York City, Vienna, Singapore and Hong Kong in building maximum units on government owned land and/buildings, partnering with private developers to build affordable units within the city (Seattle's primary model), offering federal, State and local tax cut exemptions to build more affordable units and building efficient, low cost transportation systems to enable their City's work force to live outside city limits at a lower cost of land and housing.

In keeping with One Seattle's goals of community involvement, the best example of transparency for planning and inclusion processes is the City-State of Singapore which does is publicly with a 3-D display of an updated master plan model of the entire city. As it updates development and planning, it delineates its old and new neighborhoods, location of subsidized units, and plans for "reclamation" of new land owned by the government added to its shores.

How can Seattle's OPCD become a more open planning process to all?

The One Seattle Comprehensive Plan contains noble goals and policies for the next 10+ years. However, many of them are very general and should be based upon the effectiveness of the positive outcomes of policies of the past 15 years, as well as identify the unintended consequences, and better addressing emerging trends.

Our comments below are focused on: General Goals, Growth Strategy, Land Use, Housing, Transportation, Climate and Environment, Parks and Open Space, Arts and Culture and Community Involvement:

## Growth Strategy

The GS G1 Goal of creating complete communities for the inclusive needs of all ages and abilities is the overarching One Seattle Comprehensive Plan.

## Major Institutions section:

LCC agrees with using the Major Institutions GS 8 Master Plan processes for managing their growth and uses that are needed within those boundaries as approved.

How will projects be considered "high quality" if SEPA and Design Review are not part of the regulatory process?

Many MHA titled housing units were built with no context to existing structures and zoning, displaced existing residents and small businesses, destroyed existing trees. Developers just wrote a check "in-lieu" into the affordable housing fund to build units far away from existing locations. "Stick trees" were planted onto right of ways and many died which deteriorated the City's tree canopy. How can Seattle

prevent these unintended outcomes and ensure “stewardship” practices for the replacement trees viability?..

LCC supports LU G 11 -the creation of Commercial zones that support surrounding neighborhoods and encourage long term stable businesses. Robust businesses serve both residents and employees and add to the vibrancy and into the City’s tax coffers.

#### Major Institutions

LU G15 LCC agrees that the Major Institutions are regionally important, but they must be regulated to avoid traffic, displacement and housing shortage impacts.

LCC agrees with the policies LU 15.1- LU 15.10 which are the using the tools of the Major Institution Master Plans and Major Institution Overlays. The City of Seattle is a nexus of health care and education and its needs will grow as the surrounding populations grow.

LU 15.3 LCC supports “Balance the need for the major institution to grow with the need to maintain the livability and vitality of neighboring areas”. LU 156 “ Locate major institutions where their activities are compatible with the surrounding land uses.. and where impacts associated with future development can be appropriately mitigated”.

## DEIS StoryMap Comment

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## Comment:

These are addendum comments we add to our overarching concern that all of the new zoning changes proposed really will not build truly "affordable Housing". Market rate will dominate and "house flipping" will just result in a 6-pack of townhouses, at a \$1million a piece and are not suitable for families and seniors.

) Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against.

2) If the Plan says it implements HB 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan?

44-1

3) In the DEIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices cause by limited supply and create more opportunities for income-restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to low-income people, during the past 5 to 10 years of the most extreme increases in supply of rental housing ever experienced in Seattle?

4) If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market?

5) Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the DEIS acknowledge this?

44-2

6) Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions? Do you agree that townhouses are the predominant form of new housing being permitted in formerly single-family zones?

7) Although HB 1110 allows duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments, what is the likelihood that any of these Middle Housing forms will be built by current for-profit infill developers, when these builders refuse to build rentals of any sort? If these forms are meant to produce rental apartments in formerly single-family neighborhoods, and non-profits have told the city that they can't build there either, because they need economies of scale for construction and staffing, where are the programs or zoning incentives Urban Residential neighborhoods?

8) What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods?

44-3

9) Where does the plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?

10) Where does the plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability, when a Stanford researcher who studies this determined that Seattle hadn't built enough housing 40 years ago for this to be a significant factor, when instead, Seattle tends to recycle older affordable rentals by rehabbing them into new, market-rate housing?

44-4

11) Specifically, how many low-income affordable rentals will be built under Alternative 5? Will this be

44-5

half of all new housing units, as called for by the Governor and the Department of Commerce? If not, what zoning and policies could mitigate the extreme lack of affordable rentals in Seattle?

44-5  
cont

12) Several years ago, the City redefined "family-sized housing" as 2 bedrooms, rather than 3 bedrooms. How has that change contributed to the lack of family-sized rental housing being built, and what would be the effect of restoring the definition of family size to the common understanding of 3 bedrooms?

44-6

13) What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels?

44-7

14) Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs? How can the plan incentivize stacked flats and courtyard apartments? Wouldn't such forms mean one-third to half the apartments would be ground-floor accessible apartments? Could these apartments be built by non-profits with the benefit of land trusts funded by the City?

44-8

15) What is the effect of lacking 11,000 blocks of sidewalks on our vision of a 15-minute city? On accessibility for seniors, people with mobility aids, baby strollers and ADA requirements? How can we include and fund a plan for a complete sidewalk grid within 20 years?

44-9

16. Master plans are needed to be certain that all income levels and abilities are met and a master fund portion goes to sidewalks and amenities for all types of priced housing.

44-10

## DEIS StoryMap Comment

Name: Chris Aggerholm

Organization: Grousemont Associates, QA Canal LLC - 3837 13th Avenue W

Email: chrisa@grousemont.net

Date: 5/6/2024

## Comment:

Thank you for your efforts in reviewing options for additional density where it makes sense and addressing Seattle's long term needs for housing in a thoughtful manner. We own several properties in Seattle including one at 3837 13th Avenue West which we will expect to be redeveloped into housing as the site nears the end of its useful life. We were only just notified by our architect of a May 6 date to submit comments otherwise would have prepared something more formal, however we would like to be sure and support any additional density in this unique area that is just off the Ballard Bridge between SU. any additional density in this zoning can make development more achievable by allowing us to build more cost effectively - we also have a split zoning that is odd and probably not a reason for this to be in place any longer. This corridor, to include Elliott Avenue/ 15th is a great future area for development being so close in to the City center but provides nice benefits with view of the water as well as related amenities that tenants like. We own an additional 2.5 acres on Elliott however this was recently rezoned to Industry and Innovation. We would love to have this allow for residential but expect this will take some time to alter - if ever. Again thank you for your leadership in this process.

**From:** [Laura Baumgartner](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#); [Morales, Tammy](#); [Strauss, Dan](#); [Carroll, Patrice](#); [Hubner, Michael](#)  
**Subject:** feedback on the comp plan draft eis  
**Date:** Saturday, April 13, 2024 4:00:19 PM

**CAUTION: External Email**

Mr. Holmes,  
I'm writing with feedback on the draft comprehensive plan and specifically on the EIS that is available at the website <https://storymaps.arcgis.com/collections/bc280a13a8ee4db28cd4d602ffe69336?item=1>.

I'm a resident of Seattle. I live in the Central District and have for 23 years. I am a former public school teacher and now serve as pastor at the Haller Lake United Methodist Church in north Seattle. I have a deep concern for making Seattle a place where teachers can afford to live, as I have been able to do, and also a place where people who can afford even less than teachers have a welcoming place of belonging and are not cast out and excluded, or forced to live in cars or on the streets. As you know, we have many low income residents as well as asylum seekers, refugees, and other immigrants arriving in the Seattle area regularly all struggling to find shelter. The churches are rising to the occasion, but need help meeting the need. The Zoning changes happening with the Comprehensive plan is one way to provide help.

46-1

Our congregation is in the midst of a discernment process that is leading us toward building housing on our property at 133rd and 1st Ave. NE. We have talked with neighbors and community leaders in our area. We have met with city representatives and government officials. We have partnered with community organizations and grass roots organizers. What we are hearing is that there is widespread support for more dense housing in the area, especially on our property. We see the possibility for that kind of development in Alternative 5 of the EIS and support moving in the direction of more dense housing throughout the city.

However, we also know from experience, and hear repeatedly from our neighbors, that the neighborhood around our proposed project is sorely lacking in small businesses and options for gathering, shopping, and creating community. Therefore, we would like to be able to consider creating such a space in the development on our property when we are ready to partner with a developer. None of the alternatives in the DEIS currently allow for commercial or mixed commercial and residential development on our corner. **We would like to request that the DEIS be revised to include NC2-55 zoning for the church property, Lots 3, 4 and 5, of block 65, in the H.E. Orr Park Division No. 6** so that a development might be considered that includes both commercial and residential components.

We are still in the beginning phases of planning. We don't have a developer yet but we have talked with several possible developers and have heard that the zoning, current and projected by the DEIS, limits their ability to dream with us about how we might become community with neighbors who aren't here yet.

Please consider this request and be part of our dream to build a community with space for all.  
Thank you,  
Pastor Laura Baumgartner (she/her)

Haller Lake United Methodist Church  
13055 First Ave. NE  
Seattle, WA 98125  
Cell: 206-595-9607



**BELLWETHER**  
H O U S I N G

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes; Rico Quirindongo  
[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

May 6, 2024

**Re: Support for additional residential height and density at Kingway site, 5952 Martin Luther King Jr. Way South (Parcels 8113100005 and 8113100040)**

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”), as well as the Draft One Seattle Plan.

Established in 1980, Bellwether Housing has been a pioneering force in Seattle's affordable housing landscape. As the largest nonprofit affordable housing provider in Seattle, Bellwether Housing manages over 3,500 apartments across 41 buildings, serving over 7,500 residents. Our mission is to create stable and equitable communities by developing and managing affordable homes for individuals and families with low incomes. We commend the commitment to affordable housing and the other values articulated in the draft One Seattle Comprehensive Plan.

Given our mission, we are eager to see allowances for additional residential development across Seattle – particularly in areas in close proximity to light rail, where many of our buildings are located. We firmly believe that increasing affordable housing capacity in transit-oriented areas is essential for addressing Seattle's housing affordability crisis and fostering a more inclusive urban environment.

Bellwether owns and operates the Kingway Apartments, an existing affordable housing community located at 5952 Martin Luther King, Jr. Way South (parcels 8113100005 and 8113100040) (the “Property”). The Property is split-zoned Midrise and Neighborhood Commercial 2 with a 55’ height limit (MR and NC2-55). The Property is within walking distance of a future light rail station and represents a significant opportunity for many more affordable housing units to be developed on the site. Accordingly, we encourage OPCD to include in the FEIS a study of heights and densities commensurate with NC zoning on the entire site, with height limits up to 125’. In addition, we

47a-1



encourage the City to look at sites such as these and ensure that as part of implementation of the Comprehensive Plan, they are not split zoned. Split zoning creates hardships for redevelopment, and redevelopment that includes affordable housing in this area should be encouraged.

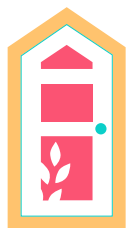
Finally, we encourage the implementation of the Comprehensive Plan in areas like these to be completed as soon as possible. We are aware that the City will focus on Regional Center subarea plans, but opportunities for affordable housing density, such as this one, which is outside of Regional Centers, should not be overlooked.

We would be pleased to collaborate with your department as may be helpful in future implementation on this site. Thank you again for receiving our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'SBoyd', is positioned above the typed name.

Susan Boyd, Chief Executive Officer  
Bellwether Housing



**BELLWETHER**  
H O U S I N G

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes; Rico Quirindongo  
[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**Re: Support for additional residential capacity for parcel #3226049579**

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”), as well as the Draft One Seattle Plan.

Established in 1980, Bellwether Housing has been a pioneering force in Seattle's affordable housing landscape. As the largest nonprofit affordable housing provider in Seattle, Bellwether Housing manages over 3,500 apartments across 41 buildings, serving over 7,500 residents. Our mission is to create stable and equitable communities by developing and managing affordable homes for individuals and families with low incomes. We commend the commitment to affordable housing and the other values articulated in the draft One Seattle Comprehensive Plan.

Given our mission, we are eager to see allowances for additional housing development across Seattle – particularly at properties owned by institutions where we see partnership opportunities. Education, widely recognized as the pathway to economic mobility, remains elusive for many. We firmly believe that increasing housing capacity adjacent to educational institutions will reduce educational disparities, create job opportunities, and contribute to addressing Seattle's housing crisis.

Bellwether is working with North Seattle College to develop the underutilized southwest corner of campus as affordable housing. The site is served by frequent transit arterials on College Way N and NE 92<sup>nd</sup> Street and benefits from the John Lewis Memorial bridge connection to the Northgate Light rail Station. The bridge was constructed to increase the light rail walkshed and currently serves the campus and higher density properties to the north of the bridge.

The One Seattle Plan future land use map shows campus and the subject property zoning unchanged along with two blocks of new Urban Neighborhood

47b-1

positioned between the Northgate Regional Center and the Aurora Licton Springs Urban Center. The college already operates under a MIMP allowing increased scale beyond the underlying LR1 and LR3 split zoning of the development parcel. The development site creates an opportunity for housing to provide a transition in scale from the campus to the Urban Neighborhood.

We are writing to request you study an expansion of the Northgate Regional Center and include the area underlying the North Seattle College MIMP into the One Seattle Preferred Action. The development site supports plan policies for creating opportunities around higher education, adding density adjacent to frequent and alternative transit, mitigating displacement of current residents and businesses, eliminating split zoned sites, and transitioning between areas varied intensity uses.

We would be pleased to collaborate with your department as may be helpful in future implementation on this site. Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'SBoyd', is positioned above the typed name.

Susan Boyd, Chief Executive Officer  
Bellwether Housing

# McCULLOUGH HILL PLLC

May 3, 2024

OPCD  
 Seattle City Hall  
 600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
 Seattle, WA 98104  
 Attn: Jim Holmes, Rico Quirindongo  
[PCD\\_compplan\\_EIS@seattle.gov](mailto:PCD_compplan_EIS@seattle.gov)  
[OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

Re: **Support for Alternative 5, request to study SM-UP zoning with heights of 85-125 feet at 14 West Roy Street**

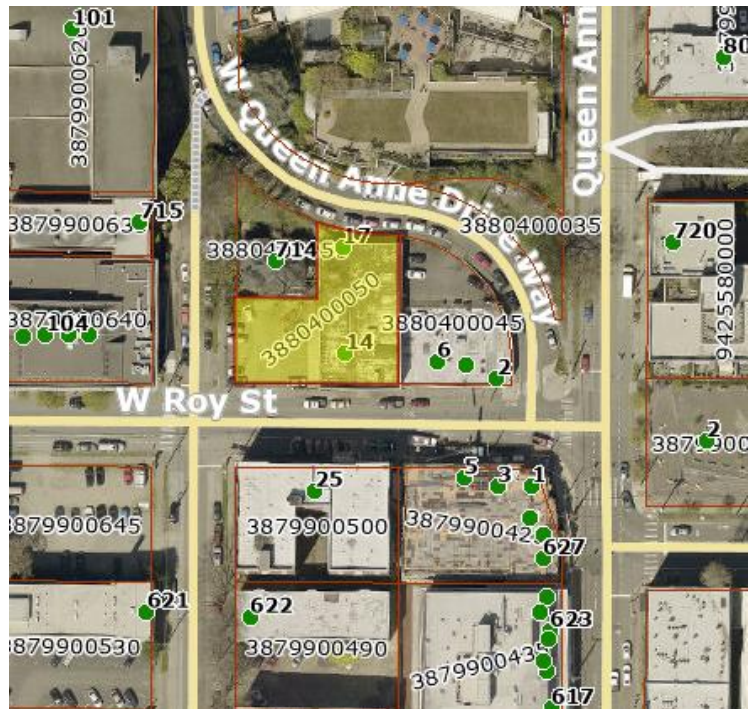
Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”).

West Roy LLC owns the property at 14 West Roy (“Property”) in the Uptown neighborhood, currently used for warehousing and retail purposes. We write to express support for Alternative 5, but request the Final Environmental Impact Statement (“FEIS”) study expansion of the Uptown Urban Center further to the north and an increase in minimum urban center height limits to 85 and 125 feet. More designated urban centers and greater heights within these areas will facilitate the residential and commercial capacity that our neighborhood needs to thrive.

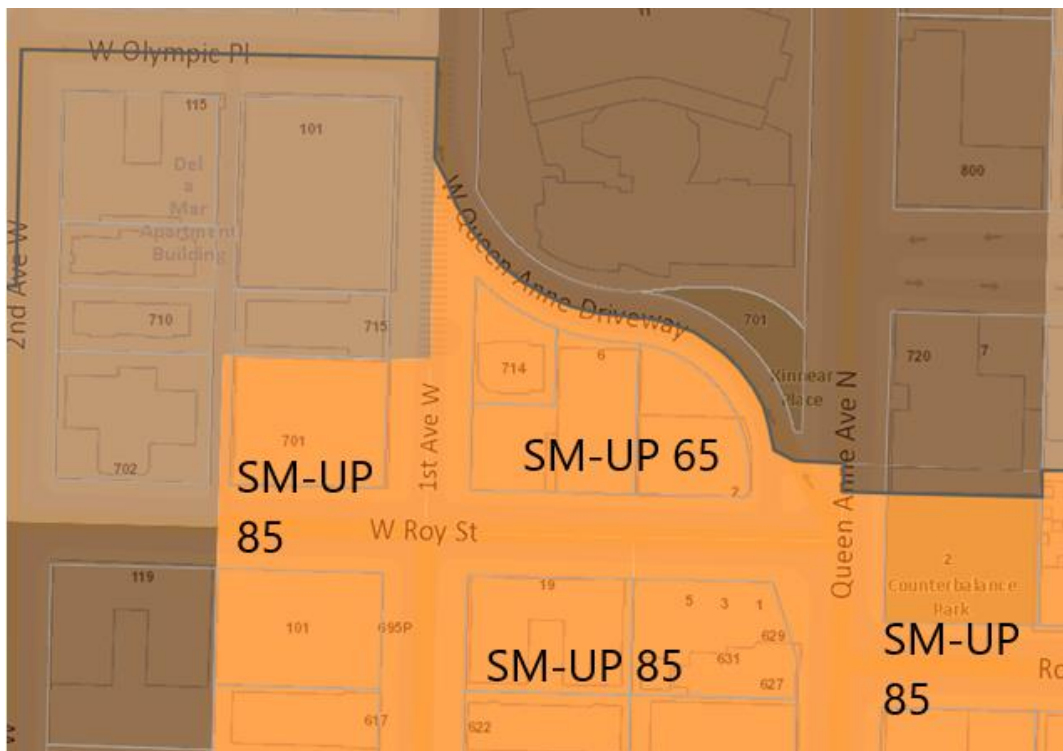
The Property is 12,035 square feet in size and is currently improved with a two-story warehouse and retail building, along with surface parking. It is located within a block of a multi-line bus stop served by the D Express, and it is across the street from Counterbalance Park in a neighborhood full of varied commercial and residential uses.

The Property is currently zoned SM-UP 65(M1) and is located along the northern boundary of the Uptown Urban Center, as shown below. The blocks to the south, west, and east of the Property are zoned SM-UP 85(M1). The Property’s current zoning, therefore, is inconsistent with that of its neighbors and with the density-promoting policies of the urban center designation. It would better facilitate the goals of the One



48-1

Seattle Plan to establish a minimum zoned height limit for urban centers of at least 85 feet, and preferably of 125 feet to allow for mass-timber construction. We request the City study zoning assumptions that would establish these height limits for urban centers generally, and on the Property in particular, as part of the Comprehensive Plan update.



48-1  
cont

In addition to increases in zoned height, we urge the expansion of the Uptown Subarea boundary to the north and request that the FEIS study an expansion beyond that contemplated by Alternative 5. This expansion would promote greater commercial vitality and better integration with surrounding residential neighborhoods. An extension of the subarea will facilitate a more cohesive and inclusive approach to planning and development, allowing better integration of Uptown and Lower Queen Anne with the surrounding residential neighborhoods and creating an even more vibrant and thriving urban district.

Along the same lines, we strongly advocate for the rapid completion of the Uptown Subarea Plan to ensure comprehensive and effective planning. Uptown, with its prime location, distinctive retail character, and numerous cultural amenities, is poised for growth that furthers the policies of the One Seattle Plan. It is imperative that the subarea plan is finalized promptly to provide clear guidance and direction for future development initiatives, ensuring that growth is managed responsibly and aligned with community aspirations.

14 West Roy  
May 3, 2024  
Page 3

Please do not hesitate to contact us if we can provide any additional information about the above.

Sincerely,

Jessica M. Clawson

On behalf of West Roy LLC

**48-1  
cont**

# McCULLOUGH HILL PLLC

May 6, 2024

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes; Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”).

Nicola Wealth (“Nicola”) owns the property located at 155 NE 100<sup>th</sup> Street and 9725 3<sup>rd</sup> Avenue NE (“Property” shown at right), the block directly south of the Northgate light rail station. We write to express support for Alternative 5, but request the Final EIS and Northgate Regional Center Subarea Plan study 240 feet in height feet in height on the Property. Nicola has conducted feasibility studies for residential towers on the Property under the current zoning, but redevelopment is more feasible with additional height. The City should maximize development capacity for residential towers so close to the light rail to fulfill its vision for Regional Centers, and achieve housing production goals.



We believe 240 feet in height this close to light-rail is wholly consistent with the Regional Center concept articulated in the Draft EIS. Based on the Draft EIS, the City will continue to rely heavily on Regional Centers to achieve 120,000 new housing units. Under Alternative 5, the highest percentage of new housing units is directed towards Northeast Seattle (Area 2). We support the Regional Centers strategy as articulated in Alternative 5, but if that is the case, the Property is a key opportunity to maximize housing unit delivery. Additionally, the FEIS should consider that sites like the Property with existing office towers will require significant resources to redevelop. Additional development capacity supports redevelopment feasibility.

The Property consists of two lots that are 151,549 square feet 139,861 square feet respectively. It is developed with three office buildings constructed in 1974 and 1979, and abundant surface parking. It is surrounded by other commercial uses. It is currently zoned SM-NG 145, with height limited to 145 feet. We request the FEIS and Northgate Subarea Plan study zoning consistent with the block to the north, SM-NG 240, which allows for 240 feet in height.

Nicola Wealth  
May 6, 2024  
Page 2

Given the City's dire need to address housing affordability, the City should optimize larger sites like the Property and remove unnecessary height constraints.

The existing Comprehensive Plan and zoning seek in part to transform larger, auto-centric blocks in Northgate into a dense, pedestrian-friendly environment. But redevelopment of larger, developed sites like the Property entails multiple complex leasing considerations, and requires significant investments over a longer period of time. Significant pedestrian-oriented and street improvement, MHA fees, and desired urban amenities all add to the cost of transformation of larger sites in Northgate, and ultimately the cost of housing. The Comprehensive Plan Update should recognize these challenges and seek opportunities to maximize height in in the Northgate Regional Center wherever possible. We also recommend the City recalibrate MHA fees in Northgate to align with current land values.

We share the City's ambitious vision for Northgate to lead in new housing production, and break down the larger-scale, driving-centric blocks that currently predominate this area. For this vision to materialize, we request the FEIS and Northgate Subarea study 240-foot height in this location.

Please do not hesitate to contact me if we can provide any additional information.

Sincerely,

/s

Jessie Clawson

49-1  
cont



## McCULLOUGH HILL PLLC

May 6, 2024

VIA EMAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes  
[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**Re: Support for additional height studied in UI U/45 zone to accommodate additional residential capacity as permitted in Industrial and Maritime Strategy**

Dear Mr. Holmes,

Thank you for the opportunity to provide feedback on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”).

I write on behalf of Aleutian Spray Fisheries, an existing industrial maritime business and property owner that owns property located at 2157 N. Northlake Way (“Property”). The property is zoned Urban Industrial with a height limit of 45 feet (“UI U/45”). As you are aware, the City’s recent amendments to implement the Industrial and Maritime Strategy allow a limited amount of workforce residential development in the UI/U 45 zone. As a longtime industrial maritime business, Aleutian feels strongly that more workforce housing is needed in Seattle, ensuring that workers at Aleutian can afford housing close to their workplace. Our maritime and industrial workers are facing the same housing affordability challenges as others seeking workforce housing rental opportunities in Seattle. It should be noted the property is outside of the BINMIC and within steps of Gas Works park and the Burke Gilman Trail, as well as dozens of other multifamily housing projects.

Following implementation of the UI/U 45 code amendments, Aleutian investigated whether residential development is possible with a height limit of 45 feet, given the constraints created by the shoreline environment on the property. From a zoning and economic perspective, a residential building limited to 45 feet will not be feasible, thereby ending any hopes Aleutian has of providing housing on its property. We therefore request that OPCD study in the FEIS a height limit of 65 feet for residential uses in the UI/U-45 zone on Aleutian’s sloped property between Waterway 19 and the Sunnyside Avenue N Boat Ramp. The addition of housing in this location is consistent with the OneSeattle Plan’s main goal of expanding housing opportunity throughout the City and addressing our housing affordability crisis. The additional height in this area corresponds to the natural slope, ensuring that upland views will not be impacted by the height—creating a win/win for the existing neighborhood and additional residential density.

Thank you for considering my input and please do not hesitate to contact me should you have any questions.

Sincerely,

Jessica M. Clawson

## McCULLOUGH HILL PLLC

May 6, 2024

Jim Holmes  
City of Seattle OPCD  
600 4<sup>th</sup> Avenue  
Seattle, WA 98104

Re: Lee Johnson DEIS comment letter

Dear Jim:

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”). We represent Lee Johnson, who owns several properties in Northeast Seattle, generally in Roosevelt, Lake City, and north of Wedgewood. They consist of the following:

- **7210 Roosevelt Way NE.** Zoned NC2-55(M) and in commercial use (doctor’s offices). Located in Roosevelt Residential Urban Village. Located on the SE corner of NE 73<sup>rd</sup> Street and Roosevelt Way NE. Shares property line with LR1 zoned property. RUV is current FLUM designation.
- **1008 NE 72<sup>nd</sup> Street.** Zoned LR1(M1) and currently in single family use. Located in Roosevelt Residential Urban Village; RUV is current FLUM designation.
- **8040 16<sup>th</sup> Avenue NE.** Split zoned NR3 and C1-55(M). Currently in single family use. Not located in an urban center or urban village. Designated “neighborhood residential” in the current FLUM.
- **8100 Lake City Way NE.** Zoned C1-55(M). Currently the Lake City Mazda Showroom. Directly adjacent to neighborhood residential zoned property and uses. Not located in an urban center or village. Designated “commercial/mixed use” in current FLUM.
- **8010 15<sup>th</sup> Avenue NE.** Zoned NC2-55(M). Currently an auto repair and detailing shop. Not located in an urban center or village. Designated “commercial/mixed use” in current FLUM.
- **8215 Lake City Way.** Zoned C1-55(M). Currently in use as a car storage/sales lot. Not located in an urban center or village. Designated “commercial/mixed use” in current FLUM.
- **9105 Lake City Way NE.** zoned C1-55. Currently an auto sales lot. Not located in an urban center or village. Adjacent to neighborhood commercial zones. Not located in an urban center or village. Designated “commercial/mixed use” in current FLUM.
- **9418 35<sup>th</sup> Ave NE.** Zoned NC1-40(M). Current use is auto repair. Surrounded by other Nc1-40 zoned properties. Not located in an urban center or village. Designated as “commercial/mixed use” in FLUM.
- **8064 Lake City Way NE.** Zoned NC2-55(M). Currently used as Mexican food restaurant. Not located in an urban center or village. Designated “commercial/mixed use” in current FLUM.

51-1

Lee Johnson supports Alternative 5 as the alternative that includes the most growth in the City, particularly along the Lake City Way/15<sup>th</sup> Ave NE corridors, where most of these properties are located. Lee Johnson supports the additional density that would be added along corridors in Alternative 5. We would appreciate the following to be studied in the Final EIS, as it pertains to Lee Johnson's properties:

- Lake City Way is one of the few remaining truly commercial corridors in the City of Seattle, and it should be utilized and protected for commercial uses.
- In the DEIS, please study the impacts of the C1-75 zone for all properties stated above.
- The DEIS in all Alternatives places more than half of the new commercial growth in Downtown Seattle. While Lee Johnson supports Downtown Seattle, it may be advisable to study an alternative that places more housing in Downtown, and places more commercial uses/jobs in the neighborhoods, to create more of a jobs/housing balance in both Downtown and the neighborhoods. Doing so will enliven Downtown in the evenings, and will add more diversity of uses to neighborhoods like Lake City.
- Additional analysis should be done that shows the growth that will be directed towards commercial corridors such as Lake City, 15<sup>th</sup> Avenue NE, and Roosevelt. Currently “activity units” are only measured in the DEIS in urban centers and villages.
- The DEIS contemplates height limits up to 55 feet in corridors, plus more in existing MF or C zones. Placing additional height on existing C and MF zones reinforces the existing urban form in Lake City, Roosevelt, and on 15<sup>th</sup>, which is a very narrow strip of commercial uses and height along the arterial, transitioning often in a lot line condition to neighborhood residential. To create better transitions, consider rezoning much larger and deeper swaths of the corridor to commercial zones—this eliminates the awkward and sometimes impactful transitions that occur when C zones and NR zones directly abut each other. As an example, the parcel located at 8038 16<sup>th</sup> Avenue NE should be rezoned to commercial, as should the rest of the block.
- Another benefit of deeper/wider C zones along corridors is more commercial uses will move to the area because there will be more commercial space. This will create more of a commercial “hub,” which the City has been losing as the Stone Way corridor, the Roosevelt corridor, the Rainier Avenue corridor, and the 15<sup>th</sup> Ave NW/Holman Road corridors are redeveloped into mixed use projects which often do not allow for the flexibility of uses that true commercial/heavy commercial uses need.
- In implementing the Comprehensive Plan, the City should utilize its own general rezoning principles stated in SMC Chapter 23.34, which state that generally physical buffers (such as streets and sometimes alleys) should serve as the zone boundary transition.
- Several split zoned conditions exist along Lake City, including on the 8040 16<sup>th</sup> Avenue NE parcel (split zoned C1 and NR). Split zoned conditions should be cleaned up and eliminated in the implementation of this Comprehensive Plan.

Pertaining to the Draft One Seattle Plan, we have the following comments:

- The Connected Communities concept should focus on job creation in places where people already live (like NE Seattle), to reduce commute times and reduce greenhouse gas emissions. Consider adding more jobs/commercial zoning to the corridor areas, including

51-1  
cont

51-2

the properties stated above. Lee Johnson has been able to retain approximately 50 living wage jobs in the area and has prevented owners of Mazda vehicles from having to triple or quadruple their emissions when buying and servicing their vehicles by maintaining a presence in this area. By expanding zoning to allow uses such as auto repair and sales, this would only further increase these numbers.

- Please add a Growth Strategy that discusses commercial uses and commercial zones. Currently, it appears there is no Growth Strategy for job growth that would be directed toward existing or new commercial/neighborhood commercial zones. Jobs in traditional heavy commercial zones (C1, C2) are often well paying, family-wage jobs.
- Consider the creation of a new Neighborhood Center along the Lake City Way corridor between the Lake City Urban Center and the Roosevelt Urban center. While Lake City Way does not yet have frequent transit service, it is a corridor that is well-suited and primed to receive transit. Do not make the mistake of failing to zone an area due to current lack of transit, only to be behind when Lake City does receive transit service.
- Policy LU 1.3 should be edited to read: Zone areas and apply development standards such that new uses and buildings protect public health and safety and minimize impacts on adjacent homes and businesses. (This change is meant to reflect the fact that the first step in minimizing impacts is to appropriately zone areas, so that C zones do not directly abut NR zones).

We appreciate the opportunity to comment and look forward to implementation of the One Seattle Plan.

Sincerely,

Jessica M. Clawson

**From:** [Jessica Clawson](#)  
**To:** [Isaac Patterson](#); [PCD\\_CompPlan\\_EIS](#); [OneSeattlePlan@seattle.gov](#)  
**Cc:** [Holmes, Jim](#)  
**Subject:** RE: 70th & Greenwood Ave LLC One Seattle Plan DEIS comment letter  
**Date:** Monday, May 6, 2024 3:01:22 PM

**CAUTION: External Email**

Also adding the OneSeattle email address, in case it's not all the same! Thanks.

Jessica M. Clawson  
**McCULLOUGH HILL PLLC**  
701 Fifth Avenue, Suite 6600  
Seattle, Washington 98104  
Direct: 206-812-3378  
Cell: 206-313-0981  
[jessie@mhseattle.com](mailto:jessie@mhseattle.com)  
[www.mhseattle.com](http://www.mhseattle.com)

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---

**From:** Isaac Patterson <[ipatterson@mhseattle.com](mailto:ipatterson@mhseattle.com)>  
**Sent:** Monday, May 6, 2024 2:52 PM  
**To:** [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)  
**Cc:** [Jim.Holmes@seattle.gov](mailto:Jim.Holmes@seattle.gov); Jessica Clawson <[jessica@mhseattle.com](mailto:jessica@mhseattle.com)>  
**Subject:** 70th & Greenwood Ave LLC One Seattle Plan DEIS comment letter

Hi Jim and OPCD,

Please see the attached comment letter on behalf of 70<sup>th</sup> & Greenwood Ave LLC and Jessica Clawson.

Thank you,

Isaac Patterson

Isaac A. Patterson  
Attorney at Law  
**McCULLOUGH HILL PLLC**  
701 Fifth Avenue, Suite 6600  
Seattle, Washington 98104  
Direct: 206.812.6961  
Cell: 206.445.8342  
[ipatterson@mhseattle.com](mailto:ipatterson@mhseattle.com)  
[www.mhseattle.com](http://www.mhseattle.com)

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## McCULLOUGH HILL PLLC

May 13, 2024

VIA EMAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes  
[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**RE: Comments on the Draft One Seattle Plan**

Dear Mr. Holmes,

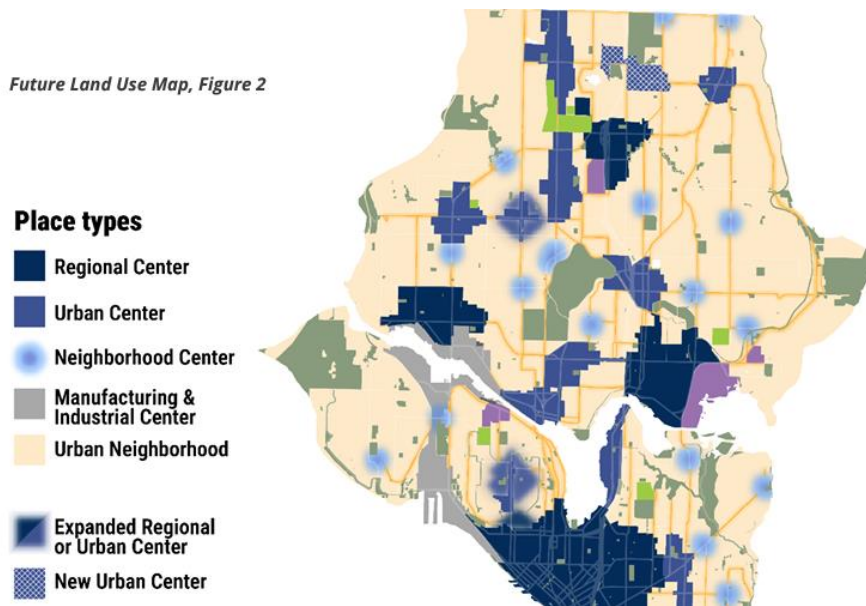
Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impacts Statement (“DEIS”) and One Seattle Comprehensive Plan: Draft for Public Review (“Draft Plan Update”).

70<sup>th</sup> & Greenwood Ave LLC owns four contiguous parcels at 7010 Palatine Avenue North and 7009 Greenwood Avenue North (collectively, “Property”) in the Phinney Ridge neighborhood. The most significant portion of the Property includes an innovative, multi-use building that hosts multiple floors of apartments above a variety of local hospitality businesses at street level.

We write to express support for Phinney Ridge’s continued evolution as a complete and walkable neighborhood. To that end, we support the continued inclusion of Policies GS 5.1 in future versions of the Plan Update and EIS. The thriving and lively streets of Phinney Ridge, whether during the day or the evenings, demonstrate the overwhelming demand for walkable neighborhood businesses and housing that are well-served by frequent transit. We encourage the City to designate a Phinney Ridge Neighborhood Center on the Plan's Future Land Use Map that reflects the unique linear nature of the Greenwood-Phinney Ridge commercial corridor consistent with Policy GS 5.4 (“Determine boundaries of Neighborhood Centers based on local conditions...”) Because the Phinney Ridge commercial corridor stretches from 85<sup>th</sup> Avenue North to Woodland Park Zoo and includes the heavily used #5 bus route, we ask the City to recognize that the neighborhood has multiple “central intersections” that should be included in a Neighborhood Center designation. Such recognized central intersections should include, at a minimum, both street sides between the intersections of North 67<sup>th</sup> Street and Phinney Avenue North to the south and Greenwood Avenue and North 73<sup>rd</sup> Street to the north.

We additionally request that the entire Property be included within a Phinney Ridge Neighborhood Center similar to that depicted in the image below, taken from page 20 of the Draft Plan Update.

53-1



The Property's inclusion in such a Neighborhood Center would support all four of the Draft Plan Update's proposed policies for Neighborhood Centers.

The Property's inclusion in a Neighborhood Center designation would support Policy GS 5.1 because the Property already hosts "diverse housing options" that "allow more people to live within walking distance of shops, services, transit, and amenities." Indeed, the primary building on the Property contains multiple floors of both ownership and rental housing above a variety of locally owned small businesses, all of which are well-served by nearby transit.

The Property's inclusion in a Neighborhood Center would support Policy GS 5.2 for the same reasons, and the Property contains no "major office developments."

Policy GS 5.3 expressly states, "Zoning in Neighborhood Centers should generally allow buildings of 3 to 6 stories, especially 5- and 6-story residential buildings to encourage the development of apartments and condominiums." Needless to say, the Property and its 5-story mixed-use apartment building already embody this Policy. Thus, the Property's inclusion within a Phinney Ridge Neighborhood Center would strongly support the proposed version of Policy GS 5.3.

Lastly, the Property's inclusion in a Neighborhood Center is warranted based on Policy GS 5.4 because it is within 800 feet of the intersection of North 73<sup>rd</sup> Street and Greenwood Avenue North.

For the preceding reasons, we respectfully ask that future versions of the EIS include the study of all potentially significant environmental impacts that could result from either the creation of a Phinney Ridge Neighborhood Center or the Property's inclusion in such a Neighborhood Center.

May 13, 2024  
Page 3

**53-1  
cont**

Thank you again for providing the opportunity to submit these comments. Please do not hesitate to reach out should you have any questions.

Sincerely,

Jessica M. Clawson



Matt Cramer  
4709 9th Ave NE  
Seattle, WA 98105

May 1, 2024

*By Email Only*

Office of Planning & Community Development  
City of Seattle  
P.O. Box 94788  
Seattle, WA 98124-7088  
[onesattlecompplan@seattle.gov](mailto:onesattlecompplan@seattle.gov);  
[PCD\\_compplan\\_EIS@Seattle.gov](mailto:PCD_compplan_EIS@Seattle.gov)

Re: *Comments to One Seattle Plan and its EIS: 9th Avenue Northeast and Area  
Midrise (MR) Opportunity*

Dear Office of Planning & Community Development:

I appreciate the opportunity to comment on the Draft One Seattle Plan (“Draft Plan”) and the related Draft Environmental Impacts Statement (“DEIS”). This letter requests an upzone to Midrise (MR) zoning (and a complimentary redesignation on the future land use map) for my home and neighborhood, so that we can do our part to support the Mayor’s One Seattle Plan by contributing new housing to our community.

I request that this Midrise (MR) upzone and redesignation be included in the scope of the FEIS study and executed by the Mayor’s Final Recommended Plan and its proposed implementing ordinances.

**A. Background: Unintended Consequences under Current Code.**

I live at 4709 9th Avenue NE, APN 0889000030, which is depicted and marked with a small grey spot at right.

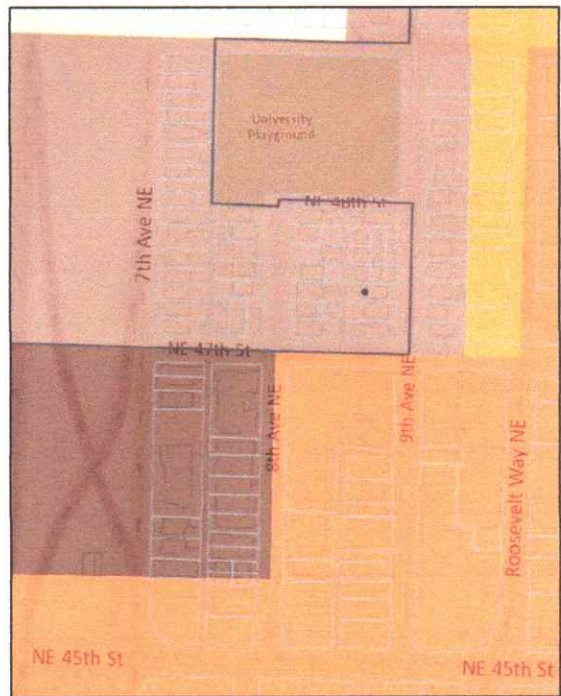


Figure 1. Current zoning surrounding my property. Light brown is low-rise, mustard yellow is neighborhood commercial, orange is Seattle Mixed, and darker brown is mid-rise.

My home is zoned LR1, but is located just outside of the current University District Urban Center (which the Draft Plan proposes transitioning into a “Regional Center”), and just one block north of SM-U 95-320 (M1) zoning (and a tower of more than 200 feet, with further 60-foot buildings immediately west of that. As you can see, the area that includes my home also is very well served by frequent transit and other vibrant urban services on Roosevelt and at 45th. The University Playground is another immediately adjacent gem that should be accessible to more housing units.

Unfortunately, as of now the Mayor’s Draft Plan proposes to leave my home, block and neighborhood relegated to “Urban Neighborhood” future land use designation, where dense housing more appropriate to this location is effectively prohibited. The currently proposed future land use redesignation could conceivably drive density ***downward*** as compared to the Multi-Family Residential Area future land use designation that is effective today.<sup>1</sup> That result flies in the face of the Mayor’s goals.

Under the vision set forth by the Mayor and the policies set forth in the One Seattle Plan, my home and neighborhood would be a fantastic place to create badly needed Midrise (MR) housing density at market rents, affordable rents, or a mix. It is no longer a fit for Lowrise zoning, and certainly not a fit for an Urban Neighborhood future land use designation.

I have watched with pride as the neighborhood has grown up into a bustling area of midrise apartments around me. It is also notable that an upzone to MR for my home and neighborhood would help provide great housing capacity *in a location where displacement will be minimal*, due to a high population of undergraduate and graduate students who generally are rotating in and out of the neighborhood on a yearly (if not quarterly) basis. In light of comprehensive transit and parks investments, together with the general urban maturation of the University District, my home and neighborhood’s current Lowrise zoning status is outdated, artificially constraining the transit-oriented density and affordability that properties like mine could provide. I request the following:

- **The Mayor’s zoning implementation map (which I understand is to be introduced in draft later this summer) should propose rezoning this area to Midrise (MR).**
- **The Mayor’s Final Recommended Plan should include this area within the adjacent Regional Center future land use designation, or *at a minimum*, the Corridor future land use designation studied in the DEIS and initially proposed in the OPCD staff draft.**
- **The Final EIS should study inclusion of this area within the adjacent Urban Center (soon to be renamed “Regional Center”), and should study an upzone of this area to, *at a minimum*, Midrise (MR) zoning.**

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<sup>1</sup> See [2022 Comprehensive Plan](#) at page 41.

Office of Planning & Community Development  
May 1, 2024  
Page 3 of 3

Thank you for all your work on the One Seattle Plan. My neighborhood stands ready to work with you in making our community's housing goals a reality.

Sincerely,



Matt Crämer

CC: Rico Quirindongo  
Marco Lowe  
Council President Sara Nelson (At-Large)  
Councilmember Maritza Rivera (District 4)  
Councilmember Tanya Woo (At-Large)  
Councilmember Tammy Morales (Land Use Committee Chair; District 2)

54-1  
cont

May 6, 2024

VIA EMAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes  
[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**Re: Support for Alternative 5 and additional height and density studied in small parcels zoned NC-55 to encourage development and create a workable Mandatory Housing Affordability program.**

Dear Mr. Holmes,

Thank you for the opportunity to provide feedback on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”).

I am an owner/partner of four sites currently zoned NC-55, at 2514, 2518 and 2616 East Cherry Street and 533 26<sup>th</sup> Avenue in the Central District neighborhood (District 3). 2514 and 2518 East Cherry Street are each 40 feet wide and 100 feet deep. 2616 East Cherry is 45 feet wide and 60 feet deep. 533 26<sup>th</sup> Avenue is 100 feet wide and 100 feet deep. These properties are typical of many small/shallow NC-55 sites around the city. Many of these parcels belong to longtime property owners, often families or owner-users, who do not have development or land use expertise. My own awareness comes from having started the redevelopment process on two of these parcels before the MHA legislation went through, and then having to rush to get that process vested to NC-40 in 2019 when I realized the devastating negative impact that the MHA formula would have for these sites.

While I was a proponent of MHA generally, the warnings that we gave to Councilmembers and Staff about the MHA changes to what were NC40 sites, prior to the adoption of the Citywide MHA program, have come true. The MHA payments have terribly diminished the existing value of this category of sites and made any new units that could be developed under MHA much more expensive than they previously were. In short, MHA has been a success in some zones, but in NC-55 zones (formerly NC-40), the program has been a disincentive to housing development. As such, I urge OPCD to study several policy suggestions outlined later in this letter.

First though, a reminder of why formerly NC-40 sites were always challenging, and therefore why the MHA changes tipped them from being challenging to infeasible, depressing housing creation and MHA fees in the NC-55 zones:

1. These sites are often on smaller commercial streets and tend to be relatively small and shallow, because they were historically zoned to reflect and/or encourage a shallow row of retail “liner” buildings in otherwise residential neighborhoods.

2. As such, they typically back up to immediately adjacent LR and NR zones, with no separating alley, and are therefore subject to a 15-foot setback at all the residential floors (i.e. above 13 feet). This condition can be found not just along East Cherry but, as just a few further examples, along the north side of Yesler in the CD, the west side of 15<sup>th</sup> Avenue on Capitol Hill, and the east side of 34<sup>th</sup> Avenue in Madrona.
3. The setback is very impactful on these shallow sites. At 2616 East Cherry, for example, the 15-foot setback removes 25% of the residential floor area. This means that the proscribed 3.25 FAR barely fits (and only if the ground floor is built to the back lot line with a blank wall). It also means that the stairs/elevators/hallways of a new building take up an inordinate amount of the floor plate relative to actual living space.
4. As NC-40 sites had started to be redeveloped around the city prior to 2019, a saving grace was that their four-story height didn't necessarily demand an elevator; and some innovative developers were choosing to do these as walkups (e.g. Pax Futura in Columbia City). This saved valuable FAR from being consumed by the elevator shaft and circulation space around it, and also saved \$150k or more in purchase price for an elevator, and thousands more per year in annual operating expenses, improving both the feasibility of these sites and the affordability of the units. Unfortunately the fee payments that came with the MHA upzone subtracted mightily from the economic viability of this solution.

MHA gave these sites an additional 0.5 FAR and an extra floor of height (from NC-40 to NC-55) but as illustrated by the points above, there is no practical way to use it. The 15-foot setback means that the four stories are already completely filled out. Going to five stories in order to capture 0.5 FAR on a small site is ENORMOUSLY expensive and inefficient. Market wisdom dictates that five floors necessitates an elevator, which along with the two stairs, circulation space, trash room/shaft easily consumes 600-800 SF per floor. On a site like 2514-2518 East Cherry, of the 4,000 SF in additional FAR, up to 25% of the additional floor would be consumed by common area. On an even smaller site like 2616 East Cherry (even with one stair serving less than four units per floor), a third to a half of the additional 1,350 SF in FAR would be consumed by the common area. In both cases, the enormous costs of adding an elevator and the building skin for an additional floor would far outweigh the finished value of the meagre additional living space created, and this is even BEFORE the costs of paying the MHA fees.

I am suggesting a multi-part solution for NC-55 sites that could be selectively applied to sites that directly abut residential zones and are less than 120 feet deep or 10,000 SF total:

1. Increase the FAR so that a full fifth story is possible on these sites, meaning a full 5.0 FAR. While this is likely not always useable due to need for windows, light and air, it would make these small sites useable to the five stories that the zoning intended.
2. Reduce the frequency of NC-zoned sites abutting neighborhood residential zones, and rezone the "back half" of these NC blocks from NR to NC. The City should work to eliminate these impactful transitions where NC zones abut NR directly or across an alley. Please study in the DEIS options that eliminate these transitions. The DEIS discloses that transitions in scale may be an issue in all alternatives, but the best way the City can mitigate this is to eliminate these awkward transitions altogether.
3. Study in the DEIS the elimination of upper-level setbacks when these transitions do occur in order to prioritize housing development. Eliminating upper-level setbacks will allow the full FAR to be utilized in these zones. The OneSeattle Plan's main goals revolve around increasing housing choices and expanding housing opportunities across the City. Whole swaths of the NC-55 zones

have been underdeveloped because of the combination of too-low FAR and these setbacks that are “protective” of neighborhood residential zones. As you are aware and the DEIS discloses, neighborhood residential zones have been “protected” for years “from” development in a manner that has been highly inequitable and exclusionary. Please consider whether protective setbacks of neighborhood zones is indeed an equitable solution.

Thank you for considering my input and please do not hesitate to contact me should you have any questions.

Sincerely,

Liz Dunn  
Dunn & Hobbes, LLC  
www.dunnandhobbes.com  
206-324.0637

**From:** [Dan Fiorito](#)  
**To:** [PCD CompPlan EIS](#); [PCD OneSeattleCompPlan](#)  
**Cc:** [Ian Morrison](#); [Strauss, Dan](#)  
**Subject:** Fiorito Family Property NE Ballard FEIS Study and FLUM designation  
**Date:** Monday, May 6, 2024 2:56:23 PM  
**Attachments:** [05\\_06\\_2024\\_Fiorito\\_OPCD\\_Comment\\_Final.pdf](#)

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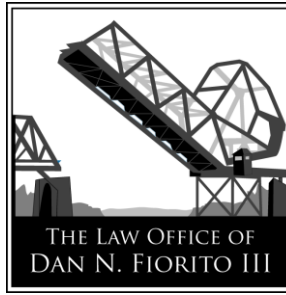
**CAUTION: External Email**

Mr. Quirindongo,

In response to the Draft Comprehensive Plan, please find attached my family's comments regarding its property in NE Ballard. We are requesting that our property be studied for inclusion within the Ballard Regional Center and that its designation be revised from industrial to a more appropriate designation that reflects the adjacent mixed-use and residential designations already in place. Let know if you have any questions. Thanks. Dan.

Dan N. Fiorito III  
The Law Office of Dan N. Fiorito III  
2470 Westlake Ave N., Suite 201  
Seattle, WA 98109  
Phone: 206-299-1582  
Fax: 206-770-7590  
Email: [dan@danfiorito.com](mailto:dan@danfiorito.com)  
Web Site: [www.danfioritolaw.com](http://www.danfioritolaw.com)

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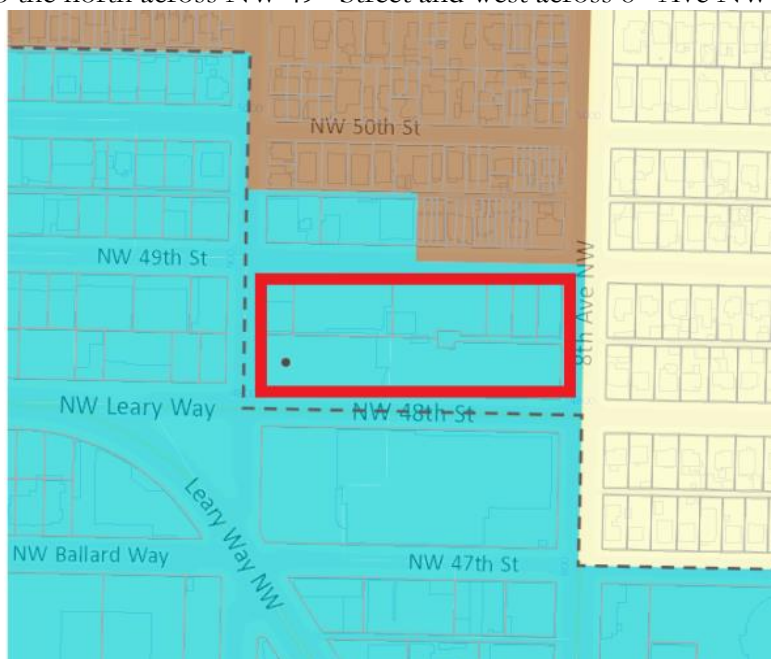
May 6, 2024

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**Re: Support for Ballard Regional Center expansion and land use regularization for orphaned industrial zoned properties in East Ballard outside of the BINMIC**

Dear Mr. Quirindongo,

I write on behalf of my family Dan N. Fiorito, Jr. and Tim Fiorito, (“Fiorito Family”), the owners of the properties that comprise nearly a full block (“Property”) bounded by NW 48<sup>th</sup> Street, NW 49<sup>th</sup> Street, 8<sup>th</sup> Ave NW, and 9<sup>th</sup> Ave NW in northeast Ballard. The City removed the Property from the Ballard Interbay Northend Manufacturing Industrial Center (“BINMIC”) as part of the Industrial and Maritime Strategy process. Despite its removal from the BINMIC, the Property is still designated as industrial on the Future Land Use Map (“FLUM”). This designation remains unworkable because the Property is bordered by mixed-use residential and neighborhood residential zones to the north across NW 49<sup>th</sup> Street and west across 8<sup>th</sup> Ave NW (shown below).



2470 Westlake Ave. N., Suite 201  
Seattle, WA 98109  
Ph: 206-299-1582 Fax: 206-770-7590  
dan@danfiorito.com

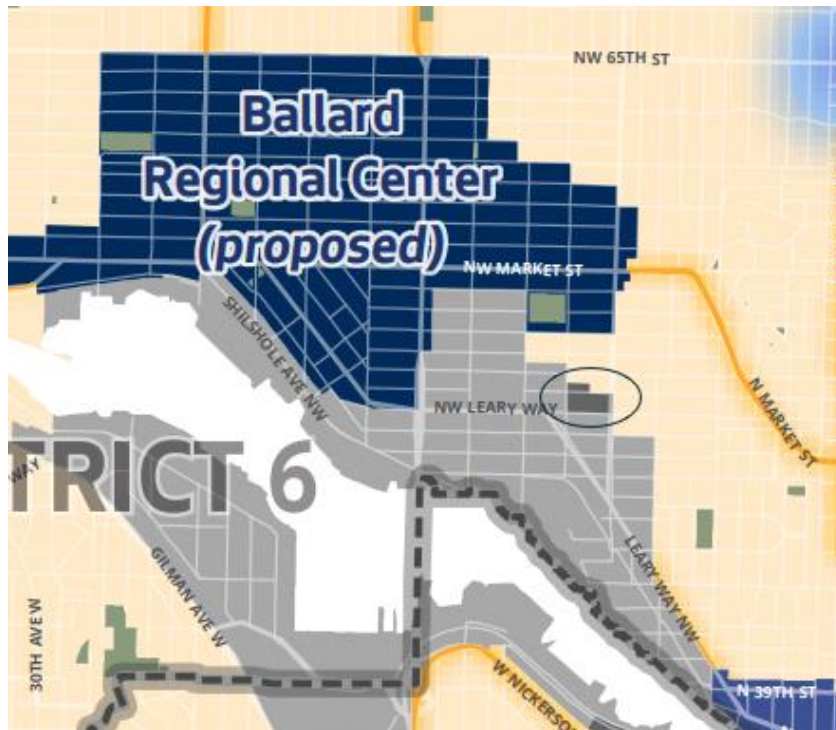


We write to request that the One Seattle Plan resolve our FLUM designation and bring it into the Ballard Regional Center. To serve that goal, the Final Environmental Impact Statement (“FEIS”) should study our Property and other isolated lands outside the BINMIC for the Ballard Regional Center designation with appropriate heights as adjacent to the 8<sup>th</sup> Ave NW frequent transit corridor.

The Property’s current FLUM designation under the One Seattle Plan and zoning is inconsistent with the surrounding mixed-use zoning. The City already recognized that our Property is not long-term viable industrial land when it removed the Property from the BINMIC as part of the Industrial and Maritime Strategy.

We believe it is illogical and impractical to maintain these industrial designations on isolated parcels outside the BINMIC and in locations that are rapidly transitioning to mixed-use and residential areas. The neighborhood around the Property longer is no longer industrial, thus making any use of the land for reasonable industrial purposes impossible.

Our Property, as shown in the circle below, is a small, isolated pocket of non-BINMIC industrial land.



The current approach under the One Seattle Plan would treat the Property inconsistently with similarly situated properties to the north and west, hampering its integration with the surrounding area and preventing it from contributing residential capacity to a growing section of Ballard. By contrast, regularizing the land use designation and zoning of our Property with that of the surrounding residential area would be consistent with its removal from the BINMIC and would promote greater coherence in planning and development. It would also facilitate more efficient and

effective land use and development decisions that support the long-term growth and vitality of this node in Ballard.

Accordingly, we urge the City to study bringing the Property within the Ballard Regional Center and changing its FLUM designation and zoning to align with the surrounding mixed-use zoning. One option would be to bring the Ballard Regional Center down 8<sup>th</sup> Avenue from NW 52<sup>nd</sup> Street to NW 48<sup>th</sup> Street, so that the area was not a “donut hole” of neighborhood residential between the Regional Center and the BINMIC. We believe that approach better serves the One Seattle Plan vision. If part of the Ballard Regional Center, we encourage the City to expedite completing the subarea planning.

Thank you for considering our comments.

Sincerely,

s/Dan N. Fiorito III

On behalf of the Fiorito Family

cc: Councilmember Strauss

56-1  
cont



## ALEXANDRIA®

*Building the Future of Life-Changing Innovation®*

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes; Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS").

Alexandria Real Estate Equities ("Alexandria") owns the site commonly known as the Salvation Army property, located at 1000 4<sup>th</sup> Avenue S. (the "Property"). In 2011, the Property, together with other nearby sites, was rezoned under the Livable South Downtown planning initiative. The environmental impact statement prepared for Livable South Downtown contemplated transitioning the Property and the nearby area into the Downtown Urban Center. However, late in the process, a decision was made to allow this area to remain in the Greater Duwamish Manufacturing Industrial Center (the "MIC"), but subject to a newly-created zone.

57-1

The IC-85/160 zone that was created for this area in 2011 is hardly an industrial zone. It is, in effect, a proxy for a Downtown zone, in that it incorporated a host of characteristics common to Downtown zones – but foreign to industrial zones – including:

- Required use of Housing Bonus and TDR provisions to achieve maximum density.
- Exception from maximum-size-of-use limits for office development
- Allowable height far in excess of typical industrial height limits and consistent with Downtown height limits

- Requirements for sidewalk widening, pedestrian through-block connections, overhead weather protection, landscaping, and other streetscape improvements, and onsite open space, all typical of Downtown development and inconsistent with normal industrial zoning standards.

In 2023, the City revised the zoning for the Property and its vicinity to II 85-240. This new zone allows a 50% increase in density for office uses in the area, while still requiring the Downtown development standards noted above.

In truth, the II 85-240 zone is more akin to a Downtown zone than to any other industrial zone. Further, the area in which this unique zone is located is physically separated from the remainder of the MIC: it is bounded by the Stadiums on the west, the Metro bus bases on the south and the CID and residential neighborhoods on the north and east. Currently, there are permits for more than 1 million square feet of office space in this area – and more is possible – all designed to be compatible with the adjoining Downtown zones.

In addition, Sound Transit is in the process of approval of the WSBLE line, which is likely to lead to the development of a new light rail station adjoining this area on Seattle Boulevard. And regardless of whether this “CID South” station is developed, this entire area is within a close walkshed of the existing Union Station light rail station. The area is well-suited for a mix of urban uses at high density.

Since this area is, in effect, an extension of the Downtown and is uniquely located to take best advantage of our regional light rail resources, it should be included in the Downtown and provided the opportunity to accommodate the same broad range of uses we see in Downtown. For example, our city and region continue to need robust housing development, especially in locations near regional transit facilities. This area is therefore ideal for future mixed-use and residential development, as well as the office and lab uses that are presently allowed. The current industrial designation of the area is, frankly, an historical accident. The area is already effectively a part of the Downtown and it has no connection to the industrial activities in the MIC.

For these reasons, the City should take action in the current Comprehensive Plan update process to remove this area from the MIC and incorporate it in the Downtown Urban Center, where it belongs. The opportunity for residential and mixed-use development will support the CID to the north and will align with the City’s vision for Regional Centers.

57-1  
cont

May 6, 2024  
Page 3 of 3

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'C' followed by a series of loops and a horizontal line extending to the right.

CHRISTIAN GUNTER  
Senior Vice President - Development  
Alexandria Real Estate Equities, Inc.  
400 Dexter Avenue North Suite 200  
Seattle, WA 98109



# ALEXANDRIA®

*Building the Future of Life-Changing Innovation*

May 6, 2024

Michael Hubner  
Long Range Planning Manager  
One Seattle Plan Project Manager  
Office of Planning & Community Development  
P.O. Box 94788  
Seattle, WA 98124

(OneSeattleCompPlan@seattle.gov; PCD\_CompPlan\_EIS@seattle.gov)

Re: *Comments on Draft One Seattle Comprehensive Plan ("Draft Plan") and its Draft Environmental Impact Statement ("DEIS").*

Dear Michael and OPCD staff:

Alexandria Real Estate Equities ("ARE") is a publicly traded Real Estate Investment Trust. ARE was founded in 1994 as the first real estate company uniquely focused on delivering the buildings and infrastructure needed to support the work of the life science industry. Today, we create and grow life science ecosystems and clusters that ignite and accelerate the world's leading innovators in their work to advance human health by curing disease and improving nutrition. We have a proven record of effectively creating, nurturing, managing, and growing life science ecosystems and clusters across the country by bringing our mission-critical real estate together with scientific innovation, and Seattle is one of our seven selected cluster, mega campus locations.<sup>1</sup> Active in the Greater Seattle region as a long-term owner and occupier since 1996, ARE's operating portfolio represents over three million square feet regionally, including 1.5 million square feet of specialized Class A laboratory space in Seattle centered around South Lake Union, Fred Hutch, the University of Washington and the Bill & Melinda Gates Foundation. In addition, ARE currently has more than 3 million square feet in the development pipeline.

Informed by our long-term investment in and commitment to supporting Seattle's life sciences institutions and industries through real estate development, we are pleased to provide the following comments on the draft One Seattle Plan ("Draft Plan") and accompanying Draft Environmental Impact Statement ("DEIS").

---

<sup>1</sup> Other selected clusters for our life science ecosystems include Greater Boston, the San Francisco Bay Area, New York City, San Diego, Maryland, and the Research Triangle.



# ALEXANDRIA

Building the Future of Life-Changing Innovation

## 1. The Mayor’s Recommended Plan and Final EIS Should Prioritize and Incentivize Life Sciences Investment.

The Draft Plan was disappointing in its lack of attention to life sciences. This industry is not only an engine that creates all manner of good, highly specialized and compensated jobs, but is also an engine for providing treatments and cures to some of the most troubling health issues that humanity faces. Although life sciences was identified as a key industry cluster, only general policies were identified to support it in the Plan.<sup>2</sup> Instead, the Plan and the EIS should articulate support for the unique space needs of life science users. Fortunately, many opportunities for improvement are available.

- *The Final Plan and FEIS should propose and study development standards (or flexibility in development standards) to accommodate the unique needs of the life-sciences industry, such as allowances for additional rooftop mechanical equipment, electrical system redundancies, and flexibility in energy code requirements.*
- *The Final Plan and FEIS should study and identify policies supporting significant revisions to the City’s entitlement processes to deliver life science projects faster. The design review program must be overhauled consistent with HB 1293 (RCW 36.70A.630) to reduce the number of design review meetings and project risk. The City should also extend and expand the current design review holiday proposed for Downtown and South Lake Union, and it should create a program to expedite life science projects and tenant improvements similar to successful steps taken by San Diego.<sup>3</sup>*
- *The Final Plan and FEIS should acknowledge that laboratory processes can be uniquely sensitive to even the tiniest vibration impacts. As Sound Transit expands, the availability of vibration-free land is expected to decrease. Zoning and development standards should acknowledge and prepare for these effects on the industry, and the FEIS should study the effects of and appropriate mitigation measures for a decrease in vibration-free land capacity.*

58-1  
cont

## 2. The final Plan and EIS Must Include More Detailed Analysis of Impacts Under A Range of Different Scenarios for Employment and the Economy, and Should Articulate a Bold Life Sciences Economic Development Strategy.

The Draft Plan and DEIS take a cursory approach to employment growth over the planning period, both as a factor in commercial built density (including life-sciences space) that will be needed, and as a critical contributing factor in our region’s economic success. Both the Draft Plan and EIS appear to assume that job growth in Seattle will exactly match the regional targets set by King County without

58-2

<sup>2</sup> See, e.g., Plan at 130 (“Examples of Examples of Seattle’s industry clusters include manufacturing, maritime, biotech and life sciences, global health and health care, clean technology, information technology, tourism, and film and music.”); 133 (“employers often face challenges finding qualified job applicants . . . to fill jobs in certain engineering, computer, and life science fields, as well as traditional industries”).

<sup>3</sup> See <https://www.sandiego.gov/development-services/news-programs/life-science-industry-pilot-program>



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any analysis of how net job growth across the City might actually differ between the different Alternatives studied, or as a result of different economic strategies that could be articulated in the Plan. We are further concerned that the 159,000 jobs (less than 8,000 a year) identified in the Draft Plan and DEIS is a significantly lower target than is actually needed for the City to thrive economically.

The Final Plan and FEIS should provide further quantification for job estimates based on actual economic trends and data to identify a healthy job growth level for the City, and these documents should also articulate specific strategies to achieve such growth. Policymaking should be aspirational in its targets, but also must articulate actionable strategies. Life science users are attracted to Seattle because of our world-class existing institutions, but Seattle is competing with considerably bigger markets who also have world-class institutions. Other cities and states are providing meaningful incentives to competitively attract companies and users—like research and development tax credits, sales tax exemptions, and guaranteed utility supplies—and Seattle should do the same. Policies aimed at incenting life science sector development articulated in the final Plan can be a first step to support these initiatives to compete successfully for new life science opportunities. A specific policy to incentivize locating life science companies in Seattle should be added to the “Business and Industry Retention and Growth” section of the Plan.

58-2  
cont

### **3. The Final Plan and FEIS Should Support Life Sciences by Providing Greater Clarity in its Approach to Additional Density Regional Centers and Urban Centers.**

The Draft Plan’s new taxonomy of Regional Centers, Urban Centers, and Neighborhood Centers is well-considered. ARE’s life-sciences end-users will depend on these centers both for new lab space to conduct their critical work and for the housing needed to accommodate researchers and their support staff in sustainable, equitable and transit-oriented communities here in Seattle.

For Regional and Urban Centers, however, the Draft Plan contains limited information about what development standards will actually be modified as a result of this process. For example, proposed height limit changes in Regional Centers – the engines of our economy – are studied only as “height varies, high-rise allowed.” See DEIS at 3.6-172. Urban Centers are likewise *studied* up to a height change of 145 feet, but the Draft Plan does not provide information on what heights are actually proposed. This is a tremendous range of potential growth, but also includes the possibility of no upward growth at all. Similarly, but even more problematically, the Draft Plan does not specify what (if any) increases in permissible floor area ratio are contemplated in Regional and Urban Centers, and the DEIS does not appear to include study of the adverse environmental impacts of a failure to provide enough new floor area ratio to keep pace with the job growth necessary for a healthy economy in our City. The City should

58-3

clarify the contemplated density increases in the Final Plan and FEIS, and it should also advance baseline density changes ahead of any future subarea plans for Regional Centers.

At minimum, the City should allow heights of 180 feet in Regional Centers to support building forms necessary for life science research and development. Likewise, the City should adjust the height at which buildings are designated “towers” for under the land use code from 160 feet to 180 feet to allow





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flexibility for 180-foot life science buildings without additional modulation, floorplate size, and tower separation standards that undercut essential building functions.

#### 4. Conclusion

Through the One Seattle Plan, the City has a once-in-a-generation opportunity to infuse new energy, opportunity, and industry into the fundamental fabric of Seattle. ARE hopes to contribute to this work not only in the planning process, but in the post-plan buildout, by continuing to bring world-class life science spaces into service here in the Seattle.

We appreciate your consideration of these comments, and look forward to working with you to continue building a Seattle that brings the world new cures, treatments, and other innovations.

Sincerely,

CHRISTIAN GUNTER  
Senior Vice President - Development  
Alexandria Real Estate Equities, Inc.  
400 Dexter Avenue North Suite 200  
Seattle, WA 98109

58-3  
cont

May 3, 2024

VIA EMAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

Re: Comment on Draft One Seattle Plan

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”). We write as owners of property in the First Hill/Capitol Hill Regional Center. Dan Chhan owns the 620 Belmont Avenue East (“620 Belmont”) and 614 Boylston, LLC owns 614 Boylston Avenue East (“614 Boylston” and collectively the “Properties”).

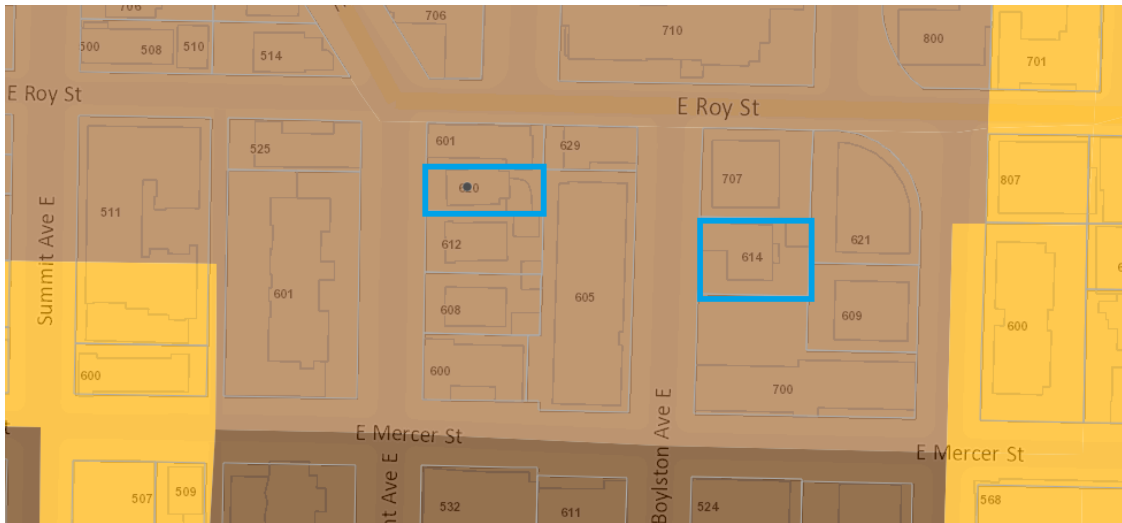
59-1

Both Properties are currently developed with single-family residences; however, 614 Boylston is currently used as an office. Overall, we support the Mayor’s vision for the One Seattle growth strategy.

However, we encourage the City to evaluate additional height and density inside the First Hill/Capitol Hill Regional Center. The Properties are both currently zoned LR-3, a multifamily zone which allows residential development of townhouses, rowhouses, and apartment buildings. The maximum height under the current zoning allowed is typically 50 feet. The Mayor’s vision for the Regional Centers calls for these areas to be the densest neighborhoods and to potentially support zoning for high-rise towers.

Our neighborhood around E. Roy Street in the Regional Center is a walkable, vibrant area with housing, office, retail, restaurant, and entertainment uses. We believe the First Hill/Capitol Hill Regional Center near Roy Street should zone for heights of 95 feet, especially for mass timber buildings. These densities are more consistent with the Regional Center vision, and would allow for these Properties to better serve the people who live and work in Capitol Hill by creating more housing options and/or mixed-use developments which could provide retail and other amenities for the residents and pedestrians who are drawn in by the unique character of this stretch of E. Roy Street.

Furthermore, as shown on the map below, the two blocks which contain these Properties are already adjacent to NC zoning with similar heights. Aligning the area’s zoning to a 95-foot height, in addition to fostering more practical development and increased housing supply in the area, would create a more uniform zoning regime by connecting the existing NC zone on the left with the much larger one on the right. We believe it is good policy to keep zoning designations consistent within a subarea, to reduce uneven future development patterns and allow for a more coherent neighborhood character.



We recognize and appreciate the amount of work that has gone into drafting the One Seattle Plan, but encourage the City to be bold with planning for Urban Center densities because this is a key part of the future housing growth. We should not waste this opportunity presented with the Comp Plan update.

The Final Environmental Impact Statement (“FEIS”) for the One Seattle Plan should study increased housing and jobs targets for the First Hill/Capitol Hill Regional Center including our Properties at 95-foot heights, including the potential for bonuses for mass timber construction, so that the City can better understand the potential benefits and impacts and be ready to adopt any necessary zoning.

As always, thank you for your consideration. Please do not hesitate to contact us if there is any additional information that we can provide that would help inform the City’s evaluation of this idea.

Sincerely,

s/Dan Chhan

s/Dave Enslow

On behalf of 614 Boylston, LLC

cc: Councilmember Hollingsworth

59-1  
cont



600 University St, Ste 1020  
Seattle, WA 98101-4107  
(206) 470-8000 tel  
(206) 470-8190 fax  
eraliving.com

VIA EMAIL

May 3, 2024

Office of Planning and Community Development  
Seattle City Hall  
600 4th Avenue, 5th Floor  
Seattle, WA 98104  
Attn: Rico Quirindongo  
Email: OneSeattleCompPlan@seattle.gov

RE: Comments on the Draft One Seattle Plan

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impacts Statement ("DEIS"). The Ida Culver House Ravenna ("House"), owned by Era Living, is located at 2315 Northeast 65th Street ("Property") in the Ravenna neighborhood. The House is a welcoming retirement community that provides independent and assisted living options.

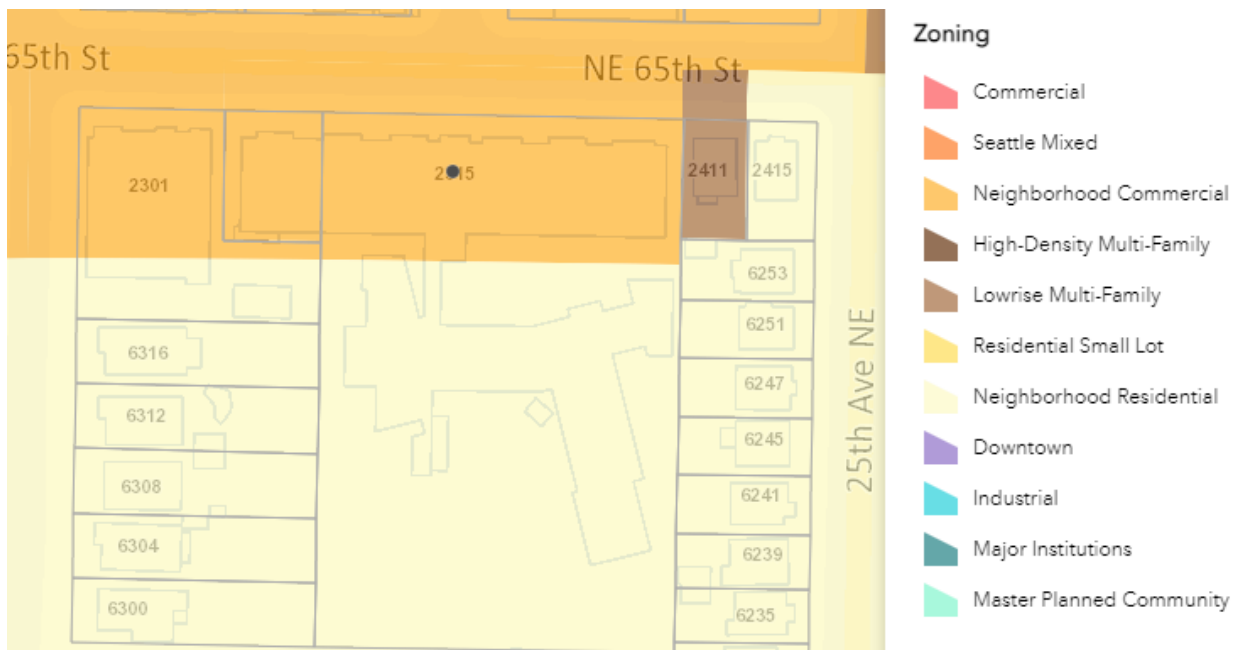
We write to express support for Ravenna's continued progress towards becoming a complete and walkable neighborhood. We also support additional zoned capacity within the Ravenna neighborhood generally and specifically on both sides of the 65th Street commercial corridor. We encourage the City to include the Mayor's proposed Ravenna neighborhood center in the final Plan, and that property within 1,000 feet of the 25th Avenue NE and NE 65th Avenue intersection support 8-story densities to support further enhancements to vibrant, mixed-use walkable neighborhood.

Along with our support for greater zoned capacity in the neighborhood, we also request that the City study the potential environmental impacts of resolving split-zoning within the neighborhood in favor of the higher density zoning. As the below image shows, the Property consists of two King County parcels, 7173700475 ("West Parcel") and 7173700480 ("East Parcel").

60-1

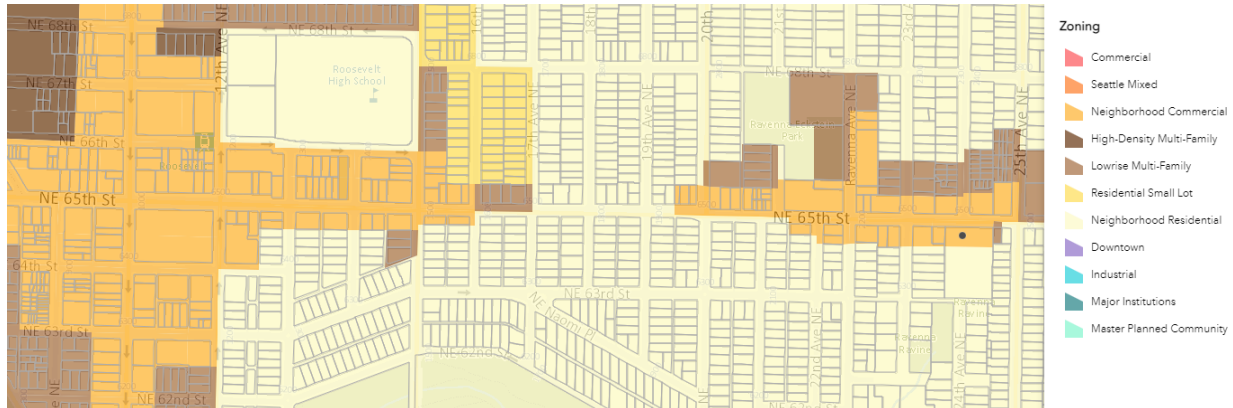


Despite hosting a shared living facility that crosses its two parcels, the Property itself falls within two different zones. The entirety of West Parcel and the northern portion of the East Parcel fall within the NC-2-P-55 (M) zone, while the majority of the East Parcel is zoned Neighborhood Residential-3. Below is a map of the Property's split zoning.



As a policy matter, we believe that split zoning should be avoided due to the complications it presents for owners. Our split zoning certainly has impacted the ability to modernize our facility.

As the below image shows, the Property (indicated by the bold black dot) is located 0.64 miles walking distance from the Roosevelt light rail station and surrounded by a mix of neighborhood commercial and residential uses.



As the City seeks to expand access to housing and business opportunities, the resolution of split-zoning in general offers an easy path forward. In the Property's case, resolution of its split-zoning will ensure that the Home is able to carry on its mission of providing much-needed senior living. Thus, we also request that the City specifically study any potential environmental impacts that resolution of the Property's split-zoning in favor of the parcels being zoned neighborhood commercial density might entail so that such harmonized zoning can be incorporated into the final version of the One Seattle Plan and the potential for the new Ravenna neighborhood center.

We also note that there is a pending contract rezone for the Property that seeks to resolve the difficulties arising from the Property's split zoning. However, as matter of policy consistency we would urge the City to resolve this issue through the One Seattle Comprehensive Plan update.

Thank you again for the opportunity to comment and please feel free to contact me if any additional information related to the above comments is needed.

Sincerely,

*Nisan Harel*

Nisan Harel  
Chief Operating Officer  
Era Living

May 3, 2024

VIA EMAIL

Office of Planning and Community Development  
 Seattle City Hall  
 600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
 Seattle, WA 98104  
 Attn: Rico Quirindongo  
 Email: [PCD\\_CompPlan\\_FIS@seattle.gov](mailto:PCD_CompPlan_FIS@seattle.gov)

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement  
 MRH Properties, LLC 1103 – 1109 North 36<sup>th</sup> Street Comment Letter

Dear Mr. Quirindongo,

On behalf of MRH Properties, LLC, I am writing to comment on the One Seattle Comprehensive Plan (“One Seattle Plan”) Draft Environmental Impact Statement (“DEIS”), maps, and policies. My family, through MRH Properties, owns two parcels at 1103 – 1109 North 36<sup>th</sup> Street in the Fremont Hub Urban Village (“Property”). I am writing in support of the Mayor’s proposed creation of the Fremont Urban Center and to request that our Property is zoned for neighborhood commercial use.

Currently, our Property is in the Fremont Hub Urban Village. It is not inside, or even near, any of the City’s manufacturing/industrial center (“MIC”) or shoreline environment. Despite our location within the Fremont Hub Urban Village, our Property is zoned Industrial Commercial. As you can see, our Property is surrounded directly to the north and west by neighborhood commercial zoning.



61-1

We have owned our Property for over 36 years. We are a Seattle born family and have worked hard to recruit and retain our tenants to occupy our renovated manufacturing buildings, parts of which date to 1909, 1950’s and 1980’s. However, over the last decade, our existing office and warehouse tenants, each occupying for over 25 years, have vacated. All around our Property, the City is redeveloping with new apartments, restaurants and retail on Woodland Park Avenue and Stone Way. Today, our neighborhood is truly a mixed-use residential area. However, our current zoning does not match this reality. We are struggling to find any viable industrial tenants for this building. It is not an industrial area. We were especially surprised when we learned – only after its final passage – that the City had done an update to its Industrial and Maritime zoning. No one from the City contacted us during that process to hear about our experience. We believe the City missed the opportunity in that Industrial and Maritime Strategy process to better align the zoning

for our little isolated swath of land with the rest of the Fremont Hub Urban Village.

We believe this One Seattle Plan process should resolve that oversight and align our zoning with the rest of the proposed Fremont Urban Center to support a mixed-use neighborhood environment.

Specifically, our comments on the DEIS are:

- **Support for Fremont Urban Center.** We support the Fremont Urban Center designation, including our Property, to create a wide range of housing, restaurant, retail, and job growth. We agree with the City's vision that Urban Centers should support a "significant" share of housing and allow for up to 8-story mixed-use residential housing types. The final One Seattle Plan and land use maps must resolve the zoning inconsistencies presented by our isolated, area of industrial commercially-zoned land within the Fremont Urban Center by adopting neighborhood commercial zoning with appropriate heights for our Property.
- **Growth Assumptions.** The DEIS contemplates a net new target of 1,537 new housing units and upwards of 311 new jobs in the Fremont Urban Center over the course of the Plan. We estimate that our Property alone could support nearly 200 units, depending on the permitted height, under neighborhood commercial zoning for an Urban Center. The Final Environmental Impact Statement ("FEIS") should study increased housing and jobs targets for the Fremont Urban Center including our Property, and the other industrial commercial zoned property inside the Urban Center, so that the City can better understand the potential benefits and impacts of those changes and be positioned to readily adopt those new maps.
- **Consistency with Policies.** The One Seattle Plan includes Policy LU 13.11 that states:

**"Avoid placing industrial zones within regional, urban and neighborhood centers. However, in locations where a center borders a Manufacturing and Industrial Center.**

use of the industrial commercial zone within the center where it abuts the Manufacturing and Industrial Center to provide an appropriate transition to help separate residential uses from heavier industrial activities." (emphasis added)

Our Property is not in – or even near – a MIC. Simply put, our Property should not be zoned industrial per the City's own policies. The City should study this issue in the FEIS for consistency with the current or proposed Comprehensive Plan, including Policy LU 13.11. We believe the only reasonable conclusion after that study must be to change the zoning to match our Property with the Fremont Urban Center mixed-use zoning and 8 story heights.

For these reasons, we ask that the City update the Future Land Use Map and zoning as part of the Mayor's preferred alternative in the FEIS and One Seattle Plan to be consistent with the rest of the Fremont Urban Center to our north and west. New mixed-use residential development on our Property supports the Fremont Urban Center and implements the Mayor's One Seattle Plan vision.

Thank you for your consideration. Please feel free to contact me with any questions.

Sincerely,



Helene Heglund  
MRH Properties, LLC  
206-618-1104  
helenereed@comcast.net

cc: Councilmember Maritza Rivera  
Councilmember Dan Strauss

61-1  
cont





May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes; Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”).

Schnitzer West (“Schnitzer”) owns the properties located at 570 Mercer St and 550 Mercer St, a full block for which Schnitzer has been permitting ([3035337-LU](#) and [3039269-LU](#), respectively) to develop future office buildings (the “Property”). Given the current state of the financial markets and the lack of office demand in the Seattle market, it makes sense to consider possible future residential development for the Property.

Unfortunately, the current zoning provisions for residential development in the Uptown neighborhood impose obstacles to such development. The 85-foot height limit does not support the kind of residential development that could be achieved in this center-city neighborhood and does not incentivize the use of heavy timber construction for residential uses.


We write to express support for Alternative 5 in the DEIS, but request the Final EIS and Uptown Urban Center Subarea Plan study at least 125 feet in height on the Property. A 125-foot height limit would allow for flexible multifamily development density, at a scale consistent with the broader neighborhood. We have attached a study of this larger neighborhood, which includes residential heights of up to 280 feet only a few blocks away from the property. Just to the south of the Property, residential development is allowed at a height of 160 feet. Allowing greater heights along the north side of Mercer Way would align with the City’s vision for Regional Centers.

62-1

May 6, 2024  
Page 2 of 2

We appreciate your attention to these comments and welcome an opportunity to meet with you to review our research & work product attached hereto.

Sincerely,



---

Zeb Keck  
Partner and Senior Director, Construction & Development

**62-1  
cont**



# **Seattle Mixed - Uptown**

Zoning Height Analysis

01-17-2024

**SM-UP 85**  
Seattle Mixed Uptown 85

- **Podium Height:**  
N/A
- **Lot Coverage Above Podium:**  
N/A
- **Floor Area Ratio:**  
Max for all uses: 5.25
- **Floor Area Limits:**  
Unlimited
- **Upper Level Setbacks:**  
For designated streets, setback avg of 10 ft required above 45/65 ft

**SM-UP 125 (PROPOSED)**  
Seattle Mixed Uptown 125

- **Podium Height:**  
N/A
- **Lot Coverage Above Podium:**  
N/A
- **Floor Area Ratio:**  
TBD
- **Floor Area Limits:**  
Unlimited
- **Upper Level Setbacks:**  
For designated streets, setback avg of 10 ft required above 45/65 ft

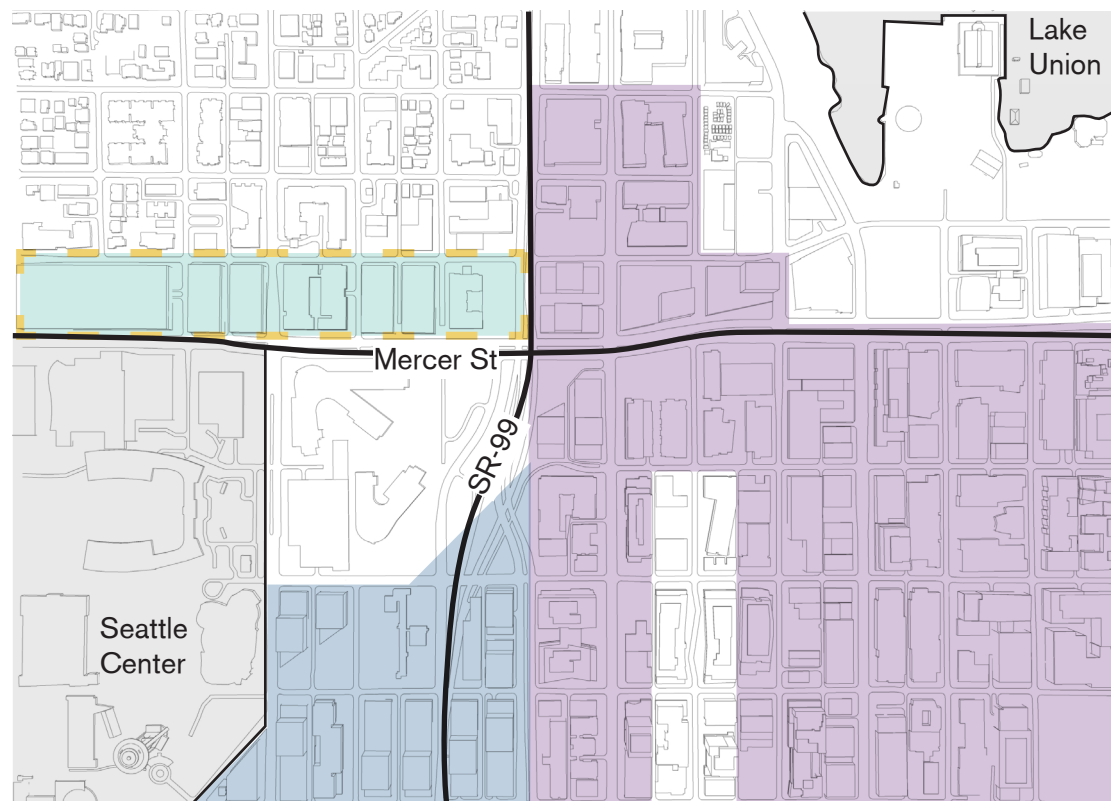
**SM-UP 160**  
Seattle Mixed Uptown 160

- **Podium Height:**  
45 ft
- **Lot Coverage Above Podium:**  
Avg GFA 50% max
- **Floor Area Ratio:**  
Base for all uses: 5  
Max Residential: 7 Non-Residential: 2
- **Floor Area Limits Above Podium:**  
Avg 12,500 SF/floor max
- **Upper Level Setbacks:**  
For designated streets, setback avg of 10 ft required above 45/65 ft

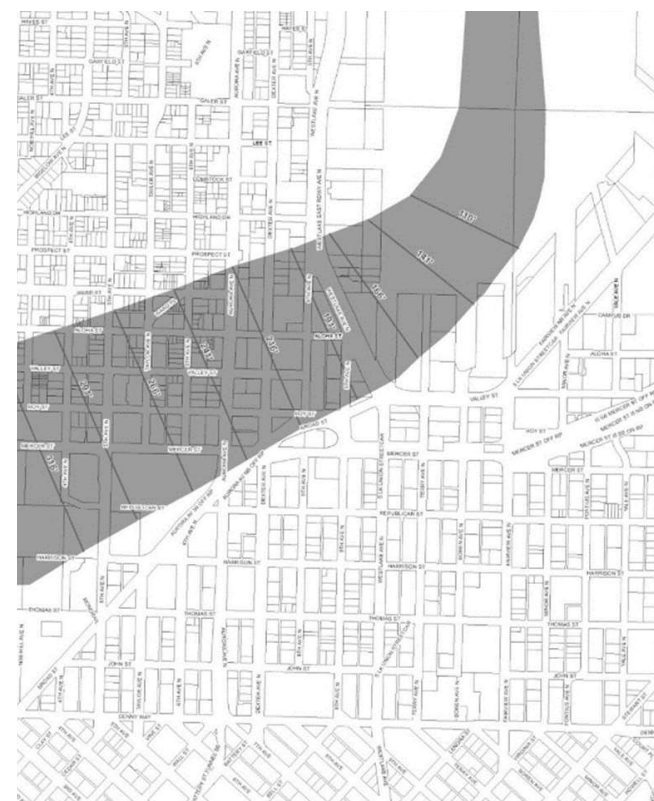
**SM-SLU 175/85-280**  
Seattle Mixed South Lake Union 175/85-280

- **Podium Height:**  
45/65/85, depending on street
- **Lot Coverage Above Podium:**  
Average GFA 50% max
- **Floor Area Ratio:**  
Base Non-Residential: 4.5  
Max Residential: 6 Non-Residential: 8
- **Floor Area Limits Above Podium:**  
Avg 10,500 SF/floor max  
Single residential story 11,500 SF/floor max
- **Upper Level Setbacks:**  
For designated streets, setbacks req above 45 ft
- **SLU Flight Path Corridor**  
Additional reduction in height along flight path

Zoning Keymap



SLU Flight Path Corridor



**Map Key**

- SM-SLU 175/85-280**  
Seattle Mixed - SLU: 280' Height Limit
- SM-UP 160**  
Seattle Mixed - Uptown: 160' Height Limit
- SM-UP 85**  
Seattle Mixed - Uptown: 85' Height Limit
- SM-UP 65**  
Seattle Mixed - Uptown: 65' Height Limit
- SM-UP 95**  
Seattle Mixed - Uptown: 95' Height Limit
- SM-SLU 85-280**  
Seattle Mixed - SLU: 280' Height Limit
- Shoreline Zoning
- Low-rise Zoning
- Urban Center Village Boundary
- SLU Flight Corridor
- Future Development Sites

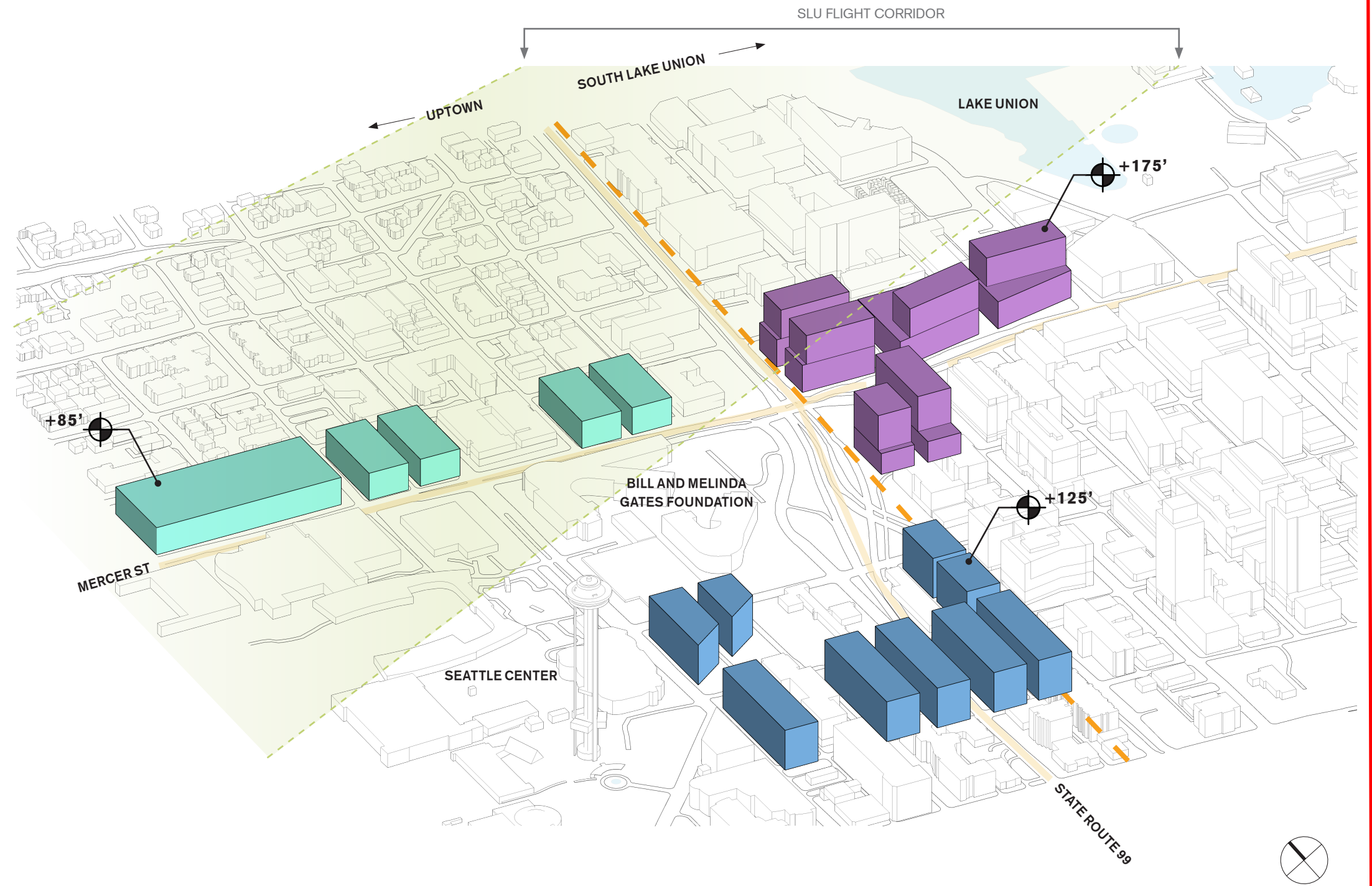
**Zoning + Overlay Designations**



**Map Key**

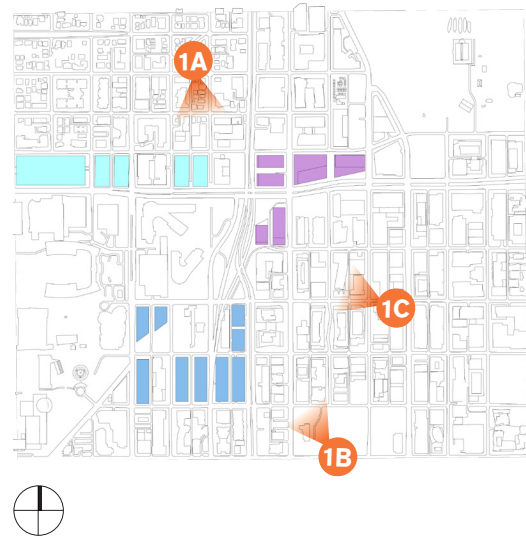
- SM-SLU 175/85-280**  
Seattle Mixed - SLU: 280' Height Limit
- SM-UP 160**  
Seattle Mixed - Uptown: 160' Height Limit
- SM-UP 85**  
Seattle Mixed - Uptown: 85' Height Limit
- Urban Center Village Boundary

**Existing Commercial Zoning Height Limits - Aerial view facing Northeast**

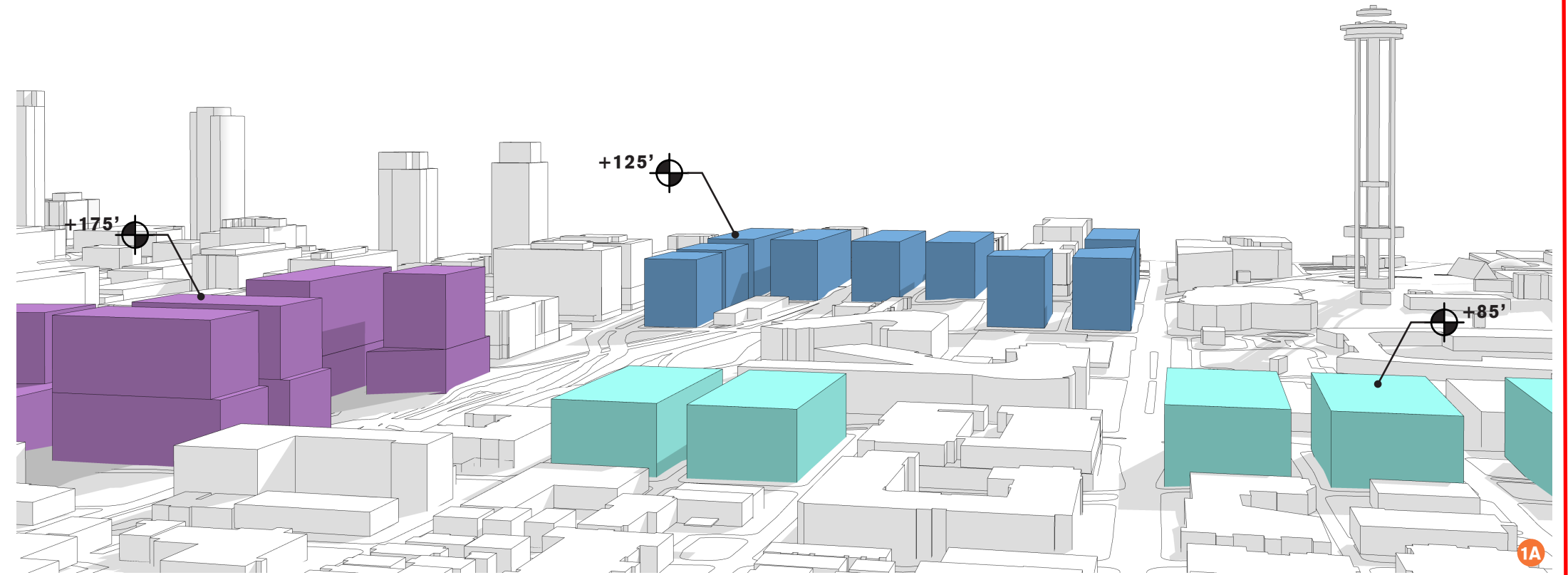


**Key**

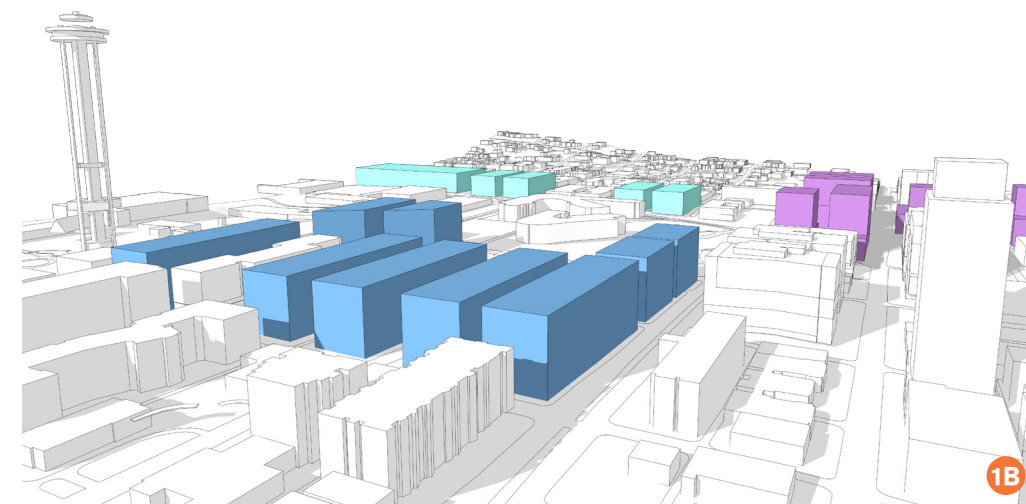
- SM-SLU 175/85-280**  
Seattle Mixed - SLU: 280' Height Limit
- SM-UP 160**  
Seattle Mixed - Uptown: 160' Height Limit
- SM-UP 85**  
Seattle Mixed - Uptown: 85' Height Limit



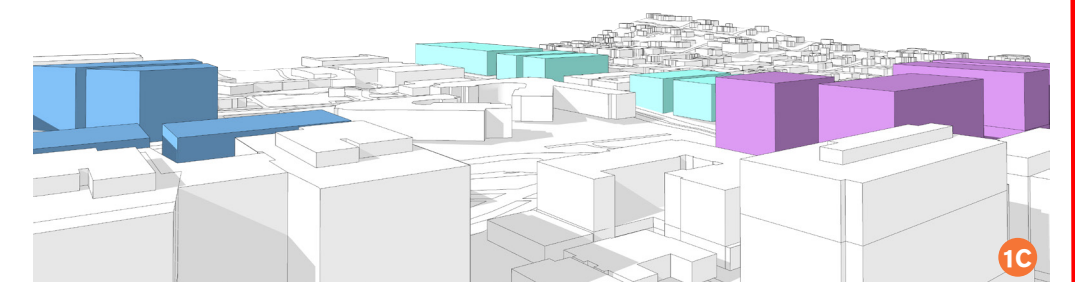
**Perspective View Facing South**



**Perspective View Facing Northwest**



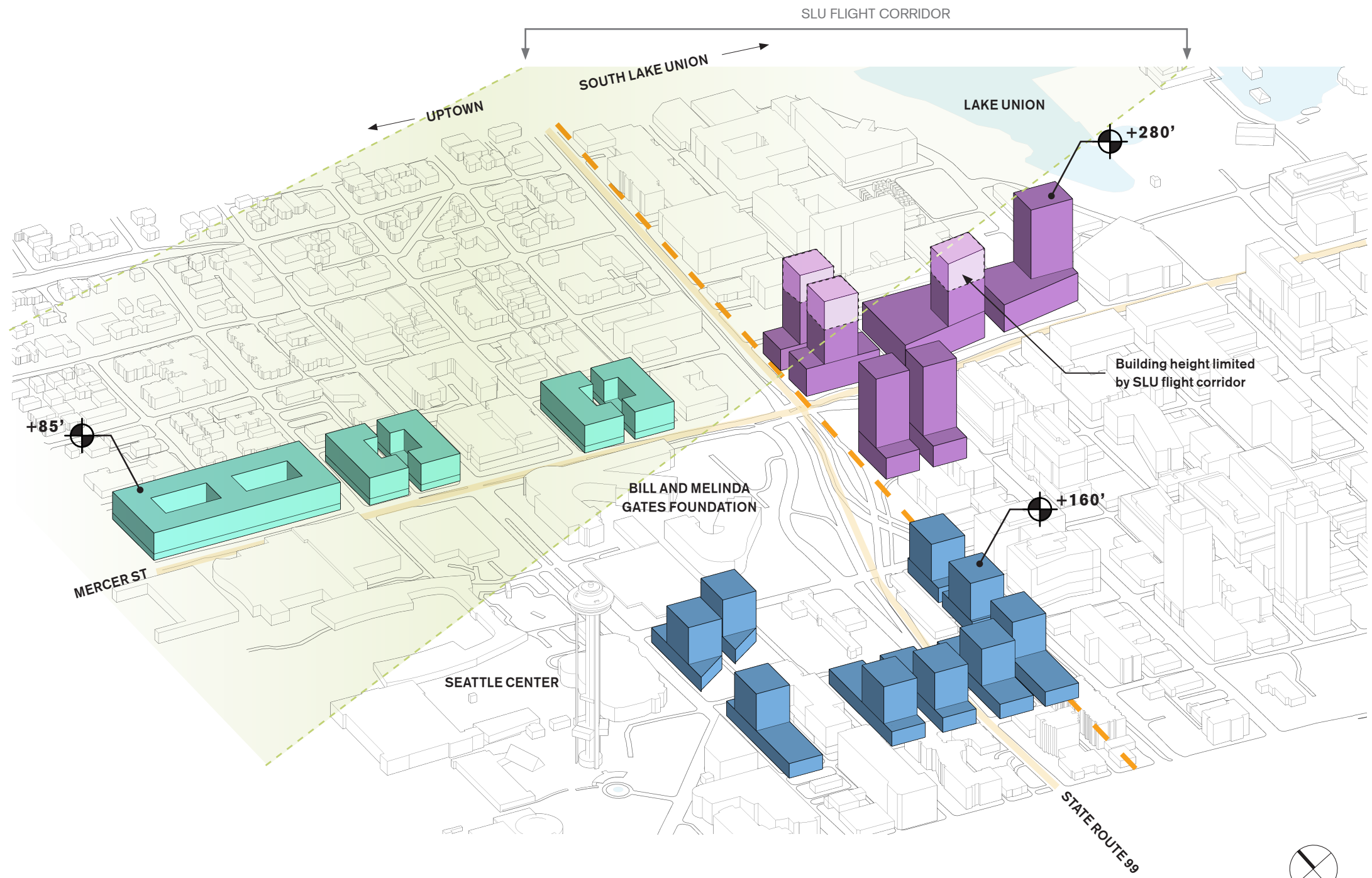
**Perspective View Facing West**



**Map Key**

- SM-SLU 175/85-280**  
Seattle Mixed - SLU: 280' Height Limit
- SM-UP 160**  
Seattle Mixed - Uptown: 160' Height Limit
- SM-UP 85**  
Seattle Mixed - Uptown: 85' Height Limit
- Urban Center Village Boundary

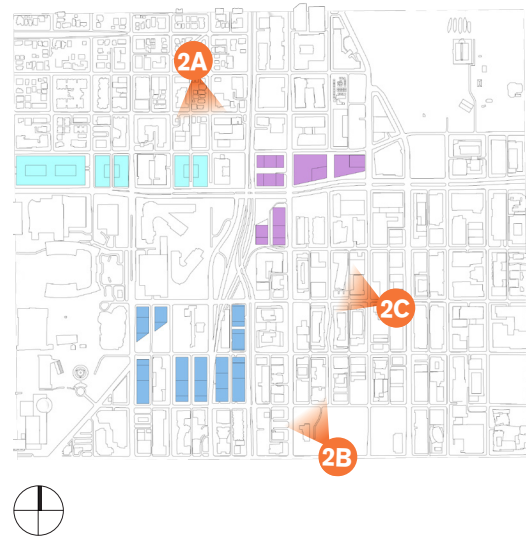
**Existing Residential Zoning Height Limits - Aerial view facing Northeast**



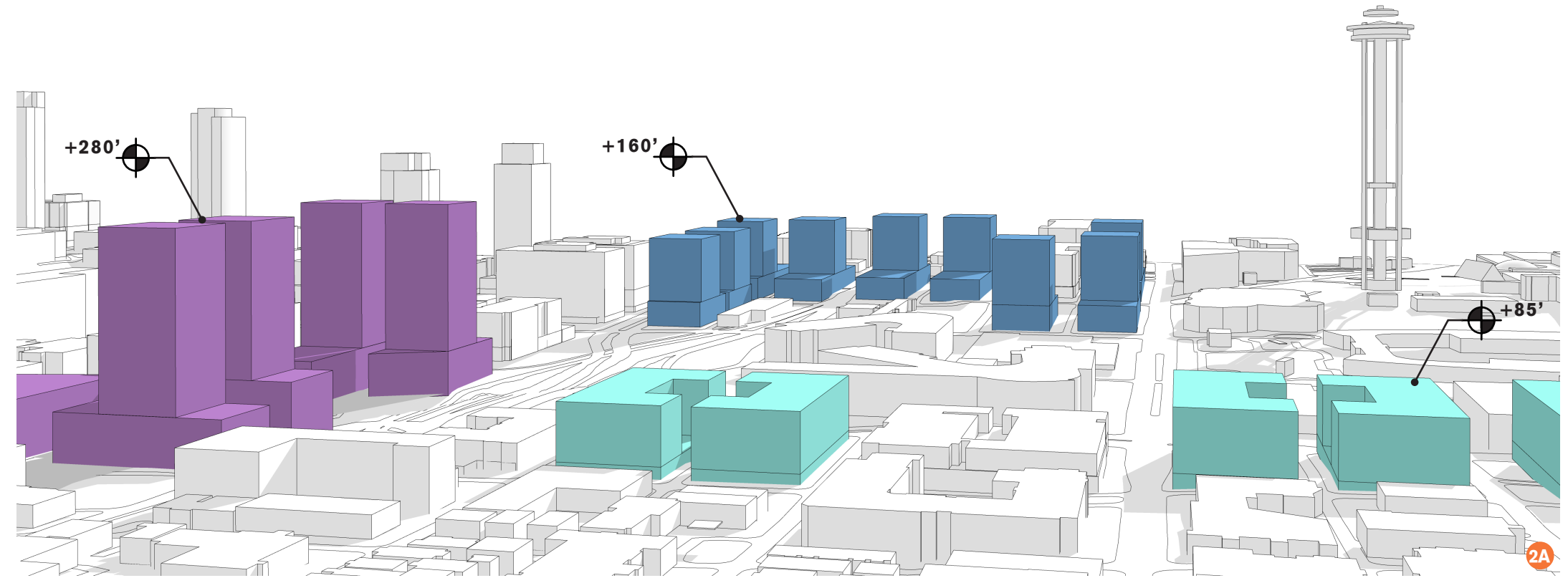


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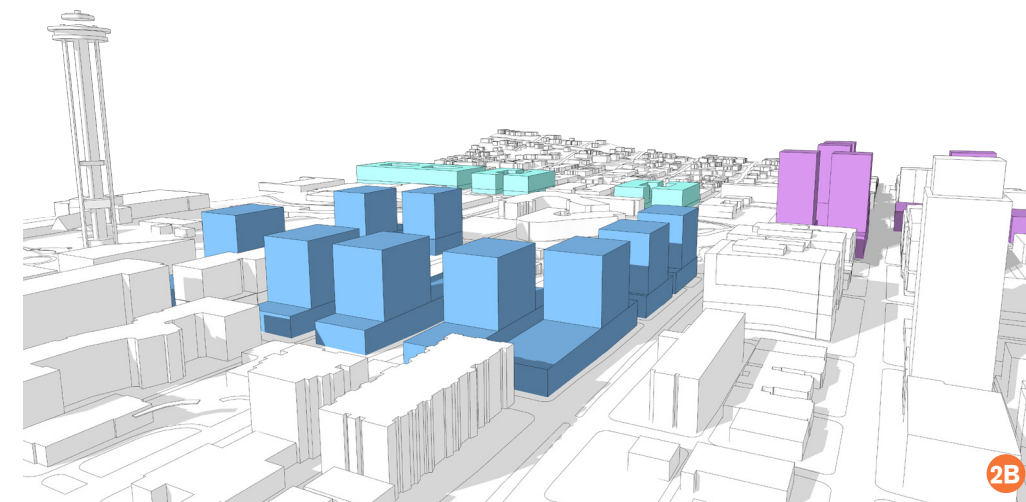
- SM-SLU 175/85-280**  
Seattle Mixed - SLU: 280' Height Limit
- SM-UP 160**  
Seattle Mixed - Uptown: 160' Height Limit
- SM-UP 85**  
Seattle Mixed - Uptown: 85' Height Limit



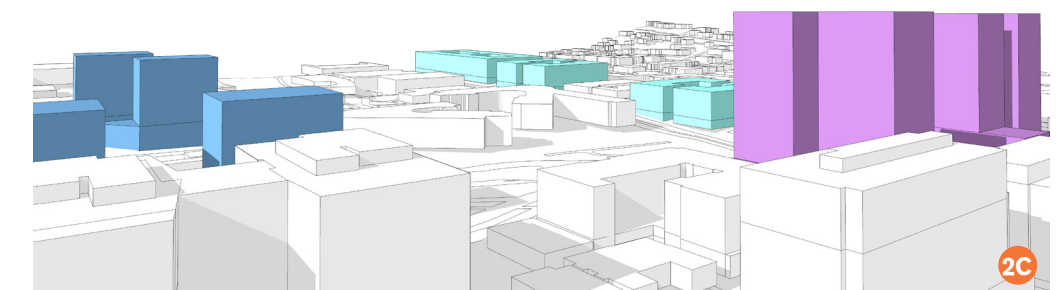
**Perspective View Facing South**



**Perspective View Facing Northwest**



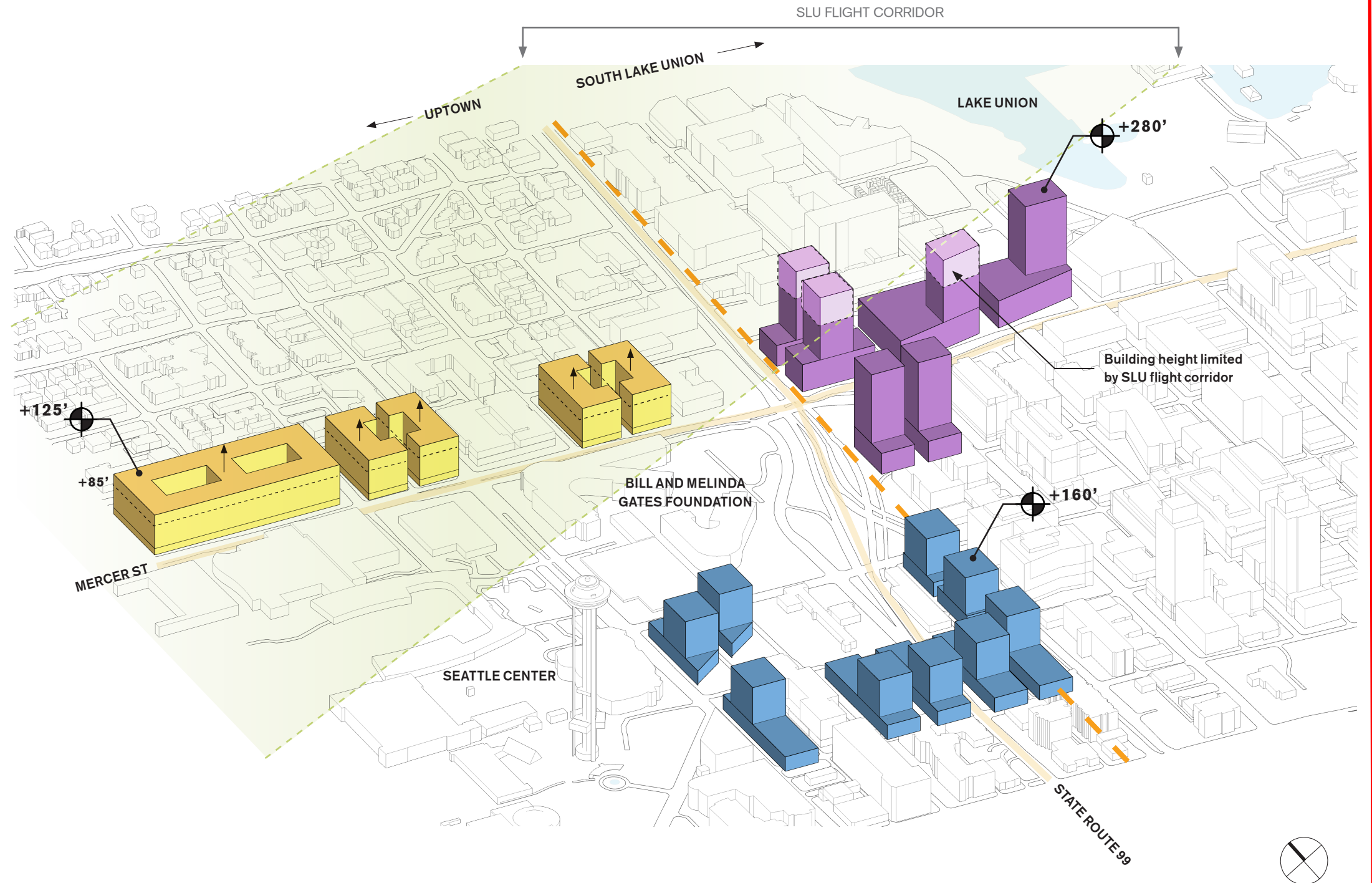
**Perspective View Facing West**



**Map Key**

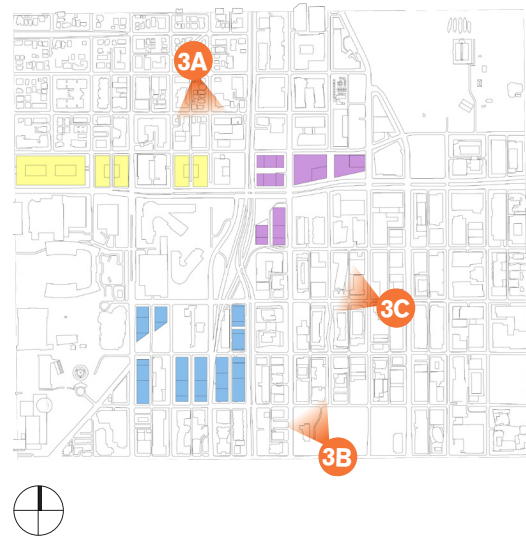
- SM-SLU 175/85-280**  
Seattle Mixed - SLU: 280' Height Limit
- SM-UP 160**  
Seattle Mixed - Uptown: 160' Height Limit
- PROPOSED SMU-UP 125**  
Seattle Mixed - Uptown: 125' Height Limit
- Urban Center Village Boundary

**Proposed Residential Zoning Height Limits - Aerial view facing Northeast**

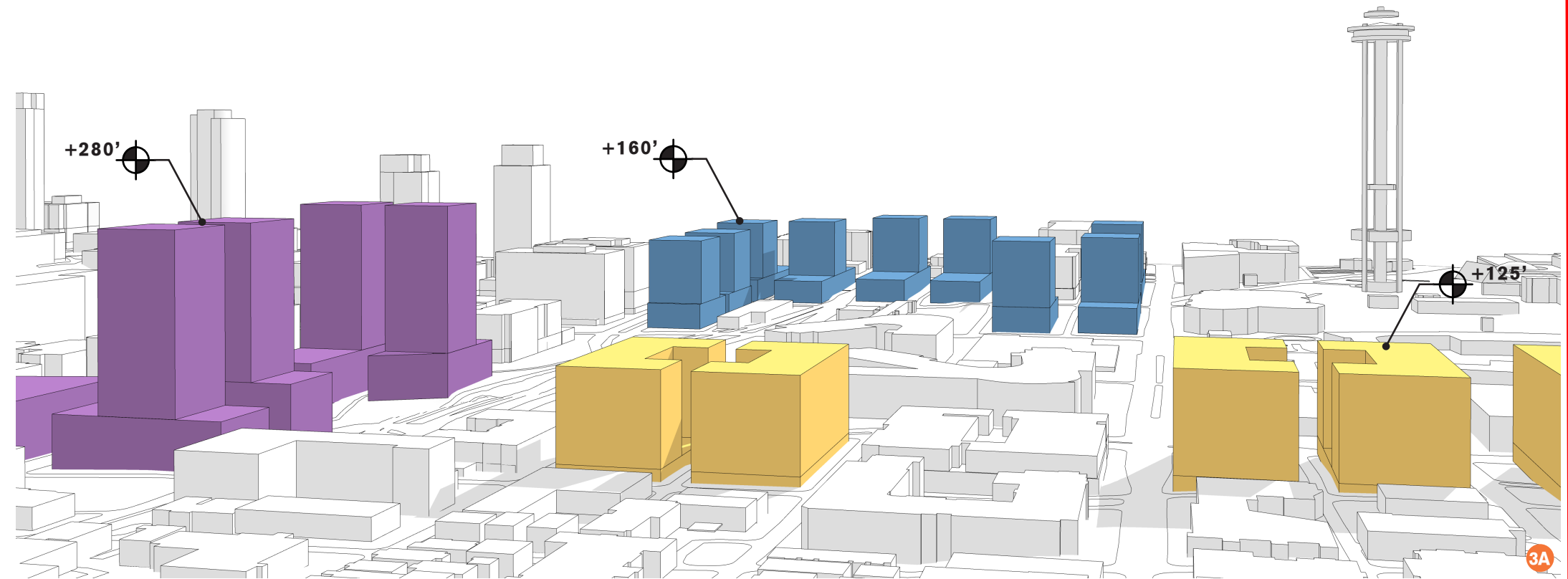


**Key**

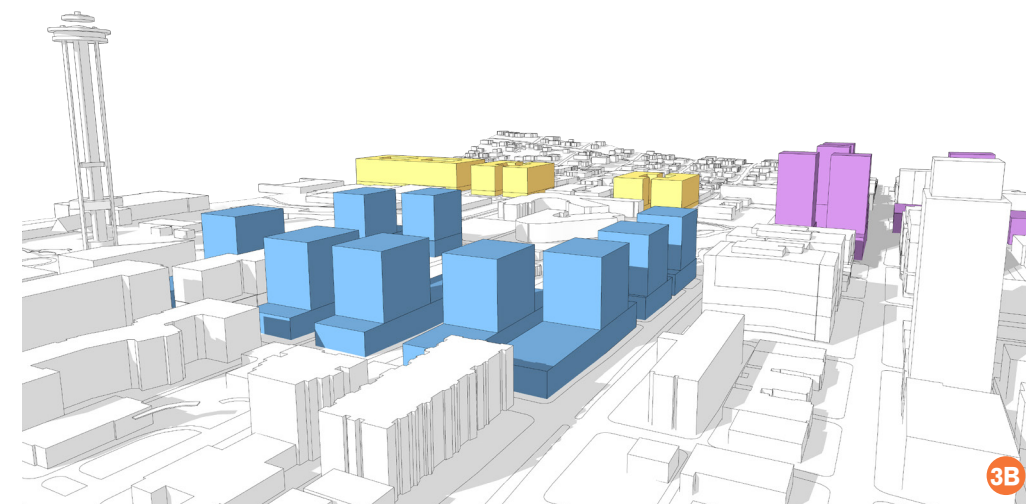
- SM-SLU 175/85-280**  
Seattle Mixed - SLU: 280' Height Limit
- SM-UP 160**  
Seattle Mixed - Uptown: 160' Height Limit
- PROPOSED SMU-UP 125**  
Seattle Mixed - Uptown: 125' Height Limit



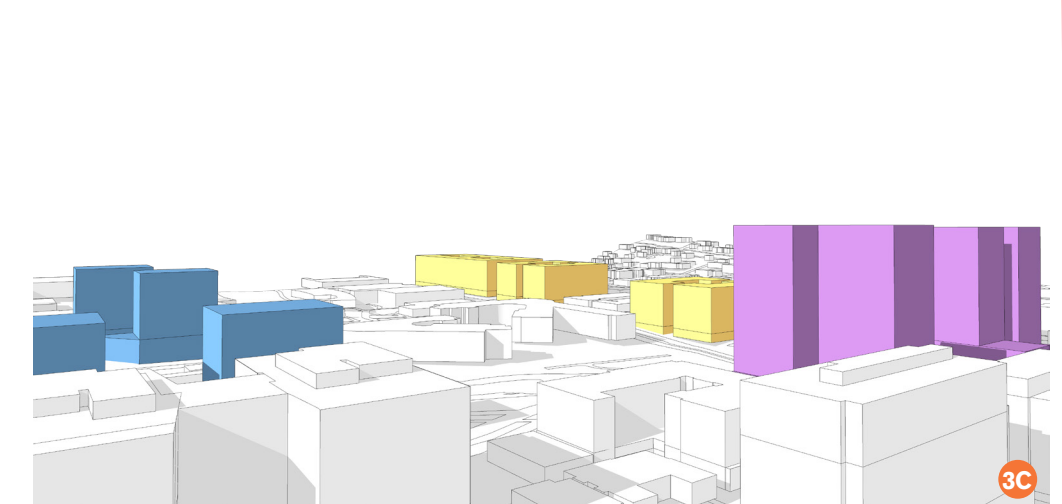
**Perspective View Facing South**



**Perspective View Facing Northwest**



**Perspective View Facing West**



**From:** [Mark Kramer](#)  
**To:** [PCD CompPlan EIS](#); [Moore, Cathy](#)  
**Subject:** 130th Street Station  
**Date:** Monday, May 6, 2024 1:09:06 AM

---

**CAUTION: External Email**

I own a home on the corner of 8th Ave. and 130th St. I bought this house with my wife in 2003 because we wanted to move out of Capital Hill and into the suburbs of Seattle. We wanted a quiet neighborhood with a yard, and trees, but we still wanted to live in Seattle so we moved 7 miles north of downtown to 8th Ave. NE., as far north as you can go without living in Shoreline. Sadly, we now have a station no one in our neighborhood (and many other Seattle taxpayers) wanted, less than one mile away from another, much larger station.

I 'met' with CM Moore during her walking meeting at the station. I say 'met' as I basically had 30 seconds to speak about the concerns of our neighborhood and the upcoming changes that will impact us directly. It was extremely frustrating having 3 people that were in our group, who live downtown and WAY out of our district, using up what little time the local residents' had to speak with OUR representative about how much this station would affect the people living 2 blocks away. We had people coming from Capital Hill saying we need more density in our neighborhood all the way up at 130th St. I was hoping that meeting would have been more about the people that the station directly effected.

Our street, 8th AVE. NE, sits directly down at the bottom on the east-side of the hill from the future light rail station. I do not look forward to 7-story buildings at the top of our hill blocking the western sunlight an hour or two early in the evening, especially in the winter. I wonder what all this will do to the Flicker Reserve Natural Area further down the hill from us around Thornton Creek. I understand that there is a plan to replant any trees that are removed, like that is an acceptable solution. We moved here FOR the trees, the old growth 5-10 story tall trees. Gutting them and simply planting a sprout that we hope lives long enough to grow tall and eventually get cut down 75 years from now for the next great city project is not acceptable to myself nor my neighbors.

If apartments, with the densities that are being discussed, are added, where will those people park their cars? I know the fantasy is that people moving into apartments across from the light-rail will not have cars and will just use public transportation, but that is not reality. The future apartment complexes will add spaces, but they will charge for them, and that will lead to our street becoming a parking lot. I used to drive around forever when I lived downtown just so I wouldn't have to pay for parking, people will do the same here and just walk down our hill to their cars to go to work or, they will park in front of our houses in the morning and walk up the hill to catch the light-rail. Either way, our street will be filled with cars. This matters because our homes were built in the 50's, they all have one car driveways, we have three cars in our family alone. We have to park on the street and so do many other residents, we need a plan for this and I have not heard one as of yet.

I'm not against density and I don't fear change. I think if we are smart about providing the proper amount of density to the 130th street station area and prepare properly for the effect this will have on the residents that already live here in our single home lots then this whole thing may work. But given how this entire station came about, where it was built (north of 125th st? Why?), and the history our neighborhood has had trying to work with the city on basic services, I'm not optimistic.

My wife and I bought our home so we could live in a neighborhood, we pay our property tax which will only skyrocket now, and I want to leave this house to my son. I just hope there is a neighborhood left and that he can afford to keep it. So I am against the high-density options in the plan, and I don't want developers to get a blank check to cut down our trees with just a promise to plant new ones as a fix. So I guess I am for keeping things the same. I hope I do have a say in this decision, after all, we were here first.

Mark Kramer  
13006 8th Ave. NE.

...live your life

**DCL Management LLC.**

**VISTA PACIFIC GROUP**  
COMMERCIAL PROPERTIES

May 3, 2024

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)  
Email: [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

**Re: One Seattle Plan**  
**4552 University Way NE - Support for Alternative 5**

Dear Mr. Quirindongo,

DCL UW, LLC, is the owner of the property located at 4552 University Way NE, on the corner of 47th Street and “The Ave” in the heart of the U District. Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”).

We write to express support for Alternative 5, but request that the Final EIS study mixed-use zoning of up to 240 feet in height along University Way NE at least north of NE 46<sup>th</sup> Street to encourage mixed-use redevelopment of the Property and surrounding north Ave properties. Zoning similar to the adjacent Seattle Mixed zone would be more consistent with the City’s Urban Village concept, including the opportunity for dense multifamily housing near transit in a neighborhood that greatly needs it.

The Property is 8,240 sf in area and is currently occupied by a two-story retail building. Located in close proximity to light rail and bus stops, the University of Washington campus, and the Ave’s prime retail corridor, the Property presents an ideal opportunity for mixed-use redevelopment.

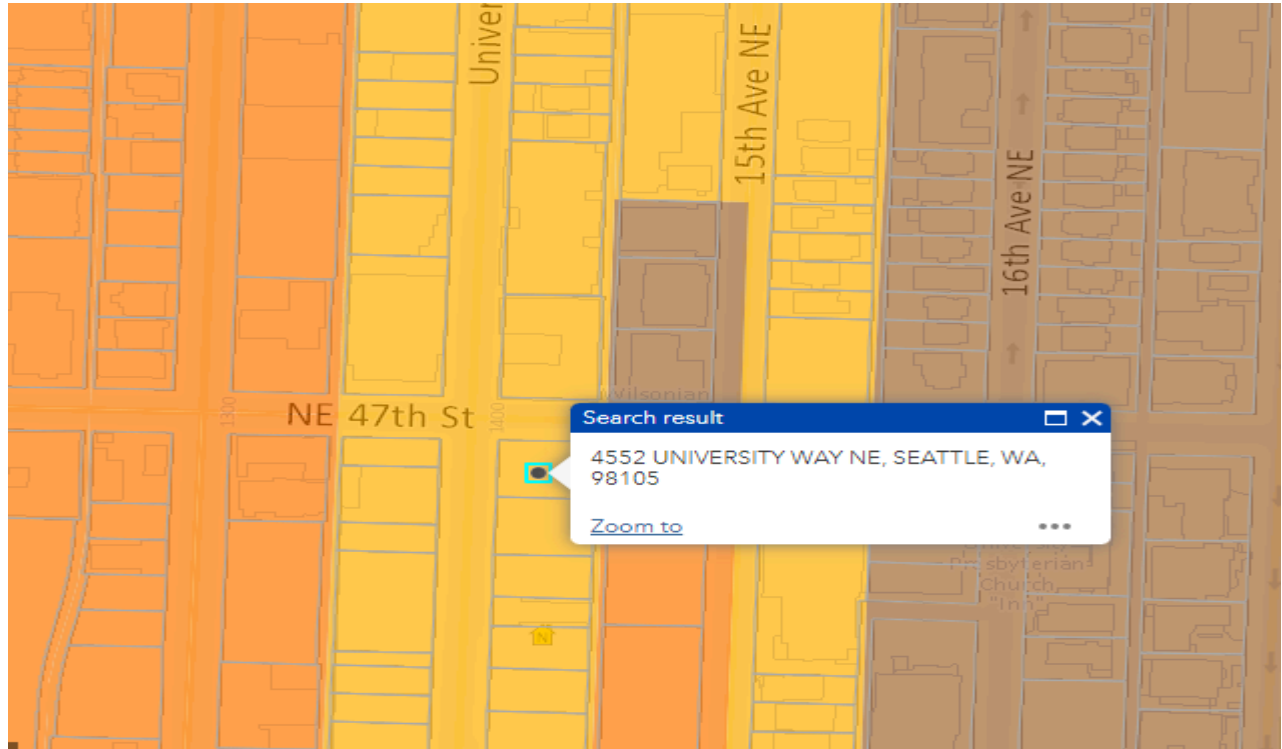
Nearby properties have recently been zoned Seattle Mixed with height limits upwards of 240 feet, as shown below, reflecting the city's commitment to accommodating increased residential density and fostering vibrant urban centers. Applying this increase to the Property and nearby properties as well would align with the City’s policy goals for the U District and for the One Seattle Plan more generally: promoting greater residential density and



64-1

enhancing transit-oriented development.

We understand that the business community on University Way south of NE 45th Street does not seek additional density in that location due to the retail character of that portion of the Ave. The Property and other sites further to the north, however, are appropriate candidates for mixed-use redevelopment that maintains the distinctive nature of the neighborhood while allowing more residents and visitors to access and enjoy it. We encourage OPCD to study Seattle Mixed densities with height limits up to 240 feet, similar to those of the surrounding areas, for the northern section of the Ave above at least NE 46<sup>th</sup> Street, including the Property. While 240 feet may be the upper envelope of what makes sense for urban design, this will support evaluation of additional heights such as 120 or 160 feet that may support redevelopment of this area. This will help the City to better understand the potential benefits and impacts and be ready to adopt any necessary zoning. We believe this will not only support the U District's objectives but also contribute to the overall livability and sustainability of our neighborhood.



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cont

Additionally, we urge OPCD to prioritize the completion of the U District subarea plan, ideally by the end of 2025. The timely completion of this updated subarea plan, and any zoning changes that are necessary, is essential for providing clear guidance and direction for future development initiatives in the U District, support the One Seattle Plan vision and meet the unique needs of our neighborhood. Please do not hesitate to reach out if we can provide any further information or assistance.

Sincerely,

Dexter Lai  
DCL UW, LLC  
P: 206.851.9167  
E: [DexterL@dclmanagement.com](mailto:DexterL@dclmanagement.com)

cc: Councilmember Rivera

DCL Management LLC.

VISTA PACIFIC GROUP  
COMMERCIAL PROPERTIES

May 3, 2024

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)  
Email: [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

**Re: One Seattle Plan  
4552 University Way NE - Support for Alternative 5**

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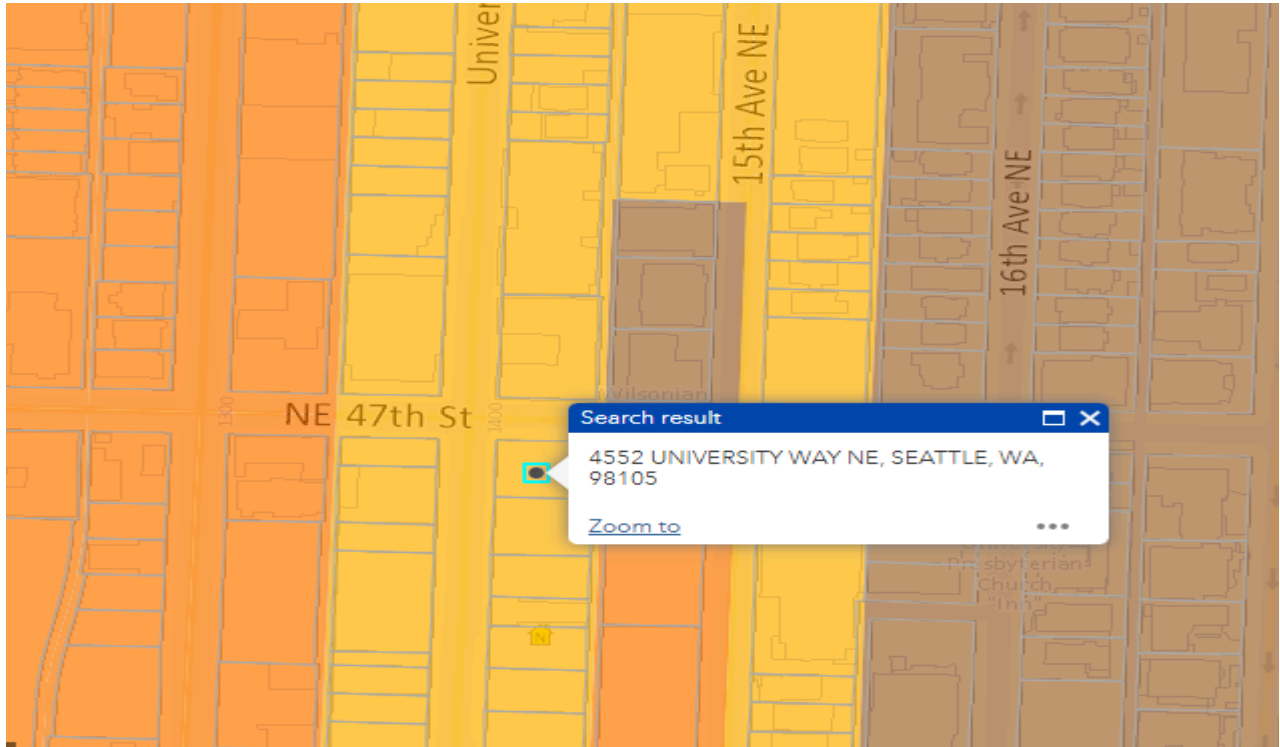
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65-1  
cont



Additionally, we urge OPCD to prioritize the completion of the U District subarea plan, ideally by the end of 2025. The timely completion of this updated subarea plan, and any zoning changes that are necessary, is essential for providing clear guidance and direction for future development initiatives in the U District, support the One Seattle Plan vision and meet the unique needs of our neighborhood. Please do not hesitate to reach out if we can provide any further information or assistance.

Sincerely,

Dexter Lai  
DCL UW, LLC  
P: 206.851.9167  
E: [DexterL@dclmanagement.com](mailto:DexterL@dclmanagement.com)

cc: Councilmember Rivera



May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)  
Email: [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement  
Lander Street Owners Comment

Dear Mr. Quirindongo,

We write as industrial property owners and business operators in the Greater Duwamish Manufacturing Industrial Center (Duwamish MIC) to the One Seattle Comprehensive Plan (One Seattle Plan) Draft Environmental Impact Statement (DEIS). Collectively, we own over 25-acres around the expanded Lander Street light rail station (the Properties). As you know, the City included the Properties in the Industry and Innovation U/160 zone with the Industrial and Maritime Strategy.

Adopting the Industrial and Maritime Strategy was a monumental accomplishment. But there is more planning work needed to refine and implement the future of the Duwamish MIC, especially within the reasonable walkshed of the expanded Lander Street light rail station. We believe the One Seattle Plan should study policies to allow a “Lander Center” node transit-oriented development concept – potentially including residential (with workforce housing units), industrial, office, entertainment, hospitality, schools, hospitals, and training facilities – at the expanded Lander Street station. *Attachment A* (Concept Study). A “Lander Center” node could support thousands of new units – including workforce units for our City’s labor workforce – immediately adjacent to light rail. Additionally, the “Lander Center” node could provide for new partnerships with local schools and/or labor stakeholders for industrial and maritime training facilities in the Duwamish MIC.

With the adoption of the Industry and Innovation U/160 zone for the Properties, there is the potential for millions of square feet of industrial, office, and information computer technology use. Given the current economic climate, however, this vision for the Industry and Innovation zone is unlikely to be accomplished within the timeline of the One Seattle Plan. The “Lander Center” node concept mirrors the Mayor’s Urban Centers vision as those areas near light rail stations where there is a wide range of housing and non-residential uses and building heights of greater than eight stories.

As you know, the Comprehensive Plan encourages this type of long-range planning exercises for the future of industrial lands to occur primarily as part of the major Comprehensive Plan update. *See* Policy LU 13.3. The City has also recognized that “unique development opportunities” such as the WOSCA site and the National Guard Armory in Interbay can be evaluated through a “comprehensive industrial redevelopment plan” that considers public benefits. *See* Policy LU 13.27.

Overall, the One Seattle Plan DEIS does not propose or evaluate land use changes to the Duwamish MIC. As owners around the Lander Street station, we respectfully request that the One Seattle Plan:

- Study the “Lander Center” node. The Final EIS for the One Seattle Plan should study the potential for a “Lander Center” node within a reasonable walkshed of the Lander Street station, including the potential for Urban Center-type transit-oriented development (TOD) with a housing component. Public benefits with the “Lander Center” node could include, but are not limited to, workforce housing, transportation impact fees dedicated to Duwamish MIC freight mobility improvements, green infrastructure, district energy, climate resiliency measures, industrial and maritime training program partnerships, or workforce equity commitments, among other benefits. The “Lander Center” node planning process would help identify and refine priority benefits and incentives that could be realized with a TOD zone in this assemblage.
- “Lander Center” master planning. We applaud the Mayor’s leadership with the master planning for the WOSCA site in collaboration with Washington State Department of Transportation and the C40 Reinventing Cities organization. This is precisely what the Comprehensive Plan calls for with LU Policy 13.27. Alternatively, if the scope and timing does not allow for the “Lander Center” node concept to be thoroughly evaluated in the Final EIS for the One Seattle Plan, we encourage the City to recognize (or amend as needed) Policy LU 13.27 to specifically include our Properties – which are the largest (and only) contiguous assemblage over 25-acres in the Duwamish MIC within minutes of a light rail station – to be recognized as “unique development opportunity” and start a master planning process similar to the WOSCA efforts.
- Industry and Innovation “Look Back”. The City, either as part of the “Lander Center” node concept or as part of the implementation of the One Seattle Plan, should evaluate the implementation of the Industry and Innovation zone around light rail stations. The City should evaluate whether the permitted uses, non-industrial size limitations, densities, incentives, and development standards are conducive to private investment in the Duwamish MIC. The “Look Back” effort should include interviews with private sector owners, investors, and developers along with stakeholders from the Port of Seattle and maritime and industrial sectors about the opportunities and challenges to development in the Industry and Innovation zone. The Office of Planning and Community Development should make recommendations to the Mayor and City Council about what, if any, modifications to the current Industry and Innovation zone are recommended to encourage market-sector investment in the MIC around these zones.
- Industry and Innovation Major Institution Master Plan (MIMP) flexibility. In the new Industry and Innovation zone, the Seattle Municipal Code (Code or SMC) authorizes both hospitals and colleges as permitted uses. SMC 23.50A.040, Table A. However, major institutions (which are limited to large hospitals or post-secondary education uses) are only permitted within existing buildings in the Industry and Innovation zone. *Id.* We believe this was an oversight in the Industrial and Maritime Strategy process. The City should support the opportunity for new hospital and educational opportunities near light rail. Allowing the Major Institution Master Plan (MIMP) process for these potential uses

here would provide additional flexibility and benefits to the Duwamish MIC. We encourage the City to resolve this use issue in the Code as part of the One Seattle Plan.

We encourage the City to explore the “Lander Center” node concept in the One Seattle Plan, or alternatively, to announce that the “Lander Center” node will be studied through a master planning exercise similar to the WOSCA efforts that are underway. This is a tremendous opportunity to meet the City’s vision for a vibrant, innovative industrial/housing TOD future for the Lander Street area.

Thank you for your consideration. Please feel free to contact me with any questions.

Sincerely,

Ted Lehmann  
Stack Industrial Properties

Bob Gillespie  
Lander Street Partners LLC

Natalie & Lorna Soules  
Sixth & Stacy, LLC & Eight & Stacey, LLC

Henry Liebman  
American Life, Inc.

Enclosures: Lander Center node concept plan

cc: City Council  
Deputy Mayor Burgess

66-1  
cont

Parcel #	Taxpayer Name	Address	Lot Area (sq. ft.)
7666204452	Rainer Pacific Co	2201 6th Ave S 98134	35,910
7666204450	Stack Industrial Prop	2225 6th Ave S 98134	42,390
7666204449	WES 2233 LLC	2233 6th Ave S 98134	61,419
7666204355	Lander at Sixth LLC	No address	68,808
7666204385	Prime NW LLC	2425 6th Ave S 98134	11,280
7666204380	Lander at Sixth LLC	2437 6th Ave S 98134	10,320
7666204375	Rainer Pacific Co	2447 6th Ave S 98134	19,800
7666204371	Lander at Sixth LLC	560 S Lander St 98134	9,000
7666203501	Sixth and Stacy LLC	2400 6th Ave S 98134	71,060
7666203540	Eighth and Stacy LLC	733 S. Stacy St 99134	32,080
7666203536	Eighth and Stacy LLC	No address	34,847
7666203710	Lander Street Prtn.	625 S Lander Street 545/555 S. Lander	21,600
7666204345	Lander Street Prtn.	St.98134	12,000
7666204346	Lander Street Prtn.	505 S Lander St 98134	20,400
7666203534	American Life	8th Ave S. 98134	42,900
7666203530	American Life	2450 6th Ave S. 98134	89,990
7666203660	Canal Boiler LP	2702 6th Ave S. 98134	14,400
7666203664	2724 6th Ave S. LP	2724 6th Ave S 98134	22,800
7666203665	2724 6th Ave S. LP	2724 6th Ave S 98134	13,200
7666203675	American Life & Industrial	2752 6th Ave S. 98134	28,800
7666203700	2724 6th Ave S. LP	7th Ave S. 98134	7,200
7666204225	2700 4th Ave S. LP	2700 4th Ave S 98134	56,862
7666204245	2700 4th Ave S. LP	2724 4th Ave. S. 98134	7,938
7666204256	GoodLeavitt2730 LLC	2730 4th Ave S. 98134	48,600
7666204275	Watts Joanne	2742 4th Ave S. 98134	25,200
7666204280	Watts Joanne	2760 4th Ave S. 98134	39,600
7666204180	South Forest LLC	2900 4th Ave S. 98134	48,600
7666204189	Watts Joanne	2924 4th Ave S. 98134	14,080
7666204190	Watts Joanne	2932 4th Ave S. 98134	34,520
7666204200	Pacific Industrial Center	2960 4th Ave S. 98134	108,000
7666204165	Pacific Industrial Center	3200 4th Ave S. 98134	55,080
Total Sq.Ft.			1,108,684
Total Acres			25.45



SECURITY PROPERTIES

May 6, 2024

Rico Quirindongo, Director  
 Jim Holmes, Strategic Advisor  
 City of Seattle Office of Planning and Community Development  
 P.O. Box 94788, Seattle, WA 98124-7088  
 P: 206-684-8372

Via email to [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov) and [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

Dear Director Quirindongo and Mr. Holmes,

Security Properties, a Seattle based developer since 1969, is writing in support of the Draft One Seattle Plan and its Neighborhood Center goals ***with a request to resolve conflicts with the City's Principal Pedestrian Street zoning and the goals outlined in the Plan, and to study such changes in the Final Environmental Impact Statement ("FEIS")***.

Currently, we are proposing a new mixed-use development at 35<sup>th</sup> Avenue NE and 85<sup>th</sup> Street, called "Wedgewood Center," which is identified at the heart of a Neighborhood Center node in the One Seattle Plan. Based on our research, Wedgewood Center is the only large project within a proposed Neighborhood Center that is in Design Review, which means we are ahead of the zoning changes contemplated to meet density goals and create complete neighborhood communities. But even though we are ahead of the contemplated changes, we believe our project perfectly fits the Neighborhood Center vision, articulated as: "[p]laces with an important local role due to a variety of housing located around a commercial core...that provides an opportunity for people to access everyday needs within a short walk or bike ride from their homes." Plan at 19. The Plan further states developments in Neighborhood Centers should provide "shops, services, grocery stores, restaurants, and other businesses that residents need to access on a regular basis." Plan at 26.

Our proposal is to redevelop a 1960's era surface parking strip mall into a mixed-use development that connects community and provides opportunities for neighbors to access everyday needs. The 6-story, 338-unit project would incorporate ground-level retail, a grocer, a daycare, a mid-block plaza with covered outdoor seating, and below-grade and surface-level accessible parking. It would also retain significant (now called Tier 2) on-site and off-site trees. The project is strongly supported by the Wedgewood Community Council and individual community members, and it appears to be exactly the sort of mixed-use, service-oriented project that the City desires in Neighborhood Centers. We are increasingly concerned, however, that the restrictions in the existing zoning that have lead the project to request five departures will stymie the development process. We request you reevaluate these problematic zoning standards as soon as possible as part of the comprehensive planning and ongoing environmental review process so that the project and others like it can proceed.

67-1

701 Fifth AVENUE, SUITE 5700

SEATTLE, WA 98104

T | 206 622.9900 F | 206 628.8031

WWW.SECURITYPROPERTIES.COM

### **A. Current Zoning Conflicts – Decisions to be Made Now**

Wedgwood Center is located on a Principal Pedestrian Street which means curb cuts are prohibited from abutting 35th Avenue without departures. However, we need a single curb cut to access a total of 16 short-term, accessible surface parking stalls for the grocer and childcare center uses. (The site currently has three curb cuts along 35<sup>th</sup> Avenue so this would be a net reduction.)

Based on the pedestrian street zoning, SDCI staff oppose the single curb cut which has already resulted in a more challenging, time consuming, and expensive review. SDCI staff did not support our departure at the first EDG meeting and we are now tasked with returning to the Design Review Board for a second EDG meeting with the prospect of being denied again.

We do believe that our departure is supported by the One Seattle Plan which states:  
*“In planning for how to use streets, we consider the need to provide space for pedestrian activities, travel ways for various types of vehicles, and a flex area along the curb for making transitions and addressing critical building access and loading needs. Pedestrian activities include walking as well as access to bus shelters, bike racks, and sidewalk cafés. The curb provides space for passenger and freight delivery, solid waste collection and storage, vehicle and bike parking, bus stops and layover.”* (One Seattle Plan, Page 67)

### **B. Why Support a Single Curb Cut and More Flexibility in Neighborhood Centers**

A grocery store has been an anchor tenant of the Wedgwood Center for decades, until QFC closed in 2021. The return of a grocery is clearly desired by the local community with overwhelming support at the EDG meeting and in comments submitted to SDCI. In addition, the One Seattle Plan has a stated goal to **Provide a Neighborhood “Healthy Food System”** in support of local grocery stores. (page 152).

As a leader in developing mixed-use grocery and residential buildings, we know that short-term parking is a requirement for a successful store. In Seattle, we built the Epicenter in Fremont (PCC), Ballard on the Park (QFC), and Angeline in Columbia City (PCC) and we recently entitled the Magnolia Village Condominium (Safeway) development.

All of the grocery brands that we have engaged have cited the need for short-term, surface parking to be competitive with the Lake City Fred Meyer, Wedgewood Safeway, and Sandpoint MET Market, which are all surface parking storefronts. We believe failure to deliver the curb cut will be a deal breaker, especially in today’s marketplace with grocer mergers, store closures, and economic uncertainty. The City should consider this feedback carefully as it designs future zoning for Neighborhood Centers where access flexibility will be key to delivering the services envisioned.

### **A. Our Request**

We specifically request the City identify and study in the FEIS removal of Pedestrian-zone curb cut access restrictions as part of implementing zoning changes for the One Seattle Plan so that our project could move forward as of right. SDCI is challenging the feasibility of a project that

clearly meets the vision for Neighborhood Centers. The project was even featured in the Seattle Times article: ["Seattle studies dozens of sites for housing growth. These 24 got picked."](#)

Security Properties cannot afford to pause and wait until the City adopts the One Seattle Plan and implementing zoning next year. Although we are requesting that the City study broader access flexibility in Neighborhood Centers in the comprehensive planning and EIS process, we are also asking for Wedgwood Center be permitted to move forward with a design that reflects the goals of the One Seattle Plan ahead of full implementation, and that the City support the project through any means possible, including support for the departure or an interim zoning change.

**B. Substantial Community Support for the Curb Cut**

We have spent the past 16 months ensuring that our development reflects neighborhood planning goals and provides identified community benefits. We consider the Wedgwood Community Council to be our community-based partner (see attached letter) and have had significant public support during the EDG process. We will follow up with a request to meet with the Mayor's Office and Councilmember Maritza Rivera who represents District 4 and the Wedgwood community to discuss how our project can lead in implementing the vision for Neighborhood Centers outlined in the One Seattle Plan.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Marasco", with a horizontal line extending to the right.

John Marasco, Chief Development Officer  
Security Properties

May 6, 2024

VIA EMAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**Re: One Seattle Plan Comment**  
2300 26<sup>th</sup> Avenue South – North Rainier Urban Center

Dear Mr. Holmes,

On behalf of Bayview Walker, LLC, which is a subsidiary of Prologis LP (“Prologis”), which owns the property at 2300 26<sup>th</sup> Avenue South (“Property”), thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”). We are writing to support the Mayor’s One Seattle Plan Alternative 5 growth strategy. The Property is located within the future North Rainier Urban Center. We encourage the City to consider leveraging the Property’s proximity to transit and the Seattle Mixed zoning directly to the south by extending the Seattle Mixed zoning designation to include our Property. Seattle Mixed zoning for our Property within the new North Rainier Urban Center would better align the zoning with the City’s One Seattle Plan goals.

The Property (in yellow on the image to the right) is approximately 10 acres in size and currently houses single-story warehouse and office buildings constructed between 1953 and 1980, and surface parking. The Property is currently vacant. It is located just over a half-mile walking distance from the Mt. Baker light-rail station and is directly across Rainier Avenue South from the City’s Martin Luther King Jr. Memorial Park. Consistent with its location in the currently designated Mount Baker Hub Urban Village, the Property is surrounded by a mix of neighborhood commercial, retail, and residential uses.

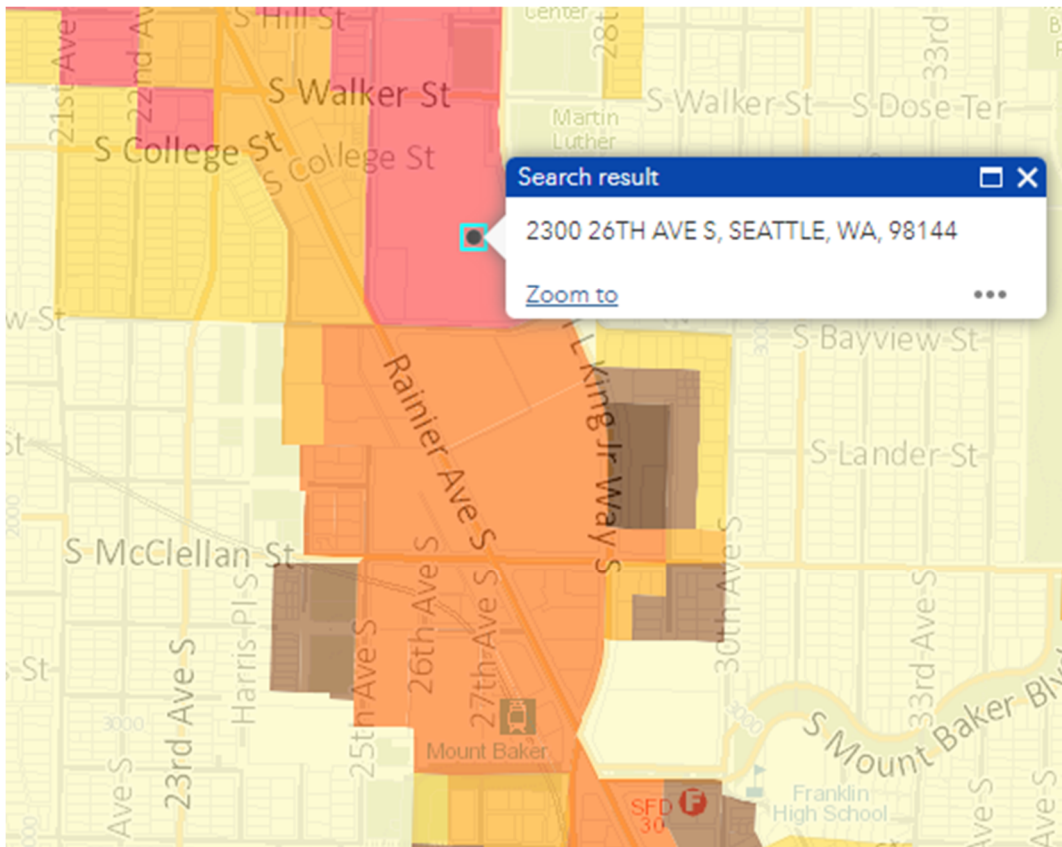
The Property is currently zoned Commercial 2 with a 75 foot height limit. Immediately to the south along S. Bayview St., the zoning changes to Seattle Mixed North Rainier with a maximum height of 145 feet.

We agree with the City’s proposed growth strategy with the new North Rainier Urban Center, where areas generally within a half-mile of light rail should be destination areas for the City with a wide range of housing, jobs, services, retail and public infrastructure. We also agree that taller heights and increased density should be encouraged around light rail. The Property, which is currently vacant, provides an excellent opportunity for a significant transit-oriented development within the approximate half-mile walkshed of the Mt. Baker light rail station and adjacent to the City’s Martin Luther King Jr. Memorial Park. We believe that the North Rainier Urban Center plan would be better implemented with the Property as Seattle Mixed North Rainier zoning like our neighboring parcels to the south (as shown below).



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cont

The DEIS assumes that the Mount Baker Hub Urban Village/future North Rainier Urban Center will include a net new housing target of 1,242 units and up to 3,053 net new jobs (for the No Action Alternative). The Final Environmental Impact Statement (“FEIS”) should study increased housing and jobs targets for the North Rainier Urban Center using the Seattle Mixed Zoning for our Property and similarly situated properties north of S. Bayview Street within an approximate half-mile of light rail. This will help the City evaluate the potential benefits, and any environmental impacts, of expanding the zoning capacity with the North Rainier Urban Center to better meet the City’s One Seattle Plan goals.

We appreciate the City’s consideration. Please feel free to contact me with any questions.

Sincerely,

Jake Maxwell

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes; Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement**

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”).

IPB Properties (“IPB”) is the owner of the half-block located at 2700 1<sup>st</sup> Avenue in Belltown (the “Property”). IPB is in the process of obtaining a Master Use Permit for the redevelopment of the Property for residential and retail units (the “Project”).

Unfortunately, current zoning limits the height of the Project to 145 feet. Given current market conditions, it is not feasible to develop a project to this limited height. Even in favorable market conditions, 145 feet provides very little development capacity above the height at which “high-rise” code requirements are triggered. Those requirements impose substantial costs on any residential project and more significant heights are required to amortize these costs over a larger development yield. Present market conditions only exacerbate this challenge, with construction costs remaining high and capital markets nearly frozen.

69-1



**Seattle Branch**  
IPB Properties  
116 Fairview Ave North, 147  
Seattle, Washington, USA  
98109

**Nashville Branch**  
IPB Properties  
1033 Demonbreun Street, 300  
Nashville, Tennessee, USA  
37203

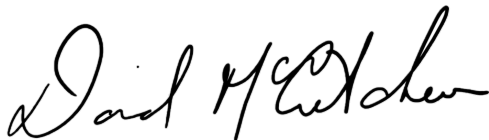
Thus, additional height and density are necessary in order to render the Project – or any project in this area of Belltown – feasible. Fortunately, there is an opportunity through the current Comprehensive Plan update to lay the groundwork for such enhanced heights and density. The current zoning in Belltown was effectively adopted in 1986 – almost 40 years ago. In the time since, the City has upzoned virtually every other square inch of Downtown, but not Belltown. For example, heights in nearby DMC zones have increased 200 feet, an 83% height increase since 1986. Heights in this portion of Belltown have increased only 20 feet – or about 15% -- as a result of the MHA rezone in 2017.

It is time to remedy this condition and adjust heights and densities for residential projects in Belltown upward, consistent with the City’s rezoning actions throughout the rest of Downtown. Our suggestions are as follows:

- Increase maximum height to 280 feet.
- Increase allowable average tower floorplate to 14,000 square feet.
- Eliminate maximum lot coverage requirements.
- Increase non-residential FAR to 6

These Code modifications would allow for financially feasible high-rise multifamily development, as well as other desired urban amenities such as structured parking and pedestrian-oriented improvements that align with the City’s vision for Regional Centers. And they would bring the scale and development potential of Belltown into conformance with the remainder of Downtown. We support Alternative 5 in the DEIS, and we urge you to take action in the Comprehensive Plan update to provide for such appropriate development in the Belltown neighborhood.

Sincerely,



David McCutcheon  
Vice President, US Operations  
IPB Properties Inc.



**Seattle Branch**  
IPB Properties  
116 Fairview Ave North, 147  
Seattle, Washington, USA  
98109

**Nashville Branch**  
IPB Properties  
1033 Demonbreun Street, 300  
Nashville, Tennessee, USA  
37203

## McCULLOUGH HILL PLLC

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes; Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”). We are writing on behalf of Graham Street Realty, the owner of the “Interbay Worklofts” located at 1631 15<sup>th</sup> Avenue W. (the “Property”). The Interbay Worklofts provides small spaces for craft work, “maker” uses and small-scale business and industrial activities of all kinds. These “maker spaces” serve a critical function in Seattle’s industrial environment, by providing affordable incubator spaces for new and emerging businesses.

In the Industrial Lands rezone of 2023, the City took steps to support and promote such maker spaces in the UI zone, by allowing (subject to various conditions) limited residential uses in that zone. We are writing to suggest that a similar approach is warranted on certain properties in the II zone.

The II zone was developed to provide opportunities to preserve and enhance industrial uses, including information and computer technology uses, in certain areas of the City. Most of these II-zoned areas are located on high-capacity transit corridors or within walking distance of light rail. However, present conditions in the market indicate that the demand for many II uses has substantially softened in Seattle. Further, some existing buildings in the II zone are not well-suited to conversion to such II uses.

Interbay Worklofts is one such example. Given the small size of the suites in the project, it is not designed to accommodate the larger-scale uses allowed in the II zone. But this collection of maker

70-1

spaces is ideally suited for the kind of live-work environment supported in the UI zone. Significantly UI zoning is located immediately north of the Property on the east side of 15<sup>th</sup> Avenue W.

For these reasons, we would ask the City to consider adding a live-work component to the II zone, similar to the concept in the UI zone, but only for smaller-scale existing buildings in the II zone. Such a measure would significantly enhance the value of these maker spaces to the incubator community, by allowing multi-use of the spaces for maker purposes and for residential use, as well as contributing to housing affordability in the industrial areas.

Sincerely,



John C. McCullough

70-1  
cont

**Proposed Text Amendment**  
*Residential Uses in Existing Buildings in II zones*

Residential use in II zones. Residential uses are permitted as an administrative conditional use in II zones if all of the following criteria are met. The residential use may be part of a Major Phased Development.

1. The residential use shall be located in a structure existing as of January 1, 2010 and not exceeding 75,000 square feet in gross floor area; and
2. The residential use shall not exceed a density limit of 80 dwelling units per acre; and
3. The residential use shall not be located within 200 feet of a shoreline; and
4. The residential use shall be located adjacent to a non-industrial use; and
5. All dwelling units shall have sound-insulating windows sufficient to maintain interior sound levels at 60 decibels or below in consideration of existing environmental noise levels at the site. The applicant shall submit an analysis of existing noise levels and documentation of the sound insulating capabilities of windows as part of the conditional use permit application; and
6. All dwelling units shall have a permanently installed air cooling system and a balanced ventilation system, which may be combined. The ventilation system shall filter any outdoor air supply through filters rated MERV 13 or higher as determined by the American Society of Heating, Refrigerating, and Air Conditioning Engineers (ASHRAE). The air cooling and ventilation systems shall be indicated on the plan; and
7. The residential use shall be located, designed, and configured in a manner to reduce potential conflict with adjacent existing industrial business operations; and
8. The owner(s) of a building seeking a conditional use for the residential use must sign and record a covenant and equitable servitude, on a form acceptable to the Director, that acknowledges that the owner(s) and occupants of the building accept the industrial character of the neighborhood and agree that existing or permitted industrial uses do not constitute a nuisance or other inappropriate or unlawful use of land. Such covenant and equitable servitude must state that it is binding on the owner(s)' successors, heirs, and assigns, including any lessees of the residential use; and
9. The residential use shall be a part of a mixed-use development that includes non-residential uses permitted in II zones; and
10. Occupancies of dwelling units are voluntarily limited by the building owner to support the availability of housing that is affordable to area workers, such that the residential use consists of either:

a. All dwelling units are live-work units in which the commercial activity qualifies as industrial, or are caretakers' quarters associated with a business on the same site provided no single business shall have more than three associated caretakers' quarters; or

b. A minimum of 50 percent of the dwelling units are made available at affordable rent or affordable sale price for a period of 75 years beginning January 1 of the year following final certificate of occupancy to eligible households with annual incomes at or below 60 percent of median income for SEDUs, 80 percent of median income for studio and one bedroom units, and 90 percent of median income for two-bedroom and larger units. Standardized procedures and definitions established by the Office of Housing for administration of Chapter 5.73 shall apply. Dwelling units eligible for the multifamily housing tax exemption may be counted towards the minimum 50 percent.

**From:** [Ian Morrison](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Rivera, Maritza](#); [Strauss, Dan](#)  
**Subject:** Fremont Urban Center stakeholders Comp Plan comment  
**Date:** Monday, May 6, 2024 3:25:58 PM  
**Attachments:** [East Fremont Urban Center Community EIS Comment Letter 5.6.2024.pdf](#)

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**CAUTION: External Email**

Dear Mayor, Councilmembers Rivera and Strauss, and OPCD staff,

On behalf of a coalition of property owners within the Fremont Urban Center that are currently zoned industrial commercial, please see the attached comment letter.

We hope that the City will use the One Seattle Plan process to finally align this community’s zoning with the Fremont Urban Center’s vision for mixed-use residential community.

Please feel free to contact me with any questions. Thanks.

Ian

Ian S. Morrison  
Partner  
**McCULLOUGH HILL PLLC**  
701 Fifth Avenue, Suite 6600  
Seattle, Washington 98104  
Direct: (206) 812-3380  
Cell: (253) 380-6781  
[imorrison@mhseattle.com](mailto:imorrison@mhseattle.com)  
[www.mhseattle.com](http://www.mhseattle.com)

NOTICE: This communication may contain privileged or confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.



May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement  
Fremont Urban Center – Stone Way Property Owners’ Comment

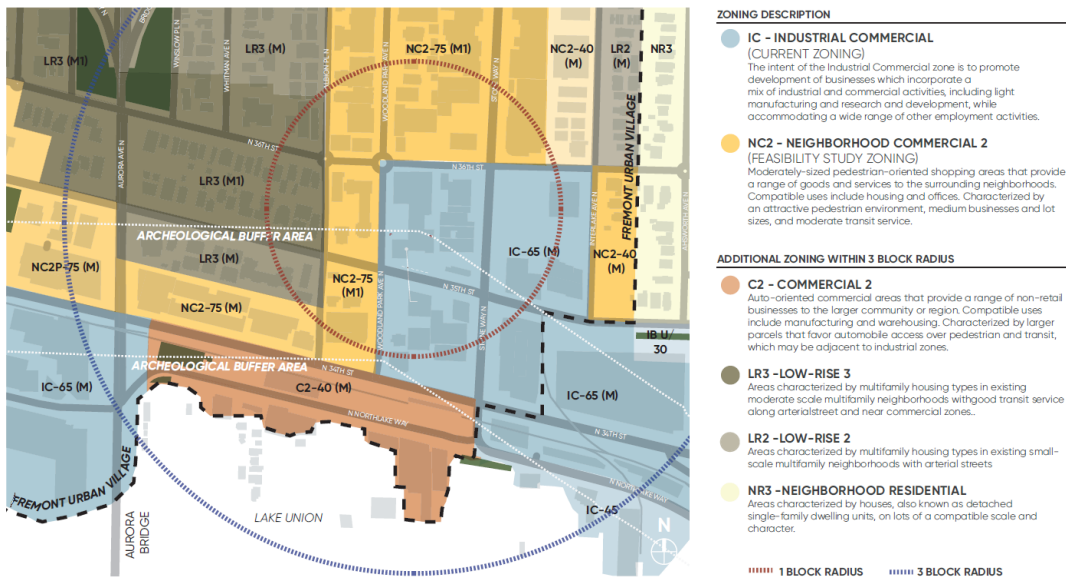
Dear Mr. Quirindongo,

We write as a coalition of property owners within the current Fremont Hub Urban Village located around Stone Way and N 35<sup>th</sup> Street. Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”), maps, and policies.

Our properties are located within the current Fremont Hub Urban Village and **not** within a manufacturing/industrial center (“MIC”) or shoreline environment; however, our properties are located within the roughly three and a half blocks that are currently zoned Industrial Commercial (“IC”). Our properties are surrounded by commercial and multifamily zoning inside the Hub Urban Village (see map below). Our properties were not an area of focus for the City’s recent Industrial and Maritime Strategy update. We felt overlooked in the Industrial and Maritime Strategy process.

The City’s One Seattle Comprehensive Plan process can help align our zoning with the rest of the proposed Fremont Urban Center and support a true, mixed-use neighborhood environment.

71-1  
cont



Specifically, our comments on the DEIS are:

- **Support for Fremont Urban Center.** We support the Fremont Urban Center designation, including our properties, to create a wide range of housing, restaurant, retail, and job growth. We agree with the City’s vision that Urban Centers should support a “significant” share of housing and allow for up to 8-story mixed-use residential housing types. The final One Seattle Plan and land use maps must resolve the zoning inconsistencies presented by our isolated, incongruous area of IC-zoned land within the Fremont Urban Center by adopting Neighborhood Commercial zoning with appropriate heights for our properties.
- **Growth Assumptions.** The DEIS contemplates a net new target of 1,537 new housing units and upwards of 311 new jobs over the course of the Plan. The Stone Way corridor around our properties includes a vibrant mixture of new residential, commercial, and mixed-use retail and restaurant developments, including Brooks Sports headquarters, evo headquarters, and the evo Campus Seattle complex. Our properties, with appropriate Neighborhood Commercial zoning, could potentially support hundreds of new multifamily housing units and neighborhood-serving restaurants and retail to build on the energy and vibrancy established by the current and planned Stone Way projects. The Final Environmental Impact Statement (“FEIS”) should study increased housing and jobs targets for our properties so that the City can better understand the potential benefits and impacts.
- **Consistency with Policies.** The One Seattle Plan includes Policy LU 13.11 that states:

“**Avoid placing industrial zones** within regional, **urban** and neighborhood **centers**. However, in **locations where a center borders a Manufacturing and Industrial Center**, use of the industrial commercial zone within the center where it abuts the Manufacturing and Industrial Center to provide an appropriate transition to help separate residential uses from heavier industrial activities.” (emphasis added)

Also, Urban Center Policy 4.3 reads “Allow a **wide range of housing types** in Urban Centers. Urban Centers should generally allow buildings of 3 to 8 stories.” (emphasis added)

Our properties are within the future Fremont Urban Center but are currently zoned Industrial Commercial. Our properties are not **within, nor bordering** a MIC. The nearest MIC is nearly one mile away. The current zoning does not allow any housing, except for a caretaker unit. Our properties’ current zoning is flatly inconsistent with Policy LU 13.11 and the City’s Urban Centers policies, including 4.3. The FEIS must study our properties’ land use designation and zoning for consistency with the Growth Management Act and the current (and proposed) One Seattle Plan policies. Moreover, the obvious conclusion that that study should reach is that the current zoning is inconsistent and that neighborhood commercial zoning with appropriate heights is the right designation for our properties.

For these reasons, the City should take action in the One Seattle Comprehensive Plan update process to rezone these areas to match the rest of the Fremont Urban Center as Neighborhood Commercial zoning. The opportunity for residential and mixed-use development will support the Fremont Urban Center around Stone Way and better align with the City’s Urban Center vision.

Sincerely,

DocuSigned by:  
Dennis Bruders  
98988F49CCE8412

2024-May-02 | 13:06 PDT

Dennis Bruders

President

Bruders Ventures

Property Address:  
1100 Nth 35th Street  
Seattle, WA 98103

Sincerely,

William Ray  
William Ray, Managing Member  
WRCRJV LLC  
Owner of 3500 Stone Way North

Sincerely,

DocuSigned by:  
Sonja Vonheim Condon  
5111E27D03D48E

Sonja Vonheim Condon

President

ABC Enterprises, Inc.

Property Address: 3525 Stone Way N.  
Seattle, WA 98103

Sincerely,

DocuSigned by:  
Robert Kleist  
8A3382368DB141A

2024-May-06 | 13:38 PDT

Robert Kleist

Property Owner

N/A

Property Address: 3501/3503 Stone Way N., Seattle, WA  
98103

Sincerely,  
Helene Heglund  
Helene Heglund  
MRH Properties, LLC  
206-618-1104  
helenereed@comcast.net

Sincerely,

DocuSigned by:  
Bryce Phillips  
EFC9227E508A16E

2024-May-04 | 08:50 PDT

Bryce Phillips  
Evolution Projects  
Manager of Campus Seattle LLC  
Owner of 3524 Stone Way N, 3535 Interlake Ave N, 3511 Interlake Ave N and 1320 N 35th St.

Sincerely,

DocuSigned by:  
Georgia Rohlfing  
7D8A8E28808748B

2024-May-03 | 17:38 PDT

Georgia Rohlfing

Georgia Rohlfing

Dock Sportsbar & Grill

Property Address:  
1102 North 34th  
Seattle WA 98103

Sincerely,

Mark Magnusson

Owner of Stoneway Court, 3409 Stone Way N. Seattle, Wa 98103

71-1  
cont

**From:** [Candice Chevaillier](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Rivera, Maritza](#); [Strauss, Dan](#); [pnorman@bellevuehealthcare.com](mailto:pnorman@bellevuehealthcare.com); [Candice Chevaillier](#)  
**Subject:** RE: Fremont Urban Center stakeholders Comp Plan comment  
**Date:** Monday, May 6, 2024 4:17:53 PM  
**Attachments:** [Fremont\\_Community\\_EIS\\_Comment\\_Letter\\_-\\_3509-3513\\_Stone\\_Way\\_-\\_Norman.pdf](#)

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**CAUTION: External Email**

Dear Mayor, Councilmembers Rivera and Strauss, and OPCD staff,

Please find attached an additional letter from Peter Norman, owner of 3509-3513 Stone Way N, just received.

He is a part of a coalition of property owners within the Fremont Urban Center that are currently zoned industrial commercial, please see the attached comment letter.

We hope that the City will use the One Seattle Plan process to finally align this community’s zoning with the Fremont Urban Center’s vision for mixed-use residential community.

Thank you,  
Candice.

**Candice Chevaillier, CCIM**  
Principal  
**Lee & Associates | Pacific Northwest**  
*Multifamily Team*

D 206.773.2694  
C 206.604.3400



May 1, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement  
Fremont Urban Center – Stone Way Property Owners’ Comment

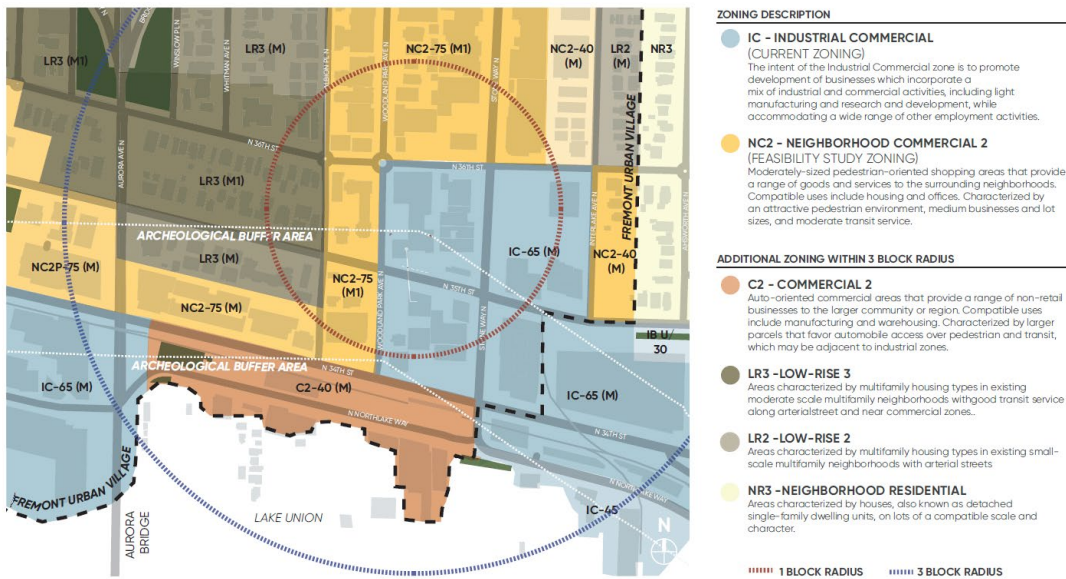
Dear Mr. Quirindongo,

We write as a coalition of property owners within the current Fremont Hub Urban Village located around Stone Way and N 35<sup>th</sup> Street. Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”), maps, and policies.

Our properties are located within the current Fremont Hub Urban Village and **not** within a manufacturing/industrial center (“MIC”) or shoreline environment; however, our properties are located within the roughly three and a half blocks that are currently zoned Industrial Commercial (“IC”). Our properties are surrounded by commercial and multifamily zoning inside the Hub Urban Village (see map below). Our properties were not an area of focus for the City’s recent Industrial and Maritime Strategy update. We felt overlooked in the Industrial and Maritime Strategy process.

The City’s One Seattle Comprehensive Plan process can help align our zoning with the rest of the proposed Fremont Urban Center and support a true, mixed-use neighborhood environment.

72-1  
cont



Specifically, our comments on the DEIS are:

- **Support for Fremont Urban Center.** We support the Fremont Urban Center designation, including our properties, to create a wide range of housing, restaurant, retail, and job growth. We agree with the City’s vision that Urban Centers should support a “significant” share of housing and allow for up to 8-story mixed-use residential housing types. The final One Seattle Plan and land use maps must resolve the zoning inconsistencies presented by our isolated, incongruous area of IC-zoned land within the Fremont Urban Center by adopting Neighborhood Commercial zoning with appropriate heights for our properties.
- **Growth Assumptions.** The DEIS contemplates a net new target of 1,537 new housing units and upwards of 311 new jobs over the course of the Plan. The Stone Way corridor around our properties includes a vibrant mixture of new residential, commercial, and mixed-use retail and restaurant developments, including Brooks Sports headquarters, evo headquarters, and the evo Campus Seattle complex. Our properties, with appropriate Neighborhood Commercial zoning, could potentially support hundreds of new multifamily housing units and neighborhood-serving restaurants and retail to build on the energy and vibrancy established by the current and planned Stone Way projects. The Final Environmental Impact Statement (“FEIS”) should study increased housing and jobs targets for our properties so that the City can better understand the potential benefits and impacts.
- **Consistency with Policies.** The One Seattle Plan includes Policy LU 13.11 that states:


“**Avoid placing industrial zones** within regional, **urban** and neighborhood **centers**. However, in **locations where a center borders a Manufacturing and Industrial Center**, use of the industrial commercial zone within the center where it abuts the Manufacturing and Industrial Center to provide an appropriate transition to help separate residential uses from heavier industrial activities.” (emphasis added)

Also, Urban Center Policy 4.3 reads “Allow a **wide range of housing types** in Urban Centers. Urban Centers should generally allow buildings of 3 to 8 stories.” (emphasis added)

Our properties are within the future Fremont Urban Center but are currently zoned Industrial Commercial. Our properties are not **within, nor bordering** a MIC. The nearest MIC is nearly one mile away. The current zoning does not allow any housing, except for a caretaker unit. Our properties’ current zoning is flatly inconsistent with Policy LU 13.11 and the City’s Urban Centers policies, including 4.3. The FEIS must study our properties’ land use designation and zoning for consistency with the Growth Management Act and the current (and proposed) One Seattle Plan policies. Moreover, the obvious conclusion that that study should reach is that the current zoning is inconsistent and that neighborhood commercial zoning with appropriate heights is the right designation for our properties.

For these reasons, the City should take action in the One Seattle Comprehensive Plan update process to rezone these areas to match the rest of the Fremont Urban Center as Neighborhood Commercial zoning. The opportunity for residential and mixed-use development will support the Fremont Urban Center around Stone Way and better align with the City’s Urban Center vision.

Sincerely,

DocuSigned by:  
  
62DF36BBBFFB400...

2024-May-06 | 15:40 PDT

PETER NORMAN

Owner

Bixby Bridge

Property Address:

3509 Stone Way N, Seattle wa  
3513 Stone Way N, Seattle wa

May 6, 2024

VIA EMAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)  
Email: [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

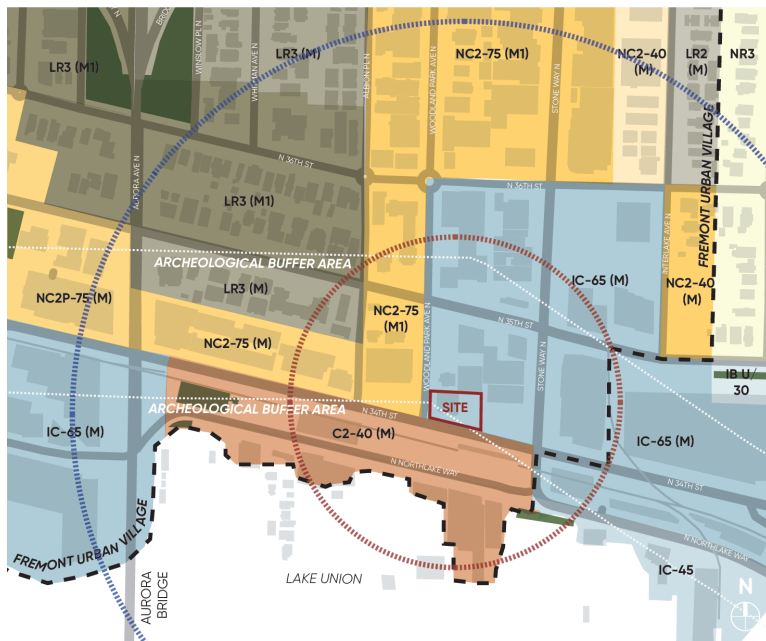
Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement  
1102 North 34<sup>th</sup> Street – Request for Fremont Urban Center Appropriate NC Zoning

Dear Mr. Quirindongo,

Along with my mother, I own the property at 1102 North 34<sup>th</sup> Street in the Fremont area (“Property”). I’m writing to comment on the One Seattle Comprehensive Plan (“One Seattle Plan”) Draft Environmental Impact Statement (“DEIS”), maps, and policies. I support the new Fremont Urban Center and respectfully ask that our Property be appropriately zoned for residential use.

Currently, our Property is in the Fremont Hub Urban Village. It is not located in a manufacturing/industrial center (“MIC”). Despite our location within the Fremont Hub Urban Village, our Property is currently zoned Industrial Commercial (“IC”). Our Property abuts the City’s neighborhood commercial zoning to the west and commercial zoning to the south. (see below)

SITE & CONTEXT ANALYSIS ZONING CONTEXT



- ZONING DESCRIPTION**
- IC - INDUSTRIAL COMMERCIAL (CURRENT ZONING)**  
The intent of the Industrial Commercial zone is to promote development of businesses which incorporate a mix of industrial and commercial activities, including light manufacturing and research and development, while accommodating a wide range of other employment activities.
  - NC2 - NEIGHBORHOOD COMMERCIAL 2 (FEASIBILITY STUDY ZONING)**  
Moderately-sized pedestrian-oriented shopping areas that provide a range of goods and services to the surrounding neighborhoods. Compatible uses include housing and offices. Characterized by an attractive pedestrian environment, medium businesses and lot sizes, and moderate transit service.
- ADDITIONAL ZONING WITHIN 3 BLOCK RADIUS**
- C2 - COMMERCIAL 2**  
Auto-oriented commercial areas that provide a range of non-retail businesses to the larger community or region. Compatible uses include manufacturing and warehousing. Characterized by larger parcels that favor automobile access over pedestrian and transit, which may be adjacent to industrial zones.
  - LR3 - LOW-RISE 3**  
Areas characterized by multifamily housing types in existing moderate scale multifamily neighborhoods with good transit service along arterial street and near commercial zones.
  - LR2 - LOW-RISE 2**  
Areas characterized by multifamily housing types in existing small-scale multifamily neighborhoods with arterial streets
  - NR3 - NEIGHBORHOOD RESIDENTIAL**  
Areas characterized by houses, also known as detached single-family dwelling units, on lots of a compatible scale and character.
- 1 BLOCK RADIUS   
 ----- 3 BLOCK RADIUS

73-1



We are small property owners. Our property has a restaurant tenant. It is not an industrial use. We understand that the City went through a process to update the industrial plans and maps. We were not aware of that planning effort. If we were, I would have asked to be treated like the rest of our neighbors in the Fremont Hub Urban Village and given similar mixed-use residential zoning.

We believe the City's One Seattle Plan process should fix this oversight and make our zoning consistent with the rest of this new Fremont Urban Center to support a mixed-use neighborhood.

Our comments on the One Seattle Plan are below:

- **Support for Fremont Urban Center.** We support the Fremont Urban Center designation, including our Property, to create a wide range of housing, restaurant, retail, and job growth. We agree with the City's vision that Urban Centers should support a "significant" share of housing and allow for up to 8-story mixed-use residential housing types. The final One Seattle Plan and land use maps must resolve the zoning inconsistencies presented by our isolated, area of industrial commercially-zoned land within the Fremont Urban Center by adopting neighborhood commercial zoning with appropriate heights for our Property.
- **Update Growth Assumptions.** The DEIS contemplates 1,537 net new housing units in the Fremont Urban Center. Early feasibility studies suggest that our Property alone could support up to 75 units, depending on the zoning specifics. The One Seattle Plan Final Environmental Impact Statement ("FEIS") should study increased housing and jobs targets for the Fremont Urban Center including our Property, and the other industrial commercial zoned property inside the Urban Center, so that the City can better understand the potential benefits and impacts of increased zoning and be ready to easily adopt the zoning changes.
- **Remove from Industrial Zoning.** The One Seattle Plan includes Policy LU 13.11 stating:  
  
"Avoid placing industrial zones within regional, urban and neighborhood centers. However, in locations where a center borders a Manufacturing and Industrial Center, use of the industrial commercial zone within the center where it abuts the Manufacturing and Industrial Center to provide an appropriate transition to help separate residential uses from heavier industrial activities."

Our Property is not in – or even near – a MIC. The City's own policies are clear that you should avoid placing IC zoning in the Fremont Urban Center. The City should study this issue in the FEIS for consistency with the Comprehensive Plan, including Policy LU 13.11. We believe the only reasonable conclusion after that study must be to change the zoning to match our Property with the Fremont Urban Center mixed-use zoning and 8 story heights.

For these reasons, we ask that the City update the Future Land Use Map and zoning as part of the Mayor's preferred alternative in the FEIS and One Seattle Plan to be consistent with the rest of the Fremont Urban Center zoned areas. We think that new mixed-use residential development on our Property supports the Fremont Urban Center and implements the Mayor's One Seattle Plan vision.

Thank you for your consideration. Please feel free to contact me with any questions.

Sincerely,

s/Ula Rohlfing  
Owner of 1102 North 34<sup>th</sup> Street

cc: Councilmember Rivera  
Councilmember Strauss

May 6, 2024

*By Email Only*

Office of Planning & Community Development  
Attn: Rico Quirindongo, Geoff Wentlandt,  
Michael Hubner, Brennon Staley, and Jim  
Holmes  
City of Seattle  
P.O. Box 94788  
Seattle, WA 98124-7088  
[onesattlecompplan@seattle.gov](mailto:onesattlecompplan@seattle.gov);  
[PCD\\_compplan\\_EIS@Seattle.gov](mailto:PCD_compplan_EIS@Seattle.gov)

Re: *Comments to Draft One Seattle Plan and Draft EIS: Congregation Beth Shalom and 35th Avenue NE Neighborhood*

Dear OPCD One Seattle Planning Leadership:

This law firm represents Congregation Beth Shalom (the “Congregation”), a welcoming and inclusive synagogue on 35th Avenue NE in the Wedgwood neighborhood of North Seattle. The Congregation is a place where people meet to find family, friendship, support and understanding. In addition to the Congregation’s worship activities, the institution provides high-quality and innovative life-long Jewish learning, and operates an Early Childhood Center that welcomes all children and their families, including those involved in Jewish life to varying degrees as well as non-Jewish families. The Congregation integrates compassion and social justice throughout all of its activities.

The Congregation recognizes and appreciates the complex and important comprehensive work that OPCD and the Mayor’s Office are currently undertaking. Although the institution’s internal strategic planning schedule unfortunately does not exactly align with the City’s Comprehensive Planning cycle and comment deadlines, we provide this brief comment with respect to a key issue that is on the horizon for the Congregation.

The Congregation’s primary structures, which currently house its worship and learning programs as well as its Early Childhood Center, are located at 6800 35th Avenue NE, or King County APN 4361200005. This parcel falls within a Frequent Transit Service Area. Under the current Future Land Use Map (“FLUM”), it is split between Multi-Family Residential and Neighborhood Residential. Today, this parcel is split-zoned between LR2(M) (shown in brown on the following page) and NR3 (light yellow).

74-1

Importantly, the Congregation also owns four parcels immediately to the north of its primary structure, at 6830-6842 35th Avenue NE. These parcels are also within a Frequent Transit Service Area, but they are all currently zoned NR3 and designated Neighborhood Residential under the current FLUM. The Congregation's five parcels are shown at right, with each of them marked by a small red circle. The four northerly properties are maintained by the Congregation and currently occupied by renters.

Notably, the Congregation's Early Childhood Center is at full capacity and operating very successfully. Given the Congregation's ownership of the four parcels to the north of its primary structure, the Congregation is evaluating the feasibility of moving the Early Childhood Center into an expanded space on some or all of these parcels.

The Congregation believes that such a proposal would be of tremendous benefit both to the Congregation and to the larger community, given the critical and acute shortage of childcare options in Seattle.<sup>1</sup>

## 1. Current Requests.

As excerpted on the following page, it appears that the current Draft Plan would downzone the future land use designation of the Congregation's southerly portion, and properties to the north of us, from *Multi-Family Residential* and *Commercial/Mixed-Use* to *Urban Neighborhood*. This draft map suggests that the entire stretch of 35th Avenue NE from the University of Washington to about NE 80th Street would be given the new FLUM's lowest-density residential designation.

The policies in the Draft Plan and the assumptions in the Draft Environmental Impact Statement ("DEIS") suggest that the proposed *Urban Neighborhood* status would contemplate **less** density than contemplated under either existing *Multi-Family Residential* or *Commercial/Mixed-Use*.

The Congregation asks that the Final Plan not make this significant change. As currently mapped and described in the Draft Plan, the change would represent a loss in walkable and transit-oriented potential and flexibility for this neighborhood generally and the Congregation specifically.

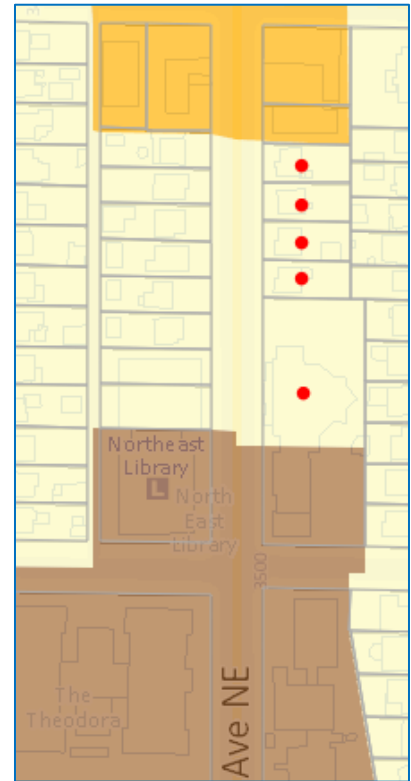


Figure 1. The Congregation's five properties (marked with red circles), with lowrise zoning shown in brown, neighborhood residential zoning shown in light yellow, and neighborhood commercial shown in mustard yellow.

<sup>1</sup> See, e.g., Daniel Beekman, Moriah Balingit and Sharon Lurye, [In WA and beyond, a child care crisis is holding parents back](#), SEATTLE TIMES, Apr. 23, 2024.

The Congregation respectfully requests that the Final Plan's FLUM not proceed with the Draft Plan's proposed downzone of 35th Avenue NE to the Urban Neighborhood designation. For the Congregation's properties, the Congregation instead asks that that the Final Plan's FLUM use either the Corridor designation or the Neighborhood Center designation as studied in the Draft EIS. These designations much better represent the current traits of the Congregation's properties traits and the clear existing trends of the neighborhood.

Neighborhood Center or Corridor designations would much better align with the existing street, which is characterized by a range of walkable community anchors and "third places" like Seattle Public Library's North Branch, University Unitarian Church, Top Pot Donuts, Grateful Bread, and many other low-rise to mid-rise destinations for the walking, rolling and transit-riding community.

In addition, in the Final Environmental Impact Statement, to help enable prospective flexibility for the Congregation and City policymakers, please ensure that the scope of study includes the possibility of a future of the Congregation's properties to NC1-40(M), to continue the zoning pattern provided to its northerly neighbors. Either of these zoning designations would align with the Neighborhood Center or Corridor designations requested above.

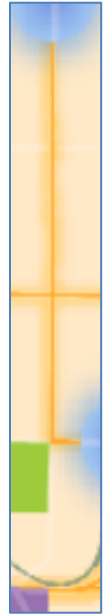


Figure 2. Excerpt from Draft Plan's FLUM, showing potential new designation of 35th Ave NE.

## 2. Pending Requests.

As mentioned above, the Congregation's strategic planning cycle unfortunately does not perfectly match with the City's comprehensive planning cycle, but the Congregation's volunteer and professional leadership have adjusted by speeding up its long-planned study of the feasibility of moving the Early Childhood Center into an expanded space on one or more of the Congregation's four northerly parcels. The Congregation's initial architectural analysis has shown that it could be difficult or inefficient to do so under the current NR-3 zoning, so the Congregation may need to seek a rezone. We hope OPCD would agree that such an expansion would help address a dramatic shortage in childcare that is a burden on Seattle workers and families.

As part of feasibility study, the Congregation is currently evaluating whether to request a rezone of its four NR-3 zoned properties into NC1-40(M) zoning, to better match the Congregation's long-term needs and better align with the development pattern of its northerly neighbors.<sup>2</sup>

We would appreciate your partnership in identifying the Congregation's parcels for rezoning to NC1-40(M) as part of the Comprehensive Planning process. This action would support the potential for expansion of the Congregation's Early Childcare Center, and allow the

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<sup>2</sup> If this is not possible, the Congregation may instead request that its properties be fully unified within the LR2(M) status that applies to the south half of its primary structure.

Office of Planning & Community Development  
May 6, 2024  
Page 4 of 4

Congregation to efficiently align its properties with the Plan's larger policy goals, without needing to engage in a lengthy and potentially duplicative site-specific rezone process. Thank you for your consideration.

Sincerely,

*Stephen H. Roos*

Stephen H. Roos  
Attorney for Congregation Beth Shalom

CC: Marco Lowe, Chief Operating Officer

ND: 24307.002 4880-6097-7595v4

74-1  
cont



May 6, 2024

VIA EMAIL

Office of Planning and Community Development  
 Seattle City Hall  
 600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
 Seattle, WA 98104  
 Attn: Rico Quirindongo  
 Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)  
 Email: [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

**Re: One Seattle Comprehensive Plan Comment  
 Support for Ballard Regional Center designation**

Dear Mr. Quirindongo,

I write on behalf of J. Selig Real Estate, LLC (“JSRE”), which owns two properties located on Market Street in Seattle’s Ballard neighborhood. Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”), policies, and maps.

**JSRE is in strong support of the proposed Ballard Regional Center designation.** I am a resident of Seattle District 6, which includes Ballard. I’m invested in our community. Currently, JSRE owns property at 1145 NW Market Street just one block east of the 15<sup>th</sup> Avenue and Market Street intersection. JSRE is under contract to buy property at 2501 NW Market Street just east of the Nordic Museum. These properties are ideally situated at key eastern and western “bookends” of the Market Street corridor, offering significant potential for true transit-oriented development that can contribute to the neighborhood's economic vitality and its environmental, transportation, and affordability goals.

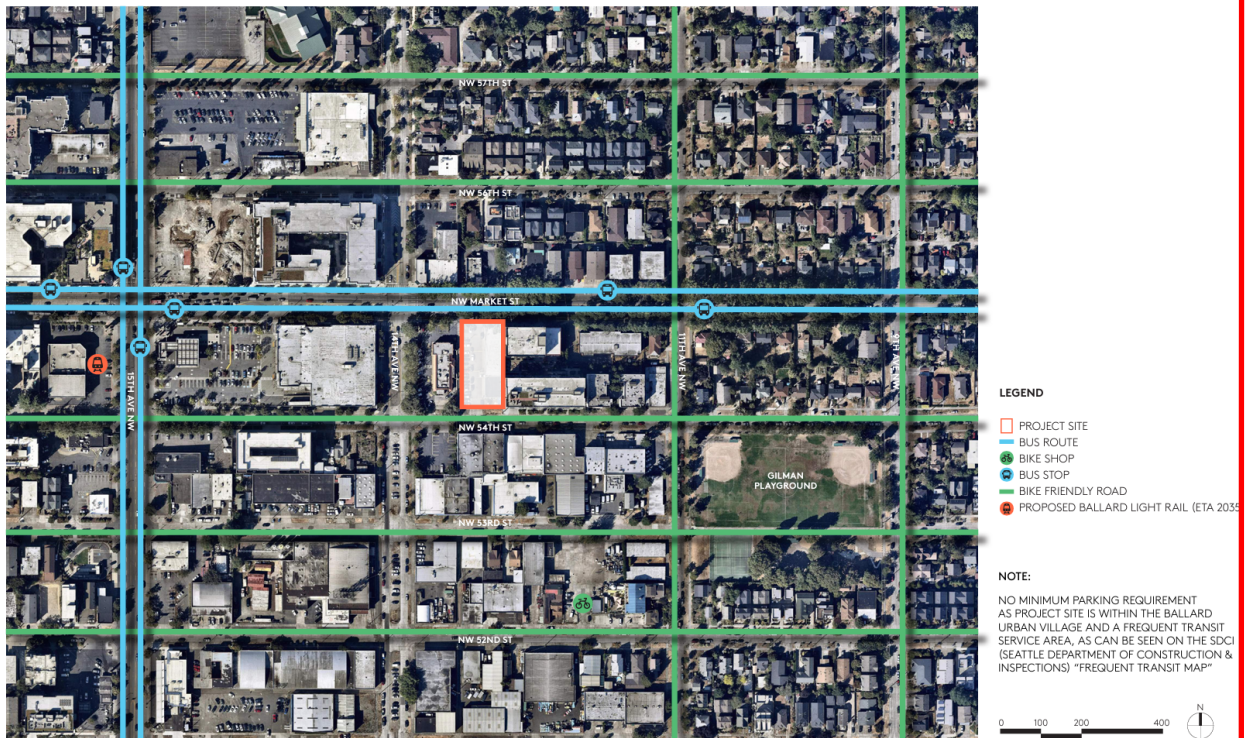
I am Executive Vice President at Martin Selig Real Estate, LLC (“MSRE”), which owns, among other buildings, the 15<sup>th</sup> & Market Building in Ballard with over 200,000 sf. of office and commercial space.

Specifically, our comments on the One Seattle Comprehensive Plan and DEIS are:

- **Support for Ballard Regional Center.** I support the Ballard Regional Center designation, including our two properties. Establishing Ballard as a Regional Center will recognize its regional importance as a housing and jobs center, along with its unique cultural, retail, and entertainment assets and the future Sound Transit light rail connectivity. **I agree that designation as a Regional Center should result in high-rise heights and densities, especially around the future light rail station and along key frequent transit corridors.**
- **1145 NW Market Street.** Located one block east of the anticipated Ballard light rail station, our 1145 NW Market Street property is one of the most compelling transit-oriented

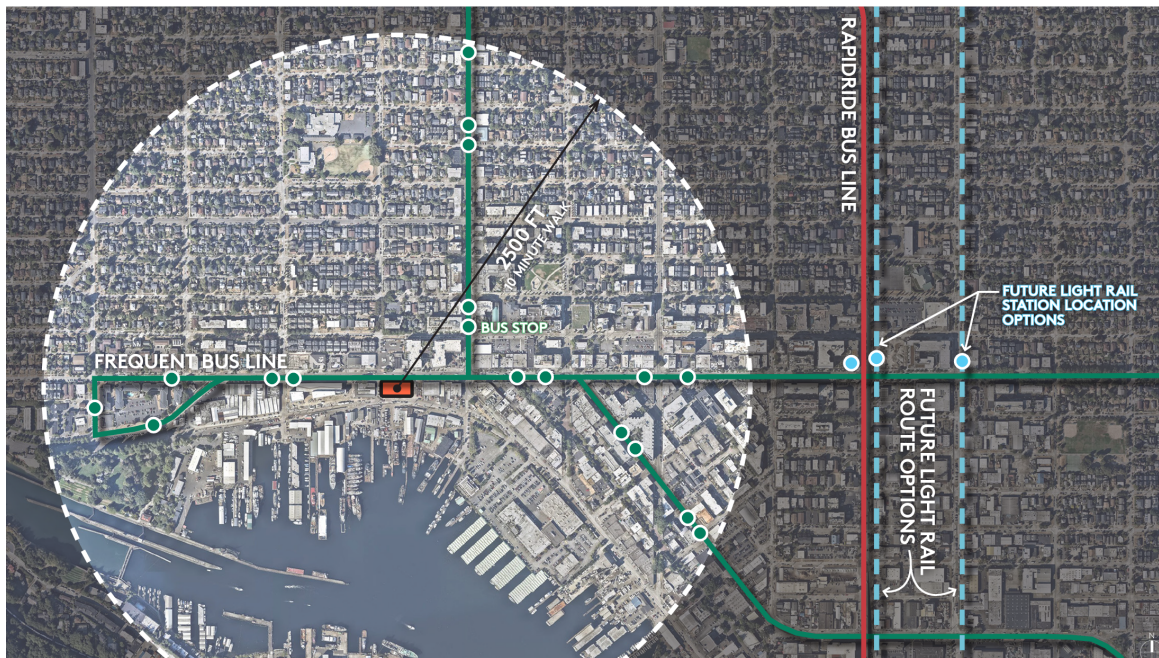
development opportunities on Market Street (see below). **The One Seattle Plan and Final EIS should study the potential for heights and densities of up to 240 feet around the walkshed of the future Ballard light rail station, including 1145 NW Market.** The City should ensure there is sufficient transit-oriented zoning around light rail to truly leverage the massive regional investment in transit infrastructure. While the property is currently entitled for a mid-rise housing project, I believe the best future of the 1145 NW Market property is as a catalyst for the new Ballard Regional Center with the development of high-rise residential.

URBAN ANALYSIS - TRANSPORTATION ACCESS



- **15<sup>th</sup> & Market.** The current 15<sup>th</sup> & Market Building is also within the heart of the transit-oriented development area adjacent to the future light rail station. This should be the densest area in the Ballard Regional Center. Like the U-District TOD zoning, I encourage the City to study and adopt zoning at the 15<sup>th</sup> & Market intersection supporting densities of 320+ feet.
- **2501 NW Market Street.** Located just east of 24<sup>th</sup> Street and near the Nordic Museum, our 2501 NW Market street property is a transformational site on the western edge of the pedestrian Market Street corridor. This part of Ballard is well served by transit (see below) and is part of an emerging cultural and residential hub around the museum. In recognition of the characteristics that distinguish this part of Ballard from the “heart” of Market Street, I encourage the **One Seattle Plan and Final EIS study the potential for heights and densities of up to 160 feet west of 24<sup>th</sup> Avenue along Market near the Nordic Museum.**





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- **Growth Assumptions.** The DEIS contemplates a target of over 6,000 net new housing units and over 4,000 net new jobs in the Ballard Regional Center. With transit-oriented zoning, I anticipate the three properties above potentially support over 750 new housing units alone. **The One Seattle FEIS should study increased housing and jobs targets for the Ballard Regional Center so that the City can fully analysis the benefits of TOD zoning.**
- **Ballard Subarea Planning.** I understand that the City is planning to do Ballard subarea planning to implement the zoning as a Regional Center, however, that this work is not scheduled to start until 2027. **I encourage the City to expedite all subarea planning, and make this new Ballard Regional Center one of the first subarea plans to be completed.** Without clarity as to the specifics of the Ballard Regional Center zoning, property owners, potential development partners, and the public will not be able to plan for investment in the future of Ballard. That uncertainty will delay the opportunities to create more Ballard housing.

Again, I appreciate the opportunity to comment on the One Seattle Plan. I believe that the Ballard Regional Center, with transit-oriented development zoning, will not only enhance the vitality of Ballard but also contribute to the overall livability and sustainability of the City and our region. I am committed to working with the City to support the successful implementation of the Regional Center.

As always, thank you for your consideration. Please feel free to contact me with any questions.

Sincerely,

Jordan Selig

cc: Councilmember Strauss

May 23, 2024

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes; Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**Re: [REDACTED] Industrial zoning on the Fremont Cut**

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Draft Plan (“Draft Plan”). Snow & Company, Inc. occupies the property located at 469 NW Bowdoin Pl (parcel no. 7442000705), shown below. We operate a boat repair business on this property, servicing vessels that dock along the waterfront here.



We appreciate the Draft Plan’s strong support of industrial uses in the industrial zone. Upon review of the Industrial Zone policies, we wanted to provide some thoughts regarding the draft policies and the forthcoming Shoreline Management Program updates to begin this year. Our property is currently in an Industrial Land Use Classification and zoned MML U/65 after a years-long process to update the City’s industrial zones.

However, it has been our recent experience that the City’s shoreline policies can conflict with the intended function of both the underlying zoning and shoreline environment, resulting in the creation of nonconforming uses and precluding new industrial uses from locating in the zoning and shoreline environments designated to accommodate them. Many of the businesses along the Fremont Cut rely

upon the use of the waterway to function; yet, the City's current SMP precludes moorage in most areas of the Cut.

Accordingly, we recommend expanding one Industrial Zone policy to ensure viability of those businesses which rely on the shoreline. We ask the City to consider revising LU 13.2 as follows:

Preserve industrial land for industrial uses, especially where industrial land is near rail- or water-transportation facilities to allow marine- and rail-related industries that rely on that transportation infrastructure to continue to function in the city. Ensure that marine-related industries have flexibility to utilize the shoreline as necessary to support business functions.

We recognize that there will be further discussion of changes to the management of shoreline areas in the upcoming Shoreline Code, but we nonetheless urge City to consider adopting this revision now as part of the Draft Plan to make it clear that the city's traditional shoreline industrial uses are supported.

Thank you for your consideration. Please do not hesitate to contact us if there is any additional information we can provide on this issue.

Sincerely,

Brett Snow, President  
Snow & Company



May 3, 2024

VIA EMAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Rico Quirindongo  
Email: [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

RE: One Seattle Plan Comments  
Proposed Downtown Sign Overlay

Dear Mr. Quirindongo,

As the owner of One Convention Place and the Pine Street Garage, CIM Group is invested in the success of both the One Seattle Plan and the Mayor's Downtown activation plan efforts. Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impacts Statement ("DEIS"). In support of our investment in Seattle's success, we offer the following comments regarding the DEIS.

As our city continues to bounce back from the effects of COVID-19, optimizing Downtown as a hub for jobs and economic activity, including leveraging tourism assets is critical. We urge the City to pursue innovative land use strategies approaches to foster a welcoming environment for employers, visitors, and residents, including the implementation of a Downtown sign overlay.

Seattle has already embraced the concept of supporting community businesses and organizations through the use of a sign overlay district at Seattle Center. In our view, the Seattle Center Sign Overlay District ("Seattle Center Overlay") has a proven track record of supporting a broad array of stakeholders. We encourage the City to build on that model as part of the Downtown vision in the One Seattle Plan. We believe that such a sign overlay district is particularly well suited for the area around the Seattle Convention Center. It is easy to envision a possible Convention Center Sign Overlay District serving visitors and locals find their way up and down the Pike/Pine Corridor.

**In order to lay the groundwork for a potential Downtown sign overlay district program, we respectfully suggest minor changes to the proposed Policy LU 4.11.**

We support the currently proposed Policy LU 4.11 language, but offer that following edits.

LU 4.11 - Regulate signage to encourage reasonable identification of business and to communicate information of community interest while limiting visual clutter, protecting the public interest, and enhancing the city's appearance and safety. In the Downtown, encourage the use of sign overlay districts around the Convention Center and Pike-Pine corridor to support Downtown economic development, promote Downtown vibrancy, improve the Convention Center experience for visitors, and contribute to the unique character of the Pike-Pine corridor.

We believe Downtown sign overlay would help implement Mayor's Downtown Activation Plan goals, including:

- **Make Downtown safe and welcoming** through improved streetscape experiences.
- **Create a unique Downtown retail experience** by enhancing retail visibility and activity.
- **Celebrate Downtown Seattle's arts, culture, sports, and entertainment** by partnering with local artists to offer free or reduced cost space for art installations and murals and informational signage advertising local cultural events and entertainment.
- **Make Downtown a top destination for Seattleites and visitors year-round** by increasing the signage and wayfinding around the Convention Center and the Pike-Pine corridor.

As part of the One Seattle Plan EIS, we encourage the City to study the potential impacts of such an overlay district – following the Seattle Center Overlay – to streamline the potential implementation.

As always, thank you for your consideration. We would be happy to meet with City staff to discuss in more detail how a potential Downtown sign overlay could align with the One Seattle Plan vision.

Sincerely,



Sofia Tobar  
Vice President, On-site Property Management  
CIM Group

cc: Markham McIntyre, Office of Economic Development

77-1  
cont

May 1, 2024

**VIA EMAIL**

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes; Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

Re: Support for Alternative 5 and increased development capacity at 830 NE Northgate Way

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”). On behalf of Balboa Retail Partners and BRFII Northgate, LLC (“Balboa Retail”), owner of the property located at 830 NE Northgate Way (“Property”), we write to express support for Alternative 5, but request the Final EIS and Northgate Urban Center Subarea Plan study at least 85 feet in height on the Property. An 85-foot height limit would allow for dense multifamily development, accounting for possible soil conditions, as well as other desired urban amenities such as structured parking and pedestrian-oriented improvements that align with the City’s vision for Regional Centers.

We believe 85-foot height this close to light-rail and on an arterial is wholly consistent with the Regional Center concept articulated in the Draft EIS. The Comprehensive Plan and Northgate Subarea Plan should prioritize high-density housing development on sites like the Property that will require significant investment to redevelop.

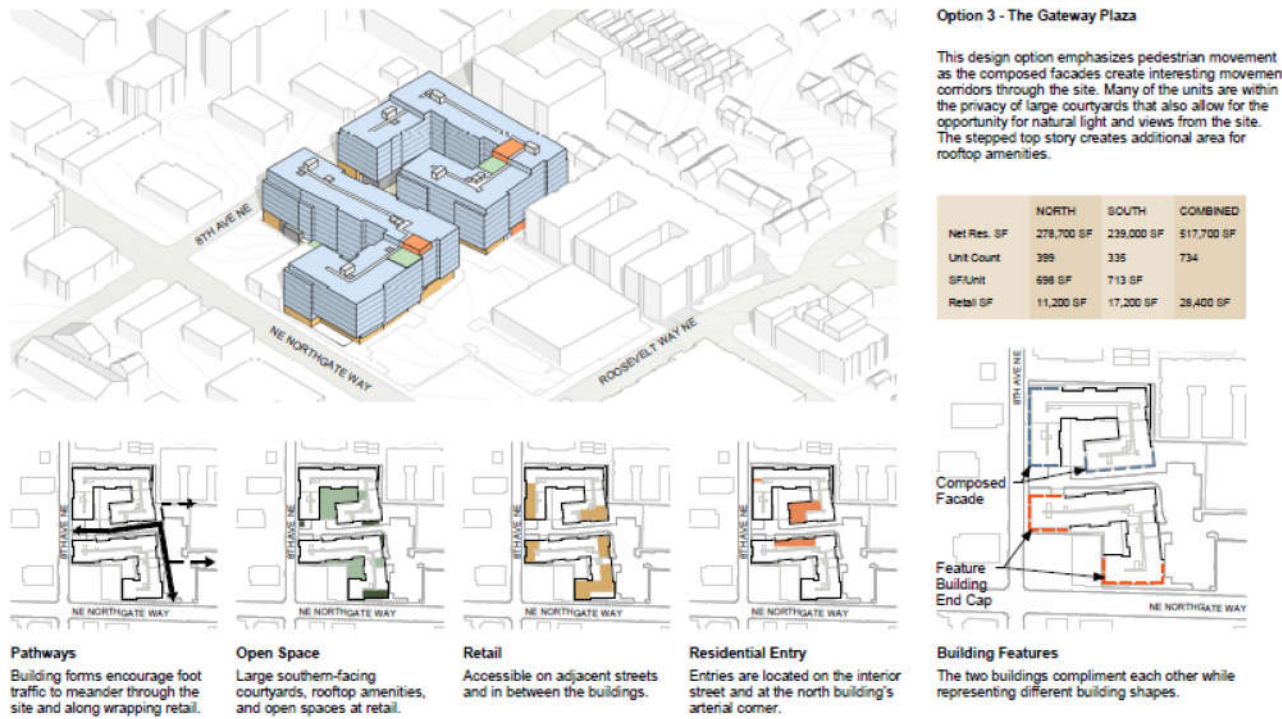
The Property is 213,065 square feet in size and is currently improved with one- to two-story retail buildings constructed between 1969 and 1970, and surface parking. Currently, the Property is zoned Neighborhood Commercial 3 with a height limit of 55 feet (“NC3-55(M”). The Property is bordered by other larger scale multifamily and commercial properties.

With an abundance of retail in the area, the site would best serve the City’s current goals if redeveloped to increase housing supply near transit. It is within a mile of the Northgate light rail and four bus routes serve the Metro transit stop located at the southeast corner of the Property.



78-1

Given the City's dire need to address housing affordability, the City should optimize larger sites like the Property and remove unnecessary height constraints. Notably, several properties in the vicinity have recently sought site-specific rezones beyond the current 55-foot height limit. With an increased height limit at 85 feet, initial massing studies for this Property show the ability to construct 734 new homes on the west side of the Property. Including the potential to develop the east side of the property, 300 additional new homes could be constructed with an increased 85-foot height limit.



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The existing Comprehensive Plan and zoning seek in part to transform larger, auto-centric blocks in Northgate into a dense, pedestrian-friendly environment. But redevelopment of larger retail sites often entails multiple complex leasing considerations, and requires significant investments over a longer period of time. If height continues to be limited to 55 feet, if significant pedestrian improvements are required, and MHA fees in this area remain at current levels, it will continue to be difficult for the transformation of larger sites in Northgate to materialize. The Comprehensive Plan Update should recognize these challenges and seek opportunities for greater height in the Northgate Regional Center, allow for flexible retail requirements, and recalibrate MHA fees to align with current land values.

We believe the Property presents an ideal opportunity for housing production near light rail, along with the City's desired street improvements and pedestrian-oriented amenities. We share the City's vision for Northgate that seeks to break down the larger-scale, driving-centric blocks that currently predominate this area. For this vision to materialize, we request the FEIS and Northgate Subarea study at least 85 feet in this location.

Please do not hesitate to contact me at [alison@balboaretail.com](mailto:alison@balboaretail.com) if we can provide any additional information.

Sincerely,



Alison Warner  
Balboa Retail Partners

Cc: Joseph Fahey, BRFII Northgate, LLC  
Jack McCullough, McCullough Hill PLLC  
Jessica Roe, McCullough Hill PLLC

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cont



May 20, 2024

VIA Email

[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**RE: One Seattle Comprehensive Plan DEIS Comment  
Support Expansion of Neighborhood Centers to Include Sand Point/Princeton**

Dear Mr. Holmes:

SBPS LLC owns a 126,000 SF assemblage at the intersection of Sand Point and Princeton, fronting Sand Point Way NE between 47<sup>th</sup> Ave NE and 50<sup>th</sup> Ave NE (the “Property”).<sup>1</sup> The City did not include Sandpoint/Princeton as a Neighborhood Center in the City’s draft plan even though the Property’s Neighborhood Center designation would advance all of the City’s stated Comprehensive Plan objectives.<sup>2</sup> If designated as a Neighborhood Center, the underutilized Property would provide the City with much needed housing and neighborhood-serving retail *without displacing a single residence*. **We strongly encourage the City to include Neighborhood Centers as a preferred alternative in the final environmental impact statement and include Sandpoint/Princeton as Neighborhood Center in the City’s final EIS and final plan.**

The City has received feedback that its draft Comprehensive Plan must do more to significantly increase our current housing crisis or risk exacerbating Seattle’s housing crisis. Recently, the Complete Communities Coalition, a coalition of over 50 diverse organizations, asked the City to expand Neighborhood Centers and to include all of the Neighborhood Centers studied in the DEIS, including Sandpoint/Princeton. SPBS strongly supports this sentiment.

Specifically, we ask the City to add the Sandpoint/Princeton as a Neighborhood Center as it moves to the final environmental impact statement. We provide the City with the following information to inform its analysis:

**Displacement Risk is Low**

The Displacement Risk at Sand Point/Princeton is low as identified in the DEIS Displacement Index at Exhibit 3.8-31 (showing the intersection and all immediate areas as deep blue demonstrating the lowest displacement risk in the City.)

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<sup>1</sup> Tax Parcel Nos. 601250-0080, 601250-0051, and 102504-9210.

<sup>2</sup> The City’s objectives are identified in DEIS Section 2.1.3: equity, livability, affordability, inclusivity, climate resiliency, and consistency with other plans and policies.

### **More Housing**

The area is under-zoned at NC2P-40. The Neighborhood Center designation would increase the Property's height by 30-feet. Increased development potential makes the property financially feasible to redevelop, and increasing the height could result in 100+ more housing units than otherwise allowed under current zoning.

### **More Affordable Housing**

The increased housing potential will result in additional affordable housing through MHA and MFTE.

### **Excellent Transit**

The City has designated the Sand Point Way NE corridor as "frequent transit service." The City's DEIS largely struck corridor planning in favor of Neighborhood Centers. The City could encourage both if it designated Sand Point/Princeton as a Neighborhood Center. The Property could serve as a Neighborhood Center hub for frequent-transit corridor growth along Sand Point Way.

This is also an opportunity for the City to expand housing along stated transit corridors in Seattle's neighborhoods. The State Legislature has continued to explore this as a statewide commitment to incentivize housing near transit and Seattle should mirror this approach across the City.

### **Non-Motorized Connections**

Encouraging growth at Sand Point/Princeton advances the City's Carbon reduction goals. There are few places in the City with better multi-modal transportation options.

A crosswalk connects the Property to the Burke-Gilman trail for easy bike access and no-carbon commutes throughout the City. Housing should continue to be prioritized near non-motorized routes to promote weekday commute and leisure trips.

### **Neighborhood Center Locational Criteria**

The area matches the DEIS's definition of a Neighborhood Center: "places with a wide range of housing and businesses that primarily serve the local community. These areas resemble urban villages, but with a smaller size and lower intensity of allowed development."<sup>3</sup>

### **Livability**

The area is in the immediate vicinity of Pathways Park and walking distance to Magnuson Park.

### **Planning and Economic Realities Are Aligned**

Many of the areas identified as Neighborhood Centers will not develop in the next decade due to real estate encumbrances or leases. In contrast, the Property does not have these

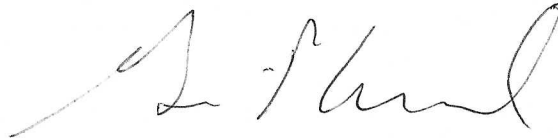
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<sup>3</sup> DEIS, p. 2-3.

limitations and SPBS is interesting in beginning the entitlement / redevelopment process once the Property is designated as a Neighborhood Center with additional redevelopment potential. These economic factors should be considered when forecasting future housing units and evaluating various Neighborhood Centers.

Sincerely,

SPBS LLC

A handwritten signature in black ink, appearing to read "G. Wood", written in a cursive style.

Geoff Wood  
gwood@windermere.com

cc:  
Jim Holmes, jim.holmes@seattle.gov

79-1  
cont

May 13, 2024

VIA EMAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**Re: One Seattle Plan  
Support for Ballard Regional Center**

Dear Mr. Quirindongo,

On behalf of Lock Vista Apartments LLC (“Lock Vista”), we write to provide our comments on the Draft Environmental Impact Statement (“DEIS”) for the One Seattle Comprehensive Plan.

Lock Vista is the owner of the apartments at 3025 NW Market St. in the western edge of the future Ballard Regional Center. We support the mayor’s vision for One Seattle and policies that will facilitate greater residential density and commercial vitality in Ballard, which will provide a better urban environment for our residents while contributing to the sustainability of Seattle as a whole.

Accordingly, we support the proposed Ballard Regional Center designation and urge the city to complete the applicable subarea plan as quickly as possible. This will facilitate comprehensive and cohesive planning that will identify and support Ballard’s unique residential, retail, and transportation needs, helping to create a more livable and inclusive community for residents and visitors alike, which will be further enhanced once the Sound Transit Ballard station is completed as part of Sound Transit’s ST3 Ballard Link Extension (BLE).

In addition, we request that the Final Environmental Impact Statement study the impacts of allowing greater residential density, with buildings up to 125 feet in height, along the westernmost sections of Market Street, including the use of mass timber construction. This could potentially contribute to more sustainable transit-oriented mixed-use housing along the westernmost Market Street corridor, which will be supported by ST3’s BLE Ballard station.

We are committed to supporting the city in its efforts to plan for the future growth and development of Ballard as a Regional Center, and we would be happy to provide further information upon request.

Sincerely,

s/Amy Worthington  
Lock Vista Apartments LLC

cc: Councilmember Strauss

May 13, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes; Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”).

Urban Visions owns the site commonly known as the S development property, located at 1045 6<sup>th</sup> Avenue S. and 1022 6<sup>th</sup> Avenue S. (the “Property”). In 2011, the Property, together with other nearby sites, was rezoned under the Livable South Downtown planning initiative. The environmental impact statement prepared for Livable South Downtown contemplated transitioning the Property and the nearby area into the Downtown Urban Center. However, late in the process, a decision was made to allow this area to remain in the Greater Duwamish Manufacturing Industrial Center (the “MIC”), but subject to a newly-created zone.

The IC-85/160 zone that was created for this area in 2011 is hardly an industrial zone. It is, in effect, a proxy for a Downtown zone, in that it incorporated a host of characteristics common to Downtown zones – but foreign to industrial zones – including:

- Required use of Housing Bonus and TDR provisions to achieve maximum density.
- Exception from maximum-size-of-use limits for office development
- Allowable height far in excess of typical industrial height limits and consistent with Downtown height limits
- Requirements for sidewalk widening, pedestrian through-block connections, overhead

weather protection, landscaping, and other streetscape improvements, and onsite open space, all typical of Downtown development and inconsistent with normal industrial zoning standards.

In 2023, the City revised the zoning for the Property and its vicinity to II 85-240. This new zone allows a 50% increase in density for office uses in the area, while still requiring the Downtown development standards noted above.

In truth, the II 85-240 zone is more akin to a Downtown zone than to any other industrial zone. Further, the area in which this unique zone is located is physically separated from the remainder of the MIC: it is bounded by the Stadiums on the west, the Metro bus bases on the south and the CID and residential neighborhoods on the north and east. Currently, there are permits for more than 1 million square feet of office space on the Property – and more is possible – all designed to be compatible with the adjoining Downtown zones.

In addition, Sound Transit is in the process of approval of the WSBLE line, which is likely to lead to the development of a new light rail station adjoining this area on Seattle Boulevard. And regardless of whether this “CID South” station is developed, this entire area is within a close walkshed of the existing Union Station light rail station. The area is well-suited for a mix of transit-oriented urban uses at high density.

Unfortunately, current market conditions indicate that office development may not be feasible in the area in the immediate future. Our city and region, however, continue to need robust housing development, especially in locations near regional transit facilities. This area is therefore ideal for future mixed-use and residential development. The current industrial designation of the area is, frankly, an historical accident. The area is already effectively a part of the Downtown and it has no connection to the industrial activities in the MIC.

For these reasons, the City should take action in the current Comprehensive Plan update process to remove this area from the MIC and incorporate it in the Downtown Urban Center, where it belongs. The opportunity for residential and mixed-use development will support the CID to the north and will align with the City’s vision for Regional Centers.

Sincerely,



CEO, Urban Visions

May 14, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes; Rico Quirindongo  
Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”).

Urban Visions is the development manager of the properties located at 318 5<sup>th</sup> Avenue N. (Parcel 1991200390) and 516 Broad Street (Parcel 1991200375) (the “Property”). Urban Visions has contemplated the potential for office and R&D development for the Property. However, given the current state of the financial markets and the lack of office demand in the Seattle market, it makes sense to consider possible future residential development for the Property.

Unfortunately, the current zoning provisions for residential development in the Uptown neighborhood impose obstacles to such development. The conditions associated with the 160-foot height limit for tower development do not support the kind of residential development that could be achieved in this center-city neighborhood.

We write to express support for Alternative 5 in the DEIS, but request the Final EIS and Uptown Urban Center Subarea Plan study modifications to the 160-foot height concept that would better promote residential development under current conditions. Specifically, the City should consider the following:

- Increase of tower height to 200 feet.
- Increase of podium height to 85 feet.
- Increase of tower floorplate gross floor area to 75% of site area.
- Provide additional FAR.

May 14, 2024  
Page 2 of 2

These and other measures will meaningfully increase the likelihood of new residential development in this portion of the Uptown neighborhood. Such zoning revisions in Uptown would align with the City's vision for Regional Centers.

82-1  
cont

Sincerely,



CEO, Urban Visions



**From:** [Nivi Achanta](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** Seattle comp plan environmental impact q's  
**Date:** Monday, May 6, 2024 4:40:05 PM

**CAUTION: External Email**

Hi! I've been reading over the comp plan and have some questions about the environmental impact. I think this plan should include housing AND trees (and climate resilience in general) and it seems to do neither. Some questions:

1. What's the comp plan's impact on Seattle's plants & animals? I'm looking at Section P 3-3 which states "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild."
2. I'm concerned about lost urban forest. The PNW is a critical urban forest we must protect if we are to build any sort of climate resilience -- what analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?
3. How will Seattle make progress towards its 30% canopy goal? How much public land is available to reach this goal?

83-1

83-2

I am also extremely concerned about the lack of housing and request that there is more attention on funding social spaces, but I left those comments on the plan itself.

[Nivi Achanta](#)



**Soapbox Project**

[www.soapboxproject.org](http://www.soapboxproject.org)

*Join us in fighting climate change from your inbox in 3 min every week.*

Let's Connect!



**From:** [Judy Akalaitis](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** Environmental Impact Question  
**Date:** Sunday, May 5, 2024 9:39:18 PM

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**CAUTION: External Email**

Hello,

It is my understanding that Seattle is short of the 30% canopy cover that it aspires to have and is currently losing about 50 canopy acres per year.

Please tell me where exactly Seattle has planned for the planting and maintenance\* (and watering the first 5 years?) of approximately 100,000 new trees? Is there a map and a plan?

Kind Regards,

Judy

Judy Akalaitis  
206.370.4176

**From:** [Judy Akalaitis](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** EIS Question  
**Date:** Sunday, May 5, 2024 9:48:34 PM

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**CAUTION: External Email**

Hello,

I am writing to ask about the statement that the comprehensive plan will work toward a 30% canopy goal. However, huge, native mature trees are being removed daily because of the impacts of the new tree ordinance – even though it is possible, in many cases, to plan a project with these trees.

My question is: how will Seattle plant enough trees to make up for development? How is this measured? Who and how will this be monitored?

Kind Regards,  
Judy Akalaitis  
3116 NE 84<sup>th</sup> St.

Judy Akalaitis  
206.370.4176

**From:** [FranFriend KirkAlex](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comprehensive Plan does not even mention our Covenants  
**Date:** Monday, April 15, 2024 2:05:09 PM

**CAUTION: External Email**

In 2002, my husband and I bought a house in the Sea-Lawn Acres Add of Broadview. We had spent the 4 years prior looking at houses, from Federal Way to Everett, with a Covenant protecting the house's views from impediment. Most houses with view Covenants included language that restricted ownership based on racial, ethnicity, or religious beliefs. We found a house we wanted in Innis Arden, but, that community had just voted to keep that discriminatory language in their Covenants. We wanted no part of a community that actively discriminates.

**We chose Sea-Lawn Acres Division 1 in Broadview because of its broad view and because there was no discriminatory language in our Covenant and never had been.** Our Covenant, which goes with the land, protects our views from trees, shrubs, houses and expressly prohibits anything other than a one-story, single-family home within 1 structure per lot.

Please allow our Covenant to speak for us:

**"All lots in said plat shall be known and described as "Residential" lots. No building or structure shall be erected, altered, placed or permitted to remain on any lot in said plat other than one single family dwelling not to exceed one story in height, together with out building appurtenant thereto and a private garage for not more than 3 cars." The ground floor area of the main structure on any lot included in said plat, exclusive of open porches and garages, shall not be less than 1000 square feet on a 60 foot lot nor less than 1200 square feet on a 70 foot lot or larger..."**

**"No trailer, basement, tent, shack, garage, or other outbuilding shall at any time be used as a residence either temporarily or permanently, nor shall any structure of a temporary character be used as a residence."**

**"No owner of any lot in said plat shall erect, plant or maintain or permit to remain on his lot, or the street abutting thereon, any radio antenna, shrubs, hedges, trees, or other planting which shall, in any manner, obstruct or impair the view of Puget Sound from any other dwelling."**

**"No noxious or undesirable thing, trade or business or noxious or undesirable use of the property in said addition whatsoever, shall be permitted or maintained upon said property, or in said Addition."**

**"All of the fore going conditions, limitations, restrictions and covenants shall be deemed covenants and restrictions running with the land, and shall be binding on any and all persons who may at any time or from time to time own, or have any interest whatsoever, in any lot in said plat, their heirs, personal representatives, successors and assigns, whether such ownership or interest be acquired by deed, contract, lease, tenancy, process of law or otherwise, until January 1,1956, at which time said covenants and restrictions shall be automatically extended for successive periods of 10 years each, unless, on or before said above mentioned date, or any 10 year extension, a written instrument shall be executed by the then record owners of a majority of the lots in said plat and duly recorded in the office of the County Auditor of King County, Washington, terminating or otherwise changing or modifying said covenants, or restrictions, in whole or in part, to take effect on said above mentioned date or at the expiration of any of said successive 10 year periods thereafter. The owner of any lot in said plat shall have the right and power to enforce any or all of the conditions, limitations, restrictions and covenants contained herein against any person or persons violating or**

**attempting to violate the same, either by injunction to prevent him or them from so doing or by the recovery of all damages suffered as the result of any breach thereof.**

**"Invalidation of any of the covenants or restrictions contained herein by judgement of any court shall in no wise affect any of the remaining provisions hereof, which shall remain in full force and effect."**

86-1  
cont

For whatever reason, the City of Seattle has neither recognized nor acknowledged our Covenants in their Comprehensive Plan. Our Covenant says you cannot build a structure in front of us that impedes our view of Puget Sound. The Washington State Supreme Court affirmed the Court of Appeals published opinion in the case of Save Sea Lawn Acres vs. Mercer et al, and reinforced the fact that the Sea Lawn Acres Division 1 Covenant is "in full force and effect and fully enforceable".

I laughed when I read House Bill 1110 mandating that certain homes would get a Covenant for 50 years requiring that the price be kept affordable. By neither recognizing nor exempting the Sea Lawn Acres Covenant, the City of Seattle is running over our Covenant like a freight train, sacrificing our collective views, quality of life, and our financial futures for the financial gain of the developer/owner. Please tell me how a 50 Year Rent Control Covenant will be enacted and enforced at the same time you ignore ours as if it does not exist.

Broadview will no longer be Broadview if the City and State permit this Comprehensive Plan to be permitted here, brushing aside our Covenant, and forcing us to spend the \$60,000.00+ it will cost us to litigate a view blocker in Court (that is with inflation on what the last view protection lawsuit cost us). Broadview will become NOview or Peek-a-View.

No where did I read where the state or the city is willing to compensate us for the loss of our view. My next-door neighbor's executor told me he is putting that house on the market for \$2,500,000. Why? The view and the Covenants. Otherwise, the house is worth \$1,000,000 less, who will compensate us for our losses?

The state and city want to take our views away from us so they can overpopulate the neighborhood with massive numbers of people, cars, and pets. That is not sustainable. Broadview spent decades with flooding and pervasive sewer issues. After 25 years of problems, we finally got relief last year with new drainage pipes but that infrastructure will not accommodate 3 new houses on every lot. The city is rectifying the lagging infrastructure just in time to repeat the entire upgrade process times 4. Great planning.

Broadview west of 2<sup>rd</sup> Ave NW is all residential now, no sidewalks, no bus service except 3 peak weekday morning & evening times, no commercial services.

- 8<sup>th</sup> Ave NW is the 2<sup>nd</sup> busiest street in Broadview with pedestrians, cars, bikes, trucks, you name the form of transportation, but it has no sidewalks.
- 8<sup>th</sup> Ave. NW in Broadview is 0.9+ miles from the nearest constant service bus stop on Greenwood, and it is all straight up hill. This is not a neighborhood for a disabled person to get to a bus stop.
- We have no sidewalks, until you reach the Broadview Library at the top of the hill at Greenwood, you are walking or biking on a street with cars, bikes, and other people.
- We have narrow streets and alleys, some very curving, that the utility trucks just fit; there is no room in front or in back for street parking unless you take away any future we might have of finally getting a sidewalk off our currently very busy streets. And, the plan to have at least 4 times as many pedestrians, cars, bikes, and trucks on our narrow streets with no sidewalks

as there are now? How will anyone have enough air to breathe? How will our air pollution not increase and thereby increase respiratory issues and planetary destruction?

Your Comprehensive Plan will cost thousands to millions in lawsuits in every community with a view Covenant. The City will have immunity because the State gave them immunity, but, homeowners within a Covenant will not have immunity from lawsuits. You will pit neighbor against neighbor and it will become a war of anger, exasperation, survival, financial ruin, and courts. Is that the future you want for Broadview?

No? Then recognize Sea Lawn Acres Covenant in your Comprehensive Plan and exclude us from your forced housing increase.

Thank you for your consideration,

Fran Friend Alexander  
12717 8<sup>th</sup> Ave NW  
Seattle, WA 98177  
(206) 371-2748

**From:** [Gia Alfieri](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Moore, Cathy](#)  
**Subject:** Environmental impacts of Seattle's plan  
**Date:** Friday, May 3, 2024 9:13:05 AM

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**CAUTION: External Email**

Hello. Thank you for the work you're doing.

87-1

I have three questions regarding the environmental impacts of Seattle's new proposed plan.

1. What is the impact of the plan on Seattle's plants and animals?
  
2. Regarding adverse impacts on tree canopy cover, what study shows that planting new trees will compensate for lost old growth trees and urban forests?
  
3. Regarding the 30% canopy goal, how much public land is required to reach the goal and how many trees will need to be planted yearly on public land to compensate for trees lost to development?

87-2

Thank you for your time.

Gia Alfieri  
3738 NE 130th St, Upper  
Seattle WA 98125

DEIS StoryMap Comment

Name: Scott Alspach

Email: salspach@outlook.com

Date: 5/6/2024

Comment:

The city should study the impacts of additional Neighborhood Centers off of arterials, especially in the Green Lake neighborhood. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.



## DEIS StoryMap Comment

Name: Robin L Amadon

Email: Rlandy@comcast.net

Date: 5/5/2024

## Comment:

My housing questions for the Comp Plan DEIS (due Monday 5 pm):

1) Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against.

2) If the Plan says it implements HB 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan?

3) In the DEIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices cause by limited supply and create more opportunities for income-restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to low-income people, during the past 5 to 10 years of the most extreme increases in supply of rental housing ever experienced in Seattle?

4) If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market?

5) Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the DEIS acknowledge this?

6) Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions? Do you agree that townhouses are the predominant form of new housing being permitted in formerly single-family zones?

## DEIS StoryMap Comment

Name: Robin L Amadon

Email: Rlandy@comcast.net

Date: 5/5/2024

## Comment:

7) Although HB 1110 allows duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments, what is the likelihood that any of these Middle Housing forms will be built by current for-profit infill developers, when these builders refuse to build rentals of any sort? If these forms are meant to produce rental apartments in formerly single-family neighborhoods, and non-profits have told the city that they can't build there either, because they need economies of scale for construction and staffing, where are the programs or zoning incentives Urban Residential neighborhoods?

8) What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods?

9) Where does the plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?

10) Where does the plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability, when a Stanford researcher who studies this determined that Seattle hadn't built enough housing 40 years ago for this to be a significant factor, when instead, Seattle tends to recycle older affordable rentals by rehabbing them into new, market-rate housing?

11) Specifically, how many low-income affordable rentals will be built under Alternative 5? Will this be half of all new housing units, as called for by the Governor and the Department of Commerce? If not, what zoning and policies could mitigate the extreme lack of affordable rentals in Seattle?

12) Several years ago, the City redefined "family-sized housing" as 2 bedrooms, rather than 3 bedrooms. How has that change contributed to the lack of family-sized rental housing being built, and what would be the effect of restoring the definition of family size to the common understanding of 3 bedrooms?

13) What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels?

14) Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs? How can the plan incentivize stacked flats and courtyard apartments? Wouldn't such forms mean one-third to half the apartments would be ground-floor accessible apartments? Could these apartments be built by non-profits with the benefit of land trusts funded by the City?

## DEIS StoryMap Comment

Name: Robin L Amadon

Email: Rlandy@comcast.net

Date: 5/5/2024

## Comment:

15) Shouldn't courtyard apartments be an option, especially where "protected" trees occupy the center of a parcel? How can they be incentivized?

16) Instead of insensitively promoting residential units with the first floor raised up, shouldn't the City be promoting Universal Design in all new construction, so that seniors and people with disabilities can find suitable homes in our future city?

17) Since we no longer have single-family neighborhoods, should every developer be required to build sidewalks on their property, not just in multi-family or Urban Villages, as now?

18) What is the effect of lacking 11,000 blocks of sidewalks on our vision of a 15-minute city? On accessibility for seniors, people with mobility aids, baby strollers and ADA requirements? How can we include and fund a plan for a complete sidewalk grid within 20 years?

19) Where does the DEIS acknowledge that City policy about anti-eviction ordinances, and the continuation and/or extensions for the school year for families with children and slowness in the courts threatens all rental housing remaining solvent in City of Seattle? That without some changes, building affordable rental housing by the for-profit sector will be moribund.

Robin Landy Amadon

**From:** [Robin Amadon](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on Comprehensive Plan EIS  
**Date:** Sunday, May 5, 2024 4:06:35 AM

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**CAUTION: External Email**

My housing questions for the Comp Plan DEIS

1) Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against. **92-1**

2) If the Plan says it implements HB 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan? **92-2**

3) In the DEIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices cause by limited supply and create more opportunities for income-restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to low-income people, during the past 5 to 10 years of the most extreme increases in supply of rental housing ever experienced in Seattle? **92-3**

4) If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market? **92-4**

5) Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the DEIS acknowledge this? **92-5**

6) Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions? Do you agree that townhouses are the predominant form of new housing being permitted in formerly single-family zones? **92-6**

7) Although HB 1110 allows duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments, what is the likelihood that any of these Middle Housing forms will be built by current for-profit infill developers, when these builders refuse to build rentals of any sort? If these forms are meant to produce rental apartments in formerly single-family neighborhoods, and non-profits have told the city that they can't build there either, because they need economies of scale for construction and staffing, where are the programs or zoning incentives Urban Residential neighborhoods? **92-7**

8) What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods **92-8**

9) Where does the plan acknowledge that planting new trees takes **92-9**

20-30 years to provide tree canopy, to shade houses, or to combat heat islands? **92-9**

10) Where does the plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability, when a Stanford researcher who studies this determined that Seattle hadn't built enough housing 40 years ago for this to be a significant factor, when instead, Seattle tends to recycle older affordable rentals by rehabbing them into new, market-rate housing? **92-10**

11) Specifically, how many low-income affordable rentals will be built under Alternative 5? Will this be half of all new housing units, as called for by the Governor and the Department of Commerce? If not, what zoning and policies could mitigate the extreme lack of affordable rentals in Seattle? **92-11**

12) Several years ago, the City redefined "family-sized housing" as 2 bedrooms, rather than 3 bedrooms. How has that change contributed to the lack of family-sized rental housing being built, and what would be the effect of restoring the definition of family size to the common understanding of 3 bedrooms? **92-12**

13) What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels? **92-13**

14) Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs? How can the plan incentivize stacked flats and courtyard apartments? Wouldn't such forms mean one-third to half the apartments would be ground-floor accessible apartments? Could these apartments be built by non-profits with the benefit of land trusts funded by the City? **92-14**

15) Shouldn't courtyard apartments be an option, especially where "protected" trees occupy the center of a parcel? How can they be incentivized? **92-15**

16) Instead of insensitively promoting residential units with the first floor raised up, shouldn't the City be promoting Universal Design in all new construction, so that seniors and people with disabilities can find suitable homes in our future city? **92-16**

17) Since we no longer have single-family neighborhoods, should every developer be required to build sidewalks on their property, not just in multi-family or Urban Villages, as now? **92-17**

18) What is the effect of lacking 11,000 blocks of sidewalks on our vision of a 15-minute city? On accessibility for seniors, people with mobility aids, baby strollers and ADA requirements? How can we include and fund a plan for a complete sidewalk grid within 20 years? **92-18**

19) where does the Plan address the policy of anti-eviction ordinances, and their extensions for the school year that is harming the solvency of all rental housing in Seattle, and the chilling effect this has on for profit developers and non-profits for that matter to build rental housing in the City of Seattle? The supply you are adding is going to be expensive and it does not "trickle down" (see point 4 and 10.) There is a problem of safety and rent arrearage now in rental housing in large part due to eviction limitations that make building mixed-income housing by the for profit sector moribund; and in the

**92-19**

non-profit sector it is an endeavor that requires massive subsidies that are scant of the need when the City faces budget shortfalls and a tax base post-pandemic that is falling short. The DEIS is strangely absent any realities of implementation and incentives given the post-pandemic realities in our City. And City policies that run counter to serving the need.

Robin Landy Amadon

**From:** [Ken Anderson](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Monday, May 6, 2024 10:22:00 AM

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CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,  
Ken Anderson

--

Kenneth G. Anderson  
Cell: 202-674-0404

## DEIS StoryMap Comment

Name: Riley Avron

Email: ravron@posteo.net

Date: 3/26/2024

## Comment:

Even alternative five is woefully too timid. The housing crisis is hurting our city every day, and all five alternatives fail to meet the moment. None redress historical redlining. None allow varied, high-density housing near our coasts and parks. None allow high density housing within generous walking distance of all our current and future transit investments. All seem primarily focused on ensuring change to our physical environment is slow, painstaking, and limited almost exclusively to our most dangerous, unhealthy roads, rather than boldly taking on our present crisis. None even pretend to meet our existing need, much less prepare us for housing abundance over the next two decades.

Please make all alternatives beyond 1 dramatically bolder, and then choose the boldest. We need real action, not more weak Seattle process.



**From:** [Anita Barcklow](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:29:51 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Anita Barcklow  
amdbarcklow@gmail.com  
10738 Bartlett Ave. N.E.  
Seattle, Washington 98125

## DEIS StoryMap Comment

Name: Deb Barker

Email: djb124@earthlink.net

Date: 5/6/2024

## Comment:

DEIS questions for the Comprehensive Plan Update:

- 1) Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against.
- 2) If the Comp Plan says it implements Housing Bill (HB) 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan?
- 3) In the DEIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices caused by limited supply and create more opportunities for income-restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to low-income people, during the past 5 to 10 years of the most extreme increases in supply of rental housing ever experienced in Seattle?
- 4) If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market?
- 5) Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the DEIS acknowledge this?
- 6a) Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions?
- 6b) Do you agree that townhouses are the predominant form of new housing being permitted in formerly single-family zones?
- 7) Although HB 1110 allows duplex, triplex, fourplex, sixplex, stacked flats and courtyard apartments, what is the likelihood that any of these Middle Housing forms will be built by current for-profit infill developers, when these builders refuse to build rentals of any sort? If these forms are meant to produce rental apartments in formerly single-family neighborhoods, and non-profits have told the city that they can't build there either, because they need economies of scale for construction and staffing, where are the programs or zoning incentives Urban Residential neighborhoods?
- 8) What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods?
- 9) Where does the plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?
- 10) Where does the plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability, when a Stanford researcher who studies this determined that Seattle hadn't built enough housing 40 years ago for this to be a significant factor, when instead, Seattle tends to recycle older affordable rentals by rehabbing them into new, market-rate housing?
- 11) Specifically, how many low-income affordable rentals will be built under Alternative 5? Will this be half of all new housing units, as called for by the Governor and the Department of Commerce? If not, what zoning and policies could mitigate the extreme lack of affordable rentals in Seattle?
- 12) Several years ago, the City redefined "family-sized housing" as 2 bedrooms, rather than 3 bedrooms.

How has that change contributed to the lack of family-sized rental housing being built, and what would be the effect of restoring the definition of family size to the common understanding of 3 bedrooms?

13) What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels?

14) Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs? How can the plan incentivize stacked flats and courtyard apartments? Wouldn't such forms mean one-third to half the apartments would be ground-floor accessible apartments? Could these apartments be built by non-profits with the benefit of land trusts funded by the City?

15) Shouldn't courtyard apartments be an option, especially where "protected" trees occupy the center of a parcel? How can they be incentivized?

16) Instead of callously promoting residential units with the first floor raised up, shouldn't the City be promoting Universal Design in all new construction, so that seniors and people with disabilities can find suitable homes in our future city?

17) Since we no longer have single-family neighborhoods, should every developer be required to build sidewalks on their property, not just in multi-family or Urban Villages, as now?

**From:** [Karen Barrett](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 3:04:51 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

RE: the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to KEEP as many existing 6" DSH and larger trees AS POSSIBLE during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services, nor maintenance to ensure survival.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done BEFORE tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Amendmend the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Karen Barrett  
karenbarrettdesign@gmail.com  
24th Ave E  
Seattle, Washington 98122

**From:** [Roniq Bartanen](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Seattle's Comprehensive Plan  
**Date:** Monday, May 20, 2024 7:50:51 AM

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**CAUTION: External Email**

To whom it may concern,

Seattle's Comprehensive Plan MUST include conservation of urban and non-urban species and stronger tree protections. We are in a continually warming cycle of our planet and climate crisis continues. How we move forward as a city with our future growth will impact us all. Please consider the negative impact of leaving behind policies and plans that will protect urban nature. Putting urban nature protection policies in place will increase the mental and physical health of all beings . We can grow and retain our urban nature and we should at the health and benefit of us all.

Thank you, Roniq Bartanen

[www.shebirds.com](http://www.shebirds.com)

Happy Birding,  
Roniq Bartanen (She/Her)  
[www.shebirds.com](http://www.shebirds.com)

Instagram: [https://www.instagram.com/she\\_birds/](https://www.instagram.com/she_birds/)  
Facebook: <https://www.facebook.com/roniq.bartanen>

Ramblings at the Roost: My blog dedicated to birds and birding <https://shebirds.com/blog>

For occasional content celebrating the culture and joy of mindful, urban and accessible birding as well as info on upcoming bird outings visit <https://shebirds.com/contact>.

Members who create an account gain access to my FREE Global Female Bird Guide Resource List! <https://shebirds.com/m/login?r=%2Ffemale-bird-guides>

**From:** [Justine Barton](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Seattle Comprehensive Plan Draft EIS  
**Date:** Monday, May 6, 2024 2:24:30 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

More affordable housing is needed as the city grows. However, the attributes that draw us to work, live and play in Seattle require the natural environment be planned for and play a role as we grow -- promoting Seattle's resiliency long term, and quality of life and healthy lifestyles for all our communities. One of the best ways to provide these attributes is by preserving and restoring our tree canopy. The myriad benefits of our urban forest are already outlined in the draft EIS. The question is whether the implementation of this plan will meet the stated goals, will include both public and private property, especially given the tension when planting/preserving trees on properties that are being redeveloped/densified going forward, and will provide the reporting/feedback/information needed (i.e., staff and budget necessary) to adaptively manage our urban forest. If we are to realize the goals of walkable, healthy and livable communities, the planning for trees must include all p roperties in an up front and intentional way, and not focus mainly on public lands. In addition the temporal lag of planting new small trees to replace large trees, must be considered. I provide the following comments with our collective quality of life in mind:

\* The draft EIS does not address the need to keep as many existing 6" DSH and larger trees as possible during development to immediately support public health, climate resiliency, environmental equity and sustainable urban forestry. Consider the temporal lag when planting to replace lost larger trees.

\* The draft EIS does not quantify or analyze the probable scale of impact of tree loss for the alternatives, but does state that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover". How can this be substantiated?

\* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Some mitigating recommendations include:

\* Reduce tree loss by allowing the city to require alternative site designs for building placement on lots, including building up, joined housing units, and larger setbacks for street trees.

\* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.

\* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.

\* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration of my comments.

Justine Barton

justinebarton013@gmail.com

6851 30th Ave NE

SEATTLE, Washington 98115-7240

**From:** [Martha Baskin](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Strauss, Dan](#)  
**Subject:** Questions Re: Draft EIS for One Seattle Plan  
**Date:** Thursday, May 2, 2024 10:26:30 AM

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**CAUTION: External Email**

Hello -

Will the One Seattle Plan's DEIS remove any of the 2035 Comprehensive Plan urban forest / tree canopy policies, strategies or goals? If so, which prior policies, strategies, and goals will be removed, and why?

Has the DEIS considered the difference in the average 2021 tree canopy cover between Neighborhood Residential zones compared to Multifamily zones?

- NR zones had 33.6% coverage (7.0k acres of tree canopy within 20.8k acres of land);
- While Multifamily zones had 22% coverage (0.9 acres of tree canopy within 4.1k acres of land). If not, why? If so, in what way will each of the alternatives impact the long-term acreage of canopy cover within NR-zones?

100-1

Will the DEIS consider how much of Seattle's 1,600+ acres of Developed Park Land without tree canopy has the physical and logistical potential to plant medium to large trees?

Will the DEIS consider how much of Seattle's 8.0k acres of Neighborhood Residential and Multifamily Residential which has roughly 500,000 medium to large trees will be lost with the addition of 150,000 new dwellings within the next 20 years for each of the proposed alternatives?

Will the DEIS consider a significant shift in Seattle's tree canopy from private land to public land? If so, (as was done in Cambridge and Los Angeles), will the DEIS consider how much of Seattle's 11k acres of Right-of-Way (R.O.W.) without canopy has the physical and logistical potential to plant medium to large trees (when mature) and what land volume is needed to plant that quantity?

Thank you,

Martha Baskin



**From:** [Martha Baskin](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [PCD OneSeattleCompPlan](#)  
**Subject:** Liveable Cities and Seattle's Comp Plan and DEIS - 100,000 new homes with no trees on site to mitigate heat islands, wildfire smoke, landslides and storms - and ensure equitable canopy and climate justice  
**Date:** Monday, May 6, 2024 1:58:14 PM

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**CAUTION: External Email**

Hello --

While all five alternatives guarantee between 80,000 to 120,000 new homes, the "road map" to ensure affordable housing is inadequate. Instead, market rate housing dominates with those who earn less than Area Median Income left to sleep under the nearest viaduct or spew out carbon to find something affordable in an outlying area. Yet "*Housing & Affordability*" is listed as one the CompPlan's key moves.

In addition, the EIS suggests nature and trees are not needed in an urban environment, although the CompPlan touts "*Climate and Sustainability*" as one of its key moves. There is a disconnect here. Trees where people live are critical to climate resilience. Trees are critical to public and mental health. Critical to holding back storm run off and landslides. And critical to equitable canopy and climate justice. Housing versus trees is a failed policy that will exacerbate heat islands and inequitable canopy.

101-1

Furthermore,

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Instead I urge the city to reduce tree loss by requiring SDCI to mandate alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.

I also urge the city to require tree inventories and landscape plans before tree removal and building permits are issued; consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed and urge amendments to the current Tree Protection

Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

101-1  
cont

Thank you,

Martha Baskin

**From:** [PCD\\_OneSeattleCompPlan](#)  
**To:** [Holmes, Jim](#)  
**Subject:** FW: Question/CommentOne Seattle Comp Plan's DEIS --  
**Date:** Wednesday, May 8, 2024 6:18:34 AM

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**From:** Martha Baskin <mobaskin@earthlink.net>  
**Sent:** Monday, April 29, 2024 1:52 PM  
**To:** PCD\_OneSeattleCompPlan <OneSeattleCompPlan@seattle.gov>  
**Cc:** Strauss, Dan <Dan.Strauss@seattle.gov>  
**Subject:** Question/CommentOne Seattle Comp Plan's DEIS --

CAUTION: External Email

Hello --

Page 3.3-5 of the DEIS states “Notably, most canopy loss was not associated with development activities; only 15% of the canopy loss occurred on parcels that underwent development during that period.” The authors of the 2021 Tree Canopy Assessment defined “redeveloped parcels” as sites that began and completed construction of new buildings that added residential units or new commercial buildings within the identified timeframes.”

102-1

This restricted definition of development-associated tree loss has supported a misleading narrative that development is not an important driver of canopy decline in Seattle.

A canopy change analysis from Washington Department of Fish and Wildlife determined that at a minimum, development or redevelopment of parcels in Seattle was the agent of change for approximately half of all tree loss that occurred between 2009-2017. The highly restricted analysis of development in the city’s 2021 canopy assessment is interesting and useful for comparing effects of fully completed projects to parcels not having undergone development, but it is not a full measure of the overall impact of development on tree loss in Seattle.

The findings from that analysis are not robust enough to defend a claim that development is not a significant source of tree loss.

Please let me know how you plan to address.

Sincerely,

Martha Baskin

Birds Connect Seattle Conservation Committee

April 29th, 2024

May 23, 2024

VIA EMAIL

Office of Planning and Community Development  
 Seattle City Hall  
 600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
 Seattle, WA 98104  
 Attn: Jim Holmes; Rico Quirindongo  
 Email: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**Re: Support for Alternative 5; Corridors Concept and multifamily development at 4822 S. Holly Street**

Dear Mr. Quirindongo,

Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”).

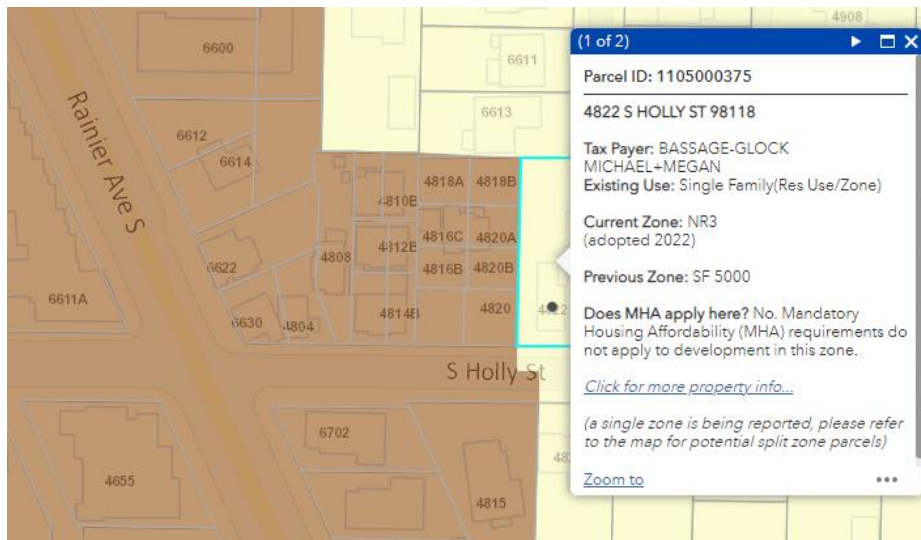
We write to express support for Alternative 5, but in particular we support the Corridors Concept, allowing for multifamily development extending generally for two blocks from transit arterials. Our property is located within a block of Rainier Avenue S, but remains zoned NR3. It would best serve the City’s housing goals as a potential location for multifamily. We ask that the FEIS study multifamily uses consistent with the Corridors concept, or at minimum the Urban Neighborhoods Concept below. We have provided more information below.

We own the property located generally at 4822 S. Holly Street (“Property”) in the Rainier Valley neighborhood of Seattle. The Property is a 7200 square foot lot, shown below in yellow, that is currently only developed with our 960 square foot home. Our property is adjacent to townhomes to the west, and otherwise surrounded by single dwelling units in the immediate vicinity.

Currently, the Property is zoned Neighborhood Residential 3 (“NR3”). It is adjacent to the Lowrise 3 (“LR3”) zone surrounding the Rainier Avenue S corridor. An image of the current zoning is provided below.

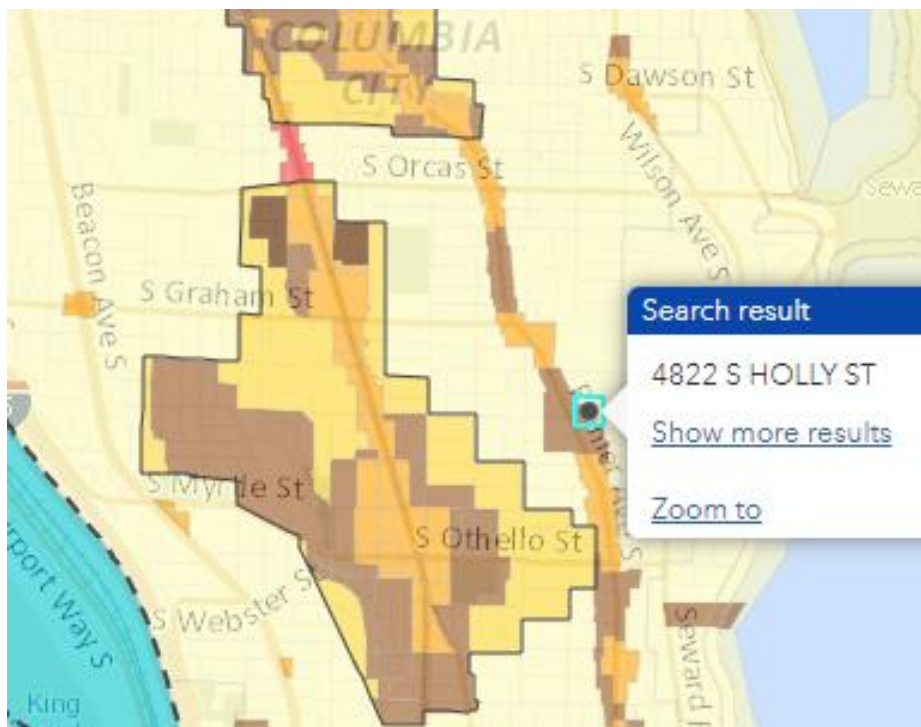


103-1



103-1  
 cont

As you know, this location along Rainier Avenue S is not currently within an urban village. Yet, Rainier Avenue S is a primary transit corridor leading to Downtown.



The neighborhood can accommodate more homes, and should also be zoned to allow retail to serve this area where viable. It is generally underserved by quality grocery, retail, and childcare services.

Given the City's dire need to address housing affordability, we would like to express our support for Alternative 5, which pursues the widest range of options and area for added residential density. We particularly support the Corridors concept, and believe it should be applied on Rainier Avenue S. We could encourage you to consider expanding dense, mixed-use zoning designations along the entire Rainier Avenue S corridor so that it can become more vibrant. As a part of that strategy, please study extending multifamily zoning, such as LR3 or higher across our Property.

It is a great opportunity for denser multifamily development near transit, and would be a missed opportunity if it remains NR3.

If you would like more information about the Property or its development potential, please do not hesitate to contact me.

Sincerely,

Megan and Michael Bassage  
4822 S Holly St.  
Seattle, WA 98118  
mbassage@gmail.com

DEIS StoryMap Comment

Name: Elizabeth Bastian

Email: lizziebas92@gmail.com

Date: 4/27/2024

Comment:

I am a renter in Greenwood, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would allow for more sustainable, car-free or car-light living. Instead the current draft plan will worsen the many crises (housing, climate, unaffordability) our city faces. To create a more vibrant city, the plan should \_\_\_\_

In Green Lake in particular, I think that the plan should allow for high-rise apartments to provide affordable housing near a gem.

104-1



**From:** [Joseph Beauregard](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Harrell, Bruce](#); [LEG\\_CouncilMembers](#); [Sea Physi](#)105  
**Subject:** Comprehensive Plan  
**Date:** Monday, April 8, 2024 8:56:50 AM

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**CAUTION: External Email**

Neighborhoods make Seattle a wonderful place to live. While I realize I can't stop the developers' wrecking ball, I would like to make some general comments for your consideration.

-- To date developers seem only able to build large apartment blocks with small apartments or tall, narrow, small, expensive townhouses. These have minimal appeal to families, the elderly, or the disabled. If all we want in the Seattle of the future are singles and childless couples, well then let what appears to be an architectural community with little imagination have at it. I would hope we want more than that.

-- Cramming 4 separate homes onto small city lots means the townhouses described above. As you drive around the city, do you really want block after block after block after block of nothing but these small tall (generally expensive) townhouses?

-- Please enact a meaningful tree protection regime. Right now, absent project by project outcry, developers wipe out as many trees (and all other vegetation) that they possibly can. I would hope we could make developers save every tree. They will say projects will be too expensive. Well, projects aren't sold based on what they cost to build. They're priced at what the market will bear. If wealthy developers make a little less profit by saving the city's trees; is that a bad thing?

-- Trees provide some heat wave and climate change relief. Why are we allowing them to be wiped out?

-- If you want to increase available housing quickly -- ban Airbnbs and Vrbo's. They're all over the city, and provide no housing for actual residents.

-- Instead of tearing down perfectly good single family homes and wiping out mature trees so that developers can cram small expensive townhomes onto small city lots; why not preserve the housing that exists and provide tax incentives for converting it into multiple dwelling units?

-- The fact that areas like Broadmoor and Windermere are exempt from any burden related to increased density is just wrong.

-- The plan apparently wants to encourage more people to bike and use public transit. Most families, elderly, and disabled won't be found biking. If you want people to use public transit, make it safe, which right now it's not.

-- Recognize that neighborhoods that have predominantly single family homes do provide value to the city -- stability, families, beauty, less congestion, and relative safety, to name a few.

So in summary, make the city welcoming to all not just singles and childless couples, make it safe, and save our trees. Don't let developers ruin a wonderful city.

Best,

Joe Beauregar

**From:** [Joseph Beaugard](#)  
**To:** [LEG CouncilMembers](#)  
**Cc:** [Harrell, Bruce](#); [Sea Physicist](#); [PCD CompPlan EIS](#)  
**Subject:** Increase Housing Supply Overnight  
**Date:** Monday, April 22, 2024 9:20:05 AM

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**CAUTION: External Email**

You can increase the housing inventory virtually overnight. No trees have to come down. No nice old homes have to be demolished to make way for tall, small, expensive townhomes.

**Ban, or severely restrict, AirBnBs and VRBOs.**

See attached article about the problem these create for Hawaii. By banning or limiting these you increase available housing for actual residents.

Just a thought.

Joe Beaugard

<https://www.seattletimes.com/business/hawaii-lawmakers-take-aim-at-vacation-rentals-after-lahaina-wildfire-amplifies-maui-housing-crisis/>

**From:** [Jason Beffa](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Hollingsworth, Joy](#)  
**Subject:** Protect Urban Tree Canopy - Make the Seattle Comprehensive Plan Better  
**Date:** Friday, May 3, 2024 1:09:40 PM

**CAUTION: External Email**

After reading the One Seattle Comprehensive Plan, I was extremely disappointed in the brazen disregard for the value, protection, and new development of the urban tree canopy around the city of Seattle. This plan is WAY to developer friendly, and while Seattle does indeed need more housing, we 1000% need to do more to protect trees in this city to mitigate the obviously drastic effects of climate change for the urban population.

I support Tree Action Seattle, and the questions they have raised are specifically targeted at some of the very weakest points related to trees in the OneSeattleComp:

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.”  
*- What is the impact of the plan specifically on Seattle’s plants and animals?*
2. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover."  
*- What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?*
3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees.  
*- How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?*

For my own question:

**How is the city planning to curb the illegal removal of trees by developers without permits and no intention to replace like sized, indigenous trees?**

*This is a clear and obvious problem, especially in high development areas like the Central District where tree canopy is already scant.*

***Please address these questions and the issue of disappearing tree canopy in this plan. Development does not have to be clearcutting, and new shrubs do not replace high value tall trees.***

Thank you.

Jason

**From:** [Arnold Bendich](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 7:34:34 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Arnold Bendich  
jebendich@comcast.net  
1754 NE 62nd St  
Seattle, Washington 98115-6821

108-1

Judith Bendich  
1754 NE 62<sup>nd</sup> St.  
Seattle, WA 98115  
May 6, 2024

To: [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)  
To: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)  
cc: [Bruce.Harrell@seattle.gov](mailto:Bruce.Harrell@seattle.gov) , [maritza.rivera@seattle.gov](mailto:maritza.rivera@seattle.gov)

This letter addresses (1) the need for housing for all economic segments of our city (as required by statute); (2) the need to preserve our current diminished - 28%, down from 30% - tree canopy and how to reach the 47% tree canopy policy required in the 2035 Comprehensive Plan (tree preservation and enhancement is also statutorily required); the need to preserve our historic resources and mitigation that could accomplish that goal. The Seattle One Plan and the DEIS do not adequately address any of these issues.<sup>1</sup>

**Preface.** My husband and I are long-time Seattle residents. He is a retired UW biology professor and I am a retired attorney. We love Seattle. We came here in 1965. Our first home was a rental which we purchased during the Boeing bust. In 1990, we moved 5 blocks to our present home. We have seen many changes, some better, some worse, but what we have always loved is Seattle history, its varied architecture, its parks, which we visit frequently, trees, and neighborhoods with their own identities and character. We didn't like when we got here racism and sexist laws. I grew up in segregated Baltimore, where my family fought for civil rights and didn't participate in white flight to the suburbs. (I learned about police brutality toward Blacks from my teenage neighbors' experiences.) We disliked Seattle's "whiteness", and I was "warned" early on not to live in the Central District. Racial justice, equal rights for women, and economic justice were my primary reasons to go to law school, graduating from the UW Law School in 1975. By that time abortion was legal without a husband's consent, non-discrimination laws had been enacted and amended to include disability, and in 1972 voters approved the Equal Rights Act. (The parameters of these laws were undeveloped.) But vestiges of earlier times remain, and the more recent MHA implementation purportedly to improve housing, health, and physical environment for all economic segments of our residents worsened the situation. The draft Seattle One Plan continues to turn a blind eye toward Seattle's real housing and environmental needs.

109-1

**Experience With the MHA Process That Remain Pertinent Today.** We live in the Ravenna-Cowen North National Historic District (NHD). I am a board member of Friends of Ravenna-Cowen, a fully volunteer organization, which achieved Washington State and National status for the NHD. After retirement from my law firm, I successfully represented my organization in the MHA administrative hearing and advocated before the City Council so that the NHD was exempted from MHA upzoning. In that hearing, in addition to historic resources, I learned a lot about trees and the environment, the lack of infrastructure (such as wooden sewers in West Seattle and combined sewers in most residential neighborhoods that overflow into Lake Washington and Puget Sound), slow response time by the police and firefighters, the dearth of resources such as trees and parks for our underserved communities, displacement, false promises and inadequate and concocted "data" by OPCD witnesses who withheld data, obfuscated to the public and in the hearing. (One OPCD employee was caught lying under oath.) OPCD maintained that with MHA, developers would include up to 50% of the units as "affordable." A complete fiction: since its implementation, only about 5% of new projects include affordable

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<sup>1</sup> All the scenarios of possible growth plans from 2 to 5 have major problems with respect to tree preservation and inadequately address housing for all economic segments of our residents. If I were forced to choose, but only after remedying the draft Plan's and DEIS's inadequacies, the least harmful choices would be 2 and 4 since building up not out would result in less destruction of trees; additional mitigation options are required and facts and factual analysis are required throughout.

units. MHA's fee schedule was lower (and still is) than other municipalities. OPCD was required to identify the actual locations where displacement could occur due to MHA upzoning. OPCD had the data down to the actual lot and buildings. But it did not divulge these data to the City Council or the public. We have now seen the aftermath, massive displacement in the Central Area and elsewhere. We have seen our thriving neighborhood small businesses shuttered. Our most needed housing is for moderate income workers, lower income, and people without housing. Affordable housing is nearly non-existent, tree canopy is routinely destroyed. OPCD's "expert" promoted trickle-down Reaganomics - that more housing units would be built, and this would lead to reductions in housing costs. The reverse is true. Developers thrived, housing costs soared, and heat islands arose due to massive coverage - whole blocks and blocks - with no trees or green cover. The issues raised in the MHA hearing continue to exist today, and worsened. Because of this experience, I will never believe OPCD's "data," its conclusions, and expect that OPCD will obfuscate, will not provide data and estimates based on fact to substantiate its conclusions, or provide the real data we need to adequately provide for the future. **The City Council should review with skepticism OPCD's proposals and projections, insist that everything be backed up by facts, and demand new evidenced-based information in compliance with state law so that we can have a vibrant city that that houses all its residents in a healthy and safe environment.**

109-1  
cont

**The Need for Protection and Mitigation for State and National Historic Resources, Including National Historic Districts.** Friends of Ravenna-Cowen has submitted its comments, which include an analysis of Goals and Policies that are proposed, the need for additional policies in the Seattle One Comprehensive Plan, the deficiencies of the DEIS, and how to mitigate the potential harm. The comments discuss in detail historic resources and the steps the City can take to preserve them. The organization's mission statement also includes preserving the NHD's natural environment; the NHD has mature trees, large shrubs, and green cover. The comments set out in detail the impacts on trees and birds (which are not enumerated in the DEIS) and ways to mitigate potential environmental damage. There are other points as well that address the DEIS, lack of meaningful mitigation and baseless hypotheses, with no factual data. Friends of Ravenna-Cowen's comments and recommendations are incorporated into this letter by reference.

### **Essential Language and Factual Information Missing in the Seattle One Plan and the DEIS.**

The Plan and DEIS do not provide adequate data, information, and definitions to comply with multiple statutes' mandates. Numerous questions remain unanswered that should be answered so that the City Council can make reasoned decisions, goals and policies:

E2SHB 1110 mandates that Seattle add 100,000+ housing units by 2045. It mandates rezoning almost all Neighborhood Residential ("single-family") lots to four units, or six units within ¼ mile of rapid transit, called "middle housing." And it has definitions throughout, many of which are missing from, and must be included in the draft Plan and DEIS.

For example, the definition of "middle housing" in E2SHB 1110, p. 5, para (21) (lines 32- 35), "*means buildings that are **compatible in scale, form, and character** with single-family houses ... ["single family" is defined at p.7, para.32, lines 32-34.]* These definitions are not in the draft Seattle One Plan or the DEIS, but they are statutory, and the boldened language is essential so that builders and their architects know how the project must be designed and so that the Department of Construction and Inspection adopts regulations that comply with the law. The language is essential for design review, whether administrative or with public input.

### **The Plan Fails to Follow the Mandate of State Law For All Economic Segments.**

o E2SHB 1110 mandates adequate provisions for existing and projected needs of all economic segments of the community and sets out definitions for four segments - less than - 60% of AMI for renters, 80% of AMI for owner-occupied and “low-income family,” and at or below 30% AMI for extremely low-income households.

o The DEIS Executive Summary states the objective for affordability is: "Increase the supply of housing to ease increasing housing prices caused by limited supply and create more opportunities for income-restricted housing." There is no evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to modest income and low-income people. This is the same **theory** posited in the MHA EIS, but during the past 5 to 10 years Seattle has had the most extreme cost increases in rents ever experienced in Seattle.

o The draft Plan needs to meet the requirements of HB 1220, now codified in RCW 36.70A.070(2). Those requirements are for the draft Plan to identify the needs for housing units for households at every economic income level and plans for how the City will meet those needs. The draft Plan fails to provide any plan to meet these needs, particularly for lower income residents and working families of modest income.

o As part of this increased goal, the draft and final Plan should assess what radius to include in various settings and how to ensure via good planning that neighborhoods transition from higher to lower density with distance from the fixed transit and commercial center.

o There is no meaningful discussion, new proposals or consideration in the draft Plan of appropriate policies to prevent displacement in the identified areas with high displacement potential for people, households who currently reside in housing that is affordable for persons in the below median income levels. Indeed, the Plan and DEIS leave the City and public without a clear view of the likely degree of loss of “naturally” occurring affordable housing and alternatives for preserving communities and affordable housing opportunities in these high risk areas and elsewhere. This is precisely what occurred with MHA implementation. For Central Area residents, MHA was catastrophic. Although OPCD had these data for every urban village, by lot and building, and could identify low-rental units and lower-income home owners by census data, none of this information was provided to the City Council or the public. (For owner-occupied homes, OPCD can use census data tract-by-tract, which provides residents’ income and ages. OPCD has all this census data.) More broadly, Seattle can identify such data city-wide, not only in the identified areas. Seniors, the disabled, and those with lower incomes or modest incomes reside in previously middle-income neighborhoods and can be forced out due to upzoning. Census data can identify these vulnerable households. The Ravenna-Cowen NHD, for example, has several community households with a large number of unrelated adults who live in a rented house. It also has retirees and people with disabilities, with less income, but who bought their homes years ago. Some live with extended families; the loss of one wage earner or unexpected debt can force them out of their homes. While the situation is dire and more concentrated in the identified areas, the same situations exist city-wide.

o Statutory requirements, RCW 36.70A.070(2)(c), include identifying “sufficient capacity of land” to meet the identified needs for housing that is affordable to each economic segment of households in the City, but such information is absent from the draft Plan and DEIS.

o The Plan does identify land for duplexes, triplexes and town homes (four units per lot in each residential area and six units when closer to major transit stops). But the draft Plan and DEIS do not propose or assess any strategies for designating land or what portion of available land that will be available for the required units of housing to be built that is affordable to persons in each income segment below median income. The number of units identified as needed for households below 120% median and above the levels eligible for publicly-



supported subsidized housing dwarfs the number of units projected as needed for households over 120% of median. The Plan lacks any proposal and analysis of how the City will meet this need for housing for persons of modest income who are often the backbone of our workforce that we want to attract and keep in Seattle, such as educators, workers in health care, social workers, service workers, hospitality workers, many governmental employees, and police and firefighters.

o The draft Plan does not include any provision to ensure that modest income working households will be able to afford housing in the areas of increased density in Regional Centers. The City should include a commitment to revisit the HALA program to have housing which is affordable at different income levels in all housing that benefits from proximity to the massive public investments in transit and other infrastructure. The City could consider using a form of tax increment financing to capture the greatly increased value of properties near our public transit and infrastructure investments., *e.g.*, NE 130th St. Station upzone area, and devote the revenues to providing affordable housing in those units. This could be done either through direct subsidy of rent or purchase or building units (with nonprofit partners).

o This, of course, could be included as an anti-displacement strategy. For example, the draft Plan and DEIS do not consider new approaches to use of the Multi Family Tax Exemption, or even if it would be more cost effective to stop losing property tax revenue in exchange for a small portion of units being set aside in MFTE developments and, instead, use the increased revenue to provide funds for building new affordable units and providing subsidies.

o The City should also substantially raise MHA fees, which were woefully low from the outset, and mandate affordable units in all new construction.

o The Plan should commit to ensuring that new housing developments that benefit from proximity to the taxpayers' massive investments in light rail, fixed transit and other infrastructure do not result in windfall profits and exclusive high-income housing. Increased housing density near public investments in transit should be accompanied by a change to HALA policies to require inclusion of affordable units of housing in new developments taking advantage of increased density allowances. Equity and improving access to the benefits of transit and other public infrastructure should be reflected in adoption of policies to ensure that a significant number (20-25%) of housing units in these areas serve the City's goals to provide affordable housing for persons (and family units) at the below 30%, 60%, 80% and 100% AMI levels. Why should the beneficiaries of the increased housing around public investment in transit go only to the highest income level households? Why should the developers of these properties not be required to share the windfall from the public investment by including housing for lower income households?

**Tree Canopy and Climate: Tree Preservation and other Environmental Elements Are Not Inadequately Addressed in the draft Plan and DEIS. Required Mitigation Measures to Achieve Policies Are Not Addressed or Proposed in the Draft Comprehensive Plan or SEPA Review/DEIS.**

On p. 150, Goal CE G12 refers to the tree canopy goals and lists several related policies. The following goals/policies should be added:

- Strengthen and enforce tree protections throughout the City to ensure Seattle's current canopy tree policies and goals continue. The draft Seattle One Plan would inexplicably reduce the goals and Policy in the existing 2035 Comprehensive Plan.

109-1  
cont

109-2

The 2035 Seattle Comprehensive Plan includes Policy EN 1.2 (p. 133) which states, “Seek to achieve citywide tree canopy coverage to **30 percent by 2037, and 40 percent eventually**, which maximizes the environmental, economic, social, and climate-related benefits of trees.” This is **current Seattle policy**. However, for unexplained reasons, without discussing the adverse implications of this major reduction in tree canopy, the Seattle One Plan changes **current policy to a goal of 30 percent with no increase over time**. Moreover, the goal, CE G12 (p.151) *makes a false statement of fact*. The actual current tree canopy is 28 percent due to a loss of 235 acres, the size of Green Lake. CE 12 maintains “Seattle has a healthy urban forest [which it does not due to climate change] with a tree canopy that covers at least 30% of the land”, which is false.

The results from this failure to properly address the required climate change and tree canopy policies and lack of inclusion in the draft Plan and lack of analysis in the DEIS are existential, including:

- a tremendous loss of mature tree canopy as the City falls further and further behind from its adopted policy goal for 30% tree canopy coverage by 2037;
- adverse health impacts from loss of tree and green space (particularly for overburdened or highly impacted communities);
- health impacts will almost certainly include increasing mortality and hospitalizations of vulnerable populations due to projected increasing days of severe high temperature with the highest temperatures in residential areas that lack tree canopy and whose residents have the most adverse social determinants of health (e.g., overburdened and highly impacted communities and populations under the State HEAL Act).
- adverse impacts due to increased storm water runoff, including stream erosion, contamination entering surface waters, harm to salmon or fish habitat and recovery and biological diversity in surface waters and shoreline habitat;
- impacts on meeting legal requirements to reduce combined sewage overflows and lack of mitigation for increased runoff from increasing impervious surfaces from other plan policies.

The DEIS recognizes that mature tree canopy reduces pollution in runoff, which is toxic to fish, in addition to the benefits in regard to heat and climate resiliency.<sup>2</sup> Much of the mature tree canopy and habitat in Seattle’s residential neighborhoods, which are home to nearly 50% of the tree canopy despite being a much lower percent of the total land area, are evergreen trees. Evergreen, including Douglas Fir and Cedar, are documented to intercept 27 to 66% of precipitation (preventing that from reaching the ground to be rapid runoff). This is far more than deciduous trees. Seattle’s existing native mature tree canopy has a far greater percentage of evergreen trees, which intercept and prevent stormwater runoff, than deciduous. However, tree replacement, especially street tree planting, is primarily deciduous and of much smaller canopy, resulting in a far greater relative increase in stormwater runoff. Preservation of mature tree canopy in residential areas is, therefore, essential mitigation to accomplish the City’s Tree Canopy, Climate and runoff goals and policies.

HB 1181, Chapter 228, Laws of 2023, requires cities to incorporate climate change goals and elements in comprehensive plans. There is a concomitant requirement to address climate change impacts and related policies in the Environmental Impact Statement (EIS) accompanying the draft comprehensive plan. RCW 36.70A.070(9) now requires that the City’s Comprehensive Plan: “Must enhance resiliency to and avoid the adverse impacts of climate change, which must include efforts to reduce localized greenhouse gas emissions

<sup>2</sup> Other than fish, the DEIS does not address that a mature tree canopy is essential for birds, both native and migratory, and that green cover provides homes to other animal species. The draft Plan and DEIS do not identify the location of, or enumerate, native flora and fauna. Without this information, the impact on our natural environment of each scenario (2 through 5) cannot be determined. See Birds Connect and Friends of Ravenna-Cowen’s comments, which address these issues.

and avoid creating or worsening localized climate impacts to vulnerable populations and overburdened communities.”

Neither the draft Plan nor the DEIS adequately consider how the loss of tree canopy, which has already been documented by the City, and which will accelerate under the draft Plan, will result in increased “heat islands” and adverse health effects on vulnerable populations and overburdened communities from reducing tree canopy. Indeed, the draft Plan and EIS are required to have strategies to reverse the documented loss of tree canopy reflected, resulting in Seattle now being further from its goal than when the goal was adopted. The Climate section of the draft Plan refers to a Climate and Environment Policy CE 9.313: “**Expand tree canopy and greenspace**, especially in communities that experience disproportionate impacts of extreme heat and smoke events.” (Emphasis added.) But the *goal*, not even a policy, is a stagnant 30%.

109-2  
cont

The City is losing tree canopy. Thus, a plan is required along with analysis of alternatives and mitigation measures to not only stem the loss but to “expand” tree canopy. No plan is presented. The Tree Canopy section is devoid of any plan or meaningful discussion. Most notable, there is no plan or discussion relating to how the development goals will be coordinated with proactive policies to preserve and increase mature tree canopy in residential areas, where most of the tree canopy, and most of the risk for loss of canopy under the draft Plan will occur. Policy CE 12.614 refers only to City property and street rights of way which cannot meet the goals: Preserve, restore, maintain, and enhance tree canopy on City property and rights-of way.

Street trees offer far less of the benefits than large mature trees. CE 12.8 recognizes this with a policy goal: Encourage the protection, maintenance, and expansion of tree canopy throughout the community, prioritizing residential and mixed-use areas with the least current tree canopy to equitably distribute benefits. How will the City “encourage” protection, maintenance and expansion of tree canopy?

Mitigation is required for specific climate, environmental and human environment (including environmental justice) policies that are adversely impacted by competing policies. The draft Plan and DEIS fail to adequately address that it is not possible to retain or replant trees when the land area is covered by new structures. The Seattle Comprehensive Plan should follow Portland’s example by acknowledging that the only means of achieving 30-percent equitable citywide canopy cover is to designate at least 40% of the residential lot area with space for trees.

The DEIS discusses the in-lieu fee program which may result in increasing tree canopy in overburdened communities that currently have less than 25% tree canopy. While this may provide vitally important benefits, it is nonsensical to cut mature trees in one area while replacing them with new trees that require approximately \$5,000 for their first four years of survival and require 15 to 60 years to grow to maturity. This scheme is untested and does not account for the reality that it would take many years for the new trees to provide the same net benefits of the cut trees. Nor does the City consider the reasonably foreseeable adverse impacts on the areas (and streams) that will lose tree canopy. The City needs to do both, maintain the trees we have and plant more trees in overburdened communities.

The DEIS and draft Plan do not consider the reasonable alternatives for revising the City’s Tree Ordinance, including measures which would assist in reaching the goal or reducing loss of canopy, such as applying the ordinance evenly to all areas/zones in the City.

The DEIS explicitly states that none of the alternatives considered include any proposal to improve regulation or incentives to reduce the pace of tree canopy loss, much less to reverse and make progress towards the goal of having 30% canopy coverage by 2037, which would gradually be to 47% current policy under the 2035 Comprehensive Plan.

The DEIS does not even acknowledge that many of the housing projects which might adversely affect the tree canopy retention policies will be exempt from further SEPA review under the City's adopted categorical exemptions. This will preclude consideration of area specific or cumulative impacts from multiple individual developments authorized under the Comprehensive Plan and Development Ordinances.

The DEIS acknowledges the obvious: that the existing tree ordinance and policies are failing, as shown in the loss of canopy. But, **without any analysis**, the DEIS asserts that the new tree ordinance will reverse this. However, the City refused to do an EIS or new analysis on the drastically revised ordinance that the Council passed. Thus, there is no analysis or basis for statements that the new ordinance will improve performance towards the goal. Further, the DEIS acknowledges that the new ordinance anticipates replacing mature canopy with street trees. SEPA requires environmental analysis of the impacts – and mitigation measures – for such a switch since the record establishes that street trees cannot replace the heat, habitat, stream protection and stormwater benefits of mature trees. To reflect the adopted Tree Canopy goal and required climate change element, and SEPA requirements for mitigation to achieve polices, the Comprehensive Plan and EIS should:

- o limit building coverage in Neighborhood Residential to no more than 60% of the lot, or limit new construction to the footprint of the original house; the latter serves two purposes (a) a house can be re-purposed and redesigned interiorly to preserve it, including its historic history, and preserving the existing structure eliminate increased environmental waste from bulldozing buildings, or (b) if leveled, most trees and green space could be preserved;
- o explicitly include increased height bonuses or adding other residential unit area for preserving the entire tree canopy space required to keep existing significant trees healthy;
- o include mitigation measures to apply the same tree protections and requirements for retention and permitting/review for removal by existing property owners to all new development in residential zones;
- o adjust FAR ratios for each zone, to accommodate tree preservation;
- o commit to requiring that the height bonus be utilized rather than merely being an option, as under current code, for developers to save significant trees by increasing development height or square footage elsewhere above what would otherwise be allowed to compensate for the area of the development reduced to ensure that significant trees on the property or adjacent properties are preserved and healthy. *E.g.*, developers of a five-story building currently have a choice to remove a tree in the proposed building envelope, or to save the tree and add replacement footage. Mitigation and commitment to the Seattle Tree Canopy Goal and required Climate goal per HB 1181, Chapter 228 Laws of 2023, should result in the Plan and mitigation commitments under SEPA including this change which honors both increased housing unit goals and climate and tree preservation policies.

o Provide examples of developments that meet increasing housing goals (including reflecting the requirement to allow various types of housing with four to six units per lot, depending on location) while preserving healthy existing mature trees on a development lot;

o Commit to adoption of an ordinance adjusting lot split and short plat lot lines to maximize preservation of existing mature trees as an element of required mitigation and commitment to the City's tree canopy and climate goals.

o Commit to increasing height for residential units in regional and neighborhood centers and expanding those centers along the entire arterials that have infrastructure completed or committed to for both light rail and bus rapid transit with the 800 foot walkable diameter zone (and fully consider on a local basis whether to expand each from three blocks/800 feet to a quarter mile/five blocks with decreasing height and FAR moving away from the transit stop); and, couple this with the tree preservation mitigation elements above to prevent this expansion from adversely affecting climate resiliency due to loss of further mature tree canopy.

o Include consideration of potential mitigation requiring both street tree planting and small pedestrian or child-friendly public access areas with larger shade trees within developments close to transit. Adjust the FAR to include increased height potential for meeting a required inclusion of plazas with trees, seating areas and play structures.

### **The DEIS Conclusions Are Factually Unsubstantiated, Would Result in Adverse Health Effects for All Seattle Residents, and Are Contrary to State Law.**

The DEIS concludes, "Action alternatives would tend to increase regional tree canopy by focusing growth in urban areas and preventing sprawl." "[D]evelopment within the urban environment of Seattle could *indirectly* benefit the tree canopy pressure in less-developed areas outside the city." (Emphasis added.) In other words, it's fine to decimate Seattle's tree canopy because tree canopy could be preserved regionally. The DEIS does not identify any data supporting an indirect benefit that regional tree canopy would increase, not even the acreage currently remaining that is less developed. Sprawl continues, with suburban areas with lawns that do not provide needed habitat for birds and other wildlife. Nor does the DEIS identify the reasons people seek housing outside Seattle. And, apparently, no one at OPCD has bothered to traverse the "region." King County and abutting counties are rapidly becoming one big sprawl as people search for more affordable housing options outside of Seattle. Moreover, state law (E2SHB 1110) now requires most municipalities to increase density, which could mean more tree cutting region-wide. The DEIS conclusions are actually an unsupported hypothesis bordering on the fantastical.

The reality is that if real mitigation to preserve Seattle's tree canopy is not implemented immediately in compliance with the requirements of HB 1181 and RCW 36.70A.070(9), Seattle will continue to lose its tree canopy and will become a polluted, heated environment adversely impacting the health (including increasing mortality) for all its residents, and native flora and fauna. One only has to look at the Roosevelt Urban Village, where within five years, multiple apartment buildings filled entire blocks (once covered with trees and green space), and transformed the area to a heat island.<sup>3</sup>

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<sup>3</sup> Representative Gerry Polett's comments also address high buildings facing City parks. The DEIS tosses proposal out without any analysis of the environmental harm that shade, run-off, etc. could cause. The same is true of the cumulative environmental impact of increased development on City parks. At the MHA hearing, a UW professor who studied and implemented restoration projects, including Ravenna Park, testified about the predictable negative effects to the park of upzoning, considering the cumulative impact.

## Summation.

The comments here touch on a few of the topics covered by the draft Plan and DEIS. But these are critical and existential. Without adequate housing for all economic segments of our City, we will continue to see negative impacts on moderate income workers and their families and on lower income residents and their families, with concomitant negative health outcomes. Decent and affordable housing is a basic human right.

Trees are the best and most effective environmental protection we have. Trees capture carbon, reduce heat, water run-off, pollution, and erosion. Trees in neighborhoods reduce crime and bring a sense of personal wellbeing. Trees are essential to our physical and mental health. Two centuries ago, Alexander van Humboldt (1767-1835) recognized the importance of trees to reduce temperature, stem pollution, retain water, prevent erosion, and protect wildlife. He shared his observations with Thomas Jefferson and with Simon Bolivar, who then began a project to plant one million trees throughout South America. Scientists today can measure trees' benefits. Economists can quantify trees' benefits into dollars. Yet Seattle, which calls itself the Emerald City, proposes to decrease its tree canopy goals and reduce tree protection.

The draft Seattle One Plan and DEIS pay lip service to trees; the DEIS is devoid of data, fails to identify meaningful mitigation to maintain the trees we have and grow more trees. There are ways to preserve trees and to increase housing. Commentators have suggested many ways to do so. Some architects are already doing so. The City Council and Mayor need to do their part so that we can have a vibrant, real Emerald City that houses all its residents in a healthy and safe environment.

Hoping you will do the right thing,

/s/

Judy Bendich

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Water flow down the steep sides of Ravenna Park is mitigated by the dense tree canopy and green cover not only in the abutting neighborhoods (the Ravenna NHD and the University Park neighborhood on the south side), but also from neighborhoods as far north as Mapleleaf. That is because the water to the park runs downhill, percolates through the glacial soil, and on its way is moderated and deflected by trees. With more impermeable surface, without trees and green cover, the water would pour down the steep sides, resulting in erosion pollution of Ravenna Creek, which joins with other streams to flow into Lake Washington and ultimately Puget Sound. The neighborhood trees and green cover also lessen pollutants and heat. Heat recudtion particularly crucial for our native conifers and native plants that are not heat tolerant.

**From:** [Ericka Berg](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 6:44:41 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Ericka Berg  
ericka98115@gmail.com  
14035 Burke ave north  
Seattle , Washington 98133

DEIS StoryMap Comment

Name: Brennen Berkley

Email: brennenfromseattle@gmail.com

Date: 4/22/2024

Comment:

I would like to see some bolder options considered in this plan, specifically around building more housing than alternative 5 suggests. Adding 120,000 more homes sounds great, but why not make that number higher? Even if not all of those possible homes get built, having more flexibility in where developers can build will increase the housing supply and help combat continually rising rents

111-1



## DEIS StoryMap Comment

Name: Brennen Berkley

Email: brennenfromseattle@gmail.com

Date: 4/22/2024

## Comment:

The proposed EIS doesn't adequately address the existing harms caused by cars in our city. It touches on the noise and pollution concerns, but fails to address the hundreds of Seattleites who are killed or seriously injured every year on our roads. This plan consistently highlights the inevitable increase in traffic and noise resulting from more housing development, yet it offers no significant mitigations.

This is unacceptable to me. Most of our streets are not safe for people outside of a car, something I can personally attest to as I was hit by a car in Seattle a few years ago. These problems will only get worse as we build more housing along busy arterial roads. With only six more years left to meet the city's Vision Zero goal of eliminating car-related fatalities by 2030, we should be exploring more aggressive options for making our streets safer. Options like pedestrian-only streets, traffic calming, narrowing or removing car lanes, and installing speed cameras on our busiest roads.

20% of Seattle households already live car-free, and we should be pursuing bold alternatives that will increase that number by making it easier and safer to navigate the city without a car.

112-1

DEIS StoryMap Comment

Name: Scott Berkley

Email: berkley47@gmail.com

Date: 4/6/2024

Comment:

Please study the following:

- \* 6 story, 6 unit stacked flats in all neighborhoods on any lot that allows housing
- \* 4 story, 12 unit apartments in all neighborhoods on lots of at least 4,000 sf
- \* 40 story high rise mixed use + apartments in all areas within 0.5 miles of a light rail stop or bus rapid transit stop

For the "Greenhouse Gases & Climate Change" analysis, please analyze the \*regional\* GHG emissions under scenarios in which regional population is fixed, but additional housing in Seattle allows 100k, 200k, or 300k more residents within city limits.

113-1

**From:** [Scott Berkley](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comp Plan Comments  
**Date:** Saturday, May 4, 2024 4:47:33 PM

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**CAUTION: External Email**

Please make the following changes to the draft comp plan:

- Revert to the Original Abundance Map proposal (aka the OPCD draft proposal to the mayor's office) that included more Neighborhood Centers and wider corridors.
- Expand all Urban Centers and Regional Centers around current and future light rail and rapid ride stops and allow high rises within a 1/4 miles.
- Allow 12 story mass timber buildings anywhere in all Regional Centers and Urban Centers.
- Add urban centers near major parks such as Magnuson, Discovery, Seward, and Lincoln.
- Designate Mt Baker and West Seattle Junction as Regional Centers
- Specify at least 50 Neighborhood Centers and expand the radius to 1/4 mile. Specifically ensure that Alki, High Point, Seward Park, South Beacon Hill, Gas Works, North Magnolia, Roanoke Park (North Broadway), Nickerson (North Queen Anne), and Upper Fremont areas are designated as Neighborhood Centers.
- All areas within Neighborhood Centers should allow at least FAR of 2.5, with the majority of land allowing FAR of at least 3.0.
- Allow mid-rise residential and mixed-use buildings anywhere within 1/3 mile of frequent bus or rail service, as well as near schools and large parks. Do not limit additional development to directly along arterials.
- Increase the allowed FAR in Urban Neighborhoods to a base of 1.6 and allow 8-plexes by right. Allow additional 0.2 FAR and an extra story of height limit for stacked flats. Also grant an additional 0.2 FAR and an extra story of height limit for passivhaus buildings or if at least 2 Affordable units are included.
- Allow unlimited height, FAR, and unit count in buildings belonging to the Seattle Social Housing Developer. The allowed lot coverage should be no less than 80%. These should be allowed in any residential area of the city.
- Eliminate parking mandates throughout the city for all land uses.
- Study congestion pricing as a method of reducing VMT and ensuring the ample availability of right of way for use by transit, walking, and biking.
- Eliminate the MHA program throughout Seattle.
- Eliminate design review for all project types and replace it with ministerial review of very limited, objective design criteria.
- Study replacing Jackson golf course and West Seattle golf course with car-free eco-districts with high-rise mixed use buildings within a campus of large amounts of open space.

# THE ORIGINAL ABUNDANCE MAP

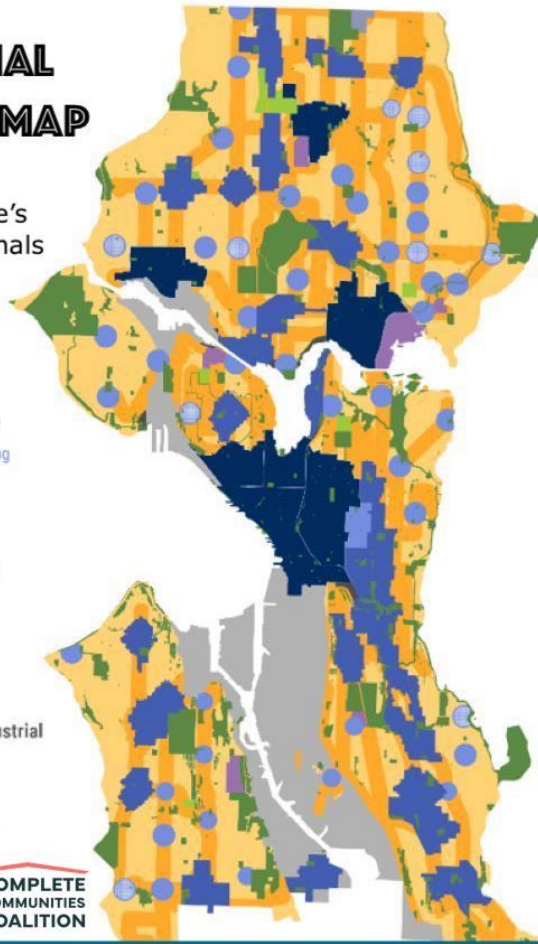
Proposed by  
the City of Seattle's  
planning professionals

## Place types

- Regional Center
- Urban Center
- Neighborhood Center
  - considered during scoping
  - added after scoping
- Corridor
- Urban Neighborhood
- Manufacturing & Industrial Center

## Other areas

- Industrial outside Manufacturing & Industrial Centers
- Major Institution
- Parks & Open Space
- Cemetery



**Ask for it by name at [engage.onesattleplan.com](http://engage.onesattleplan.com)  
Learn more at [completecommunitiescoalition.org](http://completecommunitiescoalition.org)**

114-1  
cont

Demographics:

Male, White, 35-44, live and work in Seattle, 98126

Thank you,  
Scott Berkley

**From:** [Jo Berliner](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Sunday, May 5, 2024 1:43:20 PM

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**CAUTION: External Email**

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Jo Berliner  
Seattle resident (98115)

--

Jo Berliner  
pronouns: he/they

115-1

**From:** [Lynn Best](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#)  
**Subject:** Comments on the Comp Plan Draft EIS  
**Date:** Monday, May 6, 2024 7:46:14 AM

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CAUTION: External Email

Dear Planners, my husband and I are writing to comment on the Comp Plan Draft EIS. I started my career in City government at the Department of Community Development, then switched to Construction and Land Use when DCD was eliminated. I then spent over 30 years in the Environmental Division of Seattle City Light, becoming Director and Officer. I have strong training and experience in both city planning and environmental initiatives and protection. We are concerned with the basic assumption of this environmental analysis, that developmental impacts would be contained within the city if the urban natural environment is destroyed to allow more density. We strongly believe that the greater density being sought can be gained while preserving our tree canopy and with it, urban nature. The fallacy that greater density alone keeps prices low and protects nature outside the city has been shown to be shown false again and again. Just take a look at New York City, the densest city in this country. Not cheap and sprawl is not contained.

Trees provide many benefits to urban dwellers — cooling in hot weather, cleaning the air, fighting climate change, generally making a city more livable. The EIS (P 3-3) states that Seattle will continue to make progress toward its 30% canopy goal. How is this possible under the new tree ordinance that loosens tree protection combined with a new Comp Plan that promotes more density? If the answer is planting on public land, how much land is available for planting and how many trees would need to be planted annually? Section P 3-3 also states that: “none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover?”. How is this possible? How would the loss on private property be compensated for?

Finally, Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” It does not analyze the impact of the new Comp plan on the survival of Seattle’s plants and wildlife. We believe that that analysis is required in the EIS. Thank you for the opportunity to comment on this EIS.

Sincerely, Lynn and Malcolm Best

Sent from my iPhone

116-1

**From:** [Neisha](#)  
**To:** [PCD\\_CompPlan\\_EIS](#); [LEG\\_CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Saturday, May 4, 2024 9:31:06 PM

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CAUTION: External Email

Please note my comment on the DEIS:

This plan should be prioritizing urban forest retention , should protect mature trees, and should give developers serious consequences when they allow trees to be damaged. What makes Seattle a great place to live is it's walkable and beautiful neighborhoods. We are part of nature, not in opposition of it. Density and tree retention can both happen, they don't inherently prevent each other.

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely, Eva Bhagwandin

Sent from my iPhone

117-1

**From:** [eva Bhagwandin](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:13:58 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

eva Bhagwandin  
eva.neisha@gmail.com  
515 Ne 86th St  
Seattle, 98115

118-1



**From:** [Khai Bhagwandin](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 1:49:36 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Khai Bhagwandin  
khaibhagwandin@gmail.com  
515 NE 86TH ST  
Seattle, Washington 98115

119-1

**From:** [Samuel Bhagwandin](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 3:28:03 PM

---

**CAUTION: External Email**

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- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Samuel Bhagwandin  
sgbhagwandin@hotmail.com  
515 NE 86th Street  
Seattle, Washington 98115

**From:** [Ethan Bickel](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#); [Nelson, Sara](#); [Hollingsworth, Joy](#)  
**Subject:** Comment on DEIS  
**Date:** Sunday, May 5, 2024 5:22:34 PM

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CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,  
Ethan Bickel  
Seattle, WA 98112

121-1

**From:** [Mary Bicknell](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [LEG CouncilMembers](#)  
**Subject:** Tree ordinance  
**Date:** Saturday, May 4, 2024 8:41:39 PM

---

CAUTION: External Email

Please pass legislation that encourages more trees for Seattle. It seems developers cut down beautiful mature trees, that could remain if a building was redesigned. Please encourage more setbacks for buildings from the street to make room for planting more trees. Please consider the need for open space and avoid streets with tall buildings with no room for trees between them. It seems the urge to build housing immediately has erased any thoughts of the consequences. I grew up in Chicago and remember the Projects built for low income renters. They had no trees and were certainly not attractive or even livable.

Please more trees.

Mary Bicknell

98105

122-1

**From:** [Bonnie Bledsoe](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments of draft EIS  
**Date:** Sunday, May 5, 2024 9:55:01 PM

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**CAUTION: External Email**

I have some concerns regarding the Environmental Impact Statement and the One Seattle Comprehensive Plan:

P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals" and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

123-1

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance increases the potential for tree removal and loss in several ways. One is that all the zones that can undergo development under the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current guaranteed lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur in the Neighborhood Residential zone means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development and density in each alternative?
- What is your estimation of tree planting needs and a time frame to replace the equivalent lost canopy area and volume (over 5 year periods as tracked by the city's canopy studies)?
- Is canopy area and volume replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

What is the acreage available and suitable for planting trees in each of the following public areas - the city's right of ways, Natural Areas, and Developed Parks?

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots? How many trees and what size for all canopy loss?
- What is the available acreage available to plant trees on private property?
- When will it be possible to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?
- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

As to commenting on other tree potential mitigation measures, please add:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.
- Require developers to submit a Tree Inventory and

Thank you, Bonnie Bledsoe

**From:** [Bonnie Bledsoe](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Fwd: Trees! Help!  
**Date:** Tuesday, May 7, 2024 8:35:14 AM

---

**CAUTION: External Email**

Begin forwarded message:

**From:** Bonnie Bledsoe <bonnielynnseattle@gmail.com>  
**Subject:** **Trees! Help!**  
**Date:** May 4, 2024 at 7:18:51 AM PDT  
**To:** PCD\_CompPlan\_EIS@seattle.gov

124-1

I'm very concerned about trees being protected here in Seattle. Chopping down mature trees with their nurturing ambiance and cooling overhangs cannot be replaced with saplings.

The environmental impact statements states in Section P 3-3 that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." So my question is what is the impact on the plants and animals here?

In terms of lost urban forests, what will compensate for that? Section P 3-3 says that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild"...can you confirm this?

So Seattle in this new plan has a goal of 30% canopy...how much public land is available to reach this goal? Specifically how many trees will need to be planted, and where. (The new tree ordinance greatly reduces private land available for trees.)

Thank you for addressing my concerns,

Bonnie Bledsoe

**From:** [June BlueSpruce](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [LEG\\_CouncilMembers](#)  
**Subject:** Comment on draft EIS for OneSeattle Plan  
**Date:** Monday, May 6, 2024 3:11:38 PM

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**CAUTION: External Email**

Dear OPCD staff,

I am responding to the five alternatives for increasing housing in Seattle that are presented in the OneSeattle Plan draft EIS. I encourage the OPCD to adopt Alternative 2, which would add 100,000 units of housing while having the least impact on tree canopy. My second choice would be Alternative 4.

Below are some questions I would like answered as you consider the environmental impact of the Plan:

- P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals" and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.
- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative?
- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?
- Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have continued growing, according to scientific articles?



- What is the acreage available and suitable for planting trees in each of the following public areas- the city's right of ways, Natural Areas and Developed Parks?
  - How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots?
  - What is the available acreage available to plant trees on private property?
  - When will it be possible to reach the 30% citywide goal?
  - What potential is there for more than 30% tree canopy in Seattle over time?
  - Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?
- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big trees, including conifer trees are removed?
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

Thank you for considering these questions.

Best,

June BlueSpruce  
District 2  
5008 44th Ave. S.  
206-579-1203

**From:** [Robert Blumenthal](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 6:39:26 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Robert Blumenthal  
rblument@comcast.net  
2812 NE 62nd St.  
Seattle, Washington 98115

126-1

**From:** [Scott Bonjukian](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comments on Comprehensive Plan EIS  
**Date:** Monday, May 6, 2024 11:22:33 AM

---

**CAUTION: External Email**

Hi there,

My top comment is that housing policy is environmental policy; Housing policy is climate policy; Housing policy is transportation policy. If we want to reduce environmental impacts, we need to make it easier for people to live closer to where want to be and we need to make it easier for people to get to things without cars. **That all boils down to one thing: Allow more housing everywhere in Seattle.**

The housing target is much too small. Plan for at least 200,000 housing units so we can have enough new homes to keep up with job growth and meet and exceed historical housing production. If we overplan for housing, that's OK and does not hurt anybody. If underplan for housing, we continue the twin disasters we are currently experiencing with skyrocketing housing prices and people forced to commute long distances by car and increasing carbon emissions. Plan for as much housing as possible.

There are not enough Neighborhood Centers envisioned in the plan. Even existing Neighborhood Centers with commercial uses, like Alki and the east entry of Discovery Park, are now indicated in the future land use maps. Please bring back 100% of the Neighborhood Centers originally proposed by OPCD. These neighborhood centers also need to be much larger, with apartments legal to build within at least ¼ mile of the center. These neighborhood centers also need to allow neighborhood commercial uses on more than just corner lots and permit a variety of uses that people want to access for daily needs.

We need to allow multifamily housing close to all of our major parks, which would address multiple goals for creating more access to green space refuges amid climate change and improve access to big parks for people with lower incomes. Allow multifamily housing at least ½ mile from all of our top 20 largest parks, including Discovery, Magnuson, Gas Works, Lincoln, Seward, etc. At the same time, improve transit access to these areas by running more frequent service.

Regional Centers need to all be allowed to build high-rise buildings of 15 stories or more, in every corner of those centers. These are the most important hubs for living and working.

Similarly, Urban Centers need to all be allowed to build fully mid-rise buildings of up to 8 stories. Urban Centers should be designated along all of the frequent transit routes in the city, not just in discrete locations.

Middle housing should not have floor area ratio regulated, or if it is regulated, allow at least 1.6 FAR.

Thanks.

-----  
In addition, I have further comments on the proposal for Neighborhood Residential zones to the extent these details are studied in the EIS. Page numbers below refer to the separate Neighborhood Residential Zones Report.

127-2

I am personally looking to move into a larger family-sized home in the near future since my daughter was just born in January and we are planning a second child. If my family is going to stay in Seattle and contribute to our local economy and community life we need to find housing that fits our growing household. As it is, affordable three-bedroom condos and single-family homes are virtually non-existent. I'd love to live in a sixplex or stacked flat development with a small community of neighbors. Please give my growing family more affordable and appropriately-sized middle housing options throughout the city.

My top comment is to please follow the good and important guidance of the Department of Commerce [Middle Housing Model Ordinance for Tier 1 cities](#), including these critical items:

- Allow all nine types of middle housing in all residential zones
- Do not count ADUs toward the required unit density
- Allow affordability and transit proximity bonuses to be combined (up to 8 units per lot)
- Do not regulate FAR for middle housing; or if FAR is regulated, use the Model Ordinance as a guide (e.g. up to 1.6 FAR)

I will start with a focus on FAR and permitted floor area. Page 12 of the report takes the wrong approach to comply with HB 1110, where it says "The proposal for updated Neighborhood Residential zoning would increase the number of units allowed on a lot to expand housing choices and comply with state law, *while generally maintaining the number of stories and amount of floor area allowed today*. The proposed development standards focus on increasing access to these neighborhoods by encouraging construction of more smaller homes that have comparatively lower prices."

Smaller homes that naturally have lower prices are good, but flexibility for development to also have larger attached and stacked family-sized units is critical to improving equity and affordability outcomes. Sometimes, roommates sharing a multi-bedroom home can find affordable outcomes. But most importantly, our Neighborhood Residential zones, which have been intended for families for over a century, must continue to open up to families with

children and multiple generations living under one roof. In most cases, family-friendly housing requires two, three, and four or more bedrooms in a dwelling unit. The floor area allowed today and proposed here is inconsistent with state law and does not meet all of the goals and values expressed by this very report. Family-sized units are needed to meet the goals for creating more complete neighborhoods and addressing harms from exclusionary zoning.

Family-sized units are usually at least 1,000-1,500 square feet. Floor area ratio standards should either be removed or adjusted to allow this in a variety of middle housing configurations, from townhouses to stacked flats. Using the Department of Commerce Middle Housing Model Ordinance as a guide would be the quickest and easiest path to allowing family-sized units. Either: adopt the Model Ordinance numbers (progressively up to 1.6 FAR) and make sure garages and other non-occupied space are not counted in floor area limits; or preferably do not regulate FAR at all in Neighborhood Residential zones, instead relying on the other existing zoning standards like lot coverage, setbacks, height, and parking and tree requirements to control building size. Note that not every middle housing developer will seek to maximize the size of buildings since there is a market demand for a variety of home sizes.

Comments on other specific dimensional standards:

- Is it specifically concerning that table on page 12 also does not acknowledge larger buildings than four units. I am led to believe that five- and six-unit buildings will also be limited to 0.9 FAR, which is much too small to allow family-sized units.
- The 20% open space requirement seems quite high for small lots. It must be clarified that open space on all types of yards, porches, balconies, and rooftops can help meet this requirement. Only counting ground-level open space would negatively limit design options and housing supply.
- The 50 percent lot coverage proposal is good.
- The setback requirements seem workable on typical lots.
- Maximum building height should be more specifically defined than "three stories" for market-rate developments. There is mention of 32 feet on page 27. A minimum allowed height of 35 feet is much more common in Washington state's residential neighborhoods, and 35 feet is helpful to allow a variety of configurations for pitched roofs, accommodate sloped sites, and allow tall ceilings that make homes feel spacious and create space for modern mechanical systems.

On density, please make it clear the Seattle will follow Department of Commerce guidance to allow at least eight units per lot when a development is both near major transit and includes affordable housing. I also do not see any mention of how ADUs are integrated in the unit-per-lot standards; ADUs are not middle housing under HB 1110 and should not be counted as a unit for the purposes of density compliance.

Also, nowhere in the report is a proposal for how to comply with the HB 1110 requirement

that at least six of nine listed middle housing types must be allowed. The graphics on pages 13-19 focus too much on expensive detached units and at most mention duplexes and triplexes. What are the minimum four other types going to be? To duplexes and triplexes I would add fourplexes, fiveplexes, sixplexes, and stacked flats. Townhouses are good but they challenging for some families and people with disabilities, and stairways eat up a lot of floor area in each unit. Ultimately, I strongly urge allowing all nine types in all Neighborhood Residential zones.

The proposal on page 21 for less housing allowed in high-risk displacement areas seems to not comply with HB 1110, specifically RCW 36.70A.635(4)(b)(i) which only allows extensions of implementation timelines for areas of risk of displacement. The City cannot be granted a permanent exemption but only a temporary extension until the city creates a plan for implementing anti-displacement policies by the next implementation progress report required by RCW 36.70A.130(9), per RCW 36.70A.637. It also appears some of the mapped areas violate RCW 36.70A.635(4)(c) which prohibits this approach in areas with [historic racial covenants](#) and near major transit stops such as the Rainier Valley, Delridge, and Northgate with light rail and bus rapid transit and multiple areas with trolley bus routes which are also major transit.

The affordable housing standards proposed on page 22 seem to be a move in the right direction. However, as noted above, even market-rate housing is deserving of more flexible floor area standards.

I appreciate the effort to return small neighborhood commercial development to neighborhoods on page 24. However, the approach is too small. Neighborhood businesses should not be literally limited to corner lots, of which there is a finite amount. There are plenty of examples of successful and compatible neighborhood stores located midblock. Upper floors should not have any different setback from the ground floor because this creates construction costs increases and makes many existing residential buildings non-conforming and unable to be converted to commercial use.

I applaud the consideration of removing off-street parking requirements on page 26. The report points out that current parking requirements under local and state law are quite low already. Doing away with parking requirements entirely in Neighborhood Residential zones - and perhaps even citywide - would greatly simplify regulations and make it easier to build housing. As pointed out in the report, the market may still choose to build parking because is a popular amenity, but at least local regulations would be streamlined and easier to work with.

-----

Best,

Scott Bonjukian  
3213 Harbor Avenue SW

**From:** [dougb@nwrain.com](mailto:dougb@nwrain.com)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** One Seattle Comprehensive Plan does not go far enough  
**Date:** Thursday, April 4, 2024 4:47:22 PM

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**CAUTION: External Email**

Seattle needs to have a bold housing plan to create a vibrant livable 15 minute city with abundant housing. I do not feel that the current plan will create the types of housing Seattle needs to handle future growth.

128-1

I support the below improvements to the One Seattle plan:

1. Allow bigger buildings in more places to break out of the “Urban Village” strategy.
2. Add more “Neighborhood Centers” to anchor small neighborhood business districts with housing.
3. Zone for fourplexes and sixplexes that will actually get built and support families with three- and four-bedroom homes.
4. Embrace transit-oriented development and allow larger apartment and condo buildings near all frequent transit corridors
- 5 Remove parking requirements.
- 6 Corner stores should not only be on corners.

Seattle needs be a leader in urbanization if we wish to be a thriving city that people want to live in. Seattle also needs to embrace and take full advantage of the new Washington State housing legislation and not attempt to diminish or sidestep them.

I encourage you to upgrade the plan to create more housing through implementing the above improvements. This is key to the cities future prosperity, especially as Seattle will be in competition with other cities that may work to develop better housing plans.

Thank you,

Doug Booze  
West Seattle resident

## DEIS StoryMap Comment

Name: Nora Bos

Email: bookcrush@gmail.com

Date: 5/6/2024

## Comment:

Hello,

Thank you for making this proposal available to residents of Seattle. I am concerned this proposal does not do enough to maintain and regulate existing mature tree coverage in Seattle.

As the city's own 2021 report revealed, the city has lost 1.7% of its tree cover in between 2016 and 2021. This loss of tree coverage is not slowing down, and I see the impact of the lack of regulation by the SDCI and City of Seattle. At this rate, Seattle should change its name to De-Emerald City, because the city and city planners allow mature trees to be clear cut in the name of "unaffordable housing". Simply leveraging a "fee" or tax on these developers does nothing to maintain the mature tree growth, shade, and wildlife habitat.

As follow up questions to this plan -

What is the impact of the plan on Seattle's plants and animals?

What analysis shows that tree planting programs will compensate for the loss of urban forests? It is obvious that new plantings do not provide the same level of shade, habitat, green spaces as the mature trees that are being cut down.

How many acres of public land are available to reach the 30% goal of tree coverage? How many trees - not saplings, not skinny little baby growth trees, will need to be planted to achieve 30% tree coverage?

I hope the city and city planners will reverse course on current state of allowing developers to clear cut lots. Our neighborhoods need trees for shade and for wildlife. We see the increased summer temperatures in Seattle, and clear cutting mature trees is harming our environment and citizens in this new era of hot summers and environmental change.

Thank you,  
Nora Bos

129-1



**From:** [Patrick Brady](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 12:09:04 PM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Affordable housing and maintaining our city's forested identity does NOT need to be an either/or scenario. We can prioritize upward growth, while strongly protecting our canopy that will be critical for the literal health of the city.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Patrick Brady  
pcnbrady@gmail.com  
318 29th Ave E  
Seattle, Washington 98112

130-1

**From:** [Patti Brandt](#)  
**To:** [Woo, Tanya](#); [Maritaza.Rivera@seattle.gov](mailto:Maritaza.Rivera@seattle.gov)  
**Cc:** [PCD CompPlan EIS](#)  
**Subject:** CITY WIDE PLAN & TREES  
**Date:** Sunday, May 5, 2024 1:03:05 PM

---

**CAUTION: External Email**

**Hello,**

**In the** city-wide plan that decides how Seattle develops over the next decade, the following is not clear and thus, a concern.

131-1

Here are a few major questions:

*How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?*

What is the impact of the plan specifically on Seattle's plants and animals?

What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? Patti

**From:** [Brooke Brod](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Seattle Comp Plan DEIS Comments  
**Date:** Sunday, May 5, 2024 8:59:41 PM

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**CAUTION: External Email**

To Whom it May Concern:

Thank you for this opportunity to provide comment on the Draft Environmental Impact Statement for the Periodic Update to the Comprehensive Plan. Seattle is at an important inflection point and this process is a critical opportunity to set a course for a city that provides room for people of all backgrounds.

In looking at the various documents and analyses that were developed for this planning process I paid the most attention to the Draft One Seattle Plan Housing Appendix. Housing, namely the lack of housing choice and housing affordability, is by far the most critical issue facing the city. It is an issue that touches my family personally; my stepfather has been unable to find affordable senior housing for years despite being on various waitlists and jumping through overly complex hoops. I am lucky enough to be able to provide him with space in my home and recognize that this is due largely to my privileged status as someone who owns their home.

132-1

The Draft One Seattle Plan Housing Appendix, notes that the city will need to add a net 112,000 housing units over the next twenty years. 63% of those units (70,726) will need to be affordable to people making 80% or less of area median income. So imagine my dismay at seeing that only one alternative in the DEIS proposes to add capacity above the stated need - alternative 5, which proposes adding 120,000 units over the twenty years. In this most "ambitious" alternative, 60% of the housing units added would have to be affordable. Alternative 5 doesn't even come close to this number, adding only 18,541 units, which meets only 26% of the stated need.

The Draft One Seattle Plan Housing Appendix notes that over the past 5-10 years the number of low- to middle-income households and number of households with children has been dramatically declining. For the health of our economy, addressing the crisis of people experiencing homelessness, preventing school closures and reduced programming, and stated goals around livability and equity, Seattle must do better than the current proposals.

Ultimately it will be private and non-profit developers who will create the vast majority of affordable housing that is needed. Whether that is through following MHA guidelines, taking advantage of MFTE or building on surplus land that has been donated. Those developers need the maximum amount of flexibility to build a wide variety of housing types in order to

meet the needs of all types of households. We will be unable to meet those needs without dramatically more housing capacity than is currently being proposed in any of the alternatives.

132-1  
cont

I would like to make the following suggestions and requests for further analysis in the FEIS.

- I think it is vital to increase the number of existing and proposed Neighborhood Centers and to increase the boundary/walkshed of these designated areas on the Future Land Use Map beyond the 3 minute and 800 feet designation currently outlined in the draft Comprehensive Plan to at least a .25 mile walkshed. As currently designated these centers would do very little to contribute to overall creating complete communities where more people can walk, bike, or roll to meet their basic needs. The neighborhood centers concept needs to be strengthened and expanded.
- In the FEIS, I would ask you to analyze the potential for additional housing capacity in both a .25 mile walkshed scenario and .5 mile walkshed scenario.
- I would like to see further analyses in the FEIS about which alternative would lead to creation of the most family-sized (2 or more bedroom) units.
- I would like to see further analyses in the FEIS about which alternative would lead to the most displacement of low and middle income (less than 30% AMI and less than 50% AMI) households.
- I would request further analysis in the FEIS on the impacts of proposed height limits in Neighborhood Residential and Urban Neighborhoods to unit production, unit size, and feasibility for developers to take advantage of MHA and MFTE.

132-2

I have lived in my neighborhood - Roosevelt/Ravenna - off and on for over thirty years. I went to high school in this neighborhood, lived in an apartment in my post-college years, and now own a house. I have witnessed first hand the changes brought about by new investments in light rail and upzones. These changes have been overwhelmingly positive. My neighborhood is more racially and socio-economically diverse, there are more amenities, and small businesses are thriving. These kinds of changes should be spread across the city, but can only happen if we add more housing capacity throughout the city.

132-3

This is a change that is both necessary and is one that we should embrace with enthusiasm for the benefits it will bring.

Thank you for your consideration.

--

Brooke Brod  
(646) 418-5092  
brooke.brod@gmail.com  
<https://www.linkedin.com/in/brooke-brod/>

**From:** [Barbara Broderick](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** questions regarding the Environmental Impact Statement  
**Date:** Sunday, May 5, 2024 11:49:12 AM

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**CAUTION: External Email**

Dear PCD CompPlan EIS:

- I am concerned about the welfare of urban landscapes and wildlife in section P 3-3. It states “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild”. This is vague and needs to be clear about the impact on wildlife and plant landscapes in this plan.
- What is the data and/or analysis that shows any tree planting programs will be effective in replacing lost urban forest landscapes? Increased hardscapes (sidewalks, driveways, etc.) rob the landscape of green spaces/tree cover. Section P 3-3 vaguely states, “none of the alternatives would be expected to have significant unavoidable adverse impacts on tree canopy cover.”
- The CompPlan’s statement that 30% urban tree canopy can be accomplished. How is that possible when the current urban tree ordinance reduces private land available for trees? How much public land is actually available to reach this 30% goal? Trees removed for development need to have new trees planted . . . how many trees are needed to be planted yearly to accommodate the trees lost in development?

133-1

Thank you for your consideration.

Barbara Broderick  
3911 NE 82<sup>nd</sup> St.  
Seattle, WA 98115

**From:** [Betty Brooking](#)  
**To:** [PCD CompPlan EIS](#); [Morales, Tammy](#); [Woo, Tanya](#)  
**Subject:** Environment Impact  
**Date:** Monday, May 6, 2024 12:20:55 PM

---

**CAUTION: External Email**

Dear Planners and Council Members,

The Environmental Impact of the Comprehensive Plans does not seem to address the issue of trees and plants. How can an environmental statement not consider these vital environmental issues? That's one question, plus I have a few more.

Section P 3-3 is very concerning to say the least. Is it true that none of the alternatives would have a more favorable impact on the tree canopy, or other plant or animal species, as is written in this section? Really?

If the plan states that Seattle will continue working toward its goal of 30% canopy, is there enough public land out there to reach this goal, since the new tree ordinance reduced private land available for tree planting? Also, what is your calculation about the number of trees that will need to be planted yearly due to tree removal to make way for development?

I would appreciate your response to these questions.

Regards,  
Betty Brooking  
1738 S Dawson St  
Seattle, WA 98108

134-1

## DEIS StoryMap Comment

Name: Amy Broska

Email: broskaamy@gmail.com

Date: 4/17/2024

## Comment:

As the largest city in the Puget Sound Region we have a duty to meet the outlines in the Puget Sound Regional Council VISION 2050. To meet these goals we need to seriously consider the previously discussed Alternative 5 Growth Plan with higher growth targets. Seattle's Comprehensive Plan should accommodate for the housing crisis that affects all residents in Washington State. Specifically, the city should be researching granting tax breaks and fee deferrals to housing projects that include affordable units to help make the housing we so desperately need easier to build.

I hope to see the city further study the effects of what will happen if we do not meet the required amount of housing built by 2050. We deserve to have a city that can fit all of us in it.

135-1

**From:** [Ellen Braun-Kelly](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:05:20 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Ellen Braun-Kelly  
embkelly@comcast.net  
10623 Exeter Ave NE  
Seattle, Washington 98125



**From:** [Ellen Braun-Kelly](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:47:41 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Seattle is no longer green. Mass building of homes with little attention paid to the environment is endangering everything that makes Seattle beautiful. As I look at an enormous Douglas fir across the street, which is the home of eagles, and numerous other bird species, I know it, too will probably be hacked down, as the house is for sale, and every house that is old in my neighborhood gets mowed down, along with trees, shrubs and topsoil that has been here for hundreds of years. Instead 3 or more homes will be built on the lot, disregarding any of the natural environment. The houses are built so close to each other, that not even native trees or shrubs will sustain any birds, as there will be no room. For instance, native chickadees require 6000 bugs from native plants per day when they feed their young.

Developers are the only people making money on these homes. They are NOT helping the housing shortage problem, because in my neighborhood, they sell for prices only wealthy people can afford. What is even worse is their plans are being approved, and in the plans, the trees are shown. However, they get removed anyway, saying they are endangering the buildings, and don't get re-reviewed. This is not a solution. Seattle is shooting itself in the foot, as the loss of wildlife and greenery will drastically change the environment.

Thank you for listening.

Ellen Braun-Kelly

Ellen Braun-Kelly  
embkelly@comcast.net  
10623 Exeter Ave NE  
Seattle , Washington 98125

137-1

**From:** [Beth Brunton](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 11:50:01 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Beth Brunton  
bebrunton@hotmail.com  
1900 28th ave s  
Seattle, Washington 98144

**From:** [Barb Burrill](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** 3 questions regarding the EIS  
**Date:** Sunday, May 5, 2024 10:28:37 AM

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**CAUTION: External Email**

Hello -

I have some questions about the Environmental Impact Statement in the draft Comprehensive Plan.

139-1

- 1) How can it be proven that tree planting plans make up for the loss of mature urban trees?
- 2) How much public land is available to help us reach the 30% tree canopy goal if private developments are allowed to remove trees. How many trees on that public land can be planted? And again, planting new trees does not make up for removing mature trees, particular conifers.
- 3) What exactly is the impact on wild animal or plant species? Of course, removing mature trees also removes habitats for animals that live in those trees. How will this impact be quantified?

I volunteer several hours each week to take care of and improve public spaces in a local city park. I hope that city officials will be as mindful of the importance of these green spaces as are these many citizen volunteers who live in Seattle.

Barb Burrill  
Wallingford

**From:** [Cedar Bushue](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 4:07:32 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

As it stands, South Park in particular needs a net of 6k trees planted and maintained in the next 10 years, to avoid the worst effects of climate change. But trees are regularly cut down by developers, due to lack of any meaningful regulation geared towards environmental justice areas. Thus resulting in less canopy, hotter areas, and more trees that must be planted and maintained to meet the canopy goal for South Park.

Thank you for your consideration.

Cedar Bushue  
cedar.bushue92@gmail.com  
1206 South Southern Street  
SEATTLE, Washington 98108

**From:** [Michael Byrd](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Tuesday, May 7, 2024 7:47:01 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Michael Byrd  
byrd4646@msn.com  
414 Malden ave E, E  
Seattle, Washington 98112

141-1

**From:** [nc](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#); [LEG\\_CouncilMembers](#)  
**Subject:** Seattle City Plan - we need green space and mature trees!!  
**Date:** Monday, May 20, 2024 3:50:59 PM

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**CAUTION: External Email**

Hello:

Have lived in Seattle for over 30 years and one of the biggest reasons I loved it was because of all the conifer trees, the green and the fresh air... neighborhoods with trees, plants, birds, wildlife.

No one calls Seattle the Emerald City any more. I hope it doesn't continue to lose green canopy, green spaces and become just more crowded, hotter and more like Manhattan, but it sure seems to be heading that direction.

None of the city comp plan versions seem even to consider nature, the value of trees, especially mature trees, protecting existing green spaces or creating more green spaces which are absolutely essential to the quality of life of Seattleites.

Trees and dense housing are not mutually exclusive! Please get creative! Lost mature trees and their benefits to the air, to water dispersal, to sequestering CO2, to benefit the wildlife and to benefit mental health are lost forever.

Please consider helping to keep Seattle green and Emerald... how amazing that would be to preserve what we already have instead of squandering irreplaceable trees and green space to create a concrete human-made infrastructural desert and how amazing it would be to go forward with creating more green space alongside with all the inevitable infrastructural growth.

Please work to keep Seattle green!!

Thanks for reading,

Nancy C.

**From:** [willieopal@protonmail.com](mailto:willieopal@protonmail.com)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#); [Hollingsworth, Joy](#); [Woo, Tanya](#); [Nelson, Sara](#)  
**Subject:** Trees are important to Seattle!  
**Date:** Friday, May 3, 2024 6:19:59 PM

---

**CAUTION: External Email**

I am writing to comment on the first draft of Seattle's comprehensive plan. It is very important to choose an alternative that will protect Seattle's trees in this critical time of climate change and the growth of our city. Trees give us so much – they make the city cooler, they clean the air, they provide oxygen, they improve our mental health, add beauty, and, importantly, humans are not the only residents of Seattle. Trees are home to wildlife, which also deserves a place to live and adds so much to human life, too. I am a beginning birder and I am learning how important habitat is for our city's birds and other animals.

Of the five proposed alternatives, I am asking you to choose alternative 2 or 4 so that we can preserve the most trees in our urban environment as we continue to add density to our city.

It is a much better idea to keep the trees we have than to cut them down and then plant new trees. What is the evidence that planting new trees in areas that have been developed and paved will make up for the existing tree canopy and forest that we will lose?

How will the new comprehensive plan affect the natural world— flora and fauna—of Seattle?

How many trees will need to be planted every year to compensate the loss of trees due to growth and development? How will we reach the goal of 30% tree canopy, and how much public land will be available for this goal?

We need urban nature. **Choosing density at the cost of nature is short-sighted and the loss of nature will be very hard to recover and have detrimental impacts that would be much better avoided to begin with.**

Sincerely,

Amy Candiotti

1415 E. Union #1

Seattle, WA 98122

Sent with [Proton Mail](#) secure email.

**From:** [Patricia Cannon](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Tuesday, May 7, 2024 8:52:59 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Patricia Cannon  
pattycannon@gmail.com  
8160 21st Ave NE  
Seattle, Washington 98115



**From:** [A.C](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Bring back alternative comprehensive plan 5!  
**Date:** Sunday, May 5, 2024 1:00:59 AM

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**CAUTION: External Email**

I'll keep this short. We need more housing, a lot more of it, all over the city. It makes absolutely zero sense to not do that. There is no sound, logical reason to not allow much more housing, and much more density, in the city. People are not going to randomly decide to stop moving here as much as we might wish that.

Single family zoning is a relic of a bygone era where naive people thought highways, cars, and suburban sprawl were the future. Now we've seen the countless problems that that mindset has brought, and we know better.

We need more than just a few "urban villages." Seattle isn't a quiet suburb in the middle of nowhere. It's a major metropolitan city with an exploding population that shows no signs of slowing down. It's ridiculous to not allow at least mid size apartment buildings literally everywhere in the city.

Basically, the alternative comprehensive 5 is the MINIMUM we should be considering. I'd welcome something even bolder, but I think it's a decent compromise and we shouldn't even be considering the mayor's anemic housing proposal. Most everyone in the city today wants to see a lot more housing built. Attitudes have changed a lot in the last decade and the mayor seems to have missed it.

All the city needs to do is stop standing in the way of housing.

Signed,  
Derrick (Alex) Cantrell  
Pinehurst resident

**From:** [Erica Carre](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Re: Seattle Comp Plan/130th Station Rezone  
**Date:** Monday, May 6, 2024 4:52:54 PM

---

**CAUTION: External Email**

To whom it may concern,

I would like to state that I am against urban village and only lukewarm to the idea of neighborhood anchors.

I purposely bought a home in a neighborhood that offered front and backyards and single family homes. I chose Northgate because it was one of the few that had not been destroyed by rezoning. The rezone you are considering will take away yards and privacy and build 80ft complexes right up against property lines. It's atrocious and unwelcoming to the property owners who already live here.

What you may consider progress and growth, I and many others consider problematic, disruptive and destructive to our livelihoods. I do not want my neighborhood rezoned in any form that would potentially allow a massive apt complex or otherwise to be built towering above my house and yard. Simple as that

Thank you.

Very concerned homeowner,

Erica Carre

146-1

**From:** [Erica Carre](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Seattle Comp Plan/130th Station Rezone  
**Date:** Monday, May 6, 2024 12:18:29 PM

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**CAUTION: External Email**

I do not want my neighborhood rezoned in any form that would potentially allow a massive apt complex or otherwise to be built towering above my house and yard. Simple as that.  
Thank you.  
Very concerned homeowner,  
Erica Carre

146-1  
cont

**From:** [Mal Carter](#)  
**To:** [PCD\\_CompPlan\\_EIS](#); [LEG\\_CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Saturday, May 4, 2024 10:29:05 PM

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CAUTION: External Email

To whom it may concern,

Please note my comment on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Mal Carter, community member

147-1

**From:** [Jovi Catena](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:45:55 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Jovi Catena  
jovicatena1@gmail.com  
8507 s. 115th st  
Seattle, Washington 98178

**From:** [Christine Cave](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 6:01:54 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

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Thank you for your consideration.

Christine Cave  
cmcave@aol.com  
735 N 72nd  
Seattle, Washington 98103

**From:** [Meg Chadsey](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 13, 2024 8:18:55 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

[Resubmitting because first version sent prematurely]

The Draft EIS must be amended to protect and enhance Seattle's tree canopy. This is important to all Seattle residents because trees are one of the most cost-effective (not to mention beautiful) ways to reduce heat, flooding, and air pollution that is getting worse every year. Trees improve health, especially in low income communities, and make the city someplace people actually want to live. Other Northwest cities like Portland recognize this and have enacted measures to protect urban trees, but in Seattle, I watch one tree after another get cut down and replaced by concrete or by spindly street trees destined to die in the first year. We need to take a systems approach and understand that trees are one significant puzzle piece that defines our future. Continuing to take a siloed approach to trees and many other topics will likely cost Seattle billions of dollars over the coming years and result in an unlivable city. It does not need to be this way!!

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

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- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Meg Chadsey  
mschadsey@gmail.com  
3629 Bagley Ave N  
Seattle, Washington 98103



**From:** [Meg Chadsey](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 13, 2024 8:11:16 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

The Draft EIS must protect and enhance Seattle's tree canopy. This is important to all Seattle residents because trees are one of the most cost-effective (not to mention beautiful) way to reduce heat, flooding, and air pollution that is getting worse every year. Trees improve health, especially in low income communities, and make the city someplace people actually want to live. Other Northwest cities like Portland recognize the value of mature urban trees, and have enacted measures to protect them around the country demonstrate the trees are one of the most cost effective climate measures and begin to rebuild what they have lost.

Yet, in Seattle, I watch one tree after another get cut down and replaced by concrete or by spindly street trees destined to die in the first year. We need to take a systems approach and understand that trees are one significant puzzle piece that defines our future. Continuing to take a siloed approach to trees and many other topics will likely cost Seattle billions of dollars over the coming years and result in an unlivable city. It does not need to be this way!!

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

151-1

Thank you for your consideration.

Meg Chadsey

[mschadsey@gmail.com](mailto:mschadsey@gmail.com)

3629 Bagley Ave N

Seattle, Washington 98103

**From:** [mtl2bk@gmail.com](mailto:mtl2bk@gmail.com)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Seattle Comprehensive Plan Comment  
**Date:** Wednesday, April 17, 2024 8:33:35 AM

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CAUTION: External Email

Good morning,

I live in Columbia City with my wife and two kids.

I have read both the state bill HB 1110 and Seattle comprehensive plan. I have to say the state bill is fairly straightforward and easy to comprehend. I was left knowing exactly what the changes would be.

Seattle plan is extremely wordy, full of vague details and extremely hard to digest. The maps are not detailed enough and add to the confusion. I was left wondering actually what were the proposed zoning changes and what type of housing will be allowed on what types of lots.

My recommendation is to follow the state bill and abandoned the comprehensive plan. Our state already spent time and money on this. Let's use the money we would save by adopting the state bill and put it towards affordable housing.

Wishing for more practical thinking!

Kind regards,

Marc Charbonneau

152-1

**From:** [Marcos Chavez](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:24:45 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Marcos Chavez  
marcoschavez43@gmail.com  
818 NE 106th St, Apt 211  
Seattle, Washington 98125

153-1

DEIS StoryMap Comment

Name: Ivan Chernyshev

Email: ivan.a.chernyshev@gmail.com

Date: 4/10/2024

Comment:

I am a renter in Wallingford, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would lower the cost of housing across the city. Instead the current draft plan will increase already unaffordable housing costs. To create a more equitable, sustainable, affordable city, the plan should allow much more housing to be built away from noisy, polluted arterials.

If the City of Seattle adopted my above proposed changes, then we would be able to create a more affordable city for everyone.

154-1

**From:** [Wendy Church](#)  
**To:** [PCD CompPlan EIS](#); [Morales, Tammy](#)  
**Subject:** EIS, questions  
**Date:** Friday, May 3, 2024 8:21:49 AM

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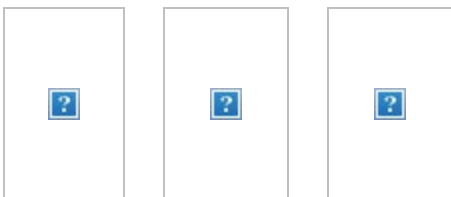
**CAUTION: External Email**

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” **What is the impact of the plan specifically on Seattle’s plants and animals?**
2. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?**
3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. **How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?**

155-1

\*\*\*

**Wendy Church, PhD**  
[wendyschurch.com](http://wendyschurch.com)  
[@wendychurchwriter](mailto:@wendychurchwriter)



**From:** [Robert Clabough](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comp Plan Comments  
**Date:** Thursday, May 16, 2024 9:04:48 PM

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**CAUTION: External Email**

Hello, my name is Robert Clabough.

I wanted to leave a comment on the Seattle plan, in favor specifically of more transit and further upzoning.

Seattle has had a housing crisis for a very long time, longer than I've lived here. In the short 10 years I've lived in the area housing has only become more expensive and less available. While I myself am fortunate enough to have purchased, there are many many more who are finding it near impossible to purchase, or even rent around Seattle.

The solution is obvious - more housing. To accomplish this we need to rethink the outdated zoning laws of the 1950s and 60s and start thinking about density across the city. More apartment buildings sure, but specifically middle housing. We are missing the middle zoning in this city, the places in between single family homes and large apartment buildings. Allowing smaller row-style housing and townhouses in what were previously less dense areas would lessen the crisis, allowing people to both purchase property and more easily rent.

Mixed use housing is also a benefit, I would encourage more looking into mixed commercial and residential. Allowing buildings with commercial on the ground floor with residential above is great for communities. Look at Woodinville and their new Schoolhouse district, it's the busiest area of town. People can now live and shop in the same place, even work there, all within walking distance.

These ideas would make Seattle more accessible and more available to people. Staying with single family housing is expensive and wasteful during this crisis. We should be celebrating that so many people want to live in our great city, not trying to "gatekeep" our city and push others out.

One final note, this is all accomplishable with transit. I'm glad to see the plan allows for extra dense zoning around transit. While we also have a housing crisis we also have a car crisis, and the only way to fix that is to reduce how many cars are on the road. I envision a future where Seattle would allow you to live without requiring a car. We aren't there yet, but I do hope that with proper planning we can become a city where you could walk outside and grab a bus or train to anywhere else in the city.

Thank you for taking the time to read this, and am happy to offer any clarification if needed.

Robert Clabough

**From:** [Lisa Clark](#)  
**To:** [LEG CouncilMembers](#); [PCD CompPlan EIS](#)  
**Subject:** Tree protection with density  
**Date:** Saturday, May 4, 2024 7:10:49 AM

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**CAUTION: External Email**

I would like to address the comprehensive plan so we can build 100,000 new homes while preserving our trees. Two beautiful, healthy cedar trees we removed across from my house, and these should have been protected though the current tree protection plans. It just seems that little is being done for protection of our city's treasures.

157-1

In Section P 3-3, it states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Where is the study that was done to prove that that tree planting programs and increased hardscape will be able to compensate for all of the trees that will be lost

From what I understand from the plan, it states that Seattle will make progress toward its 30% canopy goal. However, new tree ordinance substantially reduces private land available for trees. How much public land, and where is this land, that will be needed to reach this goal? How many trees, and what kind of trees need to be planted on public land to compensate for all the trees that are going to be removed through development?

Thank for your attention to this matter,

Lisa Clark



**From:** [Lisa Clark](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 6:30:32 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Lisa Clark  
lisaclarklisaclark@gmail.com  
PO Box 23286  
Seattle, Washington 98102

158-1

**From:** [Dave Clark](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** FW: Comments on Seattle Comp Plan EIS  
**Date:** Monday, May 6, 2024 2:15:23 PM

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**CAUTION: External Email**

Mr. Holmes,

I inadvertently sent the email below to the wrong address. Hopefully I got it right this time.

159-1

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**From:** Dave Clark  
**Sent:** Monday, May 6, 2024 2:06 PM  
**To:** PDC\_CompPlan\_EIS@seattle.gov  
**Cc:** maritza.rivera@seattle.gov  
**Subject:** Comments on Seattle Comp Plan EIS

Seattle Government:

I am providing comments on the draft EIS for the Seattle Comp Plan.

My primary concern is the lack of detailed mathematical and technical analysis concerning the impacts of adding 100,000 new housing units to the City on our precious and limited natural landscape. In particular, what will be the true and expected impact of building these many new homes on the landscape and natural environment that currently exists in the City? This is a basic concern and question that the draft EIS fails to address in any detailed manner. Blanket statements in the draft EIS suggesting that significant adverse impacts on tree cover and other natural landscape elements are not expected is not backed up with any analysis to support those statements.

Professionally authored studies are currently available to the City concerning the need for changes to the City's tree protection regulations which currently do almost nothing to protect significant trees and the acreage of tree coverage in the City. Adding 100,000 new homes to the City that currently doesn't sufficiently regulate tree coverage and protections will do nothing more than exacerbate the loss of canopy cover and effectively increase the effects of solar warming in large parts of the City. Absent any detailed or rigorous technical analysis on these impacts, the draft EIS is postulating an impact analysis that is seriously flawed in stating "significant adverse impacts on trees and canopy cover" is not expected.

Global warming is a phenomenon that is scientifically supported by essentially all corners of professional and scientific studies and literature. The draft EIS makes unsupported conclusions and statements of negligible or no adverse impact from any of the Plan alternatives on existing landscapes, vegetation, trees and tree cover/canopy that fly in the face of scientific studies to the contrary in considering the effects of same on global warming. The

City has a regulatory and legal responsibility to do a much better analysis of these Plans impacts on landscape elements and should, at the minimum, produce that analysis as an amendment to the draft EIS that is circulated for public review and comment.

Thank you for the opportunity to comment.

Dave Clark  
4005 NE 60<sup>th</sup> Street  
Seattle, WA 98115

206-817-8569 (cell)

159-1  
cont

**From:** [Linda Clifton](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 10:28:12 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

We certainly need more affordable housing as our city grows, but our plans must create healthy and livable communities across our city.

That means more trees and tree preservation as we build the homes and businesses that will nestle among them. Preserving as many large trees as possible is better for our own well-being and for the planet.

The following are comments with which i wholeheartedly agree on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Linda Clifton  
lclifton1@mindspring.com  
4462 Whitman Ave N - Upper  
Seattle , Washington 98103

## DEIS StoryMap Comment

Name: Travis Close

Email: travis.close@gmail.com

Date: 4/8/2024

## Comment:

1. The City should study the impact of higher floor area ratios for middle housing in all residential zones, such as those corresponding to the state model code for middle housing (allowing FAR of 1.6 for sixplex).
2. Study how and where to place social housing projects that are feasible to build (50+ units) in every neighborhood; and how this can impact the production of affordable units.
3. Please study eliminating parking minimums citywide.
4. Please study the impacts of allowing for greater height and density bonuses within a quarter mile of transit stops.
5. Study how allowing increased height of residential buildings, in exchange for reduced lot coverage (including for parking), can preserve tree canopy.
6. Please study the impacts of granting tax breaks & fee deferrals to housing projects that include affordable units.

161-1

DEIS StoryMap Comment

Name: Travis Close

Email: travis.close@gmail.com

Date: 5/6/2024

Comment:

I recently learned that there is a density bonus applied to certain projects that provide a certain amount of public space in their yard. It would be beneficial to study the impacts of a density and/or height bonus for middle housing projects with 2-6 units in residential areas that preserve additional green space in their yards beyond the minimums required. This type of incentive could have important, beneficial effects with respect to pervious surfaces, prevention of stormwater runoff, tree preservation, and preventing heat islands. Thank you for your consideration.

162-1

**From:** [Ashley Cohen-Lewe](#)  
**To:** [PCD\\_CompPlan\\_EIS](#); [LEG\\_CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Sunday, May 5, 2024 2:27:17 AM

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CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Ashley Cohen-Lewe  
Anything But Ordinary

163-1

May 18, 2024

To: [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)

To: [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

cc: [Bruce.Harrell@seattle.gov](mailto:Bruce.Harrell@seattle.gov) , [maritza.rivera@seattle.gov](mailto:maritza.rivera@seattle.gov)

I have lived in the Ravenna neighborhood for 39 years. During that time, much has changed throughout the City of Seattle and it is clear we need to plan for continued growth. **The draft Comp Plan and DEIS provide ideas for the future but more work must be done to acknowledge our historic and natural resources as we plan for growth.** Of most concern, is that the plans will bring greater density to our City but will not actually provide affordable housing. New, affordable housing must be planned for along with amenities such as parks, open space, preservation of tree canopy, schools, transportation and other infrastructure. I believe the draft documents can be strengthened with the following in mind.

164-1

### Protect Historical Resources

In 2018, the Ravenna-Cowen North Historic District (RCN NHD) was listed in the National Historic Register of Historic Places, as well as the Washington State Register of Historic Places, where it joins other districts which contribute to the rich cultural heritage of Washington State. The proposed One Seattle Plan Land Use Goal LU G16 (page 59) identifies three important reasons to preserve, maintain, and celebrate historical and cultural resources. The RCN NHD fulfills all of these. However, the plans fall short of adequate mitigation to protect these resources.

- Policy LU 16.1 talks about maintaining a comprehensive survey and inventory of Seattle's historic and cultural resources, but this inventory is very incomplete and still needs significant development. This inadequacy must be addressed or resources will be lost due to lack of knowledge/recognition. This is where "advance planning" can actually work (see DEIS page 3.9-121, last paragraph) because it would help *avoid* adverse impacts on historic/cultural resources.
- Policy LU 16.3 talks about supporting designation of areas as historic, cultural, and special review districts, but NHDs are not recognized as special review districts or exemptions. Recognition of NHDs must be added here. Recognition and protection for NHDs must be part of mitigation or these will be lost due to redevelopment related to upzoning and the One Seattle Plan.
- Policy LU 16.4 talks about tailoring development standards for a special review district, but this policy needs to include NHDs or they will be degraded and lose their historical/cultural integrity and ability to interpret Seattle's history



- Policy LU 16.5 talks about encouraging adaptive reuse of designated landmark structures by allowing uses in these structures that might not otherwise be allowed under the applicable zoning. This policy should also be applied for structures in historic districts and NHDs in cases where this approach could help the district retain its architectural integrity.
- Policy LU 16.6 talks about incentives to restore or reuse designated landmark structures and specified structures within designated districts. While this policy is fairly narrow, it should be *broadened to include additional incentives for restoration and reuse of historic structures* and *should also apply to NHDs* but fails to include them. These incentives should also apply to NHDs and/or contributing structures within NHDs to avoid or mitigate adverse impacts and to prevent loss of the NHD's integrity.
- Policy LU 16.7 talks about protecting the scale and character of the established development pattern in historic districts, while encouraging compatible and context-sensitive infill development. This is a very important policy, however, it fails to include NHDs. These incentives should also apply to NHDs to avoid or mitigate adverse impacts.

The DEIS provides a list of "Potential Mitigation Measures (see pages 3.9-119 and 3.9-120). While many of these can be helpful and/or are already required under other regulations, mitigation for historic/cultural resources and NHDs needs to incorporate these measures more substantially.

Also, please consider that mature trees and landscape are elements of RCN NHD, as well as many other historic/cultural districts. Protection of these not only provides part of the context for NHD, but recognition of the NHD reciprocally can help protect these elements of the environment.

### **Improve Land Use and Housing Policies**

It is interesting that for Regional Centers, GS 3.2, p. 22 has the language "Recognize and plan for the unique role and character of different neighborhoods within large regional centers." ***The same language be added for Urban Centers (GS 4, p. 24 and 25) and Neighborhood Centers.*** The Roosevelt Urban Center (p. 25) is a mix of commercial, high rise and "craftsman."

LU 2.9 (p.38) states: *Encourage the preservation of characteristics and features that contribute to communities' multiple identities, including in areas of historic,*

*architectural, cultural, or social significant.*" This is a very important policy and it needs to be taken seriously.

To help facilitate this, LU Policies should be added to recognize and plan for the unique role and character of different neighborhoods:

- Note that the definition of middle housing in E2SHB 1110, p. 5, para (21) (lines 32-35), "means buildings that are compatible in scale, form, and character with single-family houses ... ["single family" is defined at p.7, para.32, lines 32-34.]

Add a new LU that states the same language as above – *Middle housing means buildings that are compatible in scale, form, and character with single-family houses.*

- Add the italicized language to LU 4.1 (p.40). Allow for flexibility in development standards so existing structures, *trees and green space* can be maintained and improved and new development can respond to site-specific conditions.
- LU 4.18 (p.48), second bullet, add italicized language – responds to the surrounding neighborhood, *character*, and context, including historic resources. Thus, for the RCN NHD and any other NHD, the type of housing built should preserve the character of the NHD.

***With regard to housing/displacement:***

The proposed upzoning will increase the tax base for properties in the RCN NHD that will continue to displace owners from our neighborhood (this has been happening since the last rezone) as property taxes have become unaffordable for homeowners. This trend shifts ownership of these historic homes and many historic properties to developers and lessors, thus consolidating the trend of land ownership. This applies to any other NHD or historic district, and LU policies to prevent this are inadequate.

Another type of housing that exists in our neighborhood and the RCN NHD, which is located close to the University of Washington, is the group home, usually a historic home that has been rented to a group of unrelated people who often are college students and/or people with jobs in Seattle. This type of housing offers an often more affordable alternative for housing groups of people, as well as for people who prefer older buildings and garden areas. This type of housing will be displaced by redevelopment. Many existing Seattle homes can be subdivided or use a "community" model with four bedrooms with the other spaces for the shared use within the structure. Adding policies to further protect this type of use increases housing flexibility and can help protect historic housing.

164-2  
cont

164-3

Still of concern is that while the One Seattle Plan would create additional housing units per the directive of E2SHB 1110, increasing the number of units will not bring affordability. Thus, the proposed impacts on displacement and historic preservation caused by the proposed upzoning would occur without bringing enough benefit to justify the losses. This was largely the basis behind the recent Los Angeles County Superior Court ruling that overturned CA Senate Bill 9, which had overturned single-family housing in five California cities. See: <https://www.latimes.com/homeless-housing/story/2024-04-29/law-that-ended-single-family-zoning-is-struck-down-for-five-southern-california-cities> .

164-3  
cont

### **Protect Plants, Animals and the Natural Environment**

A stated goal of the Comprehensive Plan is to “protect and enhance” the natural environment (p.36). This document includes some positive goals and policies but falls short in several areas.

#### ***Furthermore, the DEIS falls short:***

The DEIS, 3.1.3, states that *“Projects that entail vegetation clearing would likely reduce the diversity and/or abundance of plants and animals on and near the affected parcels. These impacts would be expected to diminish over time as vegetation regrows in temporarily disturbed areas.”* Most projects that are moving forward are maximizing lot coverage, with little setbacks or vegetative areas around them. This general statement is misleading and implies a no problem exists when developments occur. Mitigation must address this issue.

164-4

The DEIS, p. 3.3-7, states, *“In 2023,... the city’s tree ordinance was updated. It is anticipated that these updates will decrease the rate of canopy loss associated with residential and commercial development.”* **Many urban forest practitioners, including Seattle’s Urban Forestry Commission, do not share the expectation that the new tree protection ordinance will decrease the rate of canopy loss associated with residential and commercial development, especially on Multifamily, Commercial, and Seattle Mixed Zones.** The combination of high hardscape allowances, rigid delineation method for tree protection areas, and reduced authority by departments to request alternate designs to accommodate tree preservation make it likely that any sizeable, regulated tree on these lots would be permitted for removal.

#### ***The DEIS conclusions are hypothetical, not fact-based:***

The DEIS concludes, “Action alternatives would tend to increase regional tree canopy by focusing growth in urban areas and preventing sprawl.” “[D]evelopment within the urban environment of Seattle could indirectly benefit the tree canopy pressure in less-developed areas outside the city.” (Emphasis added.) The DEIS does not identify any data supporting an indirect benefit that regional tree canopy would increase, not even

the acreage currently remaining that is less developed. Sprawl continues, with suburban areas with lawns that do not provide needed habitat for birds and other wildlife. Nor does the DEIS identify the reasons people seek housing outside Seattle. And, apparently, no one at OPCD has bothered to traverse the “region.” King County is rapidly becoming one big sprawl as people search for more affordable housing options outside of Seattle. Moreover, state law (E2SHB 1110) now requires most municipalities to increase density, which could mean more tree cutting region-wide. The DEIS conclusions are fictitious, unsupported hypotheses and pure fantasy.

The reality is that if real mitigation to preserve Seattle’s tree canopy is not implemented immediately, Seattle will be a polluted, heated environment impacting its residents, other animals and native flora. One only has to look at the Roosevelt Urban Village, parts of which transformed within four years to a heat island.

***With regard to the tree canopy:***

On p. 150, Goal CE G12 refers to the tree canopy goals and lists several related policies. The following goals/policies should be added:

- Strengthen and enforce tree protections throughout the City to ensure Seattle's current canopy tree policies and goals continue. The Seattle One Plan would inexplicably reduce that policy’s goals.

The 2035 Seattle Comprehensive Plan includes Policy EN 1.2 (p. 133) which states, “Seek to achieve citywide tree canopy coverage to **30 percent by 2037, and 40 percent eventually**, which maximizes the environmental, economic, social, and climate-related benefits of trees.” This is **current Seattle policy**. Current Seattle Policy also includes Policy EN 1.7 which states, “Promote the care and retention of trees and groups of trees that enhance Seattle’s historical, cultural, recreational, environmental, and aesthetic character.” ***Both policies should be retained.***

*However*, for unexplained reasons, without discussing the adverse implications of this major reduction in tree canopy, the Seattle One Plan changes **current policy to a goal of 30 percent with no increase over time**. Moreover, the goal, CE G12 (p.151) *makes a false statement of fact*. The actual current tree canopy is 28 percent due to a loss of 235 acres, the size of Green Lake. CE 12 maintains “Seattle has a healthy urban forest with a tree canopy that covers at least 30% of the land [this is not true....

It is critical that the Seattle One Plan maintain the 2035 Comp Plan Policies EN 1.2 and EN 1.7, for multiple reasons:

- The more trees, the better for all of us. Trees absorb and mitigate water run-off. Trees absorb pollution. Trees reduce carbon. Trees reduce heat, which is why Seattle is trying desperately to plant more trees in underserved communities to

prevent residents from dying. Currently, due to recent development in Neighborhood Residential areas, 19%, or more, tree canopy was lost. Seattle One Plan, Ex. 3.3-7. Neighborhood Residential has the highest percentage of trees in the city. The Ravenna-Cowen NHD is a green oasis with plentiful trees and green cover where Roosevelt residents now come to escape from their heat island high-rise homes. The NHD represents a historic era and embodies the reasons current Policy EN 1.7 should remain in effect.

- Trees also contribute to a personal sense of well-being and reduce crime. <https://www.motherjones.com/environment/2019/04/trees-crime-cincinnati-philadelphia-ida-b-wells-chicago/>.
- Adequate tree canopy is essential for birds and other wildlife. Among the 120+ birds tabulated city-wide by the annual Seattle Audubon Christmas Bird Count, tree-dependent species include: Pileated, Hairy, Downy, Northern Flicker and Red-breasted Sapsucker Woodpeckers; Barred, Western Screech, Great Horned and Saw-whet Owls; Cooper's, Sharp-shinned, and Red-tailed Hawks; Black-throated Gray and Townsend's Warblers, Pacific Wren, Brown Creeper, Red-breasted Nuthatch, and Varied and Swainson's Thrush. These birds require a dense forest canopy in which to hunt, feed, nest and take cover. These birds become scarce when tree canopy cover falls below 20%. There is a direct relationship between bird abundance and tree canopy. Some might say, just develop everything except the designated parks and green spaces. ***As all major wildlife and bird organizations and conservation scientists will tell you, however, these "postage stamp" preserves are not viable unless green corridors connect them. The tree canopy in Seattle is critical to ensure these green corridors.***

The Ravenna-Cowen/Roosevelt community is keenly aware of the impact from tree reduction. Our naturalist conducted a bird count. From Ravenna Park north, the bird species decreased dramatically as the trees diminished. Due to development in Roosevelt, where high-rise apartment buildings developers bulldozed all the trees, within a few years that area became a heat island with few birds and few species.

- Need for Additional Policies and Goals Due to Climate Change Impact on Tree Canopy. The Seattle One Plan contains two policies that address tree canopy and climate change, CE 12.2 and CE 12.3 (p. 150). Additional policies are needed to address this existential issue. Tree death from heat is acknowledged in the discussion, but the policies are vague. Communities around the world are emphasizing the use of native flora in landscapes and researching the use of species that would adapt readily to warmer climate. See: <https://www.discovermagazine.com/environment/cities-are-rethinking-what-kinds-of-trees-theyre-planting> If Seattle is to retain a healthy tree canopy, the Seattle One Plan must address this issue with more specificity, with specific goals, policies and

time-tables. This issue requires research, knowledgeable staff, and funding.

***With regard to the natural environment and urban wildlife:***

- The Climate and Environment Section beginning on p. 137, should include **more specific goals and policies regarding the significance of biodiversity and urban wildlife.**

This idea is reinforced by Professor John Marzluff, University of Washington Ornithology, who points out in his book Welcome to Subirdia, “When natural land cover measured across areas the size of neighborhoods, metropolitan areas or counties drops to less than one-third of its historical extent, its ability to sustain native biodiversity crumbles.” Marzluff warned that “...not considering the amount and arrangement of green spaces that connect urban people with nature is inefficient and dangerous.” He added, ***“To remember what biodiversity is, and why it is important, we must conserve nature close to where we live and work.”***

Neither the Seattle One Plan nor the Seattle Plan DEIS provide any base-line data as to the current bird count (by number and species) for indigenous and migratory birds and the impact of the Plan.

Specific policies regarding natural environment and urban wildlife should include the following:

- First, determine status and trends of biodiversity within Seattle;
- Recognize and support Indigenous-led conservation and environmental stewardship;
- Seek new financing mechanisms and incentives for conservation, natural space management, urban forestry, etc.;
- Protect and enhance habitat quality within natural areas, parks, and open spaces
- Reduce urban hazards to biodiversity, including pesticides; reflective glass; plastic and other pollution; and negative impacts from certain human-associated and introduced species, such as outdoor cats and unleashed dogs.
- Encourage residents and visitors to learn about, celebrate, study, and conserve urban biodiversity.
- Maintain current trees and green cover on Neighborhood Residential and Multifamily lots.

164-4  
cont

***With regard to Mitigation:***

The DEIS mitigation options are incomplete and fail to consider substantive steps and regulations that would reduce loss of trees/wildlife habitat. The mitigation measures below will help preserve trees and green cover on Neighborhood Residential lots

- *Amend and strengthen the Seattle Tree Ordinance as recommended by the Urban Forestry Commission.*
- *Retain current Neighborhood Residential setback requirements.* This will reduce the likelihood that tree canopy and green cover will be reduced.
- *Require developers to design projects that preserve trees, with oversight by professionals who know how to accomplish this.* While the DEIS sets out "green" alternatives, such as permeable driveways, solar panels, wood construction, limiting fossil fuels, it inadequately addresses the most valuable of our green resources, trees. There is technical knowledge on how to build and protect trees. Groups of architects now design buildings focusing on tree preservation. See, for example, Matthews Beach Cottage – NW Green Home Tour. To accomplish retention of as many trees and green space on Neighborhood Residential lots, the DEIS is deficient because it did not address solutions, such as requiring developers to identify the location of trees and species at the onset of the permitting process; requiring the developer to design the project to retain the maximum number of trees, with oversight by arborists and other professionals who understand how to accomplish tree retention.

***With regard to Access to Public Open Space, p. 157:***

This section speaks to “Public Space” and uses this term to imply parks and natural areas. Public Space can be unfortunately be interpreted by some as a concrete plaza. This term should either be deleted or defined as a space that include a majority of natural landscaping similar to the definition of the “Open Space” (which is defined as containing elements of the natural environment). Courtyards and the like should be incentivized by the City for new developments, but again these must include natural landscaping.

Thank you for your consideration of my comments.

Lori Cohen  
Seattle resident

164-4  
cont

**From:** [Alex Colledge](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:42:59 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

I am writing to let you know about the need for trees in an era of climate change. The reason I moved to Seattle was because of the stunning tree canopy which made the city so beautiful and livable. Of course, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

I know today that you are making important decisions about the next few years for Seattle. The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.

The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"

No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

There are lots of ways that canopy mitigation can occur.

We can reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees. We can require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.

We can consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.

I urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration,  
Alex Colledge

Alex Colledge  
mic2andal2@gmail.com  
5716 Latona Ave. NE  
Seattle, Washington 98105

165-1



**From:** [M.C](#)  
**To:** [PCD\\_CompPlan\\_EIS](#); [PCD\\_OneSeattleCompPlan](#)  
**Cc:** [Lowe, Marco](#); [Rivera, Maritza](#); [Morales, Tammy](#); [Woo, Tanya](#); [Nelson, Sara](#); [PCD\\_CustomerService](#)  
**Subject:** One Seattle Plan, support for density petition for MR rezoning per resident Matthew Cramer  
**Date:** Thursday, May 2, 2024 6:59:16 PM  
**Attachments:** [OneSeattle\\_Roosevelt\\_South\\_MR\\_Rezone\\_per\\_Cramer.pdf](#)  
**Importance:** High

**CAUTION: External Email**

Hello Office of the Mayor and City Officials,

I am writing you to express my support for higher density in my neighborhood and specifically to include a portion of the Roosevelt Neighborhood in the upzoning plan in work under the Mayor's current draft of the comprehensive One Seattle plan. The specified area, my neighborhood, is a perfect transition zone candidate for MR (6 story apartment building) zoning as it is close to existing tall infrastructure, a freeway, and is very close to the U-District Light Rail station among other transit lines. Please read, consider in relation to the OneSeattle plan draft, and record the attached letter petitioning for higher density in my neighborhood.

I hope our aspirations for higher density are aligned and I look forward to explicit MR upzoning in the specified region.

Thank you for your time and consideration.

Warmly,

Matt Cramer  
4709 9<sup>th</sup> Ave NE  
Seattle WA 98105  
[mocramer@hotmail.com](mailto:mocramer@hotmail.com)

166-1

Matt Cramer  
4709 9th Ave NE  
Seattle, WA 98105

May 1, 2024

*By Email Only*

Office of Planning & Community Development  
City of Seattle  
P.O. Box 94788  
Seattle, WA 98124-7088  
[onesattlecompplan@seattle.gov](mailto:onesattlecompplan@seattle.gov);  
[PCD\\_compplan\\_EIS@Seattle.gov](mailto:PCD_compplan_EIS@Seattle.gov)

Re: *Comments to One Seattle Plan and its EIS: 9th Avenue Northeast and Area  
Midrise (MR) Opportunity*

Dear Office of Planning & Community Development:

I appreciate the opportunity to comment on the Draft One Seattle Plan (“Draft Plan”) and the related Draft Environmental Impacts Statement (“DEIS”). This letter requests an upzone to Midrise (MR) zoning (and a complimentary redesignation on the future land use map) for my home and neighborhood, so that we can do our part to support the Mayor’s One Seattle Plan by contributing new housing to our community.

I request that this Midrise (MR) upzone and redesignation be included in the scope of the FEIS study and executed by the Mayor’s Final Recommended Plan and its proposed implementing ordinances.

**A. Background: Unintended Consequences under Current Code.**

I live at 4709 9th Avenue NE, APN 0889000030, which is depicted and marked with a small grey spot at right.

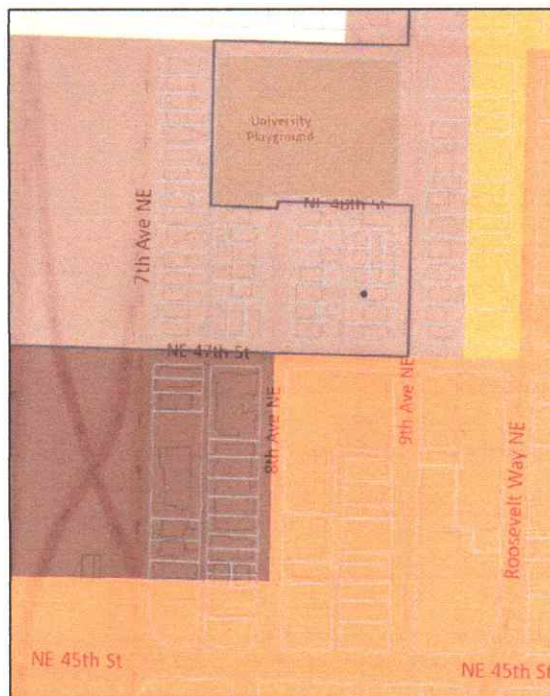


Figure 1. Current zoning surrounding my property. Light brown is low-rise, mustard yellow is neighborhood commercial, orange is Seattle Mixed, and darker brown is mid-rise.

166-1  
cont

My home is zoned LR1, but is located just outside of the current University District Urban Center (which the Draft Plan proposes transitioning into a “Regional Center”), and just one block north of SM-U 95-320 (M1) zoning (and a tower of more than 200 feet, with further 60-foot buildings immediately west of that. As you can see, the area that includes my home also is very well served by frequent transit and other vibrant urban services on Roosevelt and at 45th. The University Playground is another immediately adjacent gem that should be accessible to more housing units.

Unfortunately, as of now the Mayor’s Draft Plan proposes to leave my home, block and neighborhood relegated to “Urban Neighborhood” future land use designation, where dense housing more appropriate to this location is effectively prohibited. The currently proposed future land use redesignation could conceivably drive density ***downward*** as compared to the Multi-Family Residential Area future land use designation that is effective today.<sup>1</sup> That result flies in the face of the Mayor’s goals.

Under the vision set forth by the Mayor and the policies set forth in the One Seattle Plan, my home and neighborhood would be a fantastic place to create badly needed Midrise (MR) housing density at market rents, affordable rents, or a mix. It is no longer a fit for Lowrise zoning, and certainly not a fit for an Urban Neighborhood future land use designation.

I have watched with pride as the neighborhood has grown up into a bustling area of midrise apartments around me. It is also notable that an upzone to MR for my home and neighborhood would help provide great housing capacity *in a location where displacement will be minimal*, due to a high population of undergraduate and graduate students who generally are rotating in and out of the neighborhood on a yearly (if not quarterly) basis. In light of comprehensive transit and parks investments, together with the general urban maturation of the University District, my home and neighborhood’s current Lowrise zoning status is outdated, artificially constraining the transit-oriented density and affordability that properties like mine could provide. I request the following:

- **The Mayor’s zoning implementation map (which I understand is to be introduced in draft later this summer) should propose rezoning this area to Midrise (MR).**
- **The Mayor’s Final Recommended Plan should include this area within the adjacent Regional Center future land use designation, or *at a minimum*, the Corridor future land use designation studied in the DEIS and initially proposed in the OPCD staff draft.**
- **The Final EIS should study inclusion of this area within the adjacent Urban Center (soon to be renamed “Regional Center”), and should study an upzone of this area to, *at a minimum*, Midrise (MR) zoning.**

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<sup>1</sup> See [2022 Comprehensive Plan](#) at page 41.

Office of Planning & Community Development  
May 1, 2024  
Page 3 of 3

Thank you for all your work on the One Seattle Plan. My neighborhood stands ready to work with you in making our community's housing goals a reality.

Sincerely,



Matt Crämer

CC: Rico Quirindongo  
Marco Lowe  
Council President Sara Nelson (At-Large)  
Councilmember Maritza Rivera (District 4)  
Councilmember Tanya Woo (At-Large)  
Councilmember Tammy Morales (Land Use Committee Chair; District 2)

166-1  
cont

**From:** [Beverly Crocker](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** Environmental Impact statement  
**Date:** Thursday, May 2, 2024 8:24:56 PM

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**CAUTION: External Email**

I am concerned about the success of the 30% tree canopy goal. How have you been able to calculate the recovery of lost tree canopy when so many city trees have disappeared and are continuing to disappear, while expecting that they will be adequately replaced by planting young fragile saplings in their place? How much public land space do you have for increasing the tree canopy and who will take care of all the new trees for the next several years to ensure their survival and growth?

Thank you,  
Beverly Crocker

167-1

**From:** [Beverly Crocker](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 11:59:38 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Beverly Crocker  
beverly.canada@gmail.com  
5540 37th Ave NE  
Seattle, Washington 98105

**From:** [Carolyn Crockett](#)  
**To:** [PCD\\_CompPlan\\_EIS](#); [PCD\\_OneSeattleCompPlan](#); [Moore, Cathy](#); [LEG\\_CouncilMembers](#)  
**Subject:** Comments on One Seattle Comprehensive Plan and draft Environmental Impact Statement  
**Date:** Monday, May 6, 2024 4:07:21 PM

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**CAUTION: External Email**

Office of Planning and Community Development

Re: One Seattle Comprehensive Plan and draft Environmental Impact Statement

My name is Carolyn Crockett. Thank you for giving me the opportunity to comment on the Draft Plan and EIS. We bought our home in the Haller Lake neighborhood in 1976. My community interests have focused on the Haller Lake P-Patch which I helped found in 1998, the Haller Lake Community Club where I serve as Parks Chair, and Northacres Park.

Whereas growth is inevitable and there is a need for more housing, Seattle should not promote growth in a manner that creates problems in the future. One looming issue facing the world is increasing global temperatures. Tree canopy has been shown to mitigate neighborhood temperature. Of the 5 Alternatives in the Comprehensive Plan draft, I favor Alternative 2, Focused. Given that Alternative 1, no change, is unrealistic, Alternative 2 is the best option in that it allows for population and job growth with the least negative impact on tree canopy and biodiversity. The City of Seattle Assessment of Tree Canopy 2021 report (p. 21) found that, in 2021, neighborhood residential comprises 47% of city's tree canopy. By focusing development, per Alternative 2, more tree canopy will be preserved. The most significant canopy in Seattle is comprised of tall native species, such as Douglas firs, which, outside of parks (such as Northacres), are found on residential lots. Such trees are many decades old and would not be replaced in significant numbers by mitigation efforts such as street trees. These tall trees are also habitat for many urban wildlife species. For example, in Seattle it is not uncommon to see Bald Eagles perched, and sometimes nesting, in them. Street trees are not a replacement for these tall native evergreens.

In addition to examining the draft One Seattle Comprehensive Plan and draft EIS, I have reviewed suggestions provided by Birds Connect Seattle (formerly Seattle Audubon) and Friends of Seattle's Urban Forest.

I wholeheartedly agree with Birds Connect Seattle (BCS) that the Plan should reference Biodiversity as well as Climate and Sustainability. I agree with BCS's suggested changes to the Comp Plan shown in red on their web page: <https://birdsconnectsea.org/wp-content/uploads/2024/04/A-bird-and-nature-advocates-guide-to-commenting-on-Seattles-draft-2024-Comprehensive-Plan-update-v2.pdf>

I especially wonder why the goal of "30% tree canopy by 2037" was changed to exclude a date goal? Is this because the EIS suggests that indeed a substantial decrease in canopy will result

from all Alternatives except Alternative 1?

The remainder of my comments are copied from an email from Friends of Seattle's Urban Forest. These comments and questions are very well thought out and presented, so I do not feel the need to reword them. I have pasted them verbatim below.

Thank you for considering my comments,

Carolyn Crockett  
13034 1<sup>st</sup> Ave NE  
Seattle, WA 98125-3005  
(206) 363-9527  
[ccrockett@mac.com](mailto:ccrockett@mac.com)

**From Friends of Seattle's Urban Forest email dated 5/3/24:**

P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals" and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative?

What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?

Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

What is the acreage available and suitable for planting trees in each of the following public areas- the city's right of ways, Natural Areas and Developed Parks?



How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots?

What is the available acreage available to plant trees on private property?

When will it be possible to reach the 30% citywide goal?

What potential is there for more than 30% tree canopy in Seattle over time?

Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?

Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big trees, including conifer trees are removed?

What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

As to commenting on other tree potential mitigation measures, add:

Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.

Give SCCI Director the ability to ask for alternative site designs to save trees.

Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.

Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.

Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

DEIS StoryMap Comment

Name: Robbie Cunningham Adams

Email: robbieadams.uw@gmail.com

Date: 4/8/2024

Comment:

- The City should study the impact of higher floor area ratios for middle housing, such as those corresponding to the state model code for middle housing (e.g. allowing FAR of 1.6 for sixplex).
- Study how and where to place social housing projects that are feasible to build in every neighborhood
- Study eliminating parking minimums citywide
- Study the impact of allowing for bolder height and density bonuses within a quarter mile of transit stops

170-1

**From:** [Ethan Macey-Cushman](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** This doesn't go FAR enough  
**Date:** Friday, March 29, 2024 4:52:30 PM

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**CAUTION: External Email**

My urban-policy lingo humor is a real hit, you'll have to believe me.

In all seriousness, though, I'm deeply disappointed with the proposal for the comprehensive plan. You asked the people of Seattle what we wanted a year ago, and we went out of our way to tell you: over 60% of respondents wanted Alternative 5 or more. What was it all for? Is there some silent majority that's strongly in favor of restrictive floor-area ratios, parking requirements, and regressive zoning just steps away from light-rail stations? No. There's no silent majority, just a wealthy minority. And it's a terrible shame that you're listening to them instead of the experts, the public, and your own common sense.

171-1

Ethan Macey-Cushman

**From:** [dackchr@gmail.com](mailto:dackchr@gmail.com)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** Questions on Environmental Impact - One Seattle Comp Plan  
**Date:** Sunday, May 5, 2024 4:07:07 PM

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**CAUTION: External Email**

Hi –

I have some questions and concerns about the environmental impact of the draft Seattle Comprehensive Plan:

1. How will the plan impact the existing plants and animals that call Seattle home?
2. With increased hardscape and loss of urban forest, where is the analysis that shows tree planting programs will be enough to avoid adverse impacts on tree canopy cover?
3. To reach the 30% canopy goal, how much public land will be made available? To compensate for trees lost due to development, how many trees will need to be planted every year?

172-1

Regards,  
Christopher Dack

**From:** [Corey Dahl](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** I support a stronger, more affordable Seattle  
**Date:** Monday, May 20, 2024 4:21:05 PM

---

**CAUTION: External Email**

Hello,

I'm writing to express my support for the Housing Abundance Map and, thus, revising the draft comprehensive plan. I want a Seattle that can accommodate our existing and new neighbors. In order to be a truly inclusive city, we must act now to build more housing and more affordable housing. The current draft plan falls far short of our city's housing needs and failure to meet these needs in this plan will hurt working people. I urge changes now before it is too late.

173-1

Thank you,

Corey Dahl  
4423 S Brandon St  
Apt 12  
Seattle, WA 98118

**From:** [roubadan@aol.com](mailto:roubadan@aol.com)  
**To:** [PCD CompPlan EIS](#); [Moore, Cathy](#); [Morales, Tammy](#); [Hubner, Michael](#); [Strauss, Dan](#); [Carroll, Patrice](#)  
**Subject:** feedback on the comp plan draft eis  
**Date:** Monday, May 6, 2024 4:12:41 PM

---

**CAUTION: External Email**

Mr. Holmes,

I'm writing with feedback on the draft comprehensive plan and specifically on the EIS that is available at the website <https://storymaps.arcgis.com/collections/bc280a13a8ee4db28cd4d602ffe69336?item=1>.

I live in the Ballard area and have for 40 years. I grew up across the street from Haller Lake United Methodist Church about 3 blocks from the projected light rail station at 130th. I have been a friend of the church for about 20 years. We have become aware of the need for more housing in the area especially affordable housing. Churches are rising to the occasion but need help meeting this need. The Zoning changes happening with the Comprehensive plan is one way to provide help.

I am working with the congregation in a discernment process that is leading toward building housing on the property at 133rd and 1st Ave. NE. We have talked with neighbors and community leaders in our area. We have met with city representatives and government officials. We have partnered with community organizations and grass roots organizers. What we are hearing is that there is widespread support for more dense housing in the area, especially on this property. We see the possibility for that kind of development in Alternative 5 of the EIS and support moving in the direction of more dense housing throughout the city.

However, we also know from experience, and hear repeatedly from our neighbors, that the neighborhood around our proposed project is sorely lacking in small businesses and options for gathering, shopping, and creating community. Therefore, we would like to be able to consider creating such a space in the development on our property when we are ready to partner with a developer. None of the alternatives in the DEIS currently allow for commercial or mixed commercial and residential development on our corner. **We would like to request that the DEIS be revised to include NC2-55 zoning for the church property, Lots 3, 4 and 5, of block 65, in the H.E. Orr Park Division No. 6** so that a development might be considered that includes both commercial and residential components.

We are still in the beginning phases of planning. We don't have a developer yet but we have talked with several possible developers and have heard that the zoning, current and projected by the DEIS, limits their ability to dream with us about how we might become community with neighbors who aren't here yet.

Please consider this request and be part of the dream to build a community with space for all.

Thank you,

[Jon Daniel](#)

Haller Lake United Methodist Church  
13055 First Ave. NE  
Seattle, WA 98125  
Cell: 206-226-1690

174-1

**From:** [Casey Daniels](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** We need more housing  
**Date:** Saturday, May 4, 2024 12:30:14 PM

---

CAUTION: External Email

The city's released growth plan is wildly insufficient for Seattle's needs. Looking through it makes me wonder if city leadership even realizes that we're in the midst of a housing crisis. Just to be safe, hey, city leaders, we're in a housing crisis. Rents are out of control. Homelessness is out of control because people can't afford the rent. People are spending less at local businesses because more and more of their money is going towards rent. There are just plain more people who want to live in Seattle than there are places for them to live.

But how to fix this problem? Well, I've heard of this radical new idea of responding to increased demand and rising prices by increasing supply. OPCD's earlier housing abundance map, for example, provides something much closer to what the city actually needs. Now, I know building more housing in response to demand is a controversial idea in some circles, so I'll attempt to address some of the common criticisms.

Displacement. Some people claim that building more housing will displace those already living in the area. There's one problem with that argument. People are already being displaced. Turns out that rising prices can displace people just as easily as tearing a building down. At least building more housing means that the displaced people can remain within their existing neighborhoods rather than having to move to Tacoma because it's the only place they can afford.

Character of the neighborhood. This is a classic argument for NIMBY types. The idea that building denser housing like triplexes, row houses, and low rise apartments ruins the "character of the neighborhood." This is an argument that is dripping with classism and occasionally racism. "Ruining the character of the neighborhood" in this case seems to mean "letting the poors in." Sometimes it even means "letting the Blacks in." I don't want to live in the kind of city where these kinds of arguments are entertained. The other problem with this argument is that high homeless rates aren't exactly good for the character of the neighborhood either. For that matter, loss of the residents who provide that character through rising rents isn't great either. Finally, I doubt anyone would call the neighborhoods of Paris "lacking in character" despite much higher levels of density than what we have in Seattle.

Traffic. More people means more traffic, right? Well, not exactly. It turns out that people who live in denser, mixed use, neighborhoods drive a lot less. After all, if most everything you want is within walking distance, why drive? In addition, people who live on transit corridors are more likely to take transit rather than drive. Finally, shorter commutes contribute less to traffic than longer ones. If people can't live in the city, they'll live in the suburbs, and drive into the city for work. They'd clog up our city streets with their longer commutes, and the city wouldn't even get their tax revenue because they'd be living elsewhere.

175-1

That's actually a springboard to one last point. It's a well-established fact that denser neighborhoods bring in more tax revenue to the city. This is a strong enough effect to even outweigh the effects of wealth. On a dollar per land area basis, a low-income apartment building brings in more tax money to the city than the swankiest mansion. For a city that's struggling with a budget deficit to the point of cutting funding to popular social programs, taking advantage of this effect is an absolute necessity. A housing plan as lacking as the current one will instead serve to drain the city's coffers as it drives people to the suburbs, where they'll still use city resources by driving on city roads to jobs in the city, but will pay property taxes outside of it. In short, a denser housing plan will make balancing the budget much easier, while the current plan will make it substantially harder.

I could try to tie all this together with one last grand statement, but if you've read this far, you probably get the point by now. If you actually want what's best for the city of Seattle, you'll give us a better housing plan. It's really as simple as that.

Sincerely,

Casey Daniels



DEIS StoryMap Comment

Name: Ruth Danner

Email: ruthdannerofjuneau@gmail.com

Date: 4/3/2024

Comment:

Much research has been done by UW Traffic Lab's ("Final 50 Feet," "Alley Inventory") and SDCI ("Residential Loading Berth and Delivery Activity and Standards Research") documenting Seattle's need to adopt land use changes to meet the growing need to adopt and implement a formal "Urban Freight Plan," to better manage direct delivery of goods and services to dense neighborhoods. Left unmanaged, increased deliveries to increasingly dense neighborhoods results in increased traffic congestion and avoidable carbon emissions. Adoption of an effective Urban Freight Management Plan should be called out as mitigation for transportation impacts which the EIS predicts will be significant under all five alternatives.

**From:** [Deborah Davis](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Tuesday, May 7, 2024 9:34:40 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Deborah Davis  
davis122@gmail.com  
7715 1st Ave NE  
Seattle, Washington 98115

177-1

**From:** [Courtney Davis](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 6:06:29 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Courtney Davis  
cdavis622@gmail.com  
1232 S State Street  
Tacoma, WA 98405

178-1

**From:** [KD](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#)  
**Subject:** Three Critical Questions for the City's Comprehensive Plan  
**Date:** Monday, May 6, 2024 4:59:27 PM

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**CAUTION: External Email**

Hello!

I have three questions to consider, please, in relation to the city's comprehensive plan and Section P 3-3...

1. **Can you please let me know, what is this impact precisely on Seattle's plants and animals?**
2. **Also, what research proves that tree-planting programs, along with increased tree removal, will make up for lost urban forest?**
3. **I'm also wondering, how much public land is available to succeed the city's canopy goal of 30%, as stated in the plan? Is there a record available stating how many trees will need to be planted in these areas every year to make up for trees that would be removed with development?**

179-1

Thank you in advance for diligently looking into these questions. This is critical to our environment. Every tree lost is critical right now to our environment and the climate. And, in Seattle, we love our urban nature!

Sincerely,  
-Kirtana Devi

Sent with [Proton Mail](#) secure email.

**From:** [Gabriel-Bello Diaz](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 11:33:18 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Gabriel-Bello Diaz  
gabrielbellodiaz@gmail.com  
707 South Snoqualmie Street, 1D  
Seattle, Washington 98108

180-1

**From:** [Mary Lou Dickerson](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Question  
**Date:** Saturday, May 4, 2024 11:13:57 AM

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CAUTION: External Email

Hello, can you tell me what is the plan for encouraging the growth of large trees, and saving the large trees already in Seattle? Is there any plan to build the tree canopy in Seattle?

Thank you for a response.

Mary Lou Dickerson

Sent from my iPhone

181-1

May 6, 2024

Jim Holmes  
Seattle Office of Planning and Community Development  
600 4th Ave, Floor 5  
Seattle, WA 90194

Yes, we need more *affordable* housing, but we also need to have healthy and livable communities that are climate resilient.

The following are comments on the One Seattle Comprehensive Plan’s Draft Environmental Impact Statement (DEIS).

- Stormwater will be an issue with the planned extensive increase in impervious surfaces will increase runoff. What measures will be taken to prevent flooding streets and buildings and the scouring of receiving creek beds?
- The DEIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity, or sustainable urban forestry.
- The DEIS does not analyze the probable scale of impact of tree loss or give numbers and does not provide analysis of cumulative impacts. Yet the DEIS speculates, without evidence or analysis, that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover."
- No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

182-1

Mitigation recommendations:

- Protect mature tree canopy as mitigation for stormwater management.
- Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration. Please make me a party of record for future communications on the EIS and the One Seattle Comprehensive Plan in general

Warren Charles Dolan Jr  
1220 NE 97<sup>th</sup> St  
Seattle, WA 98115  
[chucklesd2@hotmail.com](mailto:chucklesd2@hotmail.com)  
206 683-5283

**From:** [Jill Doran](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Monday, May 6, 2024 3:10:17 PM

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CAUTION: External Email

I am disappointed in the vague statements in this plan related to the protection of trees and wildlife in this city. Where are the data points and what is the plan for centering environmental protection and environmental justice into the future of our community? We know we're in a climate crisis. Protecting and increasing tree canopies is vital to combat this. We know we're in a mental health crisis. Being exposed to nature/trees regularly is vital to combat this. We know as a city we have prioritized easy/cheap builds over protecting the greenery that makes Seattle so unique compared to other cities.

I see first hand in my neighborhood mature trees that should be considered safe under current protections consistently removed to build new mega-sized homes. It is not enough to just replant trees and hope they make it.

I've seen countless 'infrastructure improvement projects' that also kill mature trees instead of coming up with creative solutions to keep them.

The city needs a comprehensive plan that truly includes and centers saving mature trees. Growth and tree protection can go hand in hand. We are smart enough to figure this out.

Thank you for the work you all do for our city. I hope we can figure out how to keep our tree canopy not only intact, but growing.

Please note the following as comments on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,  
Jill Doran

Sent from my mobile device; please excuse brevity and errors

183-1



## DEIS StoryMap Comment

Name: Barbara Downward

Email: lavender@mindspring.com

Date: 5/6/2024

## Comment:

As a life long Seattle resident, long term Seattle Parks volunteer (retired), and home owner in the Magnolia neighborhood, I am pleased to make comment on the draft Comprehensive Plan. I retired from my nursing career early so I could devote more time to environmental restoration in Seattle Parks and the Western Washington region. That time was wonderful, and gave me an appreciation of our City and region that informs the comments to follow. Thanks for this opportunity.

1. Revise the climate and sustainability element to to become the climate biodiversity and sustainability element, acknowledging biodiversity as a goal of the comprehensive plan. While a park steward with the Green Seattle partnership at Lawton Park a few blocks from my home, I was privileged to witness the life cycle of Coopers hawks for years at the park. The hawks at Lawton fledged chicks every year from 2012 to 2023 and were studied and documented by the Urban Raptor Conservancy (URC)group who published their findings. It's hard to describe the thrill of encountering these birds at close range as I was privileged to do many times at Lawton Park- a 10 acre space adjacent to Lawton Elementary School where I often walked with my wheel barrel to work. URC has documented that urban hawks can thrive but face challenges that we here in Seattle can mitigate by acknowledging the value of wildlife and biodiversity. I urge you to protect and enhance the habitat quality of City owned property like parks, streets and undeveloped street right of ways that are often adjacent to parks.

2. Tree canopy (pp149-150) will be critical to Seattle's quality of life for people and wildlife. Reintroduce the timeline and stretch goal CE G12 to a tree canopy that covers at least 30% of the land by 2037 and 40% eventually. Page 3.3-5 states "Notably, most canopy loss was not associated with development activities; only 15 % of the canopy loss occurred on parcels that underwent development during that period" but a canopy change analysis from the Washington Department of Fish and Wildlife "determined that at a minimum, development or redevelopment of parcels in Seattle was the agent of change for approximately half of all tree loss that occurred between 2009-2017." The City's updated tree ordinance mentioned page 3.3-7 still needs revision to protect biodiversity in the City that is liable to decline.

3. Add a policy under LU G17 : "seek to increase both number and area of fish and wildlife conservation areas".

184-1

16th Avenue East  
Seattle, WA 98112

May 6, 2024

**By Email Only**

Office of Planning & Community Development  
City of Seattle  
P.O. Box 94788  
Seattle, WA 98124-7088  
onesattlecompplan@seattle.gov &  
PCD\_compplan\_EIS@Seattle.gov

Re: *Comments to One Seattle Plan and EIS: 16th Avenue East and Other Infill Opportunities*

Dear OPCD:

Thank you for the opportunity to comment on the Draft One Seattle Plan (“Draft Plan”) and the related Draft Environmental Impacts Statement (“DEIS”). This letter addresses a specific fact pattern on our block, which is no doubt relevant in many additional instances throughout the City. After providing initial background about the issues our block is facing, this letter provides recommendations to address these problems both for our block and for similarly situated blocks in many parts of the City.

*Specifically, we request an upzone to better match adjoining blocks, as well as additional EIS analysis and text revisions to the Code and the Plan that would provide continued flexibility into the future.*

The City’s action on these recommendations would allow policymakers, staff, and the public to effectively respond to changing neighborhoods and needs in support of the Administration’s and the City’s policy goals.

**A. Background: Unintended Consequences under Current Code.**

We own (and in three of four cases, reside at) 415, 421, 425 and 431 16th Avenue E, APNs 4232400690, 4232400695, 4232400700 and 4232400706. These properties are mapped on the following page. As shown, they are zoned NR3, but immediately abut property zoned NC2P-55(M).

As you can see, our location on the easterly side of 14th Ave. E between E Republican Street and E Harrison Street benefits from excellent urban services, transit, and walkability. By all applicable metrics and under this Administration’s policies and the One Seattle Plan, this location is an excellent place to provide additional housing density at market rents, affordable rents, or a mix.

This neighborhood is already dramatically changing around us. Immediately abutting our properties to the west, the City is evaluating a vested application for a six-story, 172-unit apartment building with retail and 102 parking stalls. We cautiously welcome the density, walkability and services

185-1

this development will provide, but it will create a jarring transition next to our homes. To allow adjustment to this transition and new transit-oriented density to be developed on this block, we request an upzone to LR3(M), to match properties to the north and south. Simply put, the Block's current Neighborhood Residential ("NR") zoning is outdated and is unnecessarily precluding the City and the block from valuable and badly needed additional housing capacity.

As shown in the attachments, one of us have previously conveyed such concerns to City decision-makers, with a request for action. However, the existing code retains outdated planning strategies that have prevented this block from providing the additional density it otherwise could, by prohibiting owner-driven upzones except in overly prescriptive and inflexible circumstances. *See* SMC 23.34.010.A<sup>1</sup> and 23.34.013.<sup>2</sup> While these policies may have been well-intentioned, in the context of a burgeoning housing crisis and pro-density residents, today they are clearly outdated.

**B. Requested Map Change in Zoning Map and Future Land Use Map for Final One Seattle Plan ("Final Plan").**

For the reasons briefly covered in the previous section, the block's zoning is outdated, which artificially and unnecessarily suppresses the housing supply it could provide at its location in close proximity to excellent transit, urban services, and walkable commercial density. It also results in an uncomfortable and unnatural built environment where single-family houses stand in the shadow of a dramatic six-story building project that will likely result in a jarring transition as opposed to the wedding-cake model that is now known to be a best practice. We do not wish to oppose the neighboring project, but rather request an upzone so that our properties will be permitted to complement it with compatible degrees of infill residential density.

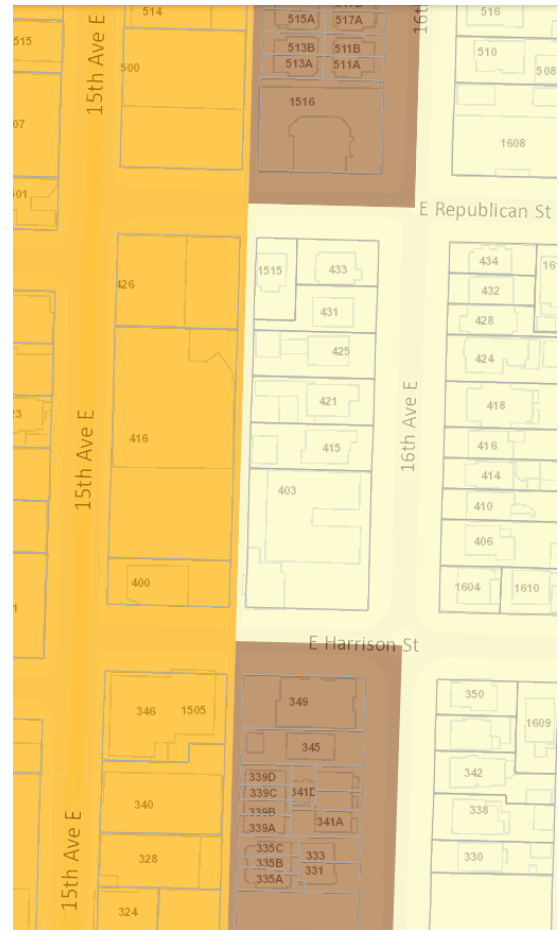


Figure 1. Current zoning of vicinity surrounding our homes. Light yellow properties are zoned NR3 and light brown properties are zoned LR3(M). Mustard yellow properties are zoned NC2-55(M), with a pedestrian designation in most circumstances.

<sup>1</sup> "Except as provided . . . single-family zoned areas may be rezoned to zones more intense . . . only if the City Council determines that the area does not meet the criteria for single-family designation."

<sup>2</sup> "An area zoned single-family that meets the criteria . . . may not be rezoned to multifamily except as otherwise provided in Section 23.34.010.B."

We understand that the proposed zoning map for the One Seattle Plan will be released in approximately July or August of this year. *We request that the map and the Mayor's Recommended Plan provide LR3(M) zoning to the westerly side of 16th Avenue E between E Harrison and E Republican, and correspondingly append this same area to the "Regional Center" designation that already adjoins us to the north and south.*

This change would allow our block's zoning to match what is already located to the north and south, and to provide a less jarring transition between NR zoning (across the street from this location to the east) and NC zoning (across the alley to the west). The change would be consistent with multiple policies set forth by the Mayor, as contemplated in the Draft Plan, including most notably draft GS 6.2 ("Allow moderate-scale housing of 4 to 6 stories in areas . . . along arterials where zoned densities may be increased to provide more housing options near frequent transit").

### C. Requested Policy Change in Final Plan, and Related Implementing Regulations.

In addition to applying NR3 zoning and Regional Center designation to the subject area, the Mayor's Final Plan should be updated to acknowledge existence of areas like ours, in order to allow such areas to not remain unnecessarily stuck for another planning cycle. At a minimum, these changes should be as bulleted below. These revisions would recognize that some Urban Neighborhoods are already very well served by urban services and appropriate for multifamily densities, and therefore may be suitable for low rise multifamily and other upzones in the future.

- At Page 27, "While some Urban Neighborhoods are not within walking distance of ~~lacking~~ the larger business districts located in centers . . ." and "By providing new options to add density, like middle housing . . ."
- At GS 6-2, "Allow moderate-scale housing of 4 to 6 stories in areas currently zoned for such housing and ~~along in the near vicinity of~~ arterials where zoned densities may be increased to provide more housing options near frequent transit."
- At Page 66, "It includes more low-scale housing options in Urban Neighborhoods across the city, and mid-scale options in parts of Urban Neighborhoods that are appropriate for greater densities."

Development regulations to implement the Final Plan should repeal SMC 23.34.010.A<sup>3</sup> and 23.34.013.<sup>4</sup> This is a needlessly inflexible rule that has kept areas like ours from appropriately responding to changing circumstances around them. This lack of flexibility is not consistent with the Mayor's vision for One Seattle.

Similarly, to implement the Final Plan, SMC 23.34.010.B.2.d should be revised to allow upzones if the proposed upzone is "[w]ithin or adjacent to a neighborhood center, regional center or urban center

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<sup>3</sup> "Except as provided . . . single-family zoned areas may be rezoned to zones more intense . . . only if the City Council determines that the area does not meet the criteria for single-family resignation."

<sup>4</sup> "An area zoned single-family that meets the criteria of Section 23.34.011 for single-family designation may not be rezoned to multifamily except as otherwise provided in Section 23.34.010.B."

~~an urban village and the Comprehensive Plan Future Land Use Map designation is a designation other than Single Family.~~” This code change would allow the Council, staff, owners and residents the flexibility needed to respond to changing circumstances as the City evolves.

185-2  
cont

**D. Requested Change in Final Environmental Impact Statement.**

To enable maximum nimbleness in finalization and implementation of the Mayor’s Recommended Plan both at the Council level and in future years, the Final Environmental Impact Statement should, in at least one of the Action Alternatives, please study the addition of the easterly block of 16th Avenue E, between E Republican Street and E Harrison Street, to the adjoining Urban Center (titled a “Regional Center” under the Draft Plan).

185-3

Additional textual changes could help maintain flexibility for future policymakers, from the Council down to planning staff. Accordingly, we recommend additional textual changes in **Exhibit A** to this letter.

Sincerely,

*Doug Du Mas and Cherry Haisten*

Doug Du Mas and Cherry Haisten (415 16th Avenue E)

*Cristoph Siegert and Lindsay Talbot*

Cristoph Siegert and Lindsay Talbot (421 16th Avenue E)

*J. Toby Jessup and Catherine Costello*

J. Toby Jessup and Catherine Costello (425 16th Avenue E)

*Hui Ji and Weiyan Chen*

Hui Ji and Weiyan Chen (431 16th Avenue E)

Enclosures

CC: Rico Quirindongo  
Marco Lowe  
Council President Sara Nelson (At-Large)  
Councilmember Joy Hollingsworth (District 3)  
Councilmember Tanya Woo (At-Large)  
Councilmember Tammy Morales (Land Use Committee Chair; District 2)

APPENDIX A:

SUGGESTED EIS TEXT CLARIFICATIONS TO MORE CLEARLY ACKNOWLEDGE  
RESIDENTIAL NEIGHBORHOODS DIRECTLY ADJACENT TO CENTERS

I respectfully suggest these text changes to the EIS, in order to allow the Council, staff, and property users greater flexibility to creatively respond to circumstances on the ground in future development and planning efforts.

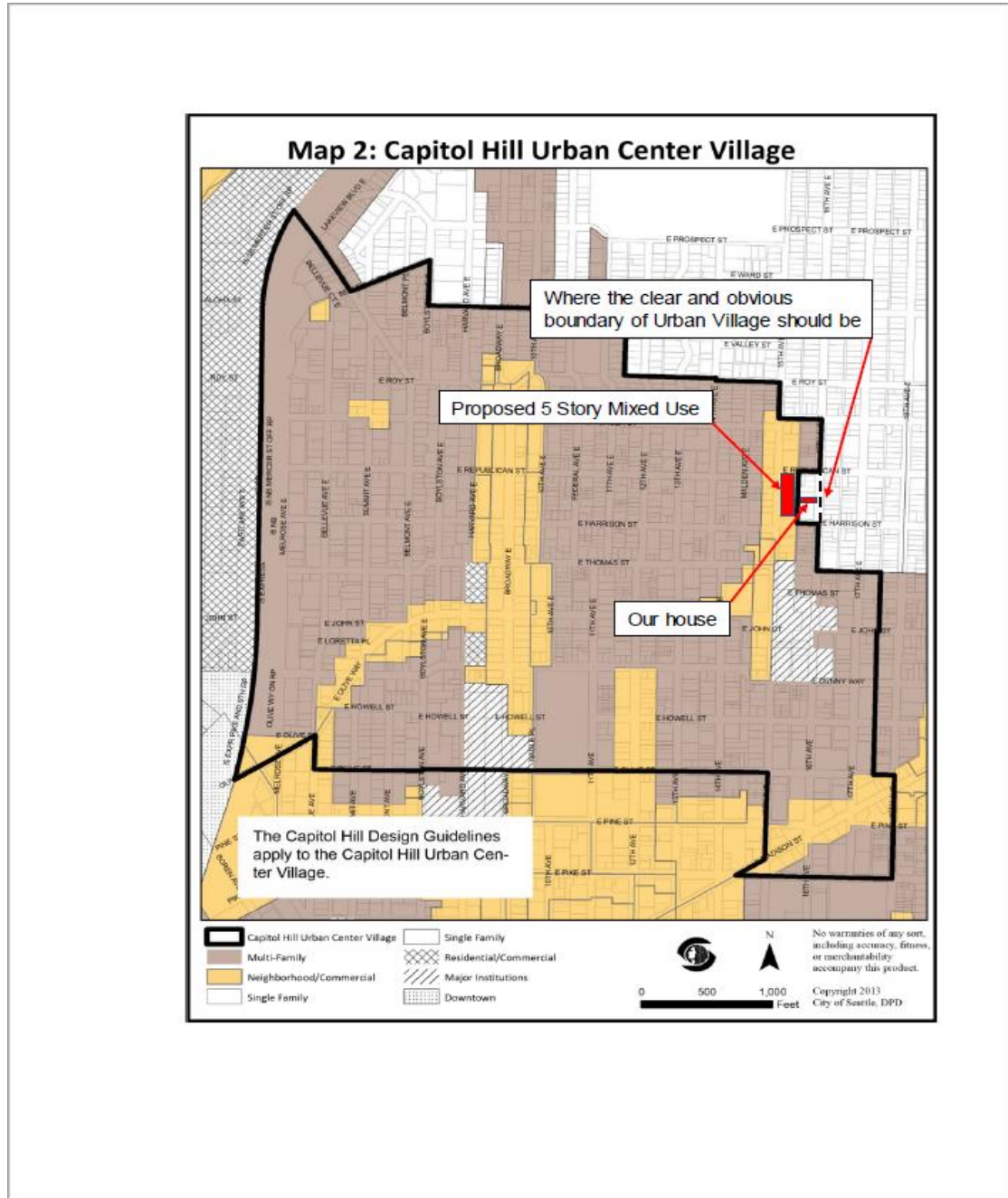
- At 1-3, 1-11, and 2-34, “Housing in the urban neighborhood place type could include . . . stacked flats and sixplexes on larger lots and lots that are adjacent to more densely zoned areas.”
- At 1-8, “Urban Neighborhoods represent primarily low-scale, ~~primarily~~ residential areas.”
- At 1-65, “Non-stacked housing ~~refers primarily to~~ unit types are primarily expected to be built in Urban Neighborhood Residential zones.”
- At 1-100 and 3.12-18, “For example, a greater degree of utility improvements may be required in many (but not all) urban neighborhood areas for multifamily development than in urban centers.”
- At 2-3, “This place type would allow flexibility for new forms of housing in areas currently zoned primarily for detached homes, including stacked flats and sixplexes on larger lots and lots that are adjacent to more densely zoned areas.”
- At 2.4-2, add a footnote to the “Urban Neighborhood” category indicating that “This EIS accounted for the possibility of additional height in Urban Neighborhoods on larger lots and lots that are adjacent to more densely zoned areas.”
- At 2.4-34, “Market-rate development in most of these areas would continue to have a three-story height limit, consistent with current rules in Neighborhood Residential zones.”
- At 2-54, in Ex. 2.4-33’s third row, “Neighborhood residential: 30 ft in most cases”
- At 3.2-36 and 3.4-17, “Under Alternative 3, a wider range of low- and mid-scale housing options in urban neighborhood areas would be allowed, expanding housing choices and allowing additional housing options near existing parks and other amenities.”
- At 3.6-14, in the lefthand column, under *Neighborhood Residential Areas*, “Neighborhood residential areas provide opportunities for detached single-family and other compatible

housing options that have low height, bulk, and scale in order to serve a broad array of households and incomes, and to maintain an intensity of development that is ~~appropriate for~~ responsive to areas with limited access to services, infrastructure constraints, fragile environmental conditions, or that are otherwise not conducive to more intensive development.

- At 3.6-14, in the righthand column, opposite *Neighborhood Residential Areas*, “• Neighborhood Residential (NR1, NR2, and NR3) and potentially Lowrise Multifamily (LR1, LR2, and LR3) to serve a broad array of households and incomes in appropriate areas that are conducive to such development.”
- Footnote 1, “See Appendix G.1 for more detailed summaries of general zoning categories and overlay districts, respectively. Additional zones, beyond those listed here as “typical,” may be appropriate in certain circumstances.”
- At 3.6-145, “Alternative 3 would allow a wider range of low-scale housing options—like triplexes and fourplexes—in all urban neighborhood areas (see Exhibit 2.4-16) and could include stacked flats and sixplexes on larger lots and lots that are adjacent to more densely zoned areas.”
- At 3.6-147, “Alternative 3 would allow missing middle housing types . . . in urban neighborhood areas, and potentially greater densities on larger lots and lots that are adjacent to more densely zoned areas.”
- At 3.6-162, “Similar to Alternative 2, urban neighborhood areas that are currently primarily 1- and 2-story buildings would be allowed to develop up to 4- to 5-story buildings, especially on larger lots and lots that are adjacent to more densely zoned areas.”
- At 3.6-183, “Where middle housing is allowed in urban neighborhood areas, more properties may develop with 3-story (or 4-story if affordable) buildings adjacent to 1- and 2-story buildings, or to greater heights on larger lots and lots that are adjacent to more densely zoned areas.”
- At 3.12-23, “The addition of multifamily homes of various sizes—~~duplexes up to sixplexes~~—would likely require construction of new water and electrical service connections and potential upgrades to wastewater and drainage facilities to accommodate greater population and development density in many (but not all) cases, particularly in areas characterized by large-lot single-family zones.

APPENDIX B:

*Illustrations previously transmitted to City officials with previous comments on this matter in April 2018 (in public comment and by written correspondence to CMs Sawant and Johnson) and February 2024 (by email to Michael Hubner, Nick Welch, Brennan Staley, Jim Holmes and Nathan Torgelson as well as Councilmembers Tammy Morales, Joy Hollingsworth and Dan Strauss).*







**From:** [Phillip Duggan](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#)  
**Subject:** Seattle Comp Plan/130th Station Rezone Draft EIS  
**Date:** Monday, May 6, 2024 2:37:51 PM

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**CAUTION: External Email**

I like the combined plan but I still don't think it goes far enough. We still need more homes than that if we're to bring down the housing costs and putting them closer to light rail and transit makes sense. I'd also like to see more smaller-scale commercial accessible from neighborhoods and near transit centers. It would be nice to do shopping and daycare drop-off on the way to/from the train.

We specifically need more child care and locations for child care in the neighborhood though. The lot for Northgate Whizz Kids Academy (in Pinehurst) is currently for sale and they have had trouble finding other suitable locations nearby.

Thanks,  
Phillip

May 6, 2024

VIA EMAIL

Office of Planning and Community Development  
Seattle City Hall  
600 4<sup>th</sup> Avenue, 5<sup>th</sup> Floor  
Seattle, WA 98104  
Attn: Jim Holmes  
[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**Re: Support for Alternative 5 and additional height and density studied in small parcels zoned NC-55 to encourage development and create a workable Mandatory Housing Affordability program.**

Dear Mr. Holmes,

Thank you for the opportunity to provide feedback on the One Seattle Comprehensive Plan Draft Environmental Impact Statement (“DEIS”).

I am an owner/partner of four sites currently zoned NC-55, at 2514, 2518 and 2616 East Cherry Street and 533 26<sup>th</sup> Avenue in the Central District neighborhood (District 3). 2514 and 2518 East Cherry Street are each 40 feet wide and 100 feet deep. 2616 East Cherry is 45 feet wide and 60 feet deep. 533 26<sup>th</sup> Avenue is 100 feet wide and 100 feet deep. These properties are typical of many small/shallow NC-55 sites around the city. Many of these parcels belong to longtime property owners, often families or owner-users, who do not have development or land use expertise. My own awareness comes from having started the redevelopment process on two of these parcels before the MHA legislation went through, and then having to rush to get that process vested to NC-40 in 2019 when I realized the devastating negative impact that the MHA formula would have for these sites.

While I was a proponent of MHA generally, the warnings that we gave to Councilmembers and Staff about the MHA changes to what were NC40 sites, prior to the adoption of the Citywide MHA program, have come true. The MHA payments have terribly diminished the existing value of this category of sites and made any new units that could be developed under MHA much more expensive than they previously were. In short, MHA has been a success in some zones, but in NC-55 zones (formerly NC-40), the program has been a disincentive to housing development. As such, I urge OPCD to study several policy suggestions outlined later in this letter.

First though, a reminder of why formerly NC-40 sites were always challenging, and therefore why the MHA changes tipped them from being challenging to infeasible, depressing housing creation and MHA fees in the NC-55 zones:

1. These sites are often on smaller commercial streets and tend to be relatively small and shallow, because they were historically zoned to reflect and/or encourage a shallow row of retail “liner” buildings in otherwise residential neighborhoods.

2. As such, they typically back up to immediately adjacent LR and NR zones, with no separating alley, and are therefore subject to a 15-foot setback at all the residential floors (i.e. above 13 feet). This condition can be found not just along East Cherry but, as just a few further examples, along the north side of Yesler in the CD, the west side of 15<sup>th</sup> Avenue on Capitol Hill, and the east side of 34<sup>th</sup> Avenue in Madrona.
3. The setback is very impactful on these shallow sites. At 2616 East Cherry, for example, the 15-foot setback removes 25% of the residential floor area. This means that the proscribed 3.25 FAR barely fits (and only if the ground floor is built to the back lot line with a blank wall). It also means that the stairs/elevators/hallways of a new building take up an inordinate amount of the floor plate relative to actual living space.
4. As NC-40 sites had started to be redeveloped around the city prior to 2019, a saving grace was that their four-story height didn't necessarily demand an elevator; and some innovative developers were choosing to do these as walkups (e.g. Pax Futura in Columbia City). This saved valuable FAR from being consumed by the elevator shaft and circulation space around it, and also saved \$150k or more in purchase price for an elevator, and thousands more per year in annual operating expenses, improving both the feasibility of these sites and the affordability of the units. Unfortunately the fee payments that came with the MHA upzone subtracted mightily from the economic viability of this solution.

MHA gave these sites an additional 0.5 FAR and an extra floor of height (from NC-40 to NC-55) but as illustrated by the points above, there is no practical way to use it. The 15-foot setback means that the four stories are already completely filled out. Going to five stories in order to capture 0.5 FAR on a small site is ENORMOUSLY expensive and inefficient. Market wisdom dictates that five floors necessitates an elevator, which along with the two stairs, circulation space, trash room/shaft easily consumes 600-800 SF per floor. On a site like 2514-2518 East Cherry, of the 4,000 SF in additional FAR, up to 25% of the additional floor would be consumed by common area. On an even smaller site like 2616 East Cherry (even with one stair serving less than four units per floor), a third to a half of the additional 1,350 SF in FAR would be consumed by the common area. In both cases, the enormous costs of adding an elevator and the building skin for an additional floor would far outweigh the finished value of the meagre additional living space created, and this is even BEFORE the costs of paying the MHA fees.

I am suggesting a multi-part solution for NC-55 sites that could be selectively applied to sites that directly abut residential zones and are less than 120 feet deep or 10,000 SF total:

1. Increase the FAR so that a full fifth story is possible on these sites, meaning a full 5.0 FAR. While this is likely not always useable due to need for windows, light and air, it would make these small sites useable to the five stories that the zoning intended.
2. Reduce the frequency of NC-zoned sites abutting neighborhood residential zones, and rezone the "back half" of these NC blocks from NR to NC. The City should work to eliminate these impactful transitions where NC zones abut NR directly or across an alley. Please study in the DEIS options that eliminate these transitions. The DEIS discloses that transitions in scale may be an issue in all alternatives, but the best way the City can mitigate this is to eliminate these awkward transitions altogether.
3. Study in the DEIS the elimination of upper-level setbacks when these transitions do occur in order to prioritize housing development. Eliminating upper-level setbacks will allow the full FAR to be utilized in these zones. The OneSeattle Plan's main goals revolve around increasing housing choices and expanding housing opportunities across the City. Whole swaths of the NC-55 zones

have been underdeveloped because of the combination of too-low FAR and these setbacks that are “protective” of neighborhood residential zones. As you are aware and the DEIS discloses, neighborhood residential zones have been “protected” for years “from” development in a manner that has been highly inequitable and exclusionary. Please consider whether protective setbacks of neighborhood zones is indeed an equitable solution.

**187-1  
cont**

Thank you for considering my input and please do not hesitate to contact me should you have any questions.

Sincerely,

Liz Dunn  
Dunn & Hobbes, LLC  
www.dunnandhobbes.com  
206-324.0637

**From:** [Ivy Durslag](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [LEG\\_CouncilMembers](#)  
**Subject:** DEIS Comments and Questions re One Seattle Draft Plan  
**Date:** Monday, May 6, 2024 10:10:11 AM

**CAUTION: External Email**

City of Seattle Staff:

I have the following questions regarding the DEIS for the Draft One Seattle Plan.

1. Current and proposed alternative setback requirements for multi-family dwellings of all types on arterials do not allow adequate space for both pedestrian access and adequate and substantial tree canopy. Residents of units facing those arterials therefore have no or inadequate buffers from noise pollution, air and particulate pollution, and heat island effects along these corridors due to lack of shade and inadequate carbon absorption. So-called affordable housing is almost universally proposed to be along these arterials, and lower income households will suffer the greatest effects. The DEIS states "major policy updates" can mitigate some effects of increased density and population. **Please provide your analysis of increasing the threshold building setback requirements on arterials for each of the alternatives, with supporting data and research. How much of Seattle's tree canopy deficiency can be met with street trees? With policy updates regarding setback requirements, how much could be met, and what would those policy requirements need to be, given the Plan's apparent reliance on street trees to provide mitigation?**

188-1

2. **What is the supporting data and research behind the DEIS assertion that "No significant unavoidable adverse impacts to air quality and greenhouse gas emissions are anticipated."**

188-2

5. Multiple neighborhoods in Seattle that are within both urban cores and urban neighborhoods, along with substantial buffer zones alongside those cores, and that are expected to absorb a substantial amount of increased units, do not have sidewalks. Greenwood north of N 85<sup>th</sup> St is one such area. The plan is designed to increase walkability, however safe walkability is not possible without sidewalks. **How much of Seattle's development under each of the alternatives is in areas currently without sidewalk? What data and research do you have regarding the walkability for areas currently without sidewalks, and the number of miles of sidewalk needed in order to meet a minimum standard of walkability?**

188-3

6. **What plans does the City have to add parks in areas with heavy concentration of**

188-4

**apartment buildings? What land does the City intend to buy for this purpose? How many acres would this need to encompass? How many trees would need to be planted in these parks to mitigate tree loss on other parcels?**

188-4  
cont

7. When no parking is provided for private automobiles in order to encourage use of public transportation, grocery stores must be within walkable distance from population centers. Approximately one supermarket is required for every 10,000 residents. As has been well-publicized, numerous supermarkets have closed around the city due to consolidation in the grocery industry. Current apartment development along the Aurora corridor and in the Duwamish Valley, for example is occurring outside the range of walkability to a supermarket, and will increase city-wide under any of the alternatives. **What is the number of supermarkets that will be required to support increased density in each zone? What location, within a range, will these supermarkets need to be in, and what is the availability of land or structures for them? What incentives will the city need to provide in order to lure supermarkets back into the city in an amount sufficient to meet the development need, and for developers to put aside ground-level units for supermarkets?**

188-5

8. **What is the anticipated family size of Seattle's population in the next 20 years? To what extent will family size differ by income, ethnicity, race, or other family background? To what extent will the standard of two bedrooms as the criterion for a family-sized unit meet the need of Seattle's families? To what extent will two bedrooms as family size provide equity? Please provide supporting documentation.**

188-6

9. **Working parents with children need daycare even for school-aged children. How will Seattle's anticipated transportation pattern, using the bus and rail system that is available only in major corridors, enable parents to get children to and from daycare and still get to their employment on time, considering that multiple parents will not work on direct buslines? How will this transportation and overall land use allow daycares to afford rent in sufficient areas of the city to meet the need? Please provide supporting documentation.**

188-7

10. **To what extent will Seattle's future housing be stair-free and suitable for seniors? Please provide supporting documentation.**

188-8

11. The DEIS states, "Given that habitats in the city limits represent a very small proportion of the total amount of habitat available to any species, differences in the availability or distribution of habitats in the city would be unlikely to result in any appreciable impacts on regional populations of plants or animals." *Yet development and population growth is expected to be statewide*, in fact has been encouraged by HB 1110, and is certainly occurring with accelerating speed in King, Snohomish, and Pierce Counties. The DEIS

188-9

has simply skirted this issue, which is unacceptable. This is a DEIS about a plan for Seattle, and ***Seattle has a responsible and key position within the region that cannot and should not be abdicated.*** **What is the supporting documentation, including data and research, showing the impact on plants and animals of development in Seattle proper?**

188-9  
cont

12. The DEIS states, "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Supporting data and research is not provided. **What would be the potential loss of tree canopy, in acreage, with increased development and density in each alternative, over each of the successive five year periods?**
13. **What impact on tree canopy loss would modification of the basic tree protection area have, for each of the alternatives, over successive five year measurement periods?**
14. **How many trees would need to be planted, and over what period of time, to replace trees and tree canopy (number of trees, size and volume of canopy) lost to development in each of the five alternatives? How many acres and how many privately owned parcels would this require?**
15. **What heat island effects would occur in the interim between planting and sufficient maturity to replace existing canopy and canopy lost over the past 20 years?**
16. **What kinds---species and varieties--- of trees would need to be planted to provide suitable nesting and food for urban birds to compensate for trees lost to development? How many such trees would be needed to maintain the current urban bird population? How long would it take for those trees to reach a size capable of providing habitat?**
17. **What is the available acreage available to plant trees on private property?**
18. **As noted above, what building setback requirements would be needed to enable street tree planting to occur sufficiently, with sufficiently large trees with sufficient volume and canopy, to compensate for tree loss due to development?**
19. **When will it be possible to reach the 30% tree canopy citywide goal? What would the 20 year climate change and heat island impact be of Seattle abdicating its role in maintaining a minimum tree canopy of 30%?**
20. **What potential is there for more than 30% tree canopy in Seattle over time? To what**



**extent is 40% canopy coverage possible over time as proposed in the previous Comprehensive Plan possible, under each of the alternatives?**

**21. Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?**

**188-9  
cont**

**22. What is the projected increase in stormwater runoff and what costs are associated with on-site and alternative city water management policies of stormwater and pollutant runoff as a result?**

**188-10**

Respectfully submitted,  
Ivy Durslag  
512 N 82<sup>nd</sup> St  
Seattle, WA 98103  
206-353-7265

**From:** [Ivy Durslag](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [LEG\\_CouncilMembers](#)  
**Subject:** Comments on One Seattle Comp Plan Draft  
**Date:** Monday, May 6, 2024 1:05:17 PM

**CAUTION: External Email**

I write in agreement with comments posted by Friends of Seattle's Urban Forest, to wit: "The following comment is in regards to legislation passed last year on Comprehensive Plan requirements

1. In the Climate and Environment Section, p 149, of the draft One Seattle Comprehensive Plan, the heading **Tree Canopy**, should be changed to **Urban Forest and Tree Canopy**.
2. Discussion - Seattle's urban forest and tree canopy is fundamental...

**Rationale for adding urban forest is legislative amendments noted in text below. Highlighting is from Friends of Seattle's Urban Forest, for pointing out specific sections. Underlined areas are new to the 2023 legislation.**

**The Washington State Legislature in 2023 passed [E2SHB 1181](#) - AN ACT Relating to improving the state's climate response through updates to the state's planning framework.**

Section 1.(14) Climate change and resiliency. Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; **prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice. ...**

Section 3.(3) The comprehensive plan of a county or city that is required or chooses to plan under RCW 36.70A.040 shall consist of a map or maps, and descriptive text covering objectives, principles, and standards used to develop the comprehensive plan. The plan shall be an internally consistent document and all elements shall be consistent with the future land use map. A comprehensive plan shall be adopted and amended with public participation as provided in RCW 36.70A.140. Each comprehensive plan shall include a plan, scheme, or design for each of the following: (1) **A land use element designating the proposed general distribution and general location and extent of the uses of land, where appropriate,** for agriculture, timber production, housing, commerce, industry, recreation, open spaces and

**green spaces, urban and community forests within the urban growth area.** general aviation airports, public utilities, public facilities, and other land uses. The land use element shall include population densities, building intensities, and estimates of future population growth. The land use element shall provide for protection of the quality and quantity of groundwater used for public water supplies. **The land use element must give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities.** Wherever possible, the land use element should consider utilizing urban planning approaches that promote physical activity and reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state. **Where applicable, the land use element shall review drainage, flooding, and stormwater runoff in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound.** The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include, but are not limited to, adoption of portions or all of the wildland urban interface code developed by the international code council or developing building and maintenance standards consistent with the firewise USA program or similar program designed to reduce wildfire risk, reducing wildfire risks to residential development in high risk areas and the wildland urban interface area, separating human development from wildfire prone landscapes, and protecting existing residential development and infrastructure through community wildfire preparedness and fire adaptation measures.

2<sup>nd</sup> change - In the Land Use Element General Development Standards:  
Policies L.U.4.8 add underlined words.

Urban forest and tree requirements to preserve and enhance the City's physical, aesthetic and cultural character and to enhance the value of the trees and urban forest in addressing stormwater management, pollution reduction, climate resiliency and heat island mitigation."

Respectfully submitted,  
Ivy Durslag  
512 N 82nd St  
Seattle, WA 98103  
206-353-7265

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DEIS StoryMap Comment

Name: Anne Dwyer

Email: dwyer.ankr@gmail.com

Date: 5/5/2024

Comment:

The city should study the impacts of expanded highrise zoning in urban and residential neighborhoods. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

**From:** [Elizabeth Edlund](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Strauss, Dan](#)  
**Subject:** Seattle's Comprehensive plan and tree canopy: choose alt 2 or 4  
**Date:** Saturday, May 4, 2024 12:49:09 PM

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**CAUTION: External Email**

I am a resident of Seattle, District 6, and I am concerned with our diminishing tree canopy and the proposed comprehensive plan's impact on tree canopy.

Tree canopy isn't just nice, making Seattle "pretty" and "The Emerald City" in name only. Tree canopy provides essential cooling in our warming climate and increasingly paved city. Trees provide vital habitat for urban wildlife which, for me, is a major reason to live here.

Specifics of the plan I'd like to address are:

The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?, and how much of that land can even support additional trees to replace being lost on private land?

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Can you point to specific analysis which shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? If this analysis has not yet been done, why not?

Section P 3-3 also states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." This is very vague and, frankly, sounds quite improbable. What, exactly, is the impact of the plan on Seattle's plants and animals?

I feel that there is an implication here that we do not need urban nature. I strongly disagree. We absolutely do need urban nature and urban forests. Not everyone who lives in Seattle has the ability to get outside the city for "more wild" nature. Urban nature is essential to our quality of life for innumerable reasons including, but certainly not limited to:

1. Human mental and physical health. (Countless studies show a positive correlation between even short walks in areas with sufficient tree canopy to positive physical and mental health benefits such as lower blood pressure and lower levels of anxiety.
2. Mediating effects of climate change by providing shade, clean air, and retaining moisture.
3. Urban nature simply deserves to exist for its own intrinsic value.

I ask you to choose either alternatives 2 or 4 in the comprehensive plan so we can build 100,000 new homes while preserving our trees. The state of our tree canopy may seem like a small thing but I believe it is very important

Thank you for considering,  
Eli Edlund  
9917 15th AVE NW  
Seattle 98117

**From:** [Sara Elaine Eldridge](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#); [Sara Elaine Eldridge](#)  
**Subject:** 3 Critical Questions, for our environmental impact statement, please?  
**Date:** Thursday, May 16, 2024 12:52:08 PM

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**CAUTION: External Email**

First

Regarding Section P3-3: We need more scientific research that clearly lays out what impacts of the Plan would be SPECIFICALLY for Seattle's animals and plants. We have to have these factual projections clearly stated for citizens to understand consequences. We must know as clearly as possible, BEFORE we take irreparable actions, making expensive choices that may not be able to be corrected.

Second

For Section P3-3: Do we have a concrete, factual analysis that demonstrates that tree planting programs, to include additional hardscapes, will scientifically serve us as sufficiently as the urban forests that are proposed for destruction?

Third

With private land available for trees measurably reduced by this new tree ordinance, which public lands will be used to get Seattle to the stated 30% canopy goal?

What are the specific plans for how much public land and the number of trees to be planted EACH Year in compensation for the destruction of tree canopy by development, please?

Thank You All for taking these issues under your consideration and into the public debate.

Thank You for your work to make our world livable into the future,  
Sara Eldridge

--

Sara Elaine Eldridge

**"Of all the forms of inequality, injustice in health care is the most shocking and inhumane."**

**Dr. Martin Luther King Jr.**

**From:** [mike eliason](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** comp plan comment  
**Date:** Monday, May 6, 2024 5:03:02 PM

**CAUTION: External Email**

In reviewing the comprehensive plan update, I have noted there are 4 overarching oversights that must be addressed if we are to be a city that actually prioritizes public health, affordability, reversing gentrification, meeting our climate goals, and ensuring a high quality of life for all residents. These oversights are:

- 1. the plan does not do enough to redress the harm and poor outcomes stemming from Seattle’s racist and classist land use regulations.**
- 2. the plan does not do enough to address broad housing affordability crises in the city.**
- 3. the plan does not center climate adaptation in the middle of a worsening climate crisis.**
- 4. the plan is not coordinated with the Seattle transportation plan and levy, nor commits to a transformative turnaround in any timeline that matters**

193-1

**Redressing Seattle’s racist land use policies**

Seattle’s land use ordinance was written by Harland Bartholomew, an urban planner hired by the city in 1921, whose views on cities, renters, and people of color was decidedly negative. In *Color of Law*, Richard Rothstein notes that Bartholomew was a zoning expert in St. Louis, whose ordinance for that city was intended, 'to “preserv[e] the more desirable residential neighborhoods,” and to prevent movement into “finer residential districts ... by colored people.” Concurrent with writing Seattle’s zoning ordinance, Bartholomew was working one for Memphis. According to Roger Biles in 'Memphis: in the Great Depression,'

*'While it sought to demarcate areas of industry, commerce, and residence, the ordinance additionally reflected the desire of the elite to maintain existing patterns of racial segregation... Recognizing that these informal boundaries might shift or that a growing black population might spill over into heretofore white neighborhoods, the strict application of zoning laws, particularly having to do with dwelling standards, went a long way toward preserving the exclusivity of white enclaves.'*

The outcomes in Memphis were the same in Seattle. The zoning map was effectively a snapshot of existing land uses. Poor areas and neighborhoods primarily with people of color were zoned for multifamily housing, with single family zoning around them to restrict movement. Our zoning map today ensures that Bartholomew’s racist views still affect how the city grows and changes. The Urban Village strategy merely doubled down on Bartholomew’s map and ordinance, effectively keeping the original 1923 zoning ordinance intact – and focusing more development in areas where multifamily zoning and density were *already* legal – increasing displacement and gentrification. The policies of the Urban Village strategy were both racist and incredibly classist – loaded with pernicious anti-tenant policies, and eliminating

affordable housing. Various neighborhood planning documents, that were largely dominated by homeowners in areas that are primarily renter, include numerous classist policies. [\[1\]](#)

These include statements and goals about preserving single family zoning over all other forms of housing in Urban Villages and areas slated for density, and limiting zoning expansion or increases.

Goal 5 - housing which conforms to the existing single-family character of the neighborhood for a range of incomes. Strive to protect the integrity of the single-family housing stock. Green Lake's plan includes this classist gem: 'the Green Lake community believes that the neighborhood already contains much of the low-income housing that exists in Seattle.

Green Lake's plan also explicitly called out limiting low-income housing, and channeling growth along arterials. Greenwood's plan eliminated 32 blocks of multifamily housing, limiting all new density to a half block depth off the freight routes of 85<sup>th</sup> and Phinney/Greenwood. As a result of these Urban Village planning documents = plans, the goals and objectives have been refined to encourage moderate income housing. Ravenna, Bryant, Wedgewood and Maple Leaf—which also had small neighborhood centers, great parks, good schools, and access to incoming high capacity transit – all avoided Urban Village designation... One wonders why that could have been...

This is why it was important that former Council Member Mosqueda pushed for the Urban Village strategy to undergo a racial equity analysis [\[2\]](#) - a report OPCD and the mayor's office delayed and have ignored. There was never an analysis for the 1994 comprehensive plan.

Throughout the One Seattle engagement – Seattle residents have overwhelmingly asked the city to step up and study a plan that not only redresses the harms of Bartholomew's racist zoning ordinance – but to go further. The overwhelming number of comments were to adopt Alternative 5, or to go even further with an Alternative 6 – pivoting towards a more equitable, social, and sustainable city with a focus on inducing significantly more affordability and social housing. [\[3\]](#)

For some reason, all of that engagement was ignored or tossed out – as the mayor's comprehensive plan update is little more than Alternative 2 and continues to double down on the racist and classist roots of Seattle's zoning history. For all the mayor's talk about affordable housing and equity – opting to preserve an inequitable and unsustainable status quo instead of an alternative that would increase most affordable homes is incredibly disappointing.

### **Prioritizing urbanism and affordable housing.**

Per OPCD's own EIS, ***only Alternative 5 maximizes the number of affordable homes.***

While it was not good policy from an urbanism, housing affordability, or public health standpoint – the plan's complete elimination of **Alternative 4 – Corridors** is



confounding. What makes walkable cities... walkable – is that density and midrise buildings are allowed for several blocks off of arterials. This plan would have allowed for multifamily and affordable housing off of dangerous, toxic and loud arterials.

The district maps show that the new neighborhood centers are largely centered on arterials and freight routes.

This plan flies in the face of HB1110 – and the authors have rightfully called out the inadequacy of it. The entire Neighborhood Residential section needs to be re-formulated so that the FAR and setbacks are functional for the development of 4-6 unit family sized homes. The proposed FAR of 0,9 is laughably inadequate – much like this plan.

The EIS also states that Alternative 5 is the greatest opportunity for more affordable housing: ***‘Alternative 5 provides the greatest capacity for housing to meet affordability... Alternative 5 would result in the largest increase in housing supply and therefore have the greatest impact on reducing overall market housing cost pressures for both new and older units.’***

With the EIS showing that project new affordable units through MHA would occur in Alternative 5 (Exhibit 1.6-15) – and by nearly 25% increase. With housing production tanking, it is more imperative than ever to prioritize and facilitate more affordable housing.

EIS also states, ***‘Alternative 5 would provide the greatest benefit for low-income renter households among all alternatives due to its impact on increasing rental housing supply and new affordable housing through MHA and MFTE.’***

In the EIS Exhibit 1.6-21 Population, Housing & Employment Summary of threshold significance – only Alternative 5 shows positive impacts for nearly across the board – increases the supply of market rate housing, affordable housing, diversity of market rate housing, the supply of income-restricted housing, and reducing economic displacement.

Alternative 5 is also the only alternative studied that would reduce growth pressure on Southeast and Central Seattle: ***‘Most housing growth would be in Northwest & Northeast Seattle (Areas 1 and 2) followed by Downtown/South Lake Union (Area 4)’***

In looking at regional effects of the comprehensive plan update – which has the greatest potential for reducing WA’s carbon emissions and meeting climate goals, the EIS states ***‘Among all of the alternatives, however, Alternative 5 offers the highest amount of new housing in the city, which would deter housing growth in the region beyond the city. Based on this, Alternative 5 could indirectly avoid adverse impacts to some of the most pristine water resources throughout the region, as described under Impacts Common to All Alternatives.’***

Prioritize and study the effects of enacting a more visionary, climate forward, and social housing-laden comp plan.

**Centering Climate Adaptation:**

Under the Equity & Climate Vulnerability Considerations – the most important consideration missing: the majority of new apartments in Seattle CANNOT utilize passive cooling or night purging because they are single aspect units in double loaded corridors. The city also don't have incentives for active solar protection (operable shading), making climate adaptation near impossible.

A climate-forward plan would prioritize thinner buildings with single loaded corridors and point access blocks (single stair buildings) to allow more units that can cross ventilate. <sup>[4]</sup> The preponderance of double loaded corridors in buildings is a massive policy and public health failure – especially in the face of future heat domes (units stayed well above 90F in new construction during the previous heat dome).

Thinner buildings would also allow for more land on lots to prioritize broadening the tree canopy in urban areas where it is needed most. Vienna's Sonnwendviertel shows how this is achieved.

Multifamily housing must also be positioned off toxic and dangerous arterials for this same reason – opening up opportunities for more affordable housing near parks which tend to be much cooler due to urban heat island mitigation.

### Public Health

Study effects of allowing more affordable housing off of arterials. Noise pollution causes way more issues than just annoyance and hearing loss – it is linked to cardiovascular issues, and more recently dementia <sup>[5]</sup>

Study effects of lush, family-friendly, car-light and car-free districts around light rail, such as Freiburg's Vauban, or Vienna's Sonnwendviertel.

Alternative 5 is the only plan that has better social impacts – stating, '**Alternative 5 would likely have overall positive impacts on social wellbeing and social interactions.**'

### Transportation

Under the visionary leadership of an actual climate leader, Paris under Mayor Anne Hidalgo has seen a 45% drop in car ownership since 1990. <sup>[6]</sup> This plan needs to be better coordinated with the Seattle Transportation Plan, which itself is completely inadequate to facilitate the mobility transition, or adapt to a changing climate.

The DEIS states that the action alternatives are expected to result in higher vehicle miles traveled (VMT) than the No Action Alternative due to increased growth levels. The impact analysis also states that all the action alternatives are expected to have significant impacts to transit passenger load, corridor travel time, intersection level of service in the NE 130th/NE 145th Street Subarea, and state facilities. The proposed mitigation measures include targeted transportation capacity improvements; bicycle, pedestrian, and freight connections; and demand management using policies,

programs, and investments aimed at shifting travel to modes other than single occupant vehicles. While we are supportive of these mitigation measures, we would like more information on whether these mitigation measures are consistent with those proposed in the STP.

*“We must shift our thinking away from short-term gain toward long-term investment and sustainability, and always have the next generations in mind with every decision we make.”*

*I wanted to end with this perfect quote from US Department of Interior Secretary Deb Haaland, because it absolutely summarizes the thinking that should be inherent in the comprehensive plan. We should have a mayor that prioritizes future generations. We should have a comprehensive plan that prioritizes the fact that the majority of residents both now, and in the future – are not homeowners, but renters. And ensures everyone – not just the wealthy and those who were able to buy ‘affordable’ detached homes decades ago – the opportunity for high quality of life, climate adaptive homes, and affordable housing. Unfortunately, this mayor and OPCD have opted not to do this. They have opted to prioritize climate arson over climate action. To prioritize homeownership over social and affordable housing. We must shift our thinking away from short term gains, to ensure the sustainable, livable, and affordable city with future generations in mind. There is a lot of work that needs to be done to ensure the comp plan is not a complete failure – and I really hope, both for our sake – as well as my own kids, and future generations – you all take that responsibility seriously.*

Thank you,

Michael Eliason

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[1] How Seattle Designed Neighborhood Plans to Inhibit Inclusivity: Part 2, Mike Eliason, <https://www.theurbanist.org/2019/10/17/how-seattle-designed-neighborhood-plans-to-inhibit-inclusivity-part-2/>

[2] Racial Equity Analysis of Seattle 2035 Comprehensive Plan and Urban Village Strategy, [https://aiaseattle.org/wp-content/uploads/OPCD-RacialEquityAnalysis-Memo-and-attachemnts\\_LUNcmte\\_071421.pdf](https://aiaseattle.org/wp-content/uploads/OPCD-RacialEquityAnalysis-Memo-and-attachemnts_LUNcmte_071421.pdf)

[3] One Seattle Comprehensive Plan Update Environmental Impact Statement (EIS) Scoping Report, <https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanEISScopingReport.pdf>

[4] Point Access Block Policy Brief, Larch Lab. <https://www.larchlab.com/point-access-block-policy-brief/>

[5] Exposure to traffic noise linked to higher dementia risk, Kelly Bilodeau.

<https://www.health.harvard.edu/mind-and-mood/exposure-to-traffic-noise-linked-to-higher-dementia-risk>  
[6] Cars Are Vanishing from Paris, Peter Yeung. <https://reasonstobecheerful.world/cars-are-vanishing-from-paris/>

**From:** [Richard Ellison](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 4:57:56 PM

**CAUTION: External Email**

Comments Planning and Community Development EIS,

TO: The Seattle City Council  
RE: Seattle Comprehensive Plan DEIS  
DATE: May 6, 2024

COMPREHENSIVE PLAN HISTORY

One of the four core values of the Seattle Comprehensive Plan is Environmental Stewardship. This has been a core value for decades of Seattle Comp Plans.

Previous Comp Plans said:

“The Seattle Comprehensive Plan calls for Seattle to continue to be a national leader in environmental stewardship. Even as the city becomes increasingly urban, Seattle is dedicated to protecting and restoring the green spaces and water that make our city special.”

- “To Design, build, and manage the City’s built environment in ways that protect, and strive to restore, ...natural resources and natural systems;
- Act as a role model ... in environmentally sustainable practices;
- Improve the overall quality of life in Seattle.”

“The overarching goal of this Comprehensive Plan is to promote sustainable development – through a smart and well-integrated approach to where and how we grow.”

NEW TREE ORDINANCE IMPACTS

In MF zones with 100% lot coverage allowed, it may be impossible to save any existing large or medium sized tree on a lot, and also many adjacent street trees.

For the EIS for Accessory Dwelling Units, the City compared canopy cover on lots that had undergone development. The found representative sample lots and compared canopy coverage before and after using LIDAR. The current DEIS for the comprehensive plan does not calculate canopy cover changes on potential lots in zones for the 5 Alternatives. Instead it wrongly assumes the new tree ordinance will protect trees similarly or better than the previous ordinance did. This wrong assumption will have potential long and short term significant impacts because mitigation opportunities will be lost as no proper evaluations of impacts has occurred to push for greater mitigations.

Exhibit 3.3-3. Total Area and Proportion of Tree Canopy Loss on Parcels That Underwent Development, by Management Unit, suggests that under the new tree ordinance, on NR lots, at the desire of the developer they are allowed to remove all trees on an approved development lot. Thus this will mimic current MF lots in regards to measured canopy’s lost. Neighborhood Residential = 19% of the parcels canopy cover lost

Multifamily = 75% of the parcels canopy cover lost

Table 3.3-3 shows that a shift from “NR” toward “MF” will result in a much higher rate of canopy loss due to development. IMO, this shift (not quantified by the EIS in acreage of land or canopy cover) could well be a “significant unavoidable adverse impact,” contrary to the conclusion on p. 3.3-30 based in good part on “the City’s current tree protection regulations minimize the potential for development-related loss of tree canopy cover and require mitigation for such tree loss.”

The new tree ordinance does not protect trees under development. It only protects trees on NR parcels NOT undergoing development. Parcels undergoing development can have even Exceptional trees be removed if they will reduce the development potential of a lot. The decision is according to the developer; it’s not the City’s decision. The City only issues the permit which then allows the tree removal.

The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.

The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover."

No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

#### OPEN SPACE AND WILDLIFE

While we have a terrible need for affordable housing, everyone needs a livable community, including trees in open spaces for families and native wildlife. Without big trees, without real open space, where are the kids going to play and dream and get off their cell phones? Housing justice and environmental justice go hand in hand.

#### PROPOSED MITIGATION IS INCOMPLETE

Tree Canopy and Climate; Tree Preservation and other Environmental Elements are Not Adequately Addressed in the EIS. Required Mitigation Measures to Achieve Policies are Not Addressed or Proposed in the Comprehensive Plan or SEPA Review / EIS.

The results from this failure to properly address the required climate change and tree canopy policies and lack of inclusion in the Plan and lack of analysis in the EIS are likely to be:

1 a tremendous loss of mature tree canopy as the City falls further and further behind from its adopted policy goal for 30% tree canopy coverage by 2037;

2 adverse health impacts from loss of tree and green space (particularly for overburdened or highly impacted communities); health impacts will almost certainly include increasing mortality and hospitalizations of vulnerable populations due to projected increasing days of severe high temperature with the highest temperatures in residential areas that lack tree canopy and

whose residents have the most adverse social determinants of health (e.g., overburdened and highly impacted communities and populations under the State HEAL Act).

3 adverse impacts due to increased storm water runoff, including stream erosion, contamination entering surface waters, harm to salmon or fish habitat and recovery and biological diversity in surface waters and shoreline habitat, impacts on meeting legal requirements to reduce combined sewage overflows and lack of mitigation for increased runoff from increasing impervious surfaces from other plan policies.

4 The current proposal will help connect clearcut lots with other cleared lots and spread tree deserts and build urban heat islands. With just a 5-ft setback, you are building a natural environment dead zone.

5 Extreme weather events, like summer droughts with record heat, require an infrastructure that includes shade trees. As we build more multiplexes that have few to no windows that open, and fewer with balconies, what happens if the power goes out and its 100+ degrees outside?

The solution?

Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.

Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.

Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.

Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Build taller, not lot line to lot line, but regardless of which housing zone, saving the best healthy trees and building around them. Give extra height bonuses to save trees with affordable housing. Is Seattle clever enough to build affordable housing with open space for families and trees and habitat for all? Is Seattle going to be a leader in Environmental Stewardship, or just clearcut our way to environmental justice?

Thank you,

Richard Ellison, MS Botany

8003 28th Ave NE, Seattle, WA 98115 [climbwall@msn.com](mailto:climbwall@msn.com)

Richard Ellison

[climbwall@msn.com](mailto:climbwall@msn.com)

8003 28th Ave NE

Seattle, Washington 98115-4639

**From:** [Karin Engstrom](#)  
**To:** [PCD CompPlan EIS](#); [PCD OneSeattleCompPlan](#)  
**Cc:** [Saka, Rob](#); [Woo, Tanya](#); [Nelson, Sara](#); [Tree Action Seattle](#)  
**Subject:** Comments on Seattle's Comprehensive Plan  
**Date:** Friday, May 3, 2024 4:09:17 PM

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**CAUTION: External Email**

I've received emails from organizations that are reading the plan and suggesting comments, but I could not find on all the websites I looked at from the Mayor's office whether there were local meetings or zoom calls to go through the plan - even a course in navigating all the documents and how they connect with others would be helpful.

195-1

I have read National Forest Plans and the Hanford output weekly - but that takes lots of time. The plan lists many entities and agencies and they pay someone to read and make judgement on the plan's value, but the average citizen is not getting paid to go over all this materia. Part of the plan must include a way to present the many documents and how they relate. I sure hope I've missed something,

My concerns over the years are the retention of trees. The new tree policy has eliminated heritage trees and I hear about very valuable trees being cut down. Further - how does this plan affect the School District when they are making changes on school property.

195-2

There are ways to evaluate the value of a tree that is planned for removal. It's value in connection with the other trees on the lot, How much carbon is stored from those trees - etc. I looked this all up when the School District was going to remove a group of Black Locust. Now I know they are not native to Seattle - but that group provided excellent shade along its fence and housed many birds and critters. Where do they go when it is all removed. Like Gaza? Just kill them all? It will take years to equal the work that those trees did in providing oxygen and their storage of carbon,

Ever Onward!

Karin Engstrom, MA  
206-390-1013

*A road is itself a kind of sentence, or story. A real place, it's also a metaphor for time, for future becoming present and then past, for passage.*

Rebecca Solnit, *Savage Dreams, a Journey into the Landscape Wars of the American West*



**From:** [Joren Estrada](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 4:52:23 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Joren Estrada  
joren.estradaaa@gmail.com  
1158 N 91st St Apt 404  
Seattle, Washington 98103

**From:** [stevi.exit@gmail.com](mailto:stevi.exit@gmail.com)  
**To:** [PCD\\_CompPlan\\_EIS](#); [LEG\\_CouncilMembers](#)  
**Subject:** Important Comment on DEIS  
**Date:** Monday, May 6, 2024 12:28:02 PM

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CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,  
Stephanie

197-1

**From:** [Carol Fahrenbruch](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 3:22:14 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

\* Please listen to and follow the advice of the Seattle Urban Forestry Commission. Despite their hard work and expertise, they have consistently been sidelined by development interests. We can both protect our mature tree canopy on private lots and build needed density. Yes, it will be more expensive if only the building costs are factored into the economic analysis without considering the economic benefits provided by our existing mature trees and the climate and natural environment costs of losing them.

\* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.

\* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"

\* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

\* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.

\* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.

\* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.

\* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Carol Fahrenbruch  
cfahrenbruch@gmail.com  
4553 51st Ave NE  
Seattle, Washington 98105

**From:** [andrea Faste](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:35:02 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. I am particularly concerned about upkeep on existing mature street trees in medians such as 8th Avenue NW between NW 85th and NW 65th.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

andrea Faste  
amfaste@comcast.net  
7713 11th Av NW  
Seattle, Washington 98117

**From:** [Tareq Fayyad](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Nelson, Sara](#); [Morales, Tammy](#); [Woo, Tanya](#)  
**Subject:** Questions on the environmental impact statement  
**Date:** Wednesday, May 8, 2024 8:59:54 AM

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**CAUTION: External Email**

Hi,

I'm reaching out with questions about the environmental impact statement

Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.”

200-1

**Will you please elaborate on the details? How will this plan affect Seattle's plants and animals?**

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover."

**How does the conclusion show that planting + hardscape will replace the environmental contribution of the mature urban forest in the near and far future?**

The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees.

**How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?**

200-1

Thank you

Tareq Fayyad (they/them)  
Sustainability Coach & Educator  
Trillium Sustainability LLC

[www.Trillium.eco](http://www.Trillium.eco)

Changing our culture of consumption and reclaiming stewardship

**From:** [Nico Faz](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** DEIS Comments  
**Date:** Monday, May 6, 2024 5:00:10 PM

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**CAUTION: External Email**

Good afternoon,

The DEIS needs to study an alternative which the citizens demanded in the 2022 scoping: Alternative 6. We need to study the impact of 150,000 units of capacity so that we can meet the moment of current undersupply and readily plan for the arrival of 250,000 new residents by 2044. We cannot continue with the status quo of low housing stock, decreasing housing affordability, and minimal varieties of housing.

Please also provide us the criteria for selection of neighborhood centers. How was the list narrowed down between scoping and drafting and why? We need all the original neighborhood centers returned to the FLUM so that we can provide new units all across the city and open up otherwise exclusive neighborhoods to new, lower-income residents.

The DEIS should also ensure that bulking regulations such as FAR and lot coverage, as well as parking minimums, can be lifted on every residential lot in the city. HB 1110 requires the allowance of a sixplex on every residential lot in the city if it has an affordability component. This will only be achieved if the Plan incentivizes development through tiered restrictions like Commerce's recommendation or a removal altogether like Spokane's new zoning ordinance.

Best,  
Nico Faz

201-1

**From:** [Rob Fellows](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** One Seattle Plan DEIS comment  
**Date:** Monday, May 6, 2024 3:57:23 PM

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CAUTION: External Email

Hello,

The DEIS No Action alternative assumes that new zoning requirements consistent with HB 1110 (2023) are in place. I believe this is incorrect. HB 1110 directs the City to change its zoning, but does not put the new zoning in place; that is done through Seattle's change to its comprehensive plan and zoning map. This comprehensive plan update implements HB 1110 through the proposed action; therefore the impacts of implementing HB 1110 should be documented as an action rather than included in the No Action alternative.

Rob Fellows  
115 N 84th St.  
Seattle, WA 98103

202-1



**From:** [Jeff Fernandes](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Moore, Cathy](#)  
**Subject:** Questions that need answers regarding Environmental Impact  
**Date:** Friday, May 3, 2024 9:47:21 AM

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**CAUTION: External Email**

1. **What is the impact of the plan on non-human life? This includes all the relationships of animals and plants and our shared environment. We must stop destroying our natural world and facilitating mass extinctions of non-human life.**
  
2. **Studies have shown that tree planting programs are inferior replacements for existing forests. How will you ensure that existing forests are not destroyed by the comp plan?**
  
3. **Have you provided a map of public land where you plan to reforest? How much land have you set aside for this? How do you plan to keep alive these newly planted trees given the intensifying heat and drought of our summers? It is extremely difficult and expensive to keep newly planted trees, so what is your detailed plan and budget for ensuring you are not just planting trees that will die in a heat wave?**

203-1

**From:** [Kaeli Fertal](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 7:45:42 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Kaeli Fertal  
kaelifertal@gmail.com  
8543 Midvale Ave N Apt 503  
Seattle, Washington 98103

**From:** [Julia Field](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 10:02:22 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Julia Field  
1juliafield@gmail.com  
2034-A NW 60th St  
Seattle, Washington 98107

205-1

**From:** [Michael Filipovic](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#); [Woo, Tanya](#); [Nelson, Sara](#)  
**Subject:** Seattle's Comprehensive Plan Concerns  
**Date:** Friday, May 3, 2024 9:17:41 AM

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CAUTION: External Email

Here are my concerns and questions.

Can you explain what impact each of these plans has on Seattle's trees, plants and non domesticated animals.

Section P 3-3 reads none of the alternatives "would be expected to have significant, unavoidable adverse impacts on tree canopy cover". This phrase raises red flags when it combines the word "significant" with "unavoidable". It leaves an awful lot of wiggle room for mass destruction of tree cover, particularly if that phrase becomes the legal standard by which any of these plans is judged. It seems designed to offer to developers who wish to take the easiest path to development in the city.

One goal of the Plan is to increase tree canopy in Seattle by 30% primarily by using city owned property rather than public land, but where are the specifics? For each plan, How many trees must be planted in those areas to replace those that are lost in the private sector, how much of that tree canopy will be added to the parts of Seattle — particularly on the South End — where there are fewer trees at present.

Thank you for considering this email.

Michael Filipovic

Sent from my iPad

**From:** [mark.a.foltz](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comments on Seattle Comprehensive Plan DEIS  
**Date:** Sunday, May 5, 2024 9:51:02 PM

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**CAUTION: External Email**

Thank you for this opportunity to provide comment on the Draft Environmental Impact Statement for the Periodic Update to the Comprehensive Plan.

The proposed alternative for the Seattle Comprehensive Plan does not address Seattle's future housing needs. It only adds capacity for 120,000 new homes over the next 20 years, which is far less annually than Seattle has produced under the previous comprehensive plan. Bellevue, a city that is one-sixth the size of Seattle, is planning on adding 40,000 new housing units over the next 20 years. Seattle must step up and do its part and produce a comprehensive plan which results in 200,000 new homes. This would match the current rate of housing production.

Moreover the current alternative falls well short of the need for affordable housing. Seattle's own Housing Needs Assessment requires that Seattle build over 70,000 new homes that are affordable to families making 80% or less of AMI. The current alternative would build only 18,000 such homes - meaning that over 50,000 families will either become overburdened with housing costs, or be displaced out of Seattle.

The definition of a "neighborhood center" to within 800 feet of a frequent transit stop is hardly believable. That is barely half a block. How can you provide the basic necessities for a family, including groceries, a drugstore, child care, and other services all within half a block? Let alone opportunities for dining, entertainment or the arts? The neighborhood center designation must include enough room to allow essential services for families to become available near transit stops.

Finally the changes to residential zoning will cause single family homes to be predominantly replaced by townhomes. Townhomes are fine, but we need a variety of housing types in single-family neighborhoods to start to undo decades of racial and class segregation in Seattle through exclusionary zoning.

I request the following in the final EIS:

- Analysis of an alternative that provides 200,000 new homes over the next 20 years in Seattle.
- Analysis of an alternative that provides 70,000 new homes affordable to 80% AMI.
- Analysis of an alternative that expands the neighborhood center designation to within at least 0.25 miles of a frequent transit stop.
- Analysis of an alternative that permits small apartments and quadplexes in all formerly single family only neighborhoods.

Thank you for considering my comments.

Please make me a party of record for the Seattle Comprehensive Plan DEIS and FEIS.

Mark Foltz

5813 17th Ave NE, Seattle, WA 98105

DEIS StoryMap Comment

Name: Corey Ford

Email: corey@coreyford.name

Date: 5/2/2024

Comment:

The city should study the impacts of additional Neighborhood Centers in Urban Neighborhoods, as well as greater height and density bonuses within a half mile of transit stops. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

208-1

**From:** [Adrie Anna Franco](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:44:55 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Adrie Anna Franco  
adrie.franco@yahoo.com  
4411 Montclair Dr SE  
Lacey, Washington 98503

209-1

**From:** [Jill Freidberg](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:05:32 AM

**CAUTION: External Email**

Comments Planning and Community Development EIS,

The science is clear. Creating policies that are based on short-term outcomes is counter-productive and destructive. We cannot plan for an equitable, live-able city that has fewer trees. Tree canopy is our best tool for keeping our city cooler. Every tree that is lost creates another heat island in its place.

The numbers are also clear when it comes to equity. Historically Black and brown neighborhoods in Seattle have more real estate development and less tree canopy. Let me put that another way. The distribution of tree canopy in this city is blatantly racist, and the city is complicit because 1) it looks the other way as real estate developers repeatedly cut down legacy trees and then just pay the fine and 2) city planning repeatedly places the burden of growth on neighborhoods south of the ship canal, leaving neighborhoods like Ravenna, Magnolia, and Laurelhurst with their single family homes tucked beneath well-established tree canopy, while neighborhoods like Rainier Beach and Beacon Hill bake under the sun in expanding concrete canyons of ever higher apartment buildings. If the city can't find a way to plan for the future in a way that repairs the economically, environmentally, and culturally inequitable systems of the past (and present), then there will never be "one Seattle."

\* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.

\* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"

\* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

\* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.

\* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.

\* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.

\* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

210-1



\* Create and enforce legislation and policies that actually deter the illegal removal of trees by real estate developers. Current and proposed policy will do nothing to deter these practices.

Thank you for your consideration.

Jill Freidberg  
Central District

Jill Freidberg  
jill.freidberg@gmail.com  
151 22nd Ave  
Seattle, Washington 98122

**210-1  
cont**

**From:** [Josh Friedmann](#)  
**To:** [PCD CompPlan EIS](#); [PCD OneSeattleCompPlan](#)  
**Subject:** Public comment on DEIS and Draft Comp Plan  
**Date:** Monday, May 6, 2024 4:23:07 PM

**CAUTION: External Email**

Dear DPCD team,

Thank you for your many hours of work on the One Seattle planning process and related environmental documents. I am a very proud Seattlite - this is the city where my grandparents finally found freedom, acceptance and happiness after arriving as refugees from genocide overseas. Today I feel very lucky to own a home off the intersection of 57th Avenue S and S Orcas Street.

I hope to live in my home for many years to come, to raise a family there, to age in place, and if I can afford it, to provide an ADU or DADU as a rental option to someone seeking an affordable home. I ask that the Mayor's Final Proposed Plan (and the accompanying FEIS) do the following to make my neighborhood more sustainable, walkable, vibrant and affordable:

211-1

- In the final Plan, please include the Seward Park Neighborhood Center as studied DEIS Alternative 5. If you can, please include all studied Neighborhood Centers in the Final Plan. In the FEIS, please ensure to study the likely adverse environmental consequences of failing to do so.
- Please implement the Corridor designation studied in DEIS Alternative 4 in the streets surrounding the gateway to Seward Park. If you can, please reinstate the Corridor designation City-wide. In the FEIS, please ensure to study the likely adverse environmental consequences of failing to do so.
- Please raise FAR and eliminate minimum-parking mandates in the Seward Park neighborhood and City-wide, for the benefit of our air, our health, and our housing affordability. In the FEIS, please ensure to study the likely adverse environmental consequences of failing to do so.
- If the Corridor model is *not* reinstated in the Final Plan, please clarify that Urban Neighborhoods may accommodate zoning designations other than NR. It concerns me that many current Multifamily-designated areas on today's Future Land Use Map are currently proposed to be replaced by Urban Neighborhood, which appears intended to be predominantly a single-family and middle-housing designation. If the Urban Neighborhood designation is intended to possibly include LR and MR zones (the way the Multifamily designation does today) please clarify that to ease future rezoning efforts, whether proposed by Council or by private parties. Please ensure that similar clarifications are made throughout the FEIS.
- Please ensure that in the FEIS, environmental impacts (especially in the realm of housing supply and affordability) are studied with reference to *likely* job and population growth in the City, not merely *targeted* growth. Planning only for a targeted outcome is very risky, so I hope we instead will use the best available information to plan for a range of *most likely* outcomes. We should be preparing our City to be welcoming to both its current residents and many more people who will arrive whether they are part of the County's targeted population growth or not.

- I also endorse and support the requests stated in the Complete Communities Coalition letter.

These comments are respectfully submitted in my personal capacity as a Seattle resident and voter; they are not submitted on behalf of any organization or any client.

Thanks for your time and all of your hard work. Onward!

Josh Friedmann  
(206) 412-6316

211-1  
cont

**From:** [Barbara Fristoe](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 5:55:16 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Barbara Fristoe  
bfristoe@mac.com  
3418 16th Ave S  
Seattle , Washington 98144

**From:** [Michelle Gadeken](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Seattle One Comprehensive Plan feedback  
**Date:** Tuesday, April 2, 2024 11:30:04 AM

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**CAUTION: External Email**

The draft plan does not make enough measurable change. The city should enact Alternative 6 and or improve the plan follows:

1. Allow bigger buildings in more places - to break out of the “Urban Village” strategy and scarcity mindset. Expanding existing "Urban Centers" as well as add more and up zone them higher. Residential Small Lot (RSL) zones to Lowrise 1 (LR1) is not enough.
2. Add more “Neighborhood Centers” to anchor small neighborhood business districts with housing.
3. Zone for fourplexes and sixplexes that will actually get built and support families with three- and four-bedroom homes. The proposed restrictive size limits — particularly the floor area ratio (FAR) set at a measly 0.9 — are effectively erasing the value of the fourplex and sixplex zoning. Follow state model code and allow 1.6 FAR in sixplex areas instead.
4. Embrace transit-oriented development and allow larger apartment and condo buildings near all frequent transit corridors. The mayor’s proposal appears to have jettisoned the transit corridor alternative from scoping.
5. Remove parking requirements. Parking requirements are a secret tax on housing that render many projects infeasible. We cannot afford this amidst a housing crisis.
6. Corner stores should not only be on corners. Allow more flexibility to ensure more neighborhoods can actually get bodegas or cafes.

213-1

Further explanation of each point can be found at <https://www.theurbanist.org/2024/03/29/op-ed-six-ways-to-improve-seattles-comprehensive-plan/>

Thanks,  
M

**From:** [Chris Gaul](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 12:08:45 PM

**CAUTION: External Email**

May 6, 2024

Good Morning,

I support Alternative 2 to concentrate growth as it results in less canopy loss for Seattle. Under Alternative 2, about 3,000 acres of currently lower-density parcels may be converted to higher-density uses (neighborhood centers), the smallest area of conversion among the action alternatives (Exhibit 3.3-4). Growth would be focused in neighborhood centers. Among the action alternatives, Alternative 2 would thus have the lowest potential for development-related impacts to vegetation (including loss of tree canopy cover) citywide.

214-1

In addition, I have these questions:

- P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals" and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.
- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative?
- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?
- Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

What is the acreage available and suitable for planting trees in each of the following public areas- the city's right of ways, Natural Areas and Developed Parks?

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots?
- What is the available acreage available to plant trees on private property?  
When will it be possible to reach the 30% citywide goal?

- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?
  
- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big trees, including conifer trees are removed?
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

Finally, please consider the following:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

Regards,  
Chris Gaul  
District 5

**From:** [Mark Ghorso](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** Questions reenvironmental impact statement  
**Date:** Monday, May 6, 2024 4:56:43 PM

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**CAUTION: External Email**

I have three questions to ask regarding the environmental impact statement that I do not see addressed in the document:

It is not clear what specific impact the plan will have on Seattle's plants and animals. Will migration zones be affected? Will bird habitats be destroyed? What is the documentation to substantiate the claim of limited impact.

How will the existing tree canopy cover be adversely affected or fully compensated by the proposed tree planting programs, coupled with increased hardscape? What are we giving up in the fight to mitigate climate change in this context?

The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal of increasing our tree canopy? How many trees will need to be planted in these areas every year to make up for trees removed by development?

I believe that these issues must be addressed in the revision of this EIS.

Sincerely,

Mark Ghorso  
7336 24th Ave NE  
206 550-1850

215-1



## DEIS StoryMap Comment

Name: Michael Gillenwater

Email: mwgillenwater@gmail.com

Date: 4/6/2024

## Comment:

I am a homeowner in North Beach, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would lower the cost of housing across the city. Instead the current draft plan will increase already unaffordable housing costs. To create a more affordable city, the plan should allow much more housing to be built away from noisy, polluted arterials.

In Ballard in particular, I think that the plan should expand the upzone walk shed around high frequency transit to at least 1/2 mile.

If the City of Seattle adopted my above proposed changes, then we would be able to create a more affordable city for everyone.

DEIS StoryMap Comment

Name: Michael Gillenwater

Email: mwgillenwater@gmail.com

Date: 4/6/2024

Comment:

I am a climate scientist living in Ballard, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would allow for more sustainable, car-free or car-light living. Instead the current draft plan will worsen congestion and pollution by forcing more people into long commutes. To create a more sustainable, vibrant city, the plan should eliminate parking minimums.

In North Seattle in particular, I think that the plan should apply Vision Zero best practices on dangerous roadways like Aurora Ave.

If the City of Seattle adopted my above proposed changes, then we would be able to reduce greenhouse gas emissions.

217-1

## DEIS StoryMap Comment

Name: Michael Gillenwater

Email: mwgillenwater@gmail.com

Date: 4/6/2024

## Comment:

I am a homeowner in North Beach, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would enable the creation of more walkable neighborhoods. Instead the current draft plan will lock us into dangerous, polluting car dependency. To create a more equitable, sustainable city, the plan should allow for corner stores in many more places.

In Ballard in particular, I think that the plan should look at zoning and othe changes to the Shilshole marina area to allow a more vibrant and walkable mixed use area given its access to the gem of the Seattle park system, Golden Gardens.

If the City of Seattle adopted my above proposed changes, then we would be able to reduce greenhouse gas emissions.

DEIS StoryMap Comment

Name: Michael Gillenwater

Organization: Greenhouse Gas Management Institute

Email: mwgillenwater@gmail.com

Date: 4/6/2024

Comment:

I have been a IPCC lead author for the last 20 years, a former lead author of the U.S. national greenhouse gas inventory submitted to the UNFCCC by the U.S. EPA, an academic scholar focusing on GHG accounting and mitigation analysis, and co-Editor for the journal Carbon Management.

Regarding the summarized impact of the five alternatives with respect to greenhouse gas emissions that is presented in Exhibit 1.6-3. GHG Emissions (MTCO<sub>2e</sub>) by Alternative and Per Capita Rate. Although I applaud the presentation of per capita emissions, I challenge the analysis as presented. First, the use of an emission inventory methodology to compare alternative scenarios is flawed, especially when inappropriate boundary conditions are used. Focusing on city boundaries when the impacts of shifting from a baseline scenario to an alternative scenario have impacts regionally will lead to erroneous policy decisions. Obviously, exclusionary zoning that drives a lack of affordable housing will simply shift populations and increase transport (e.g., commuting) outside of the analysis boundary (i.e., Seattle to surrounding areas). A consequential (intervention) analysis approach is the appropriate methodology for informing policy choices, versus an inventory (allocational or called attributional in LCA) method that compares only city-wide inventory estimates. For a deeper technical discussion of why this approach is flawed, see here:

<https://ghginstitute.org/2023/12/19/what-is-greenhouse-gas-accounting-turning-away-from-lca/>

Therefore, the comparative analysis of GHG emissions between each scenario in the EIS is fundamentally flawed. For example, assuming that all electricity in Seattle is carbon neutral, and therefore any changes in electricity consumption has no effect, problematically ignores the fact that wholesale power markets are connected and that less consumption in Seattle (due to less housing being built) will not impact how much electricity is consumed in the surrounding area (due to shifting population). Similarly, focusing on construction related emissions within Seattle only, while ignoring changes in construction outside of Seattle resulting from the implementation of an alternative scenario is also misleading. Simply put, from a consequential impact analysis standpoint, in what world are the comparative system wide (i.e., regional in this context) impacts greater in a scenario with a more dense walkable urban environment than a scenario that drives populations into less dense walkable and car-dependent areas.

I recognize that redoing the EIS on this matter at this stage is likely impractical, and I am not demanding that be done. Although, ideally, a proper scenario analysis that compared system wide (regional and global) GHG impacts of each alternative relative to the base case would be done. However, the summary discussion on GHG emission impacts, by focusing not just narrowly but misleadingly only on citywide emissions, provides policy makers and the public with incorrect information upon which to judge the tradeoffs between alternatives for a global environmental challenge such as the mitigation of GHG emissions. Therefore, the EIS should, at a minimum, qualitatively acknowledge the flaws in this presentation applying a proper impact analysis methodology that Alternative 5 would be highly likely to

result in greater overall avoided GHG emissions relative to the the base case and the other policy alternatives. I would be happy to follow up with the EIS team on how to address this apparent methodological error. I would also be happy to comment the draft Appendix D on GHG emissions if it is provided for review (it is empty when viewed online).

Sincerely,  
Michael Gillenwater, PhD

**From:** [Julie Gingerich](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Morales, Tammy](#)  
**Subject:** environmental impact of the comprehensive plan  
**Date:** Monday, May 6, 2024 3:39:46 PM

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**CAUTION: External Email**

a review of the comprehensive plan raises important questions about its potential effect on our natural environment.

220-1

- what are the specific ways that the comprehensive plan for development would impact plants and animals. How would the immediate impact be measured and what in the plan would ensure that steps would be taken to mitigate any harm done?
- What analysis has been done that shows that tree planting programs will compensate for lost urban forest?
- How much public land will be made available for replanting trees to make up for the trees canopy that will be lost due to the new tree ordinance . how many new trees would need to be planted in these public areas every year to make up for the mature trees that are removed by development.

thank you  
julie gingerich  
5314 18<sup>th</sup> avenue south 98108

**From:** [David Gloger](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#); [LEG\\_CouncilMembers](#)  
**Subject:** Comments on our One Seattle Comprehensive Plan and EIS  
**Date:** Sunday, May 5, 2024 9:30:13 PM

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**CAUTION: External Email**

Please accept my comments on the One Seattle Comprehensive Plan and the associated EIS.

I would like to see **Alternative 2** further examined and modified.

Please maintain the existing tree canopy goals of 30% by 2035 and 40% over time and specify with data how this will be achieved.

Also, please analyze the potential impact of the final selected option on **Seattle's plants and animals**.

And I have a few questions for you:

- What is your estimation of tree planting needs and a time frame to replace the equivalent lost canopy area and volume (over 5-year periods as tracked by the city's canopy studies)?
- Is canopy area and volume replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

What is the acreage available and suitable for planting trees in each of the following public areas: the city's right of ways, natural areas, and developed parks?

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots? How many trees and what size for all canopy loss?
- What is the available acreage available to plant trees on private property?
- When will it be possible to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan even possible?

- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

**I am seriously concerned about the significant loss of trees in Seattle as more and more residential lots undergo development. It seems that no mature trees are safe any longer in Seattle. I would like to see the following changes made to mitigate any further increase in the loss of our life-sustaining urban forest:**

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.
- Require developers to submit a tree inventory on lots they intend to develop.

Thank you for your work, and I hope that you will take great measures to ensure that, as we grow our city, we take into consideration all that makes life here so beautiful, sustaining and life-giving: our trees and plants, birds and animals, our creeks and hillsides. The city is not adequately protecting what makes Seattle most livable and beautiful, and we must do better!

David Gloger  
Seattle, WA



**From:** [J.G.](#)  
**To:** [PCD CompPlan EIS; Strauss, Dan](#)  
**Subject:** D6 comments  
**Date:** Sunday, May 5, 2024 10:59:21 AM

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**CAUTION: External Email**

Hi all,

Thank you for your work. In one of the DEIS meetings, I asked what impacts had been studied on the starving and polluted Southern Resident Killer Whales. The answer from Brennan was that the impact on the SRKWs from additional stormwater produced by a reduction in mature trees while adding humans creating more sewage had not been studied. P 3-3 says no impact but more study seems to be needed if our most vulnerable endangered wildlife was excluded. I also asked if the impact of removing shade providing mature trees had been studied given it will increase the need and reliance on a/c with predictions of higher temps. Growing numbers of people with and without health challenges will succumb to adverse health outcomes without cooler air in the hotter temps. The energy industry has predicted shortages in electricity with rising temperatures.

I'd assume any true EIS would include actual environmental impacts to our most vulnerable/endangered fauna and life/shade giving flora. I'm confident we can do this safely and equitably with climate justice for all residents of the "Emerald City." Where has the 2035 canopy goal gone? How will we reach 30% and on what land? Those who want to alter our city externally from other cities should not outweigh those who reside in Seattle. Especially when the majority of these vote for stronger tree ordinances in their homes in alternate cities. That would be very inequitable, wouldn't it?

Thank you so much for your work,  
Jennifer Godfrey

**From:** [Jennifer Godfrey](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 7:31:22 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Jennifer Godfrey  
plantkingdom1@gmail.com  
1900 W NICKERSON ST, STE 116 PMB 206  
Seattle, Washington 98119

223-1

**From:** [Demian Godon](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comp Plan draft  
**Date:** Monday, May 20, 2024 7:00:02 PM

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**CAUTION: External Email**

Hi,

While the draft comp plan had some good elements, it needs to go much further in allowing more housing options in more of the city. The plan is a generational opportunity and the city faces numerous crises related to lack of housing options that will stagnate or get worse with the modest current draft. We need Seattle's comp plan to align with state law and allow 6-plexes throughout the city and missing middle housing in many more areas, not just on congested, polluted, and dangerous thoroughfares.

224-1

As a homeowner in Magnolia, I'm relatively lucky to live on a quiet street near good schools and many amenities. But my neighborhood has effectively locked out working class and poor people through restrictive zoning. This has also limited options for retirees looking to downsize or young adults getting a start in life as there are scarcely any affordable options like 4 or 6 plexus, apartments, or condos. The lack of density in Magnolia and many other similar exclusive neighborhoods across the city also restricts transit options and frequency making it harder for the city to meet its climate goals.

Let's go big and make Seattle a great and thriving city for all!

Thanks,

-Demian

ATTN:  
Office of Planning and Community Development  
c/o Jim Holmes  
City of Seattle

Hello,

As both a citizen and business owner in the City of Seattle I am providing my comments on the City’s Draft Environmental Impact Statement (DEIS, 2024) as part of the public comment period. I have both numbered them and also provided pages references as necessary. These comments represent my personal opinions and do not reflect those of any organizations or entities I may be affiliated with.

225-1

My comments are as follows:

**General Comments**

1. Please study the elimination of all parking requirements in the Final EIS, as a recognition that parking will still be allowed and that the market will decide how much parking should be constructed
2. Please Provide an Alternative in the Final EIS that can address 50% the current need for income-restricted housing (housing available to those at 80% AMI or below) in a pattern consistent with Alternative 5. Based on the recent MHA/IZ program, the City’s current programs result in 7% of all produced housing being in this category of income-restricted housing and the total number of units needed according to the 2020 Community I
3. For all Alternatives, please study providing high-rise zoning immediately adjacent to all light-rail stations (within 1000 feet or 1/8<sup>th</sup> mile) similar to what is done at SkyTrain stations in Vancouver.
4. In the Final EIS, please study condensing the Seattle Mixed, Commercial, and Multifamily Zones into one Category
5. For all Alternatives, please revise the Capitol Hill Regional Center to include all land as designated “Broadway” under the City Clerk’s Geographic Indexing Atlas
6. For All Alternatives, please revise the Madison-Miller Urban Center to include all land designated as “Stevens” under the City Clerk’s Geographic Indexing Atlas
7. For All Alternatives, please extend the SLU Regional Center to include all land designated as “Westlake” under the City Clerk’s Geographic Indexing Atlas
8. For all Alternatives, please study the impact of exempting all deep green building projects from the Design Review process.

225-2

225-3

9. For All Alternatives, please extend the adjacent Urban and Regional Centers to include all land designated as “Minor” into an adjacent Urban Center OR provide justification for not including these areas given their location between Urban Centers and Regional Centers.
10. For all Alternatives, please revise the Montlake Neighborhood Center to include all land between the proposed area and the light rail station located to the north.
11. For all Alternatives, please revise the 145<sup>th</sup> station area to include the same distance from the station in the station area as is include in the 130<sup>th</sup> station, particularly as this road is slated to receive a bus-rapid transit line.
12. For all Alternatives, expand ‘corridor’ areas to include all parcels located within a 10-minute walkshed of transit stops used
13. For all Alternatives, please expand the adjacent Urban Centers to cover all areas of North Beacon Hill up to Dearborn Street (fill the gap.)
14. For all Alternatives, please provide an Urban Center adjacent to Discovery Park
15. For All Alternatives, please fill the gap between the Fremont and Wallingford Urban Centers
16. For all Alternatives, please expand the Wallingford Urban Center to include no less than ½ mile walkshed on both sides of 45<sup>th</sup> Street
17. For all Alternatives, please provide an Urban Center adjacent to Magnuson Park
18. For all Alternatives, please expand and connect the areas between the West Seattle Junction and Morgan Junction Urban Centers.
19. For all Alternatives, either establish a new Urban Center between the University Community and Roosevelt or extend the University Regional Center to include all parcels to the north of it up to the Southern Edges of the Roosevelt Urban Center and Cowen / Ravenna Parks
20. For all alternatives, please study providing a new Urban Center in NE Seattle along 35th Ave either at NE 65<sup>th</sup> or NE 75<sup>th</sup> Ave.
21. For all Alternatives, revise the center at the West Magnolia Playfield to be an Urban Center with an Area that covers a mile in diameter (no less than ½ mile in each direction around the West Magnolia Playfield)
22. For all Alternatives, revise the Green Lake Urban Center to include all lots adjacent to Green Lake Park and along all Green Lake Drives.

23. For all Alternatives, please connect the areas between the North Beacon Hill and North Rainier Urban Centers. Please also fill in the hole in the Columbia City Urban Center
24. For all Alternatives, please study providing Urban Center level zoning around Jefferson Park
25. For all Alternatives, please study an Urban Center adjacent to Seward Park
26. For all Alternatives, please study an Urban Center centered around the Burke-Gilman Playground Park / Seattle Children's Hospital
27. For all Alternatives, please study changing Othello into a Regional Center and expanding its reach to include parcels to the north up to the Columbia City Urban Center
28. Please Provide an Alternative that provides a Neighborhood Center (or more dense zoning designation) within a 10-minute walkshed of every parcel zoned for residential uses, thereby achieving the City's own stated goals of providing 15-Minute neighborhoods.
29. Please expand neighborhood centers to include an area no smaller than ¼-mile
30. Please study the following areas for inclusion as neighborhood centers
  - a. At least one neighborhood Center in the Portage Bay neighborhood, either at Eastlake Ave E / Fuhrman Ave E or Fuhrman Ave E / E Shelby St.
  - b. Greenwood Ave N / N 145<sup>th</sup> St
  - c. Greenwood Ave N / N 125<sup>th</sup> St
  - d. 15<sup>th</sup> Ave NW / NW 100<sup>th</sup> St
  - e. 32<sup>nd</sup> Ave NW / NW 85<sup>th</sup> St
  - f. 3<sup>rd</sup> Ave NW / N 80<sup>th</sup> St
  - g. 8<sup>th</sup> Ave NW / NW 70<sup>th</sup> St
  - h. Phinney Ave N / N 60<sup>th</sup> St
  - i. Fremont Ave N / N 43<sup>rd</sup> St
  - j. NW Market St between 8<sup>th</sup> Ave NW and 3<sup>rd</sup> Ave NW
  - k. 24<sup>th</sup> Ave NW / NW 80<sup>th</sup>
  - l. 32<sup>nd</sup> Ave NW / NW 65<sup>th</sup>
  - m. Phinney Ave N / N 46<sup>th</sup> St
  - n. 32<sup>nd</sup> Ave W / W Government Way
  - o. 6<sup>th</sup> Ave W / W McGraw St
  - p. 10<sup>th</sup> Ave W / W Howe St
  - q. Queen Anne Ave N / Nickerson St
  - r. Wallingford Ave N / N 37<sup>th</sup> St
  - s. Wallingford Ave N / N 40<sup>th</sup> St
  - t. Wallingford Ave N / N 34<sup>th</sup> St
  - u. 1<sup>st</sup> Ave NE / NE 50<sup>th</sup> St
  - v. Lakeside Ave / Lake Washington Blvd
  - w. MLK Jr Way / E Union St

- x. 34<sup>th</sup> Ave W / W Emerson St
- y. 35<sup>th</sup> Ave NE at all intersections not included in an Urban Center (55<sup>th</sup>, 65<sup>th</sup>, 75<sup>th</sup>, 85<sup>th</sup>, and 95<sup>th</sup>)
- z. Sand Point Way between NE 95<sup>th</sup> St and NE 97th
- aa. 5<sup>th</sup> Ave NE / NE 83<sup>rd</sup> St
- bb. West Seattle Water Taxi Station
- cc. Alki Ave SW between 63<sup>rd</sup> Ave SW and 61<sup>st</sup> Ave SW
- dd. California Ave SW / SW Charlestown St
- ee. Beach Dr SW / SW Anderson St
- ff. 35<sup>th</sup> Ave SW / SW Kenyon St
- gg. 35<sup>th</sup> Ave SW / SW Roxbury St
- hh. 9<sup>th</sup> Ave SW / SW Henderson St
- ii. Highland Park Way S / SW Kenyon St
- jj. 35<sup>th</sup> Ave SW / SW 106st
- kk. 31<sup>st</sup> Ave S / S Atlantic St
- ll. S Mt Baker Blvd / S McClellan St
- mm. Beacon Ave S / S Columbian Way
- nn. Beacon Ave S / S Graham St
- oo. Beacon Ave S / S Myrtle St
- pp. 50<sup>th</sup> Ave S / S Genesee St
- qq. 15<sup>th</sup> Ave S / S Columbian Way
- rr. 15<sup>th</sup> Ave S / S Lucile St
- ss. Wilson Ave S / S Dawson St
- tt. Rainier Ave S / S Orcas St
- uu. Rainier Ave S / S Graham St
- vv. Rainier Ave S / Lakeridge Park
- ww. Renton Ave S / S Roxbury St
- xx. Renton Ave S / 72<sup>nd</sup> Ave S
- yy. E Marginal Way S / Corson Ave S

225-3  
cont

## **Introduction / Chapter 1**

- 31. III: how do Neighborhood Centers differ from the Neighborhood Anchors introduced as part of the Urban Village strategy in 1994?
- 32. IV: why is Alternative 5 only 40,000 units more than Alternative 1, given that it's a combination of Alternatives 2, 3, and 4?
- 33. 1-3: Please provide information justifying a continuation of the current jobs and housing imbalance based on the projected number of all Alternatives, which seems to be counter to the City's stated goals of revitalizing downtown.

34. 1-11: How does Alternative 3 achieve the goal of more housing options near large parks without designating higher density place types around Discovery Park, Seward Park, Woodland Park, Green Lake, the Arboretum, and Magnuson Park?
35. 1-7: Given current downtown vacancy rates, why is the general accepted number of new jobs being located outside of downtown 15% and not higher?
36. 1-10: it is unclear if the intent is to provide a range of zones that reflect the different housing types allowed or one zone type that allows a spectrum of housing options
37. 1-10: *“neighborhood centers could have a range of housing from townhouses to 7 story stacked housing”* – where does seven story stacked housing come from and why will these be allowed in neighborhood centers but not in neighborhood residential?
38. 1-15: re Exhibit 1.4-7 – please study an Alternative that results in a higher percentage change in Area 3 as compared to Area 5 and Area 8.
39. 1-15: re Exhibit 1.4-8 – in line with community requests for a Regional Center in the South End, please study an alternative that reduces job growth in Area 4 below 50% and increases Area 8 above 10%
40. 1-17: bottom list, bullet point 3 – please revise to study single flats up to six stories, in line with Seattle’s current building code
41. 1-17: bottom list, bullet point 5 – why are bicycle requirements being studied for modification and not car parking requirements? This does not make sense given the City’s goals for mode shift as well as goals for reducing VMT.
42. 1-18: bullet point 2 – the impact of MHA must be studied in the Final EIS to both comply with the GMA as well as accurately calculate the number of projected units for each alternative studied.
43. 1-18: bullet point 4 – please revise studies to emphasize reduction in VMT as required in the Climate Change and Resiliency Element given its adoption by the City of Seattle for this Comprehensive Plan cycle
44. 1-24: please study and provide suggestions for increasing housing density while reducing pollution and runoff increases, such as allowing for higher height limits and requiring a reduction in lot coverage for multifamily-zoned land
45. 1-24: please provide evidence of compliance with HB... and lost capacity given the current contaminated sites in Seattle

225-3  
cont



46. 1-27: please acknowledged the impact of increased density in the South Park neighborhood given recent examples of flooding in the area
47. 1-29: please provide an alternative or revise alternatives so that all options reduce per capita GHG emissions so that all plans can achieve AT MINIMUM the 58% reduction from 2008 levels by outlined in the City's Climate Action Plan no later than the completion of this comprehensive plan cycle (2045).
48. 1-35: please add language that acknowledges the percentage of land owned by the City that is Right-of-Way / impervious surface and the associated amount of runoff with this area
49. 1-38: please add a bullet that acknowledges the City will take additional steps to add and replace removed trees on City-owned land and Parks
50. 1-42: please provide an alternative studied that reduces VMT to below 13.0, as recorded and studied for Exhibit 1.6-6
51. 1-51: why are transitions considered an environmental impact?
52. 1-54: provide information as to how Exhibit 1.6-11 ratings for tree canopy are assessed given that per the City's own recent study, almost all tree canopy loss was not due to development and nearly half was on City-owned land.
53. 1-59: third line - was there an Alternative 6 studied?
54. 1-61: it is clear Alternative 1 does not comply with HB 1220, which is related to the siting of affordable and permanent supportive housing. In the final EIS, please identify which alternatives comply with HB 1220 as the final adopted plan MUST comply with the state requirements.
55. 1-62: last paragraph, please study compliance to state and regional plans for ALL Alternatives included in the Final EIS so that the version of the plan Council votes on is clearly in compliance.
56. 1-66: please provide the impact on housing production for each Alternative studied should MHA be expanded to include all Neighborhood Residential zones.
57. 1-67: please provide information related to 'naturally occurring affordable housing' and how supply provided in each Alternative will balance those losses.
58. 1-68: what is the net increase in units affordable to those making below 100% AMI?
59. 1-70: Please note how all alternatives either meet demand or fall short as noted in Alternative 1
60. 1-89: For all alternatives, adjust zoning capacity to take into account the potential for the city to acquire land that achieves the LOS of Parks as outlined in Exhibit 1.6-27

225-3  
cont

## Chapter 2

61. 2, generally: please revise numbering to follow nomenclature used in other sections (3,4, etc.)
62. 2-4: please correct Exhibit to provide the place type 'Neighborhood Residential' under Alternative 1 place types. The change in name already existed before the beginning of the Comprehensive Plan process.
63. 2-42-11: please provide the required information in the EIS to show compliance with the Environment and Climate Element of the GMA, which the City voluntarily agreed to follow
64. 2-19: please study the impact of removing FAR for all Neighborhood Residential Zones
65. 2-20: revise bullet point two to allow for up to six-story single flat configurations
66. 2-30: revise Alternative to provide a consistent minimum area for each urban center designated.
67. 2-30: in addition, please revise map to designate urban centers  $\frac{3}{4}$  mile around each studied ST3 station location.
68. 2-33: please study impact of condensing all Lowrise zoning to highest possible use (LR3)
69. 2-33: please study the impact of condensing all Neighborhood Residential into one zone with a minimum lot size of 2500sf.
70. 2-34: Please study an alternative for Neighborhood Residential with a capacity limit that is in line with up to six stories on all lots and a lot coverage of 50%, in compliance with current building codes that allow wood-frame construction and single stair building up to six stories and would allow for six-unit flats on a lot.
71. 2-40: Please revise Alt 5 to truly represent a combination of alternatives 2, 3, and 4. The resulting alternative 5 should be no less than 140,000 units, or, in alignment with following comments, no less than 314,000 units (158,000 units planned for each alternative)
72. 2-48: the PSRC already acknowledges that Seattle has a housing and jobs imbalance. Please correct all Alternatives studies so that the minimum number of housing units projected is no less than the number of jobs projected
73. 2-48: the PSRC identifies a jobs / housing balance of 1.3 to be ideal for all jurisdictions within King County. That would mean planning for an increase of at least 209,670 housing units as compared to 158,000 jobs. Please study at least one alternative with a **projected** number of units that exceeds 210,000 housing units.

225-4

74. 2-51: please revise the numbers in the comparison tables, Exhibits 2.4-31 and -32. There is no reason the numbers should be the exact same in all the alternatives studied.

225-4  
cont

75. 2-56: please correct this section to acknowledge that delaying action would also put the City in non-compliance with state requirements.

### **Chapter 3 Environment**

#### **3.1 Earth & Water Quality**

76. 3.1-15: Provide information as to mitigation strategies for areas that will see a significant sea level rise by 2100.

225-5

77. 3.1-16: revise Alternatives to increase density in areas ranked either 4, 3, 2, or 1 in terms of Burden Levels

#### **3.2 Air Quality & GHG Emissions**

78. 3.2-17: how is the location of Sensitive Populations factored into the placement of new housing in all studied alternatives?

79. 3.2-21: how do the City's 2030 targets factor into estimates of housing production?

80. 3.2-24: please include GHG per capita numbers below each alternative

225-6

81. 3.2-25: please study alternatives that provide additional height and density away from the 200 meter buffer outlined in paragraph 2

82. 3.2-29: for Exhibit 3.2-7, please provide per capita numbers for all alternatives studied

#### **3.3 Plants & Animals**

83. 3.3-5: why are tree management units by zone type and not by Subarea?

225-7

84. 3.3-8: please provide additional information that makes it clear that 6PPD-quinone originates from tires

#### **3.4 Energy & Natural Resources**

85. 3.4-7: Please provide a comparative Building EUI for single-family homes based on existing energy data

225-8

86. 3.4-10: How does the Transportation Plan factor into these #s?

87. 3.4-21: there seems to be an error in the naming of Exhibit 3.4-9

#### **3.5 Noise**

88. 3.5-28: Please provide information that acknowledges the impact that a lack of air conditioning and need for passive cooling strategies (i.e. open windows) has on noise pollution in neighborhoods along arterials

225-9

### **3.6 Land Use Patterns & Urban Form**

89. 3.6-12: please provide clear language that acknowledges the continued racism and exclusionary practices continued by the Urban Village Strategy and provide clear differences between this plan and the previous one to address this history.
90. 3.5-19: please study capacity increases equivalent to eliminating all setbacks in multifamily such that buildings are regulated solely by fire separation requirements per the Seattle Building Code.
91. 3.5-19: please study capacity increases equivalent to reducing all upper setbacks to no more than 10 feet; removal of corner setback requirements; and reducing front setbacks on neighborhood residential 0 feet.
92. 3.6-21: please study capacity increases equivalent to 50% coverage of lot area for all Neighborhood Residential zones
93. 3.6-107: how are the overcast nature of most times of year in Seattle along with the increasingly hot summers factored into concerns around shadows?
94. 3.6-117: please revise all Exhibits so that place types align with new proposed place types (Regional Center, Urban Center, Neighborhood Center)
95. 3.6: for all alternatives, raise urban village zoning to a minimum of orange (85ft) and all and all urban centers to red (120ft)
96. 3.6-138: per Exhibit 3.6-93, why is the future AU/acre much lower at NE 130<sup>th</sup> as compared to 15<sup>th</sup> & 145<sup>th</sup> even though they are the same Place Type?
97. 3.6-139: please condense all zoning at 15<sup>th</sup> & 145<sup>th</sup> to study the highest potential capacity
98. 3.6-146: per Exhibit 3.6-98, the numbers in Alt 4 are the exact same as Alt 2
99. 3.6-161: per Exhibit 3.6-108, the numbers in Alt 4 are the exact same as Alt 2
100. 3.6-170: To provide increased equity, please study and revise capacity so that all Residential Urban Centers have an AU/acre of at least 50, all Hub Urban Centers have an AU/acre of at least 80, and all Regional Centers have an AU/acre of at least 150 for Alternative 5.
101. 3.6-175: Per Exhibit 3.6-115, please provide revised zoning and study additional capacity here that increases the Future Activity Units per Acre to above 70 or as much as 15<sup>th</sup> & 145<sup>th</sup>.

225-10

102. 3.6-182 Land Use Patterns & Urban Form: Please explain the justification for requiring transitions and the deference to single-family homes given the current housing emergency

103. 3.6-186 Housing: Please provide additional justification for continuing the “Urban Village” strategy under a new name given the research and confirmation by the RET Racial Analysis that the strategy has continued the racist redlining of Seattle’s past in a new form and has been insufficient to solve the City’s housing affordability emergency, which was declared in 2015.  
*(“All alternatives would focus most future growth into existing urban centers and villages.”)*

225-10  
cont

**3.7 Relationship to Plans, Policies, & Regulations**

104. 3.7-20 Housing: Per the “Housing” section of Exhibit 3.7-9, please confirm and provide one alternative that achieves the County’s goals for housing targets by affordability for all affordability bands at and below 80% AMI.

225-11

105. 3.7-26 Housing: Please provide and study a Regional Center located in the South End, as requested by a number of members of the South End Community.

**3.8 Housing**

106. 3.8-4 Housing: Given the correlation between denser housing and more racial diversity, please provide a map with zoning changes intended to allow for more dense housing in subareas that have a significantly higher percentage (above 5%) of ‘White, Non-Hispanic’ than the Seattle average, namely Areas 1, 3, and 6.

107. 3.8-31 Housing: Please provide a map for each alternative that clearly identifies new zoning types and related increases in density in areas with a low risk of displacement as compared to those with a high risk of displacement.

225-12

108. 3.8-45 Housing: For Exhibit 3.8-41, how does the total projected new income-restricted units for each alternative compare to the current deficiencies identified in the EDI Community Indicators Report (September 2020)?

109. 3.8-47 Housing: For Exhibit 3.8-44, please provide strategies or increase the number of allowed housing units in Alternative 5 in order to reduce the ‘ratio of net new units to units demolished’ to a number than is lower than Alternative 3.

**3.10 Transportation**

110. Please clearly outline in the Final EIS how the Comprehensive Plan achieves Policy T4.2, a 20% reduction in VMT by 2030

111. Please revise LOS standards to move to VMT and revise Comprehensive Plan Policies T9.7 and T 9.8 accordingly.

225-13

112. 3.10-5 Transportation: For Exhibit 3.10-2, please provide justification for maintaining an SOV mode share of '38%' for Subarea 4 as compared to other Subareas, given its proximity to two major Regional Centers. Can this number be reduced to 30%?
113. 3.10-41 Transportation: For Exhibit 3.10-22, please provide separated LOS for Freight vs. HOV vs. SOV.
114. 3.10-101 PM Peak Hour Mode Share-Alternative 5: Please provide information as to what steps or adjustments need to be made in order to achieve SOV Targets in all Subareas studied. Currently it appears that Subarea 7 does not comply regardless of Alternative.
115. 3.10-114: If you're going to provide a Sensitivity Test, please do so for all alternatives studied.
116. 3.10-129 Transportation: Please provide a matrix that shows LOS and VMT (both total and per capita) of all studies alternatives crossed with the studied transportation plan alternatives

225-13  
cont

### **3.11 Public Services**

117. Please provide additional information in the Final EIS that addresses the City's capacity to deal with extreme weather events, including but not limited to a major earthquake event.
118. 3.11-3 Public Services: for Exhibit 3.11-1, please either revise to only show the number of sworn officers from 2017 to 2022 or revise later exhibits to provide data all the way back to 2012. The information as shown currently is misleading.
119. 3.11-61 Schools: please provide revised estimates that consider the projected number of students adjusted based on the expected number of family size units to be created through all studied alternatives.

225-14

### **Chapter 4 – Acronyms & References**

120. 4.2 References: Please add references and include the following items in your research as part of the Final EIS:
- The Department of Commerce [HB 1110 Model Ordinance](#) for cities 25,000 and over
  - The Urban Institute's [Research Report](#) – Unifying Upzoning with Affordable Housing Production Strategies: Advancing Access to Housing in Washington State
  - The American Enterprise Institute's [Research Report](#) – Expanding Housing Supply with Light-Touch Density: City of Seattle Case Study
  - The Seattle Planning Commission [Issue Brief](#) – Growth Strategy (February 2022)
  - The Seattle Planning Commission [Issue Brief](#) – Anti-Displacement (March 2022)
  - The Seattle Planning Commission [Issue Brief](#) – Repurposing the Right-of-Way (November 2022)
  - The Seattle Planning Commission [Issue Brief](#) – Affordable Housing (November 2022)

225-15

- h. The Seattle Planning Commission [White Paper](#) – A Racially Equitable & Resilient Recovery (August 2020)
  - i. The Seattle Planning Commission [White Paper](#) – Evolving Seattle’s Growth Strategy (Winter 2020)
  - j. The Seattle Planning Commission [Report](#) – Neighborhoods for All (Fall 2018)
121. 4-43: Please fix the broken link to the Market Rate Housing Needs and Supply Analysis. I am assuming this is the 2021 BERK Report, however this cannot be confirmed. If it is not, please include that report in your research for this final EIS.

225-15  
cont

## **Chapter 5 – Appendices**

122. B – Detailed Estimated Growth by Alternative: can you please provide the missing information?
123. C – Infill Exemption Summary of Law & List of Codes as Mitigation: can you please provide the missing appendix?
124. D – Air Quality & GHG Appendix: can you please provide the missing appendix?
125. E – Energy Appendix: can you please provide the missing appendix?
126. F – Noise Appendix: can you please provide the missing appendix?
127. G – Land Use Appendices: can you please provide the missing tables?
128. G – Land Use Appendices: can you please provide a draft future zoning land use table? These zones should be in line with the proposed city types: Regional Centers, Urban Centers, Neighborhood Centers, Neighborhood Residential, Industrial, et. Al
129. H – Transportation Appendices: can you please provide the missing information for both the Pedestrian Master Plan as well as the Bicycle Master Plan?

225-16

Feel free to email me back for questions. In line with the requirements of the EIS as part of the Comprehensive Plan Process and per the Growth Management Act, I look forward to responses to all of my comments as listed above.

Thank you,  
Andrew Grant Houston, AIA NCARB CPHD  
District 3 Resident – City of Seattle

**From:** [Suzanne Grant](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** One Seattle Plan comments  
**Date:** Monday, May 6, 2024 2:10:26 PM

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CAUTION: External Email

## ONE SEATTLE PLAN

I would like to submit the following comments regarding the One Seattle Plan.

I support Alternative 2 as The Plan.

Alternative 2 would have the lowest potential for development-related impacts to vegetation (including loss of tree canopy cover) citywide.

Based on the anticipated amount of area likely to be redeveloped, Alternative 2 would have a lower potential of leading to increased delivery of stormwater contaminants to streams.

However, on p.3-3-30, saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover" is not backed up by facts but speculative at best. The Plan states: "development projects on parcels in the Neighborhood Residential or Multifamily management units are likely to result in more loss of tree canopy, compared to development on parcels in other management units. This is particularly true of parcels with lower-density residential designations, where existing canopy cover is higher than elsewhere. As such, strategies that convert parcels with lower-density residential designations to higher-density designations could reduce the total amount of tree canopy cover in the city."

Some questions that need answering are:

1. Considering the fact that the trees being removed are larger than the ones being planted and it will take many years to replace the current trees, what is your estimation of tree planting needs and a time frame to replace the equivalent lost canopy area and volume?
2. What is the acreage available and suitable for planting trees in the City's public areas?
3. What is the available acreage available to plant trees on private property?
  - Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?
5. What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

Although the provision for 30% tree canopy is retained in the draft Plan, reaching the target date by 2037 needs to be put back into the draft, as well as attaining a tree canopy goal of 40% over time, which has also been removed from the draft Plan. On p.3-3-12, the Plan states: "Based on the potential for reductions in canopy cover, projects that entail tree clearing could slow progress toward achieving the City's canopy cover goal."

There seems to be an opinion amongst some that we cannot have both trees and houses, but we CAN. Although the Plan states that "the City's current tree protection regulations minimize the potential for development-related loss of tree canopy cover and require mitigation for such tree loss," there are serious omissions in the Tree Ordinance. The Plan needs to correct these omissions by specifying dedicated tree retention and planting areas that will require saving more existing trees, especially mature trees, on building lots. To stop lot sprawl, the Plan needs to give SDCI Director the ability to ask for alternative site design. The Plan needs to have a provision to review and amend the Tree Ordinance to (1) require developers to submit a tree inventory before taking any action on the lot, (2) remove



the “basic tree protection area” that allows developers to unnecessarily remove almost all large trees on lots, and (3) the Tree Ordinance needs to apply to all City land use zones.

The Plan needs to require all housing built, including building additions of any size and ADU's, to plant street trees with trees of larger sizes than currently allowed on sidewalk strips being allowed if there are no wires overhead.

Increasing access to trees and clean natural spaces for people everywhere is something we all agree on. Biden’s Inflation Reduction Act includes an investment in urban tree planting of \$1.5 billion. Part of his Justice 40 Initiative ensures that 40 percent of the benefits reach communities that are disadvantaged or nature deprived. The Plan needs to specify that affordable housing and multifamily housing have trees and parks nearby.

The Plan needs to authorize the use of Parks Impact fees to create more parks, especially pocket parks, in neighborhoods across the city. The Plan needs to authorize the use of Transportation Impact fees to create more tree-lined streets.

Urban trees are valuable for so many reasons. They reduce surface temperatures and storm runoff (helping to protect our salmon). They cleanse the air and improve residents’ mental and physical health. There’s even a correlation with public safety, an issue which is SO important to Seattleites: Neighborhoods with more street trees have lower crime rates. Expanding urban tree cover is truly an issue of environmental justice and equity.

Thank you.  
Suzanne Grant  
2723 4th Ave W  
Seattle, WA 98119

## DEIS StoryMap Comment

Name: Lynn Graves

Email: lyngraves@comcast.net

Date: 5/6/2024

Comment:

Comments on Seattle Comp Plan Draft EIS

The Draft EIS lists likely 'local' adverse impacts in the categories Earth and Water Quality, Air Quality and GHG Emissions, and Plants and Animals:

Increased hard surfaces

Decreased vegetation

Increased total emissions at a local scale

'Temporary' (increased) emissions from construction (please define temporary)

Exposure of population living in new buildings near high volume roads to air pollution

'Moderate' loss of tree canopy

However, it states there is "No significant adverse impact" in these categories. The reason given is that the entire region (by the way, what region is being referred to?) will benefit or at least is not worse off. Why is a theoretical regional benefit assumed to be desirable at the cost of worsening conditions in Seattle? Shouldn't there be more discussion of this? It is important to maintain a healthy environment in Seattle for people, plants and animals and this does not have to be at the expense of a healthy regional environment.

The Draft EIS finds "Moderate adverse impacts" from Noise:

Increased construction noise

Increased transportation noise

More people living near/exposed to noise of transportation corridors

However, it states that the impact "can be adequately mitigated". This is misleading and likely false, based on my experience with construction noise in my neighborhood for the past decade.

The Draft EIS finds "Potential for significant adverse impacts" on Cultural Resources and Transportation. I agree with these findings.

Under Public Services it mentions that "Additional park space would be needed to maintain existing park level service ..." The important question would be: will the increased development be allowed to go forward without improving/increasing park space and services.

In addition, I don't think the Draft EIS addresses the issue of higher summer temperatures in the city due to more buildings, paved surfaces, and fewer trees and gardens. The environmental (e.g. more need for air conditioning) and health impacts of this deserve consideration.

Thank you for considering my comments.

Lynn Graves

**From:** [Emily Green](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Seattle One Plan feedback  
**Date:** Friday, April 26, 2024 5:02:16 PM

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**CAUTION: External Email**

Hello,

I am writing to express my disappointment with the Seattle one plan. The plan put forward by the mayor's office lacks any kind of vision of the future or awareness of the current state and future realities of housing in Seattle.

I was born in Seattle and am a life-long pacific northwester. I am in my 30's, single, and work as a prenatal healthcare provider at the UW medical center. I am immensely fortunate to be able to take public transportation to work, however that decision has also constrained where in the city I can live. I value so much about Seattle - the neighborhoods, the walkability of so many areas, the natural beauty. However, as I look at the current and future housing situation, I strongly doubt my ability to remain in this city long term. The mayor's proposal maintains the current status quo and demonstrates that this government does not value me or my contemporaries as residents of this city. It does not seek to make this city more affordable or attractive to myself, my other early-career co-workers, or my similarly situated friends.

I was fortunate to live for many years in Europe, in cities where the majority of residents are long-term renters in apartments. These cities are walkable, with easy access to local events and venues. Each neighborhood has a community center and pool, which are actively used by all generations. Fewer cars on the roads means more room for trees and plants. While homelessness exists, it is nowhere near the proportions in Seattle. When friends from Europe visit I warn them ahead of time of the situation here and they are still shocked. Affordability does not mean that only "undesirables" can live in a city, it means that nurses, teachers, cashiers at stores, the people who clean the mayoral offices and clean the streets can live in the city, instead of spending hours of their life in traffic, hours which could be spent with their families or communities. Why is Seattle not striving for a vision of the future which values these people? Renting is not a bad word in the rest of the world, but Seattle seems to think that renters are nothing more than transitory nuisances, not deserving of a stable-living situation and certainly not of buying an apartment or home in this city. With obesity and poor health on the rise, why not make it easier for people to walk to buy groceries, bike to their gym, or use any other means of transportation than a car to get around? And given all of the predictions about increased migration to Washington and the Seattle area, migrations which are likely to be made even worse by climate change, why does this administration continue to attempt to put up gates and walls around those few lucky and wealthy enough to have bought a home? Shame on the mayor and his team for having so little vision of the future, but thank you for making your contempt of me and my generation so clear.

Emily Green

DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

Comment:

I'd like to see the city study some different options for industrial areas like SoDo and Interbay. These areas take up a huge area of our city and include a lot of vacant land. It seems foolish not to study the possibility of transforming these areas into mixed-use walkable neighborhoods, allowing conversion of warehouses into cheap housing, more areas for low-cost art and music venues etc. Leaving them out of all five alternatives is a mistake.

229-1

DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

Comment:

I'd like to see the city get more creative with ways to increase density and greenery simultaneously. We can have both! Removing parking mandates citywide would allow a lot more greenspace, as would adding more meridians in the middle of busy streets, and removing onstreet parking to expand planting strips in sidewalks. I'd also like the city to study developer incentives for green roofs and walls, and incentives for keeping on-site trees. What would be the effect of unlimited building height and FAR in exchange for keeping onsite trees? I'd like to see these options studied in the EIS

230-1

DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

Comment:

I'd like Seattle to be much more walkable, meaning building many more homes near businesses and businesses near homes. I'd like the EIS to study much taller buildings in neighborhood centers, urban centers and regional centers, including an option of unlimited building height in these areas. I'd also like to study significantly expanding neighborhood centers to 1/4 mile radius instead of 800 feet and study many more than the 42 neighborhood centers in alternative 5. Research shows more than 80 of these business clusters in Seattle already. I'd also like to study zoning for small retail and cafes citywide.

231-1

## DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

## Comment:

I grew up in this city and I really would like the opportunity to settle down and raise a family here. I want my kids to be able to grow up around their grandparents. I'd like to be able to help my parents out as they get older. This comp plan is trying to force me out of my city and break up my family. I need you to study much bolder options if we are going to build enough housing for me to be able to afford to stay here. What about zoning for 5-storey apartment buildings city-wide? What about planning for 200,000 new homes? What about 6-storey apartments within a 15 minute walk from transit? What about unlimited building height in regional centers, or even city-wide? What about 80 neighborhood centers instead of 24? Why not study an option that sees growth as an opportunity for Seattle to take its place on the world stage, rather than cower in fear and blindness?

232-1

DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

Comment:

I'd like you to study the option of zoning for offices as well as housing and retail throughout the city. Everyone should be able to live within walking distance from work, and that can't happen if small to medium office buildings aren't allowed throughout the city.

233-1



DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

Comment:

I'd like to you to study the boldest possible approach to the Duwamish River- what wouldit take to make it the crown jewel of our city instead of one of the most polluted places in the country? What would it take to restore native wetland along the entire course of the river, with walking trails for the public an vibrant walkable neighborhoods along both banks? What would be the benefits of doing so (I am guessing they would be tremendous)

234-1

**From:** [Jonah Griffith](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 12:57:12 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Jonah Griffith  
jonah@objectcreative.com  
7331 21st Ave NW  
Seattle, Washington 98117

235-1

**From:** [Katy Griffith](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 4:05:50 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Katy Griffith  
katygr@msn.com  
2131 N 132nd Street  
Seattle, Washington 98133

**From:** [Barbara Gross](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 11:01:37 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Barbara Gross  
barbara.gross48@gmail.com  
6536 44th Ave NE  
Seattle, Washington 98115-7542

**From:** [Mary Ann Gwinn](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** questions about comprehensive plan  
**Date:** Monday, May 6, 2024 11:21:23 AM

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**CAUTION: External Email**

The EIS for this plan seems seriously deficient. How is this even an EIS when it doesn't address key questions of the plan's likely impact?

Here are some questions/requests for more information. Please go back to the drawing board. thanks, Mary Gwinn/West Seattle resident.

238-1

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” This is a preposterous statement, given the amount of construction and disruption that will come with building new housing plants. What are the impacts on plants and animals of the alternatives.
2. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Is there any information to support the notion that tree planting programs replace lost urban tree cover? For starters, trees take many years to replace, and many animals depends on older growth trees. Please revisit this assumption.
3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. Please provide specific information on how much public land is available for tree planting and how many trees will need to be planted to replace those lost for development.

DEIS StoryMap Comment

Name: Steph Hagerty

Email: stevenhhagerty@gmail.com

Date: 4/28/2024

Comment:

I am a Seattle renter. The city should study the impacts and opportunities of the following:

- Citywide elimination of parking minimums
- Additional Neighborhood Centers in Urban Neighborhoods
- Additional Neighborhood Centers off of arterials
- Higher floor area ratios for Urban Neighborhood zoning
- Higher growth targets for Alternative 5
- Expanded highrise zoning in Regional and Urban Centers
- Expanded highrise zoning in Urban Neighborhoods within 1 mile of parks >1 acre
- Expanded highrise zoning in Urban Neighborhoods
- Expanded highrise zoning at Neighborhood Centers
- Expanded highrise zoning within a half mile of all light rail stations
- Expanded highrise zoning around existing grocery stores
- "Corner stores" allowed mid-block as well as on corners
- Reforestation of golf courses on tree canopy
- Higher floor area ratios for middle housing in all residential zones, such as those corresponding to the state model code for middle housing
- Social housing in every neighborhood on affordability
- Greater height and density bonuses within a quarter mile of transit stops
- Greater height and density bonuses within a half mile of transit stops
- Increased building height allowances, in exchange for reduced lot coverage, on tree canopy
- Granting tax breaks & fee deferrals to housing projects that include affordable units
- Expanded highrise zoning in Regional Centers
- Development incentives like additional floor area ratio for 2- and 3-bedroom units
- Floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes
- An Urban Center around the 145th light rail station

Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

239-1

**From:** [Cheyenne Haines](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 4:15:48 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Cheyenne Haines  
cheyenneautumnh@gmail.com  
8558 19th Ave NW  
Seattle, Washington 98117

240-1

**From:** [Mark Hammarlund](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on Comprehensive Plan EIS  
**Date:** Thursday, April 11, 2024 8:34:43 PM

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CAUTION: External Email

Comment:

Thank you for the presentation of the EIS on April 11, 2024. I am writing to offer a suggestion pertaining to the “Adverse Impact” associated with Alternative Five, described in the EIS as “low level sidewalk connectivity.” The City owns 40 feet of right-of-way on Roosevelt Way from 3rd NE to Aurora Ave. Sidewalk connectivity could be increased by adding bike lanes and pedestrian lanes on the shoulders of this roadway, with ditches replaced by covered culverts.

This section of Roosevelt Way was severed in 1962 from the busy portion of Roosevelt Way when I-5 was built. Often described as the “Ghost Portion of Roosevelt Way,” this diagonal roadway has been submitted by SDOT to be considered for delisting as an arterial; delisting would allow for calming measures including speed bumps. (One speed bump is already in place on this “Ghost Portion” of Roosevelt Way, located southeast of 1st NE.)

Thank you for considering my suggestion.

Mark Hammarlund  
2121 N. 143rd St.  
Seattle WA 98133

241-1



**From:** [Mark Hammarlund](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Laura Baumgartner](#); [Pollet, Henry](#)  
**Subject:** an idea for consideration for the One Seattle Plan  
**Date:** Monday, April 15, 2024 7:59:14 PM

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CAUTION: External Email

Dear One Seattle Planners,

I live in north Seattle near the two light rail stations under construction at 130th and 148th streets. I support Option Five for density, for two basic reasons: 1) To support the development of additional low-income housing in Seattle, and 2) to lower the carbon footprint of residents in the Puget Sound area. By tolerating greater density, perhaps our society can salvage the ecology of Puget Sound and the Cascades while providing greater social economic and racial equity with respect to housing. It is time for north Seattle to play its part in providing more housing particularly around light rail stations.

I have a recommendation:

I have learned that the Haller Lake United Methodist Church at 133rd and 1st Ave. NE also supports Alternative 5 of the EIS. Their church has property that they would like to subdivide. However, they need a revision of DEIS to include NC-55 zoning for the church property, in order to accomplish their goals. Their intention to subdivide pertains to Lots 3, 4, and 5 of block 65, in the H.E. Orr Park Division No. 6.

This zoning revision would mean that the housing units could have small businesses on the ground floor. The One Seattle Plan calls for just this sort of development for land parcels located within 2 or 3 minutes of walking distance from light rail stations. The One Seattle Plan calls for new "Neighborhood Centers" exactly in line with the vision offered by the Haller Lake United Methodist Church.

Please consider making this zoning change.

Thank you,

Mark Hammarlund

2121 N. 143rd St.  
Seattle WA 98133  
206 361 6206

cc. Pastor Laura Baumgartner, Haller Lake United Methodist Church  
Cathy Moore, Seattle City Councilmember  
Henry Pollet, assistant to Cathy Moore

242-1

**From:** [Judith Hance](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comments on plan  
**Date:** Friday, May 3, 2024 9:48:31 AM

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**CAUTION: External Email**

I am devastated by this dangerous plan.  
Trees are vital to protect our city and our homes.  
Allowing trees to be cut down for building is totally wrong!

I have a big lot and have planted many trees and shrubs over the years.  
They help to keep my home cooler in the summer without having air conditioning, which would use more power! I open up my house at night for the cooler air, and close it first thing in the morning.

I have been appalled at the many houses being built in Seattle without leaving any room for trees.  
Our tree canopy is shrinking, when the opposite should be happening.  
New sidewalks, good in many ways, but they add more hard surface to absorb and radiate heat.

Who came up with terrible ideas that will make residents more vulnerable to the increasing heat and drought over the years.  
What about the children who have years and years ahead of them?

I have a large lot, and plan to stay in my home until I die. I don't want to know about the destruction of my plants and the increased risk to the birds and animals in my area.

I'm glad I won't be here to get my heart broken and see what happens after following such a plan.

Good Grief!!!! How can you be so ignorant about how to live into the future?

Judith Hance,  
Seattle since 1991

**From:** [Nancy Hannah](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS: Trees are so important for keeping us cool, and reducing carbon in atmosphere , and general well being of all of us. The other thing to consider is that they take a long time to get to the growth that will really make a diffe...  
**Date:** Monday, May 6, 2024 9:33:02 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Nancy Hannah  
nancyhannah75@gmail.com  
7526 27th Ave. NE  
Seattle, Washington 98115

**From:** [Don Harper](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** One Seattle Plan-Comment  
**Date:** Monday, May 6, 2024 3:55:49 PM  
**Attachments:** [One Seattle Plan-Comment.pdf](#)

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**CAUTION: External Email**

My comments are attached and copied into the body of this email. I am not sure which works best for you.

## ONE SEATTLE PLAN

I support Alternative 2 as The Plan.

Alternative 2 would have the lowest potential for development-related impacts to vegetation (including loss of tree canopy cover) citywide. Based on the anticipated amount of area likely to be redeveloped, Alternative 2 would have a lower potential of leading to increased delivery of stormwater contaminants to streams. More trees need to be planted in the areas with a lack of tree canopy instead of the absurdity of removing trees from areas that have a higher amount of canopy that is currently helping to mitigate the effects of climate change.

However, on p.3-3-30, saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover" is not backed up by facts but speculative at best. The Plan states: "development projects on parcels in the Neighborhood Residential or Multifamily management units are likely to result in more loss of tree canopy, compared to development on parcels in other management units. This is particularly true of parcels with lower-density residential designations, where existing canopy cover is higher than elsewhere. As such, strategies that convert parcels with lower-density residential designations to higher-density designations could reduce the total amount of tree canopy cover in the city."

Some questions that need answering are:

1. Considering the fact that the trees being removed are larger than the ones being planted and it will take many years to replace the current trees, what is your estimation of tree planting needs and a time frame to replace the equivalent lost canopy area and volume?
2. What is the acreage available and suitable for planting trees in the City's public areas?
3. What is the available acreage available to plant trees on private property?
4. Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?

5. What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

Although the provision for 30% tree canopy is retained in the draft Plan, reaching the target date by 2037 needs to be put back into the draft, as well as attaining a tree canopy goal of 40% over time, which has also been removed from the draft Plan. On p.3-3-12, the Plan states: "Based on the potential for reductions in canopy cover, projects that entail tree clearing could slow progress toward achieving the City's canopy cover goal."

There seems to be an opinion amongst some that we cannot have both trees and houses, but we CAN. Although the Plan states that "the City's current tree protection regulations minimize the potential for development-related loss of tree canopy cover and require mitigation for such tree loss," there are serious omissions in the Tree Ordinance. The Plan needs to correct these omissions by specifying dedicated tree retention and planting areas that will require saving more existing trees, especially mature trees, on building lots. To stop lot sprawl, the Plan needs to give SDCI Director the ability to ask for alternative site design. The Plan needs to have a provision to review and amend the Tree Ordinance to (1) require developers to submit a tree inventory before taking any action on the lot, (2) remove the "basic tree protection area" that allows developers to unnecessarily remove almost all large trees on lots, and (3) the Tree Ordinance needs to apply to all City land use zones.

The Plan needs to require all housing built, including building additions of any size and ADU's, to plant street trees with trees of larger sizes than currently allowed on sidewalk strips being allowed if there are no wires overhead.

Increasing access to trees and clean natural spaces for people everywhere is something we all agree on. Biden's Inflation Reduction Act includes an investment in urban tree planting of \$1.5 billion. Part of his Justice 40 Initiative ensures that 40 percent of the benefits reach communities that are disadvantaged or nature deprived. The Plan needs to specify that affordable housing and multifamily housing have trees and parks nearby.

The Plan needs to authorize the use of Parks Impact fees to create more parks, especially pocket parks, in neighborhoods across the city. The Plan needs to authorize the use of Transportation Impact fees to create more tree-lined streets.

Urban trees are valuable for so many reasons. They reduce surface temperatures and storm runoff (helping to protect our salmon). They cleanse the air and improve residents' mental and physical health. There's even a correlation with public safety, an issue which is SO important to

Seattleites: Neighborhoods with more street trees have lower crime rates. Expanding urban tree cover is truly an issue of environmental justice and equity.

Thank you.

Don Harper  
(206) 281-9018

DEIS StoryMap Comment

Name: Sabina Havkins

Email: sbhtennis@gmail.com

Date: 3/16/2024

Comment:

My concerns and questions -  
Has The Thornton Creek Watershed been considered in these growth plans. It is very close to the 130 th and 145 th street area. Protection of that watershed from increased population is essential  
If the city can't address the lack of adequate police officers now how will it handle the increase in population in the future ?  
Are there adequate safeguards in place for bike storage for commuters at the urban centers and Light Rail stations? Theft is rampant.  
How will the trails around the outside of Jackson Park be protected? How will these trails be maintained?  
How will these trails be kept safe from homeless encampments?  
How will parks along Lake City Way be kept free of drugs and .... which are current issues.  
How will there be adequate funds for maintenance of parks lands .  
Current landscapes near local elementary schools are growing" wild". After being rebuilt the Olympic Hills elementary school does not seem to have any funding for the maintenance of its landscapes. Will this occur with other new schools built

246-1

246-2

DEIS StoryMap Comment

Name: Caroline Hedlund

Email: hedlca@uw.edu

Date: 4/10/2024

Comment:

I am a renter in U-District, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would enable the creation of more walkable neighborhoods. Instead the current draft plan will worsen the many crises (housing, climate, unaffordability) our city faces. To create a more vibrant city, the plan should add many more 'Neighborhood Centers', especially in Urban Neighborhoods.

If the City of Seattle adopted my above proposed changes, then we would be able to reduce rates of homelessness.

247-1



DEIS StoryMap Comment

Name: Troy Heerwagen

Email: gmwoo.lj@gmail.com

Date: 4/16/2024

Comment:

The city should study the impacts of Additional Neighborhood Centers off of arterials. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

**From:** [Anna Hill](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Wednesday, May 8, 2024 11:52:43 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Anna Hill  
anna.hill.206@gmail.com  
2711 N.E. 105th St.  
Seattle, Washington 98125

249-1

DEIS StoryMap Comment

Name: Carl Hiltbrunner

Email: subscribe+seattle@carl.hiltbrunner.email

Date: 4/23/2024

Comment:

The Comprehensive Plan sets a goal of ensuring equitable internet access for all residents of Seattle. Is there broadband capacity to accommodate this growth, but also ensure 150/150 broadband speeds for all, per the RCW 43.330.536 state-level goal definitions?

250-1

**From:** [William Holland](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** More aggressive comp plan please  
**Date:** Monday, May 20, 2024 5:00:18 PM

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**CAUTION: External Email**

Please rework the comp plan to expand housing capacity across the city and not just in isolated pockets and along car-choked arterials. I am embarrassed for Seattle to hear Rep. Jessica Bateman call our plan "underwhelming" and Rep. Julia Reed call it "the minimum." The majority of Seattleites would love for rent prices to stabilize or come down. Everyone would benefit from the inherent eco-friendliness of denser housing with nearby amenities. We welcome more housing stock!

251-1

**From:** [DEBORAH HORN](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS for One Seattle Comprehensive Plan  
**Date:** Monday, May 6, 2024 3:32:58 PM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Dear Council Members and Mayor Harrell,

I have been a Seattle resident since 1981, and have watched the tree canopy slowly (and more recently - quickly) disappear during this time. What this amounts to is a loss of the character and livability in Seattle, nothing less. I've also been an active citizen of Seattle, and am thinking back to when there was a big clash between developers of the Northgate area that is now Thornton place and the people like me who wanted to see the headwaters of Thornton Creek daylighted. What I learned from that experience it that developers can do the right thing if they have to, and it doesn't cause them much pain either. The Creek is daylighted and it is an amenity that makes the real estate more desirable.

We are asking again that the City Council do the right thing and require developers to retain big trees as much as possible. You have the specifics in other letters from people like me, but I want to emphasize one mitigation action in particular:

"Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees."

Please require designs to incorporate existing trees on lots as much as possible. Both sides can win this way, and that makes the decision-makers look good. This is not as onerous as developers would have us believe. In the end, the trees make the property more valuable, not less. Often, the alternative doesn't even affect the total square footage of building on the lot.

Thank you for considering these comments.

Sincerely,  
Deborah Horn  
1901 NE 135th St.  
Seattle, WA 98125

DEBORAH HORN  
[artemis.gardens@gmail.com](mailto:artemis.gardens@gmail.com)  
1901 NE 135th St  
Seattle, Washington 98125

252-1

**From:** [Jared Howe](#)  
**To:** [PCD CompPlan EIS](#); [Morales, Tammy](#)  
**Subject:** Seattle's draft comprehensive plan and the environmental impact statement  
**Date:** Thursday, May 2, 2024 7:14:02 PM

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**CAUTION: External Email**

To whom it may concern,

Please consider alternatives 2 and 4.

According to Section P 3-3, the plan is not anticipated to cause any adverse effects that would diminish the chances of survival or recovery for plant or animal species in the wild. **How does this plan specifically influence the flora and fauna of Seattle?**

253-1

Section P 3-3 asserts that none of the alternatives are projected to yield substantial, unavoidable negative effects on tree canopy cover. **What research demonstrates that initiatives like tree planting programs, combined with expanded hardscape, will counterbalance the reduction in urban forest?**

The plan indicates Seattle's advancement towards its 30% canopy target. However, the new tree ordinance significantly diminishes the space on private land suitable for trees. **What is the extent of available public land to achieve the 30% goal? Additionally, how many trees must be planted annually in these areas to offset those removed due to development?**

Sincerely,  
Jared Howe  
Seattle, WA

**From:** [Sam Hranac](#)  
**To:** [LEG CouncilMembers](#); [PCD CompPlan EIS](#); [Moore, Cathy](#)  
**Subject:** About the DEIS and the Comprehensive Plan  
**Date:** Sunday, May 5, 2024 11:31:35 AM

**CAUTION: External Email**

I have serious concerns regarding the continued destruction of Seattle's canopy and building plans based on what I'm seeing in current city council actions.

Regarding the Draft Environmental Impact Statement :

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? This assumption looks like a fantasy.

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

And about the Comprehensive Plan specifically as it impacts District 5:

The massive "neighborhood center" project planned for Roosevelt Ave NE and NE 90th in Maple Leaf is laughably named. It will destroy a large section of an established neighborhood, including existing homes and change the character of an established community.

I live next to a plot that had a small affordable home torn down to make room for 3 massive, ugly, high-priced housing units. (Despite being 3 units on a small lot, they will sell for well beyond a barista's salary. There is no way this is low cost housing.) This will not only disrupt the quality of the block in the future, but has proven to be a violation of our privacy and property rights all during the construction. 827 NE 98th St is a construction project where the workers have repeatedly walked over our property and tossed their food litter all over our yard from the beginning. Workers have also most often not worn safety equipment and broken other rules that appear to have no consequences when reported. They also ripped down an exceptional tree on the north side of the lot. The spot where the tree was still has nothing built on it, so I don't know why they had to do this. We managed to stop them from taking down two more exceptional trees on the east and west sides of the property, but they have repeatedly removed the "permanent" fencing that is supposed to protect those trees during construction. Currently, they have a table saw and a huge pile of lumber within the "protected area" of one tree. Again, the city does nothing about any of this. I have no doubt that any Comprehensive Plan/neighborhood center construction will be carried out with the same disregard for rules and promises as what I am seeing going on right next to me today.

Beyond all that, why destroy a lovely bit of neighborhood when there are under-utilized stretches of parking lot and office buildings much closer to the Northgate Transit Center? I

walk past the area of NE 100th and 1st Ave NE and see very few cars ever parked there. That area could contain one of these neighborhood centers without destroying a single home. It would be closer to transportation, and still very close to schools and shopping. The plan as it is is ridiculous.

Sincerely,  
Sam Hranac  
Maple Leaf



**From:** [Matt Hutchins](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** DEIS comments  
**Date:** Sunday, May 5, 2024 7:55:53 AM

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**CAUTION: External Email**

In short, the benefits of building a denser city far outweigh the temporary impacts during development. Increasing bulk isn't an impact, it is a feature of a lower carbon, more efficient city. We should lean into smarter, greener growth with:

- **Taller buildings in growth areas.** Around our light rail investments, tall buildings should be the norm. As job centers, they should be paired with enough zoned capacity to make thousands of homes there. For example, the new 130th Street Regional Center is stated to add only 1644 homes (*DEIS, page 1–77*), but could be home to thousands more. And as Councilmember Morales has pointed out [“...excluding the South End from intentionally planning for economic development opportunities...\(will create\)...deeper economic inequality.”](#) It is the natural progression for Seattle moving from a single downtown destination to a polycentric network where you can walk to your job or take transit to another neighborhood without ever going downtown.
- **Additional stories elsewhere.** Adding a story or two elsewhere has a marginal impact on the street, but these are the cheapest floors in any development already being built. In the rebranded Centers, 30' tall Residential Small Lot zoning should jump to 40' and 55' heights. This 4–5 story scale is the baseline for non-profit developers to build subsidized affordable housing, and also the scale at which we start to see for-profit developers provide affordable units under Mandatory Housing Affordability (MHA). There may not be the political will for the 5–8 story

urban streetscape of a Paris or Copenhagen, but more new development should hit that sweet spot.

- **Zoning for Mass Timber.** Buildings made from [mass timber](#), a low-carbon alternative to steel or concrete, can go up to 18 stories. We should optimize the zoning to match the building code and let the market produce green towers.
- **Zoning for more than Townhouses.** Granted, smaller homes are generally less expensive, but shorting middle housing will drive more projects into the typology we already have: 3 or 4 units on a parcel (like today's NR and RSL zoning). There is a strong market preference for townhouses and the city's approach will make it easier to build and sell those, but it leaves the extra capacity granted by HB1110 on the shelf unbuilt. To get the other types of middle housing, such as sixplexes, the update should factor in some bonuses for height, setbacks or floor area.
- **Reward extra units** The update should either allow for more bulk as you add units as an incentive like the State model code, or use a more basic unlimited density within the buildable area like Spokane's successful [Building Opportunity for Housing](#) program.
- **Don't count ADUs when counting density.** Over the last several years, ADUs have become popular because they have low barriers to permit and flexibility that fit many residential sites. The Update counts them against the 4/6 unit maximum per parcel, closing the code exceptions, like exemption from MHA, that makes them so popular (2500 ADUs in just the last three years). They are low-impact infill development and there is no reason to kneecap this housing type.

- **Solve for affordable housing.** First, the kinds of buildings funded and built for income-restricted housing are not low-rise middle housing in residential neighborhoods — they are largely 4–8 story mid-rises in growth areas. More urban centers need to be zoned for this scale of building. If we want affordable housing distributed throughout the city, we must repeat similar zoning in the new ‘Neighborhood Center’ place type.
- **Resist the urge to expand Mandatory Housing Affordability (MHA)** into zones we hope to build middle housing. [ADUs \(not subject to MHA\) have exploded, up 217% over four years, versus townhouses \(subject to MHA\), which are off 77%](#). Builders will go where the barriers are lowest. A [recent study by Shane Phillips about inclusionary zoning in Los Angeles](#) illustrates that for every affordable unit inclusionary zoning creates, it costs 4–5 market rate ones. In the plan, OPCD studied expanding MHA into Urban Neighborhoods but only netted 3 more income-restricted units built on-site there (DEIS, pg 3.8.46).
- **Align the Affordable Housing Bonus building type with Habitat for Humanity and Seattle’s Social Housing Developer.** The affordable housing bonus type (1 unit per 400 sq ft of lot and a FAR of 1.8) in the [Updating Seattle Neighborhood Residential Zones](#) documents might be more workable for those specialized builders if the affordability requirements mirrored their optimal pro formas. This is a natural alignment with the nascent social housing developer’s publicly supported mission and the principles of the comprehensive plan.
- **Center new housing on parks and shorelines, less on arterials.** The health impacts of placing multifamily housing on arterials are well

documented and disproportionately affect BIPOC and low-income residents. As a means to equitably increase access to nature, light, air, and recreation, the plan should prioritize housing around parks and shores.

- **Support Neighborhood Centers.** Just because the idea has been around, doesn't mean that it will be accepted easily. Actually, the fact that zoning hasn't changed at all around them for decades is proof of just how difficult it will be politically. Already between the scoping report and the draft plan, the number and area of the Neighborhood Centers have been clipped, from 42 to 24, and from roughly 3000 acres to somewhere around 1000 acres. Yet these zones supply some of the biggest growth, nearly 20,000 units under Alternative 5.
- **Embrace Neighborhood Centers as '15 Minute' neighborhoods.** They support local jobs and services, mixed-use buildings, increases in the tax base and commerce, in walkable proximity both to new housing and existing neighborhoods. It is home to your favorite coffee shop or bakery, professional services like daycare, dentists, plus a library and grocery store. Every home we put into Neighborhood Centers fuels local business and keeps people out of cars.
- **Build out 'Low-Emission Neighborhoods'** that were promised in the Seattle Transportation Plan and under Executive Order 2022-07 and these Neighborhood Centers would be perfectly suited to lowering our per capita carbon footprint.
- **Lean into infill development to reduce carbon per capita over**

**time.** [Doubling density reduces CO2 emissions from residential energy use by 35% and household travel by 48%](#). Beyond the Low Emission Neighborhoods mentioned above, we should align urban design and the housing market with climate change adaptation.

- **Remove parking mandates** (it doesn't mean parking won't be built). Parking requirements drive up the cost of housing, lock in carbon emissions, and require either expensive garages or extensive surface parking, taking space that could otherwise be used for vital tree canopy. In today's Neighborhood Residential zoning, we require one parking space per principal unit. If we allow more principal units, the number of parking spaces should be based on the discretion of the developer. In 2024, there is no reason to require parking in new urban development when cities like Olympia, Austin, and Raleigh have already done away with this antiquated requirement.
- **Go bigger to leverage lower carbon benefits of smart zoning.** It is not surprising that the most ambitious Alternative 5 is also the greenest: 20% less electricity demand per capita, 28% reduction in natural gas demand, and a 22% reduction in vehicle miles traveled (VMT) per capita.

As for commenting on the plan, annotating a PDF is labor intensive and not intuitive. I've opted for email.

--

**Matt Hutchins, AIA CPHD**  
**Principal - CAST architecture**

115-C North 36th Street, Seattle, WA 98103

[matt@CASTarchitecture.com](mailto:matt@CASTarchitecture.com)

Direct: 206.360.8336

Office: 206.256.9886

[website](#) [instagram](#) [facebook](#)

**From:** [K I](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comments on draft One Seattle Comp Plan EIS  
**Date:** Monday, May 6, 2024 3:56:31 PM

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CAUTION: External Email

Hello,

I choose alternative 2 for the alternative development scenarios proposed. I believe this is the best choice for giving growth while keeping climate impact considerations a high priority. I don't think it would be wise for us to compromise those impacts with any of the other alternatives. If we destroy our environment, what will be the point of our development?

Thank you for your consideration,

Kippy Irwin

Sent from my iPad

256-1

**From:** [Steve Itano](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Save our trees  
**Date:** Friday, May 3, 2024 11:31:38 PM

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CAUTION: External Email

All of the plans are written in so much legalese, that I cannot understand what the plans protect our trees. My Grandkids and all of the children on our block use to call the Kitty Tree



Now it and all of the other trees have been replaced by and 60 plus apartment building that has no parking.

Please explain to me and my grandchildren how you plan to mitigate this lost.

Your Truly  
Steven Itano  
9214 24th Ave SW  
Seattle WA. 98106

257-1

**From:** [GAYLE JANZEN](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** My Seattle One Comprehensive Plan Draft EIS concerns  
**Date:** Monday, May 6, 2024 4:24:47 AM

**CAUTION: External Email**

To Whom It May Concern:

I have some questions and concerns regarding the EIS statement:

Section 3.3-30 states that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." I think all the Alternatives except 1 will definitely have a negative impact on our tree canopy. The new tree protection ordinance INCREASES the potential for tree removal and loss. The current guaranteed lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur in the Neighborhood Residential zone means more trees, especially large ones, will be removed.

The EIS states: "Canopy cover decreased by 255 acres between 2016 and 2021—an area roughly the size of Green Lake. As canopy cover decreases, mature tree benefits like helping to keep our neighborhoods cool, helping to clean our air and providing homes to wildlife are diminished. The city is BELOW its goal for canopy cover. Total cover in 2021 was 28%, compared to a goal of 30%." And this was **BEFORE** all the current building going on.

- \* So what exactly is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development and density in each alternative?
- \* Will it ever be possible to reach the 30% citywide goal and is there even a potential for more than 30% tree canopy in Seattle over time?
- \* Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan even possible?
- \* Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff so what is the projected loss in canopy volume over the next 20 years as big conifer trees are removed? And what is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

**If you really want to save our established trees, I urge you to consider implementing the following suggestions:**

- \* Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- \* Allow and encourage the SCCI Director to ask for alternative site designs to save trees.
- \* Support building higher and building attached units to allow for tree retention and planting areas like Portland, OR has done, with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- \* Amend Tree Protection Ordinance to require the Tree Protection Ordinance to apply to **ALL** city land use zones.
- \* **I think one of the most problematic issues affecting mature tree loss is the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots. This**



**loophole needs to be removed as it makes all the talk about saving trees just words on paper!**

\* Developers need to be required to submit a Tree Inventory and how they will save as many trees as possible on any given lot. Currently they are given free reign to cut down trees with impunity.

I think the EIS is just more pie in the sky words that the policymakers think will appease the public when it comes to saving/increasing our tree canopy. It will take decades for any small, deciduous replacement trees to provide all the benefits of the mature trees that are currently being cut down. We shouldn't have to fight so hard to try to save the huge trees that currently offer so many benefits for free.

Sincerely,  
Gayle Janzen  
Seattle

**From:** [Jan Jarvis](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#); [Staton, Renee](#)  
**Subject:** Comment on Draft Plan  
**Date:** Monday, May 6, 2024 12:39:29 PM

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CAUTION: External Email

Dear People,

Again , I read your criteria for the plan and again it fails to meet the lofty goals. Let's get right to equity. I live in Haller Lake, close to the 130th new station and about an 11-12 minute walk to the 145th one. The algorithm used by the planners to give a 10-minute walk window was either was an average. As a senior citizen I could be expected to make the average lower but the 130th Street Stations about 9 minutes and -as I said, the 145th Street one is a bit further. One would think that ALL this area—like Shoreline—from Meridian to the freeway would be up zoned.

However, again, equity, the idea that ALL citizens are equal lost to the statement by Lakeside School, that they were not interposed in having the area around them up zoned. Of course, we all know in the neighborhood that Lakeside has been buying up houses, in the beginning to house their teachers but also, like EVeryGreen School to the north, to plan for future expansion. And also of course, they do not want to pay their share of taxes on their acquisitions.

I live between the High School & the Middle School. I have an 860 sq. ft. little post-war box on a nearly 9000 sq.ft. lot. A prime example of poor zoning, I am not able to subdivide—no, I don't want to build an ADU. I want the property liquid for my children and myself. It could easily house six families in townhouses, all within reasonable walking distance to the light rail and even preserve some private yard area—or cottages—or a condo building at 3 stories. But my neighborhood is a hole into plan due to Lakeside and their wishes.

Again, Shoreline has done a great job providing housing, providing jobs, providing wealth. Seattle's plan, particularly in my neighborhood bows to the willow the wealthy -again-just like there is no social housing in Laurelhurst or Madison Park.

I want all of Haller Lake from the line of Meridian to I-5 to be upzoned like Shoreline endnote have the wealthy covertly run the city plan.

I was around her win the Charlie Chong days and remember the NIMBY-ism and the preciousness of Seattle voters, who cried about their 'neighborhoods' but let thousands of acres of east and south King County go to development with no infrastructure. Thousands of forest and farms were turned into the area's needed housing to protect the 'feel' of the neighborhoods and resist change in Seattle—providing the same sort of short-sightedness still seen in this plan-

As a then-resident in the wilderness around North Bend, on the family farm, I witnessed this ignorance up close—and here—in light of a similar 'balanced' to the wealthy and the NIMBY is a similar one—time to grow up Seattle and become a real city—

The truth is. ———It is either density or sprawl

Choose density for the health of the planet---

Jan Jarvis  
 2325 North 137th St.  
 Seattle 98133

**From:** [Tim Jaureguy](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 12:17:43 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Tim Jaureguy  
tim.jaureguy@gmail.com  
5110 NE 54th St  
Seattle, Washington 98105

260-1

DEIS StoryMap Comment

Name: Jeannette

Email: jeannette2679@gmail.com

Date: 3/13/2024

Comment:

I strongly support Alternative 5. I live in the station area and am in my 30s. We need more housing for Seattle's future, so people don't have to leave the area and can have families here. There will be impacts, but the impacts of insufficient housing are worse. It feels like what is proposed might not even go far enough. Right now there is not enough housing; if the proposal only meets today's needs then we will still have a problem in the future.

261-1

**From:** [barbara Jeniker](#)  
**To:** [PCD CompPlan EIS; Strauss, Dan](#)  
**Subject:** Environmental Impact Statement  
**Date:** Friday, May 3, 2024 11:54:51 AM

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**CAUTION: External Email**

Section P3-3 claims NO IMPACT on "plant or animal species in the wild", BUT, what is the impact on plant or animal species IN SEATTLE'S URBAN FOREST?

Section P3-3 claims these plans will not have significant adverse impacts on the tree canopy cover. \*\*\*\*WHO MAKES THIS CLAIM?\*\*\*\* When you remove a tree, it is removed FROM the tree canopy cover; it is subtracted. Removing multiple trees TAKES AWAY from tree canopy cover! How can subtracting not be adverse to the GOAL of attaining 30% cover? Planting saplings does NOT EQUAL mature trees which today make up SEATTLE'S urban forest and tree canopy cover.

How does planning to attain 30% urban tree canopy cover (by planting new trees/saplings) work without space for them to mature? If mature trees are not left on developed land, where will they be? Remember, saplings do not equal mature trees.

262-1

**From:** [Jerome MD PhD, Keith R](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comp plan comment  
**Date:** Monday, May 20, 2024 1:50:33 PM

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Just a quick note to encourage you to amend the comp plan to increase housing in Seattle. The younger generation needs the chance to live in our city. Something closer to your previous “housing abundance map” would be a great start.

Keith Jerome  
Seattle

**From:** [C Johnson](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Monday, May 6, 2024 4:58:32 PM

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**CAUTION: External Email**

I would like to submit these questions regarding the DEIS:

- Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?
  
- Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?
  
- The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Carla Johnson  
Seattle, WA

264-1

**From:** [Iskra Johnson](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** comment on One Seattle Plan DEIS  
**Date:** Monday, May 6, 2024 3:52:05 PM

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**CAUTION: External Email**

1. To combat global warming the city of Seattle has committed to a goal of increasing its tree canopy cover to 30% by 2037.

What provisions are in the One Seattle Plan to help reach this goal?

Iskra Johnson

265-1



**From:** [Iskra Johnson](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on Comprehensive Plan DEIS  
**Date:** Monday, May 6, 2024 4:00:52 PM

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**CAUTION: External Email**

3. According to King County’s own 2021 [Urban Growth Capacity Report](#), under recent cumulative up-zones Washington’s biggest urban county already has capacity for 400,000 more housing units. This is enough to meet population pressures through 2035 and the following 20-year planning period: additionally, city planners have told citizens at the Comp Plan meetings that there is already sufficient housing capacity for the next 40 years. Why is this data being disregarded in estimates of how much new housing and upzoning is needed moving forward?

Iskra Johnson

266-1

**From:** [Iskra Johnson](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on Comprehensive Plan EIS  
**Date:** Monday, May 6, 2024 4:00:45 PM

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**CAUTION: External Email**

2. It is important to look at how the One Seattle Plan intersects with the Missing Middle legislation. Under the Missing Middle law formerly single family neighborhoods may have up to 6 units of housing on them. How is the city going to reach its 30% canopy goal with this level of density?

Iskra Johnson

266-2

**From:** [Iskra Johnson](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comment on Comprehensive Plan DEIS  
**Date:** Monday, May 6, 2024 4:00:47 PM

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**CAUTION: External Email**

4. The majority of urban trees, 67%, are in residential areas and particularly in areas formerly considered single family. The 2023 tree code allows developers to add impermeable landscape and structures to 85% of a lot, effectively deforesting the lots completely --and even heritage trees are not fully protected. Given the current tree code, what calculations has the EIS done to predict the future of the tree canopy under the One Seattle Plan's additional density?

Iskra Johnson

266-2  
cont

**From:** [Iskra Johnson](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on Comprehensive Plan DEIS  
**Date:** Monday, May 6, 2024 4:00:41 PM

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**CAUTION: External Email**

5. What science and data has the EIS reviewed to assess the effects of the Plan's added density on

- a. Stream and watershed health
- b. Salmon health
- c. Bird and pollinator health
- d. Human health from heat islands caused by urban deforestation

Iskra Johnson

266-2  
cont

**From:** [Iskra Johnson](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on Comprehensive Plan DEIS  
**Date:** Monday, May 6, 2024 4:00:35 PM

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**CAUTION: External Email**

7. The EIS has stated that there are no environmental concerns worth assessing with the added density of the One Seattle Plan. What infrastructure capacity studies has the EIS looked at to assess the city's sewer capacity to handle storm overflow in the new climate of extreme rainfall with added density and hardscaping? Has it looked, for reference, at the proven historical damages and enormous expense incurred to repair inadequate drainage in Broadview, and the Central District's Madison Valley, where storm overflow has led to death? (Source <https://www.seattletimes.com/seattle-news/anatomy-of-madison-valleys-fatal-december-flood/>) Has it considered the flash flooding in Ballard in November 2023 that overwhelmed water systems and flooded the Salty Dog Studios, causing tens of thousands of dollars? Has the EIS taken into account that we now have "100-year floods" annually and that most of our drainage systems were built 50+ years ago, and built for 25-year floods? Has it looked at the science of how large trees hold water in the ground and prevent flooding?

Iskra Johnson

**From:** [Iskra Johnson](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on Comprehensive Plan DEIS  
**Date:** Monday, May 6, 2024 4:00:34 PM

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**CAUTION: External Email**

8. How will the One Seattle Plan mitigate damages from deforestation and the lack of organic drainage formerly provided by larger trees?

Iskra Johnson

266-4

**From:** [Iskra Johnson](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on Comprehensive Plan DEIS  
**Date:** Monday, May 6, 2024 4:00:33 PM

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**CAUTION: External Email**

9. Are the One Seattle Plan's predictions of housing needed and population based on pre-pandemic work and population trends? If so has the DEIS looked at how work from home, climate change and demographic changes may effect population assumptions?

Iskra Johnson

266-4  
cont

**From:** [Iskra Johnson](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on Comprehensive Plan DEIS  
**Date:** Monday, May 6, 2024 4:00:30 PM

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**CAUTION: External Email**

11. One of the chief rationales for adding exponential housing density throughout the formerly single family zones has been “equity.” It is a fundamental value proposition of the One Seattle Plan that low income people should have equal access to the desirable neighborhoods with trees, gardens and historical character, and particularly that people formerly excluded from these neighborhoods under redlining should benefit from added density. Since the added density will remove historical homes, trees and gardens, leading to hard-scaped heat islands and making formerly desirable neighborhoods less environmentally healthy and appealing, in what way will this benefit formerly excluded and low income people?

Iskra Johnson

266-4  
cont



**From:** [Iskra Johnson](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on Comprehensive Plan DEIS  
**Date:** Monday, May 6, 2024 3:58:00 PM

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**CAUTION: External Email**

10. What assessments has the One Seattle Plan done to verify existing housing capacity, and has the DEIS verified these assessments and predictions of future needs?

Iskra Johnson

266-5

**From:** [Iskra Johnson](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on Comprehensive Plan DEIS  
**Date:** Monday, May 6, 2024 4:02:36 PM

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**CAUTION: External Email**

6. What science and data has the One Seattle Plan DEIS reviewed, given recent estimates of approaching exhaustion of the power grid, to assess whether our power infrastructure can support an additional 100,000 units of housing in the next 20 years? (Sources <https://www.pnucc.org/wp-content/uploads/2024-PNUCC-Northwest-Regional-Forecast-final.pdf> <https://www.seattletimes.com/seattle-news/climate-lab/surge-in-electricity-demand-poses-tricky-path-ahead-for-pnw-utilities-report-shows/>)

Iskra Johnson

266-5  
cont

**From:** [Iskra Johnson](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on Comprehensive Plan DEIS  
**Date:** Monday, May 6, 2024 4:00:28 PM

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**CAUTION: External Email**

12. It has been shown after 20 years of explosive growth of housing in Seattle, with 30% of all new housing provided in the last two decades, that new housing is far more expensive than old housing: Housing costs have doubled and tripled. Has the DEIS verified the assumptions that 100,000 new units of housing will trickle down to create greater affordability? If so, how much more affordability will occur? The past 20 years have shown that for-profit developers build luxury housing and expensive apartments, not affordable rentals. What protection is there in the One Seattle Plan to prevent the housing inflation that comes with gentrification?

266-5  
cont

**From:** [Andalucia Johnston](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Urgent Comment on DEIS  
**Date:** Sunday, May 5, 2024 8:00:32 PM

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CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Luci Johnston

267-1

**From:** [Judi Jones](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 10:44:53 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

For Seattle to remain a desirable city we need to maintain our livability which means open space and trees!

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Judi Jones  
jjinseattle@me.com  
4616 25th Ave NE #484  
Seattle, Washington 98105

268-1

**From:** [Mary Jones](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:29:40 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Mary Jones  
206mej@gmail.com  
2600 Fairview Ave East, Slip #5  
Seattle, Washington 98102

**From:** [Wendy Joseph](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#); [Woo, Tanya](#); [Nelson, Sara](#)  
**Subject:** Trees Save Lives  
**Date:** Thursday, May 2, 2024 9:41:58 PM

**CAUTION: External Email**

To the comprehensive planners and my District 5 Representatives:

I have serious questions about Seattle's Comprehensive Plan for growth. Trees have to come first and trees do not appear to have much importance in this plan.

**Section P 3-3** states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What should we expect if this is not true? What are the specific details? **This statement is too vague.**

**Section P 3-3** also states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Again, what are the details of these "adverse impacts"? How do you **guarantee survival of the tree canopy?**

The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much land do we need for this 30% goal? How much will be slated for "development" (i.e., pricey apartments and condos with nothing reserved for low income people) and how much for trees? Where in the city will these trees be planted? And how many trees exactly do we need to reach the 30% goal?

**Jimi Hendrix Park** has pitifully few trees, and was passed by the last time the city planted trees in public places. It covers a large area, 2.3 acres, and **trees could be planted in abundance there**, trees that have a proven value in raising the quality of life with healthier air, and the proven psychological lift that green spaces provide, ergo less crime. We could certainly use that in Seattle. The park is in a low income, mostly minority neighborhood. **Just why is it that Jimi Hendrix Park, named in honor of one of Seattle's greatest musicians and hands down the greatest rock guitarist of all time, gets treated so shamefully? Don't Black Lives Matter there?**

**SAVE THE PLANET.**  
**PLANT A TREE.**  
**SAVE THE PLANET FASTER.**  
**PLANT MORE TREES.**

--

Fair winds,  
Wendy

Wendy Joseph  
 10345 Meridian Ave. N. #703  
 Seattle, WA 98133  
[wjoseph924@gmail.com](mailto:wjoseph924@gmail.com)  
 (206) 819-9924 cell

**From:** R.K  
**To:** PCD CompPlan EIS  
**Subject:** Seattle Comprehensive Plan (/ Environmental Impact Statement).  
**Date:** Sunday, May 5, 2024 10:20:47 PM

**CAUTION: External Email**

Seattle Comprehensive Plan (/ Environmental Impact Statement).

Some input... thank you for the consideration.

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>> The DEIS Executive Summary states an intent to "Increase the supply of housing to ease increasing housing prices caused by limited supply."

Provide evidence for and against the claim that this supply-side trickle-down theory has worked for housing... and state whether the evidence is scarce or abundant.

Provide evidence for and against the claim that this supply-side trickle-down theory has worked to reduce housing costs for low-income households during the recent 10 years of extreme increase in rental housing in Seattle... and state whether the evidence is scarce or abundant.

What specific change has been drafted to address this input?

>> Include definitions of "affordability" that are good (proven to be clear by public survey), and make them easily found.

What specific change has been drafted to address this input?

>> Require that all development be required to build sidewalks, or pay into a sidewalk fund if a sidewalk is already present.

(NOTE: The city has demonstrated over the years that sidewalks will not be built in significant numbers by city dollars if significant changes in policy are not enacted).

What specific change has been drafted to address this input?

>> Prioritize that development (with sidewalks) occur where sidewalks are lacking... and DE-prioritize development where sidewalks already exist... to...

- 1) Get sidewalks.
- 2) Get enough sidewalks to make a difference (hence the "DE-prioritize elsewhere").
- 3) Reduce the damage to older existing sidewalks which has been occurring near development.

(NOTE: The city has sufficiently demonstrated over the years that sidewalks will not be built in significant numbers by city dollars if significant changes in policy are not enacted).

What specific change has been drafted to address this input?

>> Provide no giveaways to developers that are not combined with impact fees or other commensurate public benefit compensation.

(NOTE: Once developers are given something, it can't be taken away or balanced (they will sue, successfully), therefore, the give and take need to be connected... not giveaways first).

What specific change has been drafted to address this input?

>> According to current code, when the zoning of a parcel changes, it can also impact the rules for neighboring parcels.

For example: changing a parcel from single family zoning to "Low Rise" may loosen the (for example) setback requirements on a neighboring parcel zoned Commercial.

Do not give away such benefits to the investors in those NC Commercial zone properties without simultaneously implementing impact fees or other commensurate public benefit compensation.

REF: Commercial Setback Requirements (23.47A.014): ([https://library.municode.com/wa/seattle/codes/municipal\\_code?nodeId=TIT23LAUSCO\\_SUBTITLE\\_IILAUSRE\\_CH23.47ACO\\_23.47A.014SERE](https://library.municode.com/wa/seattle/codes/municipal_code?nodeId=TIT23LAUSCO_SUBTITLE_IILAUSRE_CH23.47ACO_23.47A.014SERE)).

What specific change has been drafted to address this input?



>> Up-zones without commensurate public benefit compensation are immoral.  
 Such up-zoning now cheats current and future generations of the asset of being able to apply those up-zones under better circumstances... when fairness can be applied (up-zones which create private benefit in exchange for public benefit)... or when there is greater need to stimulate the economy and create employment in construction and government (during periods of high unemployment).  
 Such up-zoning now is short-sighted and a short term money grab... when long term needs are not predictable except that it is nearly certain that things will not stay on a steady course, but rather that there will be cycles (periods of rising and falling employment).  
 What specific change has been drafted to address this input?

>> Blanket up-zones without commensurate public benefit compensation are particularly immoral as they cheat current and future generations of being able to target up-zones for maximum result (highest public benefit and lowest public harm).  
 What specific change has been drafted to address this input?

>> **Do not up-zone the residential blocks between 85th and 80th near Greenwood Ave.**

...  
 "Updating Seattle's Neighborhood Residential Zones" page 4 says:  
 "In these new and expanded centers (see map), areas currently zoned Neighborhood Residential would be changed to other zones (like Lowrise Multifamily) where development of larger buildings could occur."  
 This may mean a change to: Lowrise Multifamily (LR1, LR2, LR3):  
 (<https://www.seattle.gov/Documents/Departments/SDCI/Codes/MultifamilyZoningSummary.pdf>).

...  
 Just as "one-size-fits-all" is false, it is also false that "one-shape-fits-all". Looking at the actual situation in Greenwood rather than plopping standard shapes on a map leads to a better conclusion... that the Greenwood Urban Village should not be changed to up-zone residential blocks between 85th and 80th.

...  
 This location is not near "major transit" (which WA state has defined as a stop which serves light rail, express buses and HOV lanes), and lacks even minor direct transit to the largest centers north of the canal.

...  
 The up-zoning may or may not change the value of the property, but would change who it is of value to... from those seeking a place to live... to those seeking a place to hold as an investment until multiple contiguous properties are available for teardown and redevelopment.

...  
 The effect will be that the properties will experience a future of decay as the incentive to maintain the structures is lost because of the expectation of future tear-down.

...  
 In effect this rezoning is a rezoning to "AREA OF FUTURE DECAY" (a dedicated decay zone).

...  
 In areas that have already experienced significant decay, the housing may have reached a natural affordability. In such cases this rezoning can hasten the tearing down affordable housing and the replacing of it with housing which is not affordable, on a false theory that it will increase affordability.

...  
 This plan is using quality decay, and quality of life decay, to achieve greater profitability for investors, and to increase employment during a time of already low unemployment.

**Do not up-zone the residential blocks between 85th and 80th near Greenwood Ave.**

What specific change has been drafted to address this input?

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DEIS StoryMap Comment

Name: Jack Kaldowski

Email: evita.kaldowski@icloud.com

Date: 4/6/2024

Comment:

I am a renter in U District, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would encourage social housing in all neighborhoods. Instead the current draft plan will increase inequality and homelessness. To create a more equitable, affordable city, the plan should add many more 'Neighborhood Centers', especially in Urban Neighborhoods.

If the City of Seattle adopted my above proposed changes, then we would be able to enhance housing security for renters and low-income folks.

272-1

**From:** [Dan Keefe](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comp Plan Shortcomings  
**Date:** Sunday, May 5, 2024 10:16:15 PM

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**CAUTION: External Email**

1. The Comp Plan poorly documents that plants and animals will not be affected by planned building scenarios.
2. Preservation and enhancement our urban forest lands and parks must be a high priority. Many people cannot get out of town into the national forests because there is no transportation.
3. It's absurd to state that new tree plantings will compensate for those removed for development. It takes years for new trees to equal the sequestering ability of mature trees.

Respectfully submitted,  
Dan Keefe  
Meadowbrook

**From:** [Sophia Keller](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:29:15 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Sophia Keller  
keltiawind@gmail.com  
851 SW 127th Street  
Seattle, Washington 98146

274-1

**From:** Kathryn Keller  
**To:** PCO, CompPlan, EIS  
**Subject:** A few comments on the One Seattle DEIS and Planning for climate and people resilience in future  
**Date:** Monday, May 6, 2024 4:50:42 PM  
**Attachments:** Snoho Transportation Concurrency Approach.png

CAUTION: External Email

Hi:

I've been following the process for some time (and involved historically in a number of these efforts). I think that once we got HB1110, along with the Seattle and WA ADU bills, Seattle could potentially get some level of growth everywhere. So, Earth and Climate, displacement pressures, and city infrastructure impacts become really important to mitigate or avoid, given Seattle's development way ahead of where most of the rest of the state is at. We do not exist in a vacuum. Nor does any one get to say, or should get to say 'I will live out in the country' and have nothing to do with the local economy of that place by virtue of job in framing or open space management. So, I do not believe Seattle takes on ALL growth issues for the state.

I don't see any place based discussion other than for the new light rail station area in the EIS, so I expect area based planning, out of which any rezones (and changes to the code itself) should come. We should actually have the whole city planned like Portland has, maintained plans. So they can be adjusted over time. It isn't about the 'type' of zoning, it is about the place and the whole mix of history, people, and many types of zoning. Why should the city care if it isn't facilitated by good transportation, diverse uses and architecture and diversity of residents? The people who get pushed out cared but they are gone now. Their children now care about harms done in the name of planning, though. We all care when the land slides, too. Or we get flooded. I realize no one can fix anything, but let's stop lose lose propositions.

We require transparency about exactly what the impacts are, no mitigation possible is NOT an answer. No mitigation needed — we need the evidence, the money is on the table. You will need to fight for mitigation is not the answer, either. The means, programs and laws that ensure we are safe and secure in our homes, and communities are resilient, needs to be materially assured before government allows more construction in an area. Focus on what to develop and who to develop for is also critical when publicly subsidies are needed for pretty much everyone's home if they are under AMI. Access to services and transportation infrastructure is more important, as well as, and all that makes a complete neighborhood. People living in a place need to shape that, because de facto eminent domain is more what has happened. Anti-displacement measures need to be in place before up zone actions. And legacy and outcomes of prior action needs to be assessed.

I argue that we consider a much better process for the implementation land use actions for the comprehensive plan that can take into account the recently passed Transportation Plan, more aggressive anti-displacement measures, hashing out preservation of some more land for trees, our sidewalks, etc. Including hyper local assessment in EIS's.

With Neighborhood Residential work, I also think certain facts of history and how they played out need to be readdressed. Because the city is doing generic zone-based zoning, all incredibly 'flexible' (NEVER any form based), which carries a ton of false assumptions. Presumption has been the name of the game. Never actually talk to homeowners who have the land under them changed by the government.

Much of low rise in the Central Area was a recognition of an area that was not mostly developed with nice platted subdivisions. And, I am sure there are other areas that are not nice neat suburban style platted. But, the city went on a mission to conform all to some suburban style scheme and make it grow more, and in my area 'accommodated' some flexibility. This needs a serious unwiring of history. From the last 60 years or so.

Accommodating low rise when it was actually just a few units on a lot, meant that those families did triplex their properties, and a few properties were redeveloped, which did have some anti-displacement effect prior to 2000. The sell off by SHA had an impact. There are cottage condo communities nearly 50 years old, too. Dirty little secret, once multiple owners on a lot it's pretty much done for redevelopment potential unless, someone buys up to the point or owners flip to investment property to the point, when it is no longer 50% owner occupied residential under terms where feds will lend for home purchase. This is a vulnerability that all the rewrite of state 'HOA' laws which still apply to all the townhomes zero-lot whether they require an HOA or not, is missed. And, there are two story apartment buildings. But, the 'highest and best use' did not reach a threshold making it impossible for someone to develop their own property for housing family or renting out units until after 2000. At least in my area of outside the Urban Village but still low rise.

Even with the Urban Village scheme, there were low rise outside the Urban Village and Single Family inside the Urban Village because the city wanted to draw lines on the map to scope the planning work, again ignoring that planning is not about bigger buildings, but community development, and this in a community struggling to prevent displacement. Where one presumes the community there, the PEOPLE THERE, should benefit from what building happens. Others just see empty land to exploit.

In the 21st Century, the city classified all zones not Single Family/single owner/single house as Multi-family (which everyone thinks apartment buildings), with development regulations to promote redevelopment and displacement. The zoning toolbox is weak, too weak, when it comes to options for form and fit with the real economy and economic conditions of the people. The multi-family track became an exercise on paper to add units and square footage, then apply everywhere without regards to real differences in different places. Ignoring the fact that government has accountabilities rezoning the land under peoples' homes. It is as if someone changed the covenants without having you sign anything to agree the way the city will not communicate real consequences by USPS. On land you own?

I think the biggest new reality is that we really have multiple housing units on a lot anywhere in the urbanized areas of the state. The intent of low rise, at least what was LDT and L-1, and smaller apartment buildings L-2, seems to be really the same as higher densities of what is allowed under HB1110, and projected for our new Neighborhood Residential, so I'd hope we can align this better. In hindsight, MHA seems unfair to those pulled into that regime by virtue of having been low rise, or single family inside Urban Village, just before the city allows three units for sale everywhere, and the state unwind 'pure' single family development. At least in some areas, there is no potential for redevelopment really. It's already new townhouses or old families who survived. Redevelopment will happen, but it will be more rare than tearing down whole blocks.

We will need to look carefully at the steep slope and liquefaction areas before encouraging more building. Or, how would development improve or stabilize the earth? The hillsides over that Madison Valley neighborhood on the map are still being studied with water issues continuing. Believe me, people living on that land are concerned, and every development seemed to include some mudslide activity.

We do not know if the Transportation levy will pass, and even if it does, we need to know the budget is there to support whatever level of development is proposed for each area to be rezoned.

For all those reasons, I think there is a lot more reality check that everyone needs to understand, more deep look at place based interconnections of all concurrency factors and equitable income distribution. Not from 'above' on a map with spreadsheets. On the ground with the people who are residents and plot owner residents in the places.

As far as this Draft EIS, and the realities of generic/theoretical/ideological planning:

DEIS 3.1 Earth and Water This section needs to have more information about the specific land slide prone areas and water and flood threats with the building we have already in those places.

DEIS 3.6 Land Use This section should reflect better dependency on anti-displacement measures which may need to be beyond that which housing subsidies try to deliver for. It does not belong only in the housing section, because all homeowners and residents (home owners who have long tenure living on their land are residents) are impacted positively or negatively, by up zoning. Some see the disinvestment in their commercial areas when no one wants to build what is planned for. Local businesses being pushed out is also a huge problem. The poor and middle class are pushed out which subsidies try (without enough) to mitigate. The wealthy don't want poor people in their neighborhoods? Too bad. That ship has sailed, but we need to ensure sidewalks and transit assets to those areas when there is growth planned for. We might need to take place based planning more iteratively, in conjunction with when we actually are doing infrastructure improvements in an area or plan large public investment because we are talking about adding onto what already is. Infill is not empty land, but in some ways, we need to handle the processes by which land becomes 'empty'. A little bit of forensics about property transfers would uncover a lot of dirty dealing by land flippers, supported by a system that views land as empty if under built to zoning they did not agree to when they bought, and which is now lived on and well loved.

Backyard cottages under MFTE would help us. As would a lot more Habitat type housing. Privilege those, and long time homeowners rehabbing for additional units, in the permitting process. I think enabling more people to house more people where they live is slower, and not as visible, but more resilient and community stability focused.

Finally: Saving trees elsewhere or any other grand scheme is not a reason for Seattle to take action that contradicts the basic concurrency factors we have decided matter for a healthy life. GMA envisions a system of complete towns and cities. It is framed with growth boundaries, ending suburban subdivisions and strip malls, and highway capacity replaced with rail that will stop creeping urbanization. The economic growth in the city of Seattle is connected by people who move around the region. Yet, within and outside of the city there are urban areas that are underdeveloped, and have mass transit options. This requires investment in community and housing for all incomes in all 'places' which is different from 'everywhere' or covering the earth with building and human enterprise. We have well formed and defined places that operate as a system. Not just Seattle.

Thank you,  
 Kathryn Keller

I offer a perspective, expressed in the Snohomish County plan, in their Transportation section. It makes transparent the very real choices we have, might have, and might not have.

275-1

275-2

275-3

275-4

**Figure TE-8 Reassessment Strategy Options for Balancing LOS, Land Use, and Revenues**

Option 1. Reset the Level of Service (LOS)	Option 2. Identify Additional Public Resources	Option 3. Reduce Allowable Land Use Intensity	Option 4. Restrict Land Use through Development Phasing
<ul style="list-style-type: none"> <li>Lowering the LOS to an appropriate, but affordable, level is often the first option for balancing revenues with needs</li> </ul>	<ul style="list-style-type: none"> <li>A second option for balancing revenues and needs at a given LOS is to continue to seek additional revenues or other public resources</li> </ul>	<ul style="list-style-type: none"> <li>A third option for bridging the gap between revenues and needs is to defer potential future demand for arterial improvements by reducing the intensity of development in areas where existing land use patterns and constraints limit their suitability for higher-intensity uses</li> </ul>	<ul style="list-style-type: none"> <li>A fourth option for balancing revenues and needs is to restrict the land use element through development phasing, which can be used to restrict development until adequate roads can be provided</li> <li>Phasing creates an incentive for adjacent developers to collaborate on financing holistic improvements, as opposed to piecemeal frontage requirements</li> <li>Phasing not only controls demand for improvements, it has the potential to add revenue by better coordinating required developer contributions</li> </ul>

**From:** [Peter Kelly](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:48:14 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Trees and housing are not incompatible. We need to preserve our existing mature trees and support the planting and growth of more trees. That will make our neighborhoods more healthy and livable.

I have comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS):

- \* It does nothing to address keeping safe the existing larger trees when properties are developed.
- \* It provides no research or analysis of the impact of the tree loss that we are currently experiencing and will continue to experience without better protections. It dismisses new solutions without proof.
- \*There is no time frame for any restoration or replacement for lost trees.

Mitigation recommendations:

- \* Allow the city to require alternative site designs and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before any tree removal and any building permits are issued.
- \* Provide dedicated tree planting and retention areas like Portland does and Tacoma has proposed.
- \* Amend the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.
- \*Make stiffer penalties for any tree removal done in violation of the Tree Protection Ordinance. Trees are often removed despite plans approved that show the trees retained.

Thank you for your consideration.

Peter Kelly  
12pixelpete@comcast.net  
10623 Exeter Ave NE  
Seattle, Washington 98125

276-1

**From:** [shana kelly](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [LEG CouncilMembers](#); [Strauss, Dan](#); [Moore, Cathy](#); [Harrell, Bruce](#)  
**Subject:** Environmental impact on our urban canopy  
**Date:** Monday, May 6, 2024 12:35:39 AM

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**CAUTION: External Email**

Out of the five alternatives in the plan, alternatives 2 and 4 would save the most trees and still allow for 100,000 new homes.

In Section P 3-3 states, "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recover of plant or animal species in the wild."

What are the expected impacts of the One Seattle Plan on Seattle's plants and animals?

Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild."

What is the impact of the plan specifically on Seattle's plants and animals? We have already experienced significant bird, insect, and plant decreases over the past few years. I don't see how removing more trees and allowing unsustainable increases in density, pavement, and shorelines won't impact the flora and fauna.

Will there be long term monitoring of impacts?

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover."

I would like to know what analysis or data shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees and the current system of fining developers is not effective.

What is the environmental impact of continuing to lose 1.7 of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods?

Where does the city acknowledge that planting new trees takes 20-30 years to provide a tree canopy, to shade houses, or combat heat islands?

Doesn't it seem more practical to offer incentives to build around established trees?

How much public land is available to reach the 30% goal?

How many trees will need to be planted in these areas every year to make up for trees removed by development AND what responsibility will the city take for ensuring the life and



growth of newly planted trees, when new owners are unable/unwilling?

Thank you for your support of Seattle's irreplaceable urban forest.

*Shana Kelly, M.S., CCC-SLP*

*Pediatric Speech Language Pathologist  
Children's Communication Corner, Inc.  
[www.communicationcorner.org](http://www.communicationcorner.org)*

**From:** [Kathleen Kerkof](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Woo, Tanya](#); [Kettle, Robert](#); [Nelson, Sara](#); [Strauss, Dan](#)  
**Subject:** One Seattle Comprehensive Draft Plan  
**Date:** Monday, May 6, 2024 4:56:05 PM

**CAUTION: External Email**

Dear Staff members and Coun members

I am writing to state my preference for Urban Planning Alternative 2 and 4 as they would protect the most trees. Some of the draft's sections such as the one on Climate and the Environment talk about and recognize the benefits of green spaces and trees. However, preserving and expanding our tree canopy and green spaces will not happen without concrete efforts. With that in mind, I have concerns and questions about statements in the Environmental Impact Statement.

1. Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." **What is the impact of the plan specifically on Seattle's plants and animals? This statement implies that nature is "out there" and separate from people living in the city. Connection to nature is vital to our physical and psychological health and to imply that the only thing that matters as far as environmental impact is whether the plant or animal goes extinct gives lie to the goals and statements in the Comprehensive Plan.**
2. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? Keep in mind that when we cut down old large trees which keep growing and putting on more canopy each year, we are destroying valuable green infrastructure. Any tree that is planted will take many years to take return us to what we had. Do we have that time given the accelerating effects of climate change? Are we leaving enough space for trees to be able to survive?**
3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. **How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development? What budget has been established to reach our 30% goal?**

Sincerely,  
Kathleen Kerkof  
2235 NW 64<sup>th</sup> St  
Seattle, WA 98107

**From:** [Paulette Kidder](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 5:48:46 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Paulette Kidder  
pwkidder@seattleu.edu  
2122 N 88th Street  
Seattle , Washington 98103

279-1

**From:** [Janet Kimball](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 3:22:40 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Janet Kimball  
hughandjanetkimball@yahoo.com  
8051 28th Avenue NE  
Seattle, Washington 98115

**From:** [Vicki King](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comp Plan comments  
**Date:** Sunday, May 5, 2024 6:24:43 PM

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**CAUTION: External Email**

Alternatives 2 and 4 are less harmful than 3 and 5.

What an appalling set of alternatives for those of us who worry about the impact on Seattle's short- term and long-range liveability as climate change continues to impact our city, state and region.

Existing big trees can help mitigate the changes coming. Cutting these big trees down -- not to mention not requiring that many more be planted in the very areas that will be developed -- to be able to stuff ever more housing into already developed areas with no shade is short-sighted and will just make life miserable for the new inhabitants.

Letting developers cut down big trees only to plant small trees elsewhere will not improve the liveabiity of the new housing.

Victoria King  
7326 55th Ave NE  
Seattle

281-1

**From:** [Susan Kirchoff](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Wednesday, May 8, 2024 1:01:20 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Susan Kirchoff  
kirchoffsusan5@gmail.com  
3237 29th Ave W  
Seattle, Washington 98199

**From:** [Tracey Kirk](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 6:30:16 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Sincerely,

Tracey Kirk  
Seattle, WA

Tracey Kirk  
[traceylskirk@gmail.com](mailto:traceylskirk@gmail.com)  
6801 43rd Ave Ne  
Seattle, Washington 98115

283-1

**From:** [Bryan Kirschner](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Public Comment on the One Seattle Draft EIS  
**Date:** Monday, May 6, 2024 6:30:59 AM

**CAUTION: External Email**

This is public comment on the Draft One Seattle Environmental Impact Statement (DEIS).

1: The City has documented that people of color (POC) in Seattle are more likely to live within 200 meters of major freight routes, adjacent to busy arterials, and near sources of industrial pollution as a result of land use planning decisions regarding the location of multifamily housing. The Final EIS will limit the scope of change possible in the One Seattle Comprehensive Plan (Comp Plan) update. The Final EIS should therefore include a plan encompassing the number, kind, and location of homes sufficient to remedy this racial inequity based on where people live during the effective period of the One Seattle Comprehensive Plan Update. This would be consistent with the City's Federal obligation to Affirmatively Further Fair Housing and Council Resolution 31164 which states "The Race and Social Justice Initiative envisions a city where racial and social disparities have been eliminated and equity and inclusiveness achieved...City departments should use available tools to work to eliminate racial and social disparities across key indicators of success, including health...".

1a: Did the City consider an analysis of a plan encompassing the number, kind, and location of homes sufficient to remedy racial inequity based on where people live based on its obligation to Affirmatively Further Fair Housing? If so, why was such an analysis rejected? If such an analysis was conducted, why was it not included in the DEIS?

1b: Did the City consider an analysis of a plan encompassing the number, kind, and location of homes sufficient to remedy racial inequity based on where people live based on Council Resolution 31164? If so, why was such an analysis rejected? If such an analysis was conducted, why was it not included in the DEIS?

1c: Did the City consider an EIS analysis of a plan encompassing the number, kind, and location of homes sufficient to remedy racial inequity based on the Comp Plan update objectives of "Equity"--"Equity: Provide equitable access to housing, jobs and economic opportunities, services, recreation, transportation, and other investments. Center the work with an intersectional, race-conscious lens, informed by a history of racial discrimination and disinvestment"--and "Inclusivity"--"Increase diversity of housing options in neighborhoods throughout Seattle to address exclusivity and so more people can live and stay in a variety of neighborhoods." If so, why was such an analysis rejected? If such an analysis was conducted, why was it not included in the DEIS?

2: The City has documented that POC in Seattle are more likely to live within 200 meters of major freight routes, adjacent to busy arterials, and near sources of industrial pollution as a result of land use planning decisions regarding the location of multifamily housing. The DEIS states that "Equity" and "Inclusivity" are objectives of the Comp Plan update. What are the detailed forecasts for the number and percentage of POC living in and not in those areas over the effective period of the Comp Plan update for each alternative presented?



3: The City has documented that POC in Seattle are more likely to live within 200 meters of major freight routes, adjacent to busy arterials, and near sources of industrial pollution as a result of land use planning decisions regarding the location of multifamily housing. The majority of residential land in the city that is not within 200 meters of major freight routes, adjacent to busy arterials, and near sources of industrial pollution is zoned “Neighborhood Residential.” The DEIS includes the possibility of “Implementing MHA requirements in Neighborhood Residential zones” as a mitigation measure related to “Population, Housing, & Employment.” MHA entails charging a fee for the construction of multifamily housing that is not applied to the construction of single family housing. This should be stricken from the EIS because it runs counter to the Comp Plan update’s objectives of Equity and Inclusivity, the City’s obligation to Affirmatively Further Fair Housing, and Council Resolution 31164 because it would reduce the economic competitiveness and viability of constructing multifamily housing more affordable to POC in those areas relative to single family housing.

4: The DEIS states “The gradual conversion from low-intensity to higher-intensity development patterns is an expected characteristic of urban areas.” The DEIS also states as a potential impact on “Land Use and Urban Form” “Increased frequency of areas with mixing of uses and heights. Awkward transitions may temporarily result in older, less intense development next to newer, more-intense ones during Redevelopment. Additional height and bulk changing views, casting longer shadows, and displacing trees.” The DEIS presents as a potential mitigation measure “Implementing gradual transitions in zoning.” Frankly these statements constitute something of an inscrutable mess and should be clarified and disambiguated in the EIS. To the extent any such considerations have played or will play a role in EIS analysis and proposals, they must be quantified, made clear to the public, and empirically based on pre-existing conditions as follows:

4a: First, since urban areas such as “Paris” and “Barcelona” exist and are popular, what “the expected nature” of a “gradual conversion from low-intensity to higher-intensity development patterns” in urban areas relative to looking backwards at Seattle of the past versus a Seattle of the future is ambiguous. If this assertion is retained, what constitutes “gradual,” “low intensity,” and “high intensity” should be explicitly defined, along with options for the nature of “transitions.” Any impacts from choosing “gradual transitions” for the sake of “expectations” should be declared and quantified relative to the Comp Plan update’s goals of “Equity” and “Inclusivity,” including residential patterns in which POC disproportionately live within 200 meters of major freight routes, adjacent to busy arterials, and near sources of industrial pollution as a result of land use planning decisions regarding the location of multifamily housing.

4b: “Intensity” should be broken down into constituent elements that are clearly defined. Massing and height, for example, are distinct from “type of use” (such as commercial). The need for “transitions” should be reduced or eliminated based on real-world conditions rather than general expectations. For example: Seattle’s “First Residential” districts allowed churches. Thus in Northwest Wallingford, for example, St. Ben’s church, a big structure with a multistory bell tower is next door to single family houses. There was no need for a “gradual” transition and larger structures than single family houses have (empirically) happily coexisted for a long time. Likewise, the Walling-Five apartments are the same height as a single family house next door to them, and the Mari-Don apartments are shorter than a three-story single family house. Planning should take into consideration what has empirically actually worked in practice rather than some conceptual and set

of expectations.

4c: Residential density—units per lot—should be stricken from consideration in terms of “transition” outside of health and safety requirements in building code because it would have segregative effects by race and class. There is a large single family house on our block, for example, that could be four two bedroom stacked flats or six to eight one bedroom apartments within the same massing, for example—the latter being more affordable options) Likewise, within the massing of typical four-three-story townhome developments the homes could be one studio per floor. A corner commercial building on Meridian Avenue in Tangletown is shorter than the single family house next door. An older relative who grew up in Ballard described corner stores as “everywhere” in his youth. Slightly more intensive—e.g., corner commercial—within the same massing also does not require “transitions.”

4d: The statement “Additional height and bulk changing views, casting longer shadows, and displacing trees” is internally contradictory. Trees cast shadows and block views, and the trees that benefit the city most are as tall or taller than allowable heights on most of the city’s residential land. This statement implies removing big trees could be a good thing relative to shadows and views. The EIS and the Comp Plan should clearly state that the highest priorities are more and more affordable homes and trees, not changes in views or patterns of shadow. Consider awarding height bonuses for preserving or planting larger rather than smaller trees.

5: The 2017 City of Seattle and Seattle Housing Authority Joint Assessment of Fair Housing states “Within a 200-meter radius of T-1 and T-2 roadways... the noise and air pollution impacts are most acute...” Recent research has indicated that “Residential proximity to busy roads, defined as >10 000 vehicles per day, was selected as a marker of long-term exposure to near-road traffic-related pollution” and “Air pollution is hyperlocal ...research shows it can vary up to 800% from one end of a block to the other” (See: 2017 City of Seattle and Seattle Housing Authority Joint Assessment of Fair Housing, Chronic burden of near-roadway traffic pollution in 10 European cities (APHEKOM network), Air disparities in the Bay Area: Hyperlocal data insights to support climate action). The EIS should evaluate Equity and disproportionate exposure of POC to pollution by analyzing each alternative in view of the number, kind, and affordability of homes that are neither within 200 meters of a T-1 or T-2 roadway, nor on a street carrying 10,000 or more vehicles per day, nor on the block face of a busy street. The EIS should include an option for the number, kind, and affordability of homes that would equalize living in or not in those locations by race. Bryan Kirschner Seattle

**From:** [Timothy Kitchen](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Support Original Abundance Map, Seattle Comprehensive Plan  
**Date:** Monday, May 20, 2024 4:20:37 PM

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**CAUTION: External Email**

Hi Seattle Comprehensive Plan planning,

I support the original abundance map being advocated by Complete Communities Coalition. I support an alternative 6 that provides ability to build 10,000+ units a year, has the original 44+ Neighborhood Centers included in OPCD's 2023 Fall draft, allows more businesses beyond corner stores, etc.

I've been renting for 10 years, and I know that less supply of housing will mean increased cost, potentially pricing me out of my home and making the possibility of actually buying a home much less likely.

I've was born in Western Washington and have lived and rented in Seattle for 15 years, attending UW Seattle for 5 years, volunteering at Roots Youth Homeless shelter, organizing in person meetups for 7 years as organizer of Seattle Hacker News Meetup, serving as board member on my Fremont Neighborhood Council, playing several seasons on pinball teams in Seattle. I am an engaged and contributing member of our Seattle community.

I live and I work in Seattle. I buy and sell products for a living and use public transit to purchase from thrift stores in Seattle. Less density and housing in Seattle will put more cars and traffic on the road, making my job take longer, as thrift stores exist throughout seattle.

My sister and her husband were priced out of Seattle, as they both lived and worked here. For housing cost reasons when they got married they moved north to Edmonds, and again for housing cost reasons when they had kids they moved further north to Everett. They both still work in Seattle, with my sister works as a nurse and nurse manager that delivers babies at a Seattle hospital. But now they have to commute an hour plus everyday to get to work. This costs them time and money, and keeps them away from their family longer every work day.

Having to drive an hour extra each workday is also dramatically more dangerous, than well, not having to do that.

We do not consider enough in our housing policy the consequence of forcing people to have to live far from the job hub of Seattle. The more people have to drive, the higher the chances of literally dying in a car accident. Do we not have a Vision Zero traffic death goal? And how is that fair? Do the people that work here not deserve to live here, and the added transit safety of living here?

Does my sister who literally helps deliver new life into this world as a Seattle nurse, does she and her family deserve to live here?

Best,  
Timothy Kitchen :)

DEIS StoryMap Comment

Name: Dylan Klein

Email: kaylan406@icloud.com

Date: 5/1/2024

Comment:

The city should study the impacts of "corner stores" allowed mid-block as well as on corners. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

286-1

**From:** [suzanne knoblet](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Light rail etc  
**Date:** Tuesday, March 12, 2024 11:39:10 AM

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**CAUTION: External Email**

Please consider all the critters you displace and make homeless by cutting down trees, green belt areas. My yard is now full of animals due to loss of habitat along i5 and now look for cover as well as any food that might be available. I've more squirrels, raccoons, birds of all types and 5 homeless cats in the last few years all living rough under buildings since no green belt for them. The plantings will take years to grow to shelter them. How about larger taller etc plantings to help where we can have critters move back to our urban green belts.

287-1

**From:** [Cheryl Kordick](#)  
**To:** [Moore, Cathy](#); [PCD\\_CompPlan\\_EIS](#); [LEG\\_CouncilMembers](#)  
**Subject:** About The DEIS and the Comprehensive Plan  
**Date:** Sunday, May 5, 2024 11:42:55 AM

**CAUTION: External Email**

I have serious concerns regarding the continued destruction of Seattle's canopy and building plans based on what I'm seeing in current city council actions.

Regarding the Draft Environmental Impact Statement :

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? This assumption looks like a fantasy.

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

And about the Comprehensive Plan specifically as it impacts District 5:

The massive "neighborhood center" project planned for Roosevelt Ave NE and NE 90th in Maple Leaf is laughably named. It will destroy a large section of an established neighborhood, including existing homes and change the character of an established community.

I live next to a plot that had a small affordable home torn down to make room for 3 massive, ugly, high-priced housing units. (Despite being 3 units on a small lot, they will sell for well beyond a barista's salary. There is no way this is low cost housing.) This will not only disrupt the quality of the block in the future, but has proven to be a violation of our privacy and property rights all during the construction. 827 NE 98th St is a construction project where the workers have repeatedly walked over our property and tossed their food litter all over our yard from the beginning. Workers have also most often not worn safety equipment and broken other rules that appear to have no consequences when reported. They also ripped down an exceptional tree on the north side of the lot. The spot where the tree was still has nothing built on it, so I don't know why they had to do this. We managed to stop them from taking down two more exceptional trees on the east and west sides of the property, but they have repeatedly removed the "permanent" fencing that is supposed to protect those trees during construction. Currently, they have a table saw and a huge pile of lumber within the "protected area" of one tree. Again, the city does nothing about any of this. I have no doubt that any Comprehensive Plan/neighborhood center construction will be carried out with the same disregard for rules and promises as what I am seeing going on right next to me today.

288-1

288-2

Beyond all that, why destroy a lovely bit of neighborhood when there are under-utilized stretches of parking lot and office buildings much closer to the Northgate Transit Center? I walk past the area of NE 100th and 1st Ave NE and see very few cars ever parked there. That area could contain one of these neighborhood centers without destroying a single home. It would be closer to transportation, and still very close to schools and shopping. The plan as it is is ridiculous.

Cheryl Kordick  
823 NE 98th Street  
Maple Leaf resident

**From:** [Eugene Kramer](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comprehensive Plan Housing Abundance Map.  
**Date:** Monday, May 20, 2024 3:27:44 PM

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**CAUTION: External Email**

Please bring back the Housing Abundance Map for the Comprehensive Plan. This city desperately needs more housing. Don't programmatically water down or obstruct our community efforts do build more housing now.

Respectfully,  
Eugene Kramer

Foundation Board Member,  
Grants, Fundraising, Seattle Subway  
[grants@seattlesubway.org](mailto:grants@seattlesubway.org)  
[www.SeattleSubway.org](http://www.SeattleSubway.org)

289-1



**From:** [Thomas Kuczmarski](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 7:15:29 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Thomas Kuczmarski  
thomaskuczmarski@gmail.com  
815 Northeast 97th Street  
Seattle, Washington 98115

**From:** [Carrie Lafferty](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#)  
**Subject:** Environmental Impact Statement comments  
**Date:** Thursday, May 2, 2024 7:30:37 PM

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CAUTION: External Email

I am writing as a resident of Greenwood neighborhood in Seattle for 24 years. I am writing with comments and questions on the Environmental impact statement relative to Seattle's Comprehensive Plan.

Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What will be the direct impact of the Comprehensive plan on Seattle's flora and fauna? How can this much development not be expected to impact the urban wildlife and plants?

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What specific data and analysis predicts that tree planting programs, coupled with increased non-living landscaping, will compensate for lost urban forest? How can established trees be replaced by smaller sapling tree plantings? This will take a very long time.

The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is then going to be available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development? This is utter ridiculous to cut down established large trees that already provide canopy and think they will be able to be replaced in our lifetimes!

Thank you,  
 Carrie

Carrie Lafferty, PT  
 Guild Certified Feldenkrais Teacher  
 Master Healing Qi Gong Teacher  
<https://protect2.fireeye.com/v1/url?k=31323334-50bba2bf-31321b84-4544474f5631-0da3d97881cda313&q=1&e=f5769d80-182c-482a-91e6-76bb50388c56&u=http%3A%2F%2Fwww.movementfromwithin.net%2Fhttps://protect2.fireeye.com/v1/url?k=31323334-50bba2bf-31321b84-4544474f5631-863710b83fc9e38f&q=1&e=f5769d80-182c-482a-91e6-76bb50388c56&u=http%3A%2F%2Ffeldenkraisteachersinseattle.com%2F>

Creator of The Walking Way: Stepping Into Awareness (6-CD Audio Series)

P.S. I wanted to remind you of my weekly Feldenkrais and Qi Gong classes on Mondays. Please see my Calendar page.

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For Patients: When you choose to communicate Patient Identifiable Information by responding to this email, you are consenting to the associated email risks. Please note email is not secure, and I cannot guarantee that information transmitted will remain confidential.

291-1

**From:** [J. Lange](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Monday, May 6, 2024 1:40:21 AM

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CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,  
Janet Lange  
11733 Sand Point away NE  
Seattle 98125  
[prettysharppencil@gmail.com](mailto:prettysharppencil@gmail.com)

Sent from my iPhone

292-1

DEIS StoryMap Comment

Name: Aileen Langhans

Email: aileenmargaret@yahoo.com

Date: 5/6/2024

Comment:

Please respond to the following questions in response to the City’s DEIS:

I. The plan’s details provide many sketches of multi-unit complexes in family neighborhoods, but they only include city blocks that are completely flat. Our neighborhood is filled with steep hills. If we try to build a DADU in our backyard, most of it would be underground. How would these designs be adaptable to various geographical limitations?

293-1

II. Our neighborhood lots are far less than the 5000 square feet assumed in the various sketches provided in the Plan’s details. Those variations in styles already appear to result in the loss of valuable open space; but they would not be practical on our lots, where the current homes already supersaturate the use of the available square footage. So, how can these designs be adapted to our narrow lots, purposefully designed that way in the early 1900s to maximize coverage and profits?

III. What happens to our lower 1 to 1 ½ story houses with solar panels if they become surrounded by 4-5 story box structures which will block access to the sun?

IV. Is anyone addressing the issue of light pollution?

V. Why doesn’t the City consider and factor in these losses, when acclaiming their success stories:

- i. The loss of existing affordable housing in apartment complexes razed in the process, including the energy it took to construct and demolish those buildings? ...
- ii. The loss of green spaces as density and mass are rapidly increased? ...
- iii. The loss of low-rent apartments/homes which house larger families, only to be replaced by efficiency apartments? Instead of justifying the gains by simply counting the numbers of new units, regulations should require an accurate count of the number of residents and family sizes both gained and lost, but not replaced.

293-2

VI. Corner stores may be a wonderful addition to a neighborhood, but the City cannot predetermine whom they will serve. Furthermore, solid corner stores without any meaningful setbacks can create a blind spot for pedestrians and cyclists. Is anyone addressing this safety issue?

293-3

VII. Has the City reviewed its fence regulations? Tall hedges, walls, and solid fencing may lead to a sense of privacy for the residents, but they act as shields which can create a sense of insecurity for the passersby. Instead, if Seattle still wants to retain and expand its title as a “pedestrian-friendly town”, these features should be encouraged throughout the neighborhoods:

- i. Inviting entrances to the streetscape, including colorful gardens and yards for gathering spaces.
- ii. Fences, etc. that are not overwhelming.
- iii. Large lobbies for larger complexes
- iv. Corner stores, etc. without blind spots

293-4

v. Special emphasis on safety and a sense of community

VIII. How will the City provide larger families, especially multi-generational families of color, with affordable, larger, 3–4-bedroom homes, as they seek a sense of permanency, so that they can raise their children and care for their elderly in one place, without feeling nomadic? Remember there are other concerns for families besides price, such as amenities (schools, libraries, places of worship, convenient and affordable shopping, and gathering places like the YMCA and community centers), safety, and a true sense of community.

293-4  
cont

IX. Trees are definitely important, but how will the City encourage gardens and yards, filled with aromas, color, and textures, for our residents to enjoy and for our non-human neighbors to explore and add joy to our lives?

X. Why doesn't the City wait until the results of the Pilot Program first and its 35 projects, which upon analysis and data collection, may positively or negatively influence the structure and promises of the OneSeattlePlan?

293-5

Respectfully submitted on May 6, 2024,  
Aileen M. Langhans  
206-595-0656  
aileenmarget@yahoo.com

## DEIS StoryMap Comment

Name: Aileen Langhans

Email: aileenmargaret@yahoo.com

Date: 5/6/2024

Comment:

Please respond to these additional questions in response to the City's DEIS:

294-1

I. How is the entire plan going to achieve any meaningful results in 20 years? Will homeowners be forced to sell, forced to tear down their homes in order to increase housing units? Will speculators and developers be encouraged to let their properties deteriorate, purchase adjacent properties by force, and then make larger multi-plex complexes? How much pressure will be placed by the City on homeowners?

II. Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against.

III. Will the City's new zone maps be revised independently of any outside influence by developers who may lobby to have carve outs or extensions to the upzoned areas for their personal projects and profits – to the detriment of the entire district/neighborhood and to the upheaval of the long-term aspirations of the City's Comprehensive Plan?

IV. How will the City encourage a variety of home configurations, such as clusters of houses with a central garden/yard? Don't you think that developers will try to maximize profits while minimizing costs?

294-2

V. Why is the City considering the removal of Design Standards and Reviews because of the cost in time in money instead of streamlining the process and including the surrounding communities from the start of the process?

294-3

VI. Why does the City fail to discuss and formalize the transition zones as permanent, impenetrable boundaries that surround the higher density zoning of the Urban Center, etc.? They were designed to protect the bordering family neighborhoods from aggressive infiltration by large-scale development, which could potentially lead to the accumulation of our smaller lots in order to create major complexes.

294-4

VII. Why doesn't the City create general overlay zones to protect family neighborhoods, especially those that are established, already saturated with homes, and have their own distinct character and history? This should be achieved by requiring that all developers of new homes or of major additions follow these steps: notification of the surrounding neighborhood, through mail and signage, of their projects; and engagement with those most affected by the development before the plans are finalized. Furthermore, neighborhoods, all unique and with their own pressures and limitations, should be able to create a simplified set of design standards which can be used at the start of the permitting process. This would lead to a greater sense of cooperation and lessen the need for long, tedious, and formal Design Standard processes by City Boards, which may lead to a compromise no one wants, while creating a feeling of tension and mistrust.

294-5

VIII. How can the City justify its assumption that a rapid increase in the number of units built is more important than meeting the demands for multi-bedroom homes by larger families? Instead, the City made all sorts of promises that affordable housing for displaced and marginalized families would be its focus in the upzoned areas created around the Light Rail Stations. In spite of multiple warnings, the City is now expanding its efforts outward into family neighborhoods in search of such housing, without admitting that their original proposals were mere illusions, as they allowed the rapid growth of tall multi-plex apartments, only to create units for single adults – apodments, group housing apartments, and efficiency units.

IX. How is the City going to achieve the grandness of this new “OneSeattlePlan”? What is the strategy to create more housing units per lot?

- i. Will residents of single-family homes be forced to move out (and if so, where ... to the suburbs)?
- ii. Will speculators be encouraged to buy adjacent properties on our narrow lots? Will they be monitored, so that they don't allow these properties to deteriorate, in order to expand their purchases, so that larger complexes can become a reality?
- iii. In our neighborhood of University Park, the absentee landlords make so much money renting out to large groups of students. What will be their incentive to provide multi-plex home arrangements for families of all sizes – a process that would involve demolishing existing buildings, applying for permits, hiring architects and engineers – all while losing years of income from rent?

We appreciate your sincere and open-minded approach to resolving these issues, in order to correct such errors before the ink dries on the “OneSeattlePlan”.

Sincerely,

Aileen M. Langhans

**From:** [Sarah Lappas](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Monday, May 6, 2024 3:32:22 PM

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**CAUTION: External Email**

To whom it may concern:

Please note my comment on the DEIS:

- 1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?
- 2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?
- 3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Sarah Lappas

295-1



## DEIS StoryMap Comment

Name: Rebecca Lavigne

Email: rebecca.lavigne@gmail.com

Date: 5/6/2024

## Comment:

Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

The city should study the impacts of: higher growth targets for Alternative 5; additional Neighborhood Centers in Urban Neighborhoods, including off of arterials; social housing in every neighborhood; expanded highrise zoning within a half mile of all light rail stations; greater height and density bonuses within a half mile of transit stops; corner stores allowed mid-block as well as on corners; floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes; an Urban Center around the 145th light rail station; and citywide elimination of parking minimums.

296-1

**From:** [Therese law](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Saka, Rob](#)  
**Subject:** Environmental impact of comprehensive plan for Seattle housing  
**Date:** Thursday, May 2, 2024 8:01:33 PM

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CAUTION: External Email

Dear PCD,

I have three different questions for you concerning the comprehensive plan specifically the environmental impact statement.

First, Section P 3–3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” This seems rather vague because building always disrupts, ecosystems and habitat, cutting down trees, impacts birds nesting, removing lawns, hedges, and plants removes cover and food for animals. Is there any sort of plan to mitigate these disruptions? Secondly, section P 3–3 states that “none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover.” Again, this sounds vague and disingenuous, most of the builders want to tear down all the trees all the bushes all the hedges when they build these housing units because it makes their construction easier. How can you say it won’t have an impact on the tree canopy? Removing mature trees impacts our tree canopy and planting trees will take years to replace what have been destroyed.

Thirdly, the plan states that Seattle will make progress toward its 30% canopy goal. Again the wording is pretty vague. It will make progress. What does that mean? It seems to me that removing mature trees for construction is counterintuitive to making progress towards 30% canopy goal. If the developers are allowed to remove mature trees, will there be any room left to plant trees and are the designs of the buildings such that trees reaching maturity would have room to grow?

Climate change is going to make tree canopy vital for many of our communities. There’s an article in the paper today about how energy use is increasing it an alarming rate, and our renewable sources are not keeping up.

It just seems shortsighted to me to allow developers and builders to remove mature trees and then plant new ones when with a little thoughtfulness, ingenuity and planning they could design buildings around the trees, which would make a more pleasing environment for everyone.

Terry Law

206-498-2413 cell

297-1

**From:** [Jay Lazerwitz](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** Seattle Comp Plan – "personal" Comments  
**Date:** Saturday, May 4, 2024 4:21:36 PM

**CAUTION: External Email**

## **Seattle Comp Plan – personal comments from the Chair of the Roosevelt Neighborhood Association:**

Seattle is projected to grow and grow, as much or more proportionately as any major city, so setting the growth plan targets appropriately, is the key to making the plan workable. Zoned capacity is not plentiful enough in Seattle. If it were, then housing prices wouldn't be going through the roof. **Increase the housing capacity projections to match future demand; aim for 120,000 new units over the next 20 years.**

To increase walkability throughout the city there should be more Neighborhood Centers. **Increase the number of new Neighborhood Centers to 50 (as OPCD initially proposed) and allow buildings six stories and up, near job centers, transit hubs, mixed-used nodes, schools, and parks, to provide the level of density that both reduces overall unit cost and adds homes at the scale needed to address Seattle's shortage.**

It will be in the Urban Centers and Neighborhood Centers where most of the new housing will be developed. Buildings made from mass timber can go up to 18 stories. **Allow for taller midrise housing in these growth areas, as these will all be served by frequent transit. These should allow for a minimum height of 65' and 85', with central areas of Urban Centers where the zoning allows for 12-18 stories.**

WA State HB 1110 will soon allow 4 units per lot in most places in Seattle, and 6 units per lot near major transit stops or anywhere in the city if at least two are affordable. **Increasing the development gross buildable area of Middle-housing is critical to make this a realistic feature of the plan. Raising the FAR from 0.9 to 1.2 (and up to 1.5 for properties within a 800' of major transit and Neighborhood Centers) will be more effective in producing family-sized units in these walkable communities; possibly requiring some affordable and family-sized homes for this trade-off.**

Affordability is a major concern to all of us, and State HB1220 requires that all state comprehensive plans "accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock". **Create significant floor area, height, and density bonuses for affordable and social housing development. Include tax-rebate programs for developers to "include" affordability restricted units as an alternative to the MHA program.** <https://www.sightline.org/2024/02/23/now-fully-funded-portlands-affordability-mandate-should-be-a-model/>

Displacement is an important consideration as properties are redeveloped. **Include the OPCD proposed anti-displacement strategies in the Comp plan.**

Off-street parking increases the cost of housing and takes up space that could be reserved for tree canopy. **Remove parking requirements for housing on Neighborhood-Residential lots.**

Thank you

**Jay Lazerwitz**  
Chair, Roosevelt Neighborhood Association  
206-335-8680

298-1  
cont

## DEIS StoryMap Comment

Name: Jay Lazerwitz

Organization: Roosevelt Neighborhood Association

Email: chair@artandarch.net

Date: 5/4/2024

## Comment:

Zoned capacity is not plentiful enough in Seattle. If it were, then housing prices wouldn't be going through the roof. \* Increase the housing capacity projections to match future demand; aim for 120,000 new units over the next 20 years.

To increase walkability throughout the city there should be more Neighborhood Centers. \* Increase the number of new Neighborhood Centers to 50, and allow buildings five stories and up, near job centers, transit hubs, mixed-used nodes, schools, and parks, to provide the level of density that both reduces overall unit cost and adds homes at the scale needed to address Seattle's shortage.

It will be in the Urban Centers and Neighborhood Centers where most of the new housing will be developed. Buildings made from mass timber can go up to 18 stories. \* Allow for taller midrise housing in these growth areas. These should allow for a minimum height of 65' and 85', with areas of Urban Centers that allow for 12-18 stories, as these will all be served by frequent transit.

WA State HB 1110 will soon allow 4 units per lot in most places in Seattle, and 6 units per lot near major transit stops or anywhere in the city if at least two are affordable. \* Increasing the development gross buildable area of Middle-housing is critical to make this a realistic feature of the plan. Raising the FAR from 0.9 to 1.2 (and up to 1.5 for properties within a 800' of major transit and Neighborhood Centers) will be more effective in producing family-sized units in these walkable communities; possibly requiring some affordable and family-sized homes for this trade-off.

Affordability is a major concern to all of us, and State HB1220 requires that all state comprehensive plans "accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock". \* Create significant floor area, height, and density bonuses for affordable and social housing development.

Include tax-rebate programs for developers to "include" affordability restricted units as an alternative to the MHA program.

<https://www.sightline.org/2024/02/23/now-fully-funded-portlands-affordability-mandate-should-be-a-model/>

Displacement is an important consideration as properties are redeveloped. \* Include the OPCD proposed anti-displacement strategies in the Comp plan.

Off-street parking increases the cost of housing and takes up space that could be reserved for tree canopy. \* Remove parking requirements for housing on Neighborhood-Residential lots.

I strongly prefer Alternative 5 with higher growth targets.  
The city should also study the impacts of these alternatives:

Citywide elimination of parking minimums  
Additional Neighborhood Centers in Urban Neighborhoods  
Higher floor area ratios for Urban Neighborhood zoning  
Higher growth targets for Alternative 5  
Expanded highrise zoning in Regional and Urban Centers  
Expanded highrise zoning in Urban Neighborhoods  
Expanded highrise zoning at Neighborhood Centers  
Expanded highrise zoning around existing grocery stores  
Higher floor area ratios for middle housing in all residential zones, such as those corresponding to the state model code for middle housing  
Social housing in every neighborhood on affordability  
Greater height and density bonuses within a quarter mile of transit stops  
Increased building height allowances, in exchange for reduced lot coverage, for increased tree canopy  
Granting tax breaks & fee deferrals to housing projects that include affordable units  
Development incentives like additional floor area ratio for 2- and 3-bedroom units  
Floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes  
An Urban Center around the 145th light rail station

## DEIS StoryMap Comment

Name: Jay Lazerwitz

Email: jay@artandarch.net

Date: 5/5/2024

## Comment:

I am a homeowner in Roosevelt, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would enable the creation of more walkable neighborhoods. Instead the current draft plan will worsen the many crises (housing, climate, unaffordability) our city faces. To create a more diverse city, the plan should allow taller and bigger buildings in many more places.

I strongly prefer Alternative 5 with higher growth targets. The city should also study the impacts of these alternatives:

In Roosevelt in particular, I think that the plan should include ideas that support HB1220 for affordable housing throughout the city.

Zoned capacity is not plentiful enough in Seattle. If it were, then housing prices wouldn't be going through the roof. \*Increase the housing capacity projections to match future demand; aim for 120,000 new units over the next 20 years.

To increase walkability throughout the city there should be more Neighborhood Centers. \*Increase the number of new Neighborhood Centers to 50, and allow buildings five stories and up, near job centers, transit hubs, mixed-used nodes, schools, and parks, to provide the level of density that both reduces overall unit cost and adds homes at the scale needed to address Seattle's shortage.

It will be in the Urban Centers and Neighborhood Centers where most of the new housing will be developed. Buildings made from mass timber can go up to 18 stories. \*Allow for taller midrise housing in these growth areas. These should allow for a minimum height of 65' and 85', with areas of Urban Centers that allow for 12-18 stories, as these will all be served by frequent transit.

WA State HB 1110 will soon allow 4 units per lot in most places in Seattle, and 6 units per lot near major transit stops or anywhere in the city if at least two are affordable. \*Increasing the development gross buildable area of Middle-housing is critical to make this a realistic feature of the plan. Raising the FAR from 0.9 to 1.2 (and up to 1.5 for properties within a 800' of major transit and Neighborhood Centers) will be more effective in producing family-sized units in these walkable communities; possibly requiring some affordable and family-sized homes for this trade-off.

Affordability is a major concern to all of us, and State HB1220 requires that all state comprehensive plans "accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock". \*Create significant floor area, height, and density bonuses for affordable and social housing development.

Include tax-rebate programs for developers to "include" affordability restricted units as an alternative to

the MHA program.

<https://www.sightline.org/2024/02/23/now-fully-funded-portlands-affordability-mandate-should-be-a-model/>

Displacement is an important consideration as properties are redeveloped. \*Include the OPCD proposed anti-displacement strategies in the Comp plan.

Off-street parking increases the cost of housing and takes up space that could be reserved for tree canopy. \*Remove parking requirements for housing on Neighborhood-Residential lots.

If the City of Seattle adopted my above proposed changes, then we would be able to create a more affordable city for everyone.

I strongly prefer Alternative 5 with higher growth targets. The city should also study the impacts of these alternatives:

- Citywide elimination of parking minimums
- Additional Neighborhood Centers in Urban Neighborhoods
- Higher floor area ratios for Urban Neighborhood zoning
- Higher growth targets for Alternative 5
- Expanded highrise zoning in Regional and Urban Centers
- Expanded highrise zoning in Urban Neighborhoods
- Expanded highrise zoning at Neighborhood Centers
- Expanded highrise zoning around existing grocery stores
- Higher floor area ratios for middle housing in all residential zones, such as those corresponding to the state model code for middle housing
- Social housing in every neighborhood on affordability
- Greater height and density bonuses within a quarter mile of transit stops
- Increased building height allowances, in exchange for reduced lot coverage, for increased tree canopy
- Granting tax breaks & fee deferrals to housing projects that include affordable units
- Development incentives like additional floor area ratio for 2- and 3-bedroom units
- Floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes
- An Urban Center around the 145th light rail station



**From:** [Breck Lebegue](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [James Moschella](#); [Mark Vossler](#); [Beth Brunton](#); [Mariah Harrod](#)  
**Subject:** EIS effect of Seafair Blue Angels  
**Date:** Monday, May 6, 2024 5:33:10 PM

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**CAUTION: External Email**

Good evening and thank you for the opportunity to comment on the PCD Comp Plan. One Plan states this key value:

"Climate and Sustainability: Meet the challenges of climate change for a resilient future. Seattle residents are feeling the impact of the climate crisis with more extreme weather events every year, disproportionately impacting lower income and communities of color. This Plan introduces a Climate and Environment element that redoubles our effort to reduce our carbon footprint and build resiliency in frontline communities most vulnerable to climate impacts. The new element includes strategies to reduce carbon pollution from key sectors: transportation, development pattern, buildings, energy, and solid waste. It also promotes a wide range of measures to enhance the resilience of our communities and natural environment that are threatened by current and potential climate impacts."

301-1

As a retired USAF Flight Surgeon I loved the roar of aerial demonstration teams like the USAF Thunderbirds and Navy Blue Angels. That was then, decades ago. Climate science irrefutably demonstrates the environmental harm and human disease caused by fossil fuels--we know better now, so it's time to change our ways. A coalition of thoughtful health, climate and environmental groups respectfully ask that Seattle and WA state close the chapter on Blue Angels at Seafair. PM 2.5 particles, green-house gases, and jet noise are not good for us. Let's find some electric aerial demonstration teams--piloted or drones--to wow the crowds. We look forward to engaging with you on this issue in the near future. To your health!

Breck  
Breck Lebegue MD MPH  
WA Physicians for Social Responsibility  
Climate and Health Task Force

[www.wpsr.org/transportation](http://www.wpsr.org/transportation)  
[brecklebegue@gmail.com](mailto:brecklebegue@gmail.com)

Steilacoom WA 98388  
210-414-8419

*"Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has."*  
Margaret Mead

**From:** [Judith Leconte](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 7:53:33 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Please attend to these issues. I have been to several sites where tree removal has been expedient for the developer but bad for the climate and surrounding neighborhood.

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Judith Leconte  
tbacgster@gmail.com  
6506 19th A e. N E  
Seattle, Washington 98115

**From:** [Richard Lee](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:05:07 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Richard Lee  
ricklee1@comcast.net  
5210 37th Ave NE  
Seattle, Washington 98105

303-1

**From:** [Shelly L](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** One plan SEATTLE  
**Date:** Monday, May 6, 2024 1:20:45 PM

**CAUTION: External Email**

Comments for the One Seattle Plan.

Here are my thoughts about Seattle and its future.

The One Seattle Plan is covering too long of time. In today's climate change, an EIS could only be reliable for information for 5 years. Yes, I am saying every 5 years Seattle needs to access its growth and needs. The SEPA's don't work. They do not improve an EIS, they just refer back to it as if the EIS is a document to be followed, not updated. Every 5 years a full EIS with a Housing, Tree Count and Park evaluations. If 11 houses go up in a 5-year period in a small radius of a mile, with more planned, is it a good idea to ignore the overall environmental impact for another 5, 10 or 20 years? In the last 5 years, in my small 1 mile square, I have seen 20 large evergreens removed, 20 mature deciduous and no replacements

Apartment buildings cost less to live in than a house. They have less upkeep. Making more houses, will not satisfy housing needs for all income levels. Forcing developers, apartment complex owners to have a percentage of apartments for low income will. 20% for low income (under 45K) with more weight given to those with the least amount of income.

Affordability is not driven by the number of homes built, or even what type home is built. Affordability can only be attained when restraints are placed upon those doing the building and selling. If one is building a home in Seattle, then the type home, the number of inhabitants and the general location needs to be considered. A two bedroom home is not going to house a family, if a family is made up of more than 2 adults. No parking with any home is a disaster. All housing must have parking. An area with no parks, no playgrounds and no parking will not be inviting to a family. How close do those things need to be to housing? I would suggest there be NO crossing of 4 lane roads to get to a park. No further than a mile from a home...is ideal. That is walking distance for younger children.

The thoroughness of what can be done to meet housing and environmental needs, leaves me with many questions the foremost of which is: Why are trees and wildlife habitat required to suffer the most to meet housing needs? What are big businesses, builder's associations, developers, private corporations that buy up the land doing to facilitate new affordable housing? What will be done to guarantee that anything that is "new" will be affordable? For example, the single family homes, are bought by developers, who in turn build 3 or more homes on that lot. That is what the City wants. But that does not increase the affordability of housing. In fact, what it has done is increase the amount of money that a developer, or builder and the like place in their pocket. What has happened is that my property tax has increased, due to the number of homes that are new, in my neighborhood, that have sold for \$600K or above. My home is three bedrooms, 900 sq. ft. built in the 1950's. It is being compared to and taxed at the level of the brand new "affordable" houses.

Instead of sending out information and requests for people to grow evergreen trees if they have room, why don't you keep the ones we have??? Not every inch of a lot must be covered with lumber and gravel. Architects could do a better job of keeping trees, as could the developer, they won't keep the trees if they can remove them so they can build faster. The City needs to ask for more alternative development plans on all properties. Tree retention is an architects problem, design the plan to keep the trees, with no waivers necessary.

I also suggest that one look closely at a plan that opens the entire city, or at least the "poorer" areas of the city to two, three or more houses on one lot. Those homes are apartments with thicker walls,

and larger halls between them. That is not healthy. That is a disaster waiting to happen. Of course, if one is looking to have cigarette box style of architecture for the future of Seattle, then I guess that open, build whatever you want in the outlying areas and “poorer” areas will fill that bill.

The type homes being built waste space. High ceilings, and lots of windows is not going to make better housing, or affordable housing. But that is the style builders have chosen for Seattle. The cost to maintain such a home will increase rapidly. The cost for electricity in this city climbs, reminiscent of a hiker on Mt. Rainier...ever higher, except with the mountain there is a peak, with City Light there is no such thing.

There are 11 homes that have been built in my 1 mile walk around the edges of the neighborhood. That does not count anything inside that path, just the outer edges. Of the 11 homes, I have seen trees removed, with no replacements (we don't have sidewalks, so trees have no where to be replaced too). We don't have walking paths, and if such things were made, there would be no parking...everyone around here has cars, and if there are two adults, there usually are two cars. If there are teenagers and young adults in that mix, there are even more cars per house. No replacement trees. Can you imagine what that does for the environment? What that does to people? I live between I-5 and 99. I live on 135<sup>th</sup> not far from the new car garage, the 100's of apartments going up on the Shoreline side of 145<sup>th</sup>, and not far from the Kraken stadium. Guess what, there is already a lot of pollution and high density housing in this area. We don't need more tree removal, oversized houses and no parking. We already have increased traffic, speeders, and crumpled traffic islands.

People can live in apartment buildings. There are a lot less costs for upkeep, taxes, and insurance plus other home owner costs. There is no need to have a house for every person in Seattle. Some people would like to live in an apartment complex, as long as it has play areas, and parking. Families like the security offered in an apartment complex (if it is designed to protect the children). Apartment buildings can easily be accessible to the disable and elderly. The 2 and 3 story houses I am seeing are not accessible, due to the steps.

Do trees and wildlife habitat have a monetary value? Do trees and wildlife habitat have any health benefits that are very important to the citizens of Seattle? Should those health benefits, which would be available to all income levels, be considered? Are they? What about the infrastructure value for older, mature trees? Is that being considered in this rush to make Seattle a high density population? Are new sapling street trees really going to cover the infrastructure needs of this City?

Do they need to be kept, even if it means less housing on that lot? My answer is yes, those trees help with air quality, low upkeep for leaves, and highly useful when it comes to rain, because they retain water. Can a 7 ft sapling deciduous do that? Think about it. How many years would it take for a sapling to do the work of a 100 ft Fir tree? Instead of sending out information and requests for people to grow evergreen trees if they have room, why don't you keep the ones we have??? Not every inch of a lot must be covered with lumber and gravel. Architects could do a better job of keeping trees, as could the developer. Unless forced they won't keep the trees if they can remove them so they can build faster.

City parks can only do good, where the city park is, and if they are properly maintained. Most of Seattle parks are not maintained to the degree necessary. Garbage, and non-native plants take over quickly, unless it is used for league play, which increases traffic in an area. A City park 2 miles from my home is not going to do any good for my houses cooling and heating. But the Urban Forest that the School District is going to want to remove does. The Fir trees in my yard do.

Do trees have value? Yes, all trees have value. A tree is worth its age in gold. A tree is worth its age to keep a city and its inhabitants healthy. The taller, stronger, older trees are better than any forest of saplings. One tall, strong, older tree can supply better oxygen, infrastructure, cooling, and heating needs of a home owner than 20, 7-10 ft trees. An Evergreen tree supplies help year-round a deciduous helps mostly in the summer to keep away heat islands. Both types of trees are needed. When a builder comes along, the first thing to go are the oldest trees. . .at a tremendous cost to the

environment.

I see that my options are minimal in the One Seattle Plan, sad as that may be. I have been advised that the best options will be 2. I am not sure about that, since it still leaves a lot of questions about how Seattle is going to obtain "affordable" housing and keep trees so it can be called an Evergreen City with trees.

Having a chance to talk with others, I see that there are issues that must be addressed in a more direct manner. More analysis, and less speculative guessing is required. At no time should tree removal be considered a first option for development. As I stated earlier, an EIS is simply not a good idea as a map for a future with drastic climate change. The EIS must be easily amended to meet the new challenges a City will have. Tree retention must be a priority, if climate change is to be met head on. Heat Islands must be mitigated with more trees, not less. Building lots must have better space usage, that retains trees. No more stunts of saying "we will keep the tree if we can" and then have that tree the first thing to be removed by a bulldozer...with the yellow tape surrounding it.

Note the following:

P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. **This is a Seattle EIS, not a regional or state EIS.** Saying "unlikely to result in appreciable impacts on regional populations of plants or animals" and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals. **Logically any tree removal will have an adverse impact on plants and animals. The more trees removed in a smaller area will have a larger impact on those animals in that area. Remove large older trees, and you won't see the Ravens and Eagles that I have seen this Spring.**

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative? **Again, if you remove trees, that changes the environment. That is not a statement of genius quality, it is a statement of fact that any person who wants to evaluate truth will see. If you take away a tree it changes the tree canopy. PERIOD. It is easier to modify where a house will be placed on a property, and how to build that house for maximum residency, than it is to replace a 100 year old tree... or even 20 year old tree.**
- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)? **Simply put, and much easier to understand, if you cut down a 100 year old tree...it will take 100 years to replace**

it. And even if you “replace” it with small caliber trees, it will take 100 of those small 7-10 ft trees to make up 50% of the loss from that old tree... and that doesn't include the pollution released into the atmosphere the minute the old tree is cut down. One never recovers that pollution that immediately goes into the air. Be wise, keep the tree.

- Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles? **Like I said, you never replace what you take away when you remove an old tree. You will NEVER replace it.**
- What is the acreage available and suitable for planting trees in each of the following public areas- the city's right of ways, Natural Areas and Developed Parks? **What good will it do the heat island in my area if you plant trees away from my home?**
- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots? **Basically, how much more will it cost the city to plant trees, keep trees alive, and hope for a quick canopy recovery compared to the rampant developer, chain saw, money in the pocket scheme of the developer?**
- What is the available acreage available to plant trees on private property? **Land is at a premium, it would be wiser to keep trees, than to find private property to plant trees on. Maybe even pay people to keep their trees?**
- When will it be possible to reach the 30% citywide goal? **That is rhetorical, there is no way on God's green earth to get 30% canopy with 85% hardscape...**
- What potential is there for more than 30% tree canopy in Seattle over time? **Read previous point, Seattle is doomed to less than 30% canopy.**
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible? **Again read the above bullet point.**
- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big trees, including conifer trees are removed? **What is it going to cost in man hours, equipment and infrastructure damage??**
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result? **You won't cover the ditch surrounding my house, because it would create a problem for the City management of storm water damage, and I have 5, 100 year old trees in my back yard, what are your plans for the rest of the**

**City when you remove all the trees? Are you going to put ditches in???**

**More comments about other tree problems this City has:**

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger. **Keep trees, especially trees with a decent start to their growth.**
- Give SCCI Director the ability to ask for alternative site designs to save trees. **Architects are supposed to be smart, that is why they went to school for so many years, they should be able to give more than one design that keeps trees, and the SCCI Director should make them do so. Time to let the SCCI Director get real answers and choices...isn't that why they were hired?**
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone. **Not thrilled with idea, UNLESS the areas with new apartments, multifamily units are built in areas where transportation is, along 4 lane (or more) streets.**
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones. **Another no brainer, if you want to protect trees, protect them. Don't play dartboard legislation...throw a dart keep those trees throw another dart cut those down...**
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots. **Since the only thing that makes developers even consider a tree is money, offer them some type bonus, like a reduction in some permitting costs, to keep trees? The bigger the tree, the more the bonus.**
- And finally, please, please, please make sure all the people checking a development, look at where the fencing is to be around a tree, and if it has been removed, bent up, leaning against the tree, or moved in any direction other than where it should be **FINE THE CONTRACTOR.** You can't keep a selected save tree, if the tree is damaged during construction...

**Thank you for reading,  
Michele Leonard  
13502 Ashworth Avenue North  
Seattle WA 98133**



**From:** [Judith Leshner](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Kettle, Robert](#)  
**Subject:** Questions related to Trees  
**Date:** Sunday, May 5, 2024 12:22:13 PM

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**CAUTION: External Email**

Good Day:

Regarding this draft plan, please consider these questions.

Section P 3-3 — Reducing tree canopy will surely impact wildlife and plants in our urban forests. Has even the obvious impact on bird populations been studied?

Section P 3-3 — How can the loss of tree canopy not result in “. . . significant, unavoidable adverse impacts on tree canopy cover.” We’re trying to save many trees, an **urban forest**, not just a single tree here and there.

The newly adopted Seattle Tree Ordinance actually provides less protections for our City’s trees. How does the City plan to achieve the long-time goal of 30% tree canopy?

Thank you for your consideration.

Sincerely,  
Judith Leshner  
2568 10th Ave. W.  
Seattle, WA 98119

305-1

**From:** [Sharon LeVine](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#); [Harrell, Bruce](#)  
**Subject:** Comp Plan Draft EIS  
**Date:** Thursday, May 16, 2024 11:51:38 PM

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**CAUTION: External Email**

Although our family supports the Alternative 1 (no action baseline ), Alternative 2 will be the least destructive to Seattle's exceptional tree canopy, our vegetation and the urban wildlife that enhance our environment !

Further study the environmental impacts of Alternative 2 for the EIS.

Implement the following mitigation measures to help compensate for the loss of many exceptional, significant and mature trees.

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

306-1

**From:** [Sarah Lewis](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Monday, May 6, 2024 5:17:19 PM

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CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

S. Lewis

307-1

**From:** [Christine Lewis](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Proposed zoning changes for Winona neighborhood  
**Date:** Monday, May 20, 2024 1:52:15 PM

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CAUTION: External Email

Please keep Green Lake perimeter as it is. I do not live on W Green Lake Drive N but the lake is a gem and should not be ruined by developers who care only about making money.

Development of the neighborhood village should occur along the arterials not neighborhood streets. Changing zoning in those areas will only benefit developers and not help with affordable housing.

308-1

Christine Lewis

Sent from my iPhone  
Please excuse my brevity!

**From:** Daniel Lim  
**To:** PCD CompPlan EIS  
**Subject:** Comp Plan Feedback  
**Date:** Monday, May 20, 2024 2:52:00 PM

**CAUTION: External Email**

While the proposed comp plan is a good step in increasing housing for our communities. I'm disappointed that consideration is not currently being given to increase the FAR/coverage for smaller middle housing projects. We are behind and below the state other municipalities adopted standards. Without and increase in FAR the units build will be smaller and it will also disincentivize them from being built at all as less livable units are less desirable and therefore make less financial sense for a developer. In short, Seattleites want more housing options, a sixplex boom can bring down housing costs, underbuilding with the current townhome model can be a forever mistake, the state and other cities are setting a higher standard on lot coverage and there is need for more divers housing options that can accommodate families and multigenerational groups.

309-1

Lastly, I disagree on the reduced zoning for South Seattle neighborhoods. This is in fact redlining, artificially devaluing these properties preventing those individuals from realizing the full value of their properties as well as develop for their own community needs.

Thank you for you consideration and I hope that you make the right choice.

**Daniel Lim**  
Vice President  
Lee & Associates | Seattle

D 206.773.2692  
C 206.928.2311  
O 206.773.2696  
[dlim@lee-associates.com](mailto:dlim@lee-associates.com)

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**From:** [Pat Limberg](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Save our trees  
**Date:** Monday, May 6, 2024 7:19:52 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Pat Limberg  
patlimberg@gmail.com  
816 NE 95th St  
Seattle , Washington 98115

310-1

DEIS StoryMap Comment

Name: Susanna Lin

Email: susieinseattle@gmail.com

Date: 5/5/2024

Comment:

The EIS should consider effects on solar panels, light, parking, traffic, public safety (especially on the light rail), tree canopy, mobility for people with wheelchairs or strollers, parks (including dog parks), neighborhood character, small businesses, public art, trash and graffiti.

311-1

DEIS StoryMap Comment

Name: Susan Little

Email: susan-san@q.com

Date: 5/5/2024

Comment:

I generally advocate for denser housing throughout the city in new development projects. I support Alternative 5. My church, Haller Lake United Methodist, is considering development of low income housing on our property and we would like to be able to include retail space. This would make our neighborhood more accessible and appealing.

312-1



## DEIS StoryMap Comment

Name: Christine Loder

Email: cma319@gmail.com

Date: 3/8/2024

## Comment:

1. I'm dubious that there will be no overall effect on our area waterways given that we regularly have sewage overflows into the Sound and Lake WA. Can our system really handle 200K more users?
2. Moderate tree canopy loss is not acceptable. The idea that tree loss will be offset as new trees grow is not a given. We know that small trees are not cared for and often die or are stunted. There should be no loss of large mature trees.
3. The idea that overall, it's okay if we see tree loss in the city because "Action alternatives would tend to increase regional tree canopy by focusing growth in urban areas and preventing sprawl" is not valid. "Regional tree canopy" will not keep Seattle cool. We don't want to be a heat island. And, there are growth boundaries that prevent sprawl. All development is infill now. Ask any developer.
4. I'm glad to see renter displacement acknowledged.
5. Public services: The plan mentions we will need 300-700 new acres of parkland. Is there that much empty/available land open that could be added to the park system?
6. Public services: I'm a longtime animal shelter volunteer. We have been overwhelmed as the population has grown. There has been no new funding, no plans for a larger building. As we grow, if there continues to be no plan, animals will continue to suffer and be euthanized.
- 7: Nowhere do I see mitigation for the impacts (air pollution, pedestrian safety, noise) of more cars on our streets. Even if people less frequently own cars, they still employ Doordash, Uber, Amazon, etc etc. How are we going to keep cars off the road? How about requiring EV only for deliveries? How are we going to ensure pedestrian safety? What about more traffic/speed cams and more traffic calming measures?

313-1

313-2

**From:** [Bill](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#)  
**Subject:** Comments One Seattle Plan EIS  
**Date:** Monday, May 6, 2024 4:56:30 PM

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**CAUTION: External Email**

Greetings,

Upon reviewing the EIS I have a few questions.

Section P 3–3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” How was this determined and who made this determination? Does this mean that all the plants currently growing within the Maple Leaf Neighborhood Center would survive a 50% build out?

Section P 3-3 also states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Please provide me with the data that supports this conclusion. This seems impossible to me. Please define significant and adverse.

The EIS indicates that tree planting will mitigate the loss of mature trees. How was this determined?

How did you determine that it will be possible for the city to meet the 30% canopy goal with the estimated increase in housing densities. As a professional forester I do not understand how this will be possible.

I look forward to your response.

Sincerely,

Bill Loeber  
1046 NE 89th St.  
Seattle, WA. 98115  
[loeberbill@gmail.com](mailto:loeberbill@gmail.com)

314-1

**From:** [Ryan Lorey](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Fw: One Seattle Comprehensive Plan Feedback  
**Date:** Sunday, April 14, 2024 10:04:43 PM

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**CAUTION: External Email**

Hello Jim Holmes and OPCD,

I am forwarding my feedback on the draft Comp Plan that I previously sent to the mayor, council, and the general OPCD email address to the email address provided in the OPCD Story Map. Please find it below.

Thanks,  
Ryan Lorey

---

**From:** Ryan Lorey <[ryanlorey@outlook.com](mailto:ryanlorey@outlook.com)>  
**Sent:** Thursday, April 11, 2024 12:18 PM  
**To:** [Cathy.Moore@seattle.gov](mailto:Cathy.Moore@seattle.gov) <[Cathy.Moore@seattle.gov](mailto:Cathy.Moore@seattle.gov)>; [Tanya.Woo@seattle.gov](mailto:Tanya.Woo@seattle.gov) <[Tanya.Woo@seattle.gov](mailto:Tanya.Woo@seattle.gov)>; [Sara.Nelson@seattle.gov](mailto:Sara.Nelson@seattle.gov) <[Sara.Nelson@seattle.gov](mailto:Sara.Nelson@seattle.gov)>; [bruce.harrell@seattle.gov](mailto:bruce.harrell@seattle.gov) <[bruce.harrell@seattle.gov](mailto:bruce.harrell@seattle.gov)>; [opcd@seattle.gov](mailto:opcd@seattle.gov) <[opcd@seattle.gov](mailto:opcd@seattle.gov)>  
**Cc:** [council@seattle.gov](mailto:council@seattle.gov) <[council@seattle.gov](mailto:council@seattle.gov)>  
**Subject:** One Seattle Comprehensive Plan Feedback

Hello CMs Moore, Woo, and Nelson, Mayor Harrell, and the Office of Planning and Community Development,

My name is Ryan Lorey, and I am a Seattle resident of District 5 in the 98125 zip code.

As I am unable to attend any of the in-person events around the Comprehensive Plan update, I am contacting you today to provide my feedback on the draft.

The proposal in its current state is insufficient to meet our housing needs and does not properly incorporate the previous community feedback OPCD received during the initial scoping for the plan. When presented with Alternatives 1 - 5, the community *overwhelmingly* preferred Alternative 5 and a community-led Alternative 6 that would go even further than what OPCD presented. We are in a housing crisis and have been for years. This plan guides our city's growth pattern over the next 20 years. We do not have the luxury to go small, and we have a responsibility as the largest city in Washington - and in the US for hundreds of miles - to build significantly more housing than we have in the past.

Additionally, in the most recent election for city council, not only did every candidate that won explicitly say they supported Alternative 5 when asked, nearly all *candidates* in the general election also supported Alternative 5 or 6. In my view, Seattle's city leaders have a mandate

from voters to lead on housing growth and go big.

My specific feedback is as follows:

1. The plan needs to address HB 1110 provisions that require 6-unit zoning within walking distance of high capacity transit, including trolleybus lines.
2. The plan needs to use the state Department of Commerce's model middle housing zoning ordinance developed as part of HB 1110 implementation as a minimum standard. Ideally, we would allow a set FAR ratio per unit (e.g. 0.4 for 1 unit, 0.8 for 2, 1.2 for 3, 1.6 for 4, etc.). The state's model code tapers off FAR for higher unit counts, meaning larger buildings have a lower per-unit size. In either case, the current proposal from OPCD is too limiting and will not result in many, if any, 6-unit developments.
3. Add back the removed neighborhood centers. No neighborhood should be exempt from density, and the number of neighborhood centers in the draft plan is greatly reduced from the original proposals presented for the lower growth alternatives.
4. Discontinue the practice of focusing all growth along high traffic corridors. This feedback is the most important. Our past and current development patterns focus nearly all housing growth along high traffic roads, which we know from evidence and data are the most dangerous to human health. They result in higher numbers of traffic violence, have higher levels of air and noise pollution, and make for less cohesive communities but cutting them in half. Instead, we should be moving our growth to be within the grids created by these higher traffic corridors rather than running these corridors down the middle of our highest population zones.
5. The plan should *eliminate* parking minimums city-wide.

Thank you for your hard work on this proposal, and I hope that the community's feedback will be heard.

Thank you,  
Ryan Lorey

**From:** [Ryan Lorey](#)  
**To:** [PCD CompPlan EIS](#); [Harrell, Bruce](#)  
**Subject:** Bring back the original abundance map!  
**Date:** Monday, May 6, 2024 11:46:16 AM

---

**CAUTION: External Email**

Hello OPCD and Mayor Harrell,

My name is Ryan, and I am a Seattle resident of District 5 in the 98125 zip code.

I have previously sent an email regarding my feedback on the comprehensive plan update, and want to provide a final bit of feedback.

316-1

I strongly support bringing the comprehensive plan back in line with the original map OPCD drafted before it was pared down to the current map in the draft EIS. This proposal matches up with Alternative 5, which received massive community support. This proposal would also ensure that we can meet our expected housing demand, as well as prepare for unexpected future increases in housing demand (keep in mind our demand has surpassed previous estimates for several planning cycles - we are not doing well at predicting future growth!). Our comprehensive plan should go above our projections and bare minimum requirements to ensure Seattle can become and *stay* a livable and affordable city for all who want to be here regardless of whether predictions hold.

Please bring back this land use map!

Thank you,  
Ryan Lorey



**From:** [Nelson Lowhim](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Increase the housing in Seattle please  
**Date:** Wednesday, April 17, 2024 4:47:53 PM

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**CAUTION: External Email**

Hi,

Hoping you can increase the housing in seattle  
By increasing on the plan that the mayor has put out. Thank you

Nelson Lowhim



**From:** [Nelson Lowhim](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Re: Increase the housing in Seattle please  
**Date:** Wednesday, April 17, 2024 6:17:07 PM

---

**CAUTION: External Email**

I live on 827 14th ave and a dense built up village on 17th and cherry would be great

Best,

Nelson

On Wed, Apr 17, 2024 at 16:46 Nelson Lowhim <[nlowhim@gmail.com](mailto:nlowhim@gmail.com)> wrote:

Hi,

Hoping you can increase the housing in seattle  
By increasing on the plan that the mayor has put out. Thank you

Nelson Lowhim

318-1

**From:** [General Use](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comprehensive Plan  
**Date:** Sunday, May 5, 2024 9:46:38 AM

---

**CAUTION: External Email**

I am writing to support the adoption of **Alternative 2** as the development alternative in the update One Seattle Comprehensive Plan.

Most importantly:

- **Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.**
- **Give SCCI Director the ability to ask for alternative site designs to save trees.**
- **Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.**
- **Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.**
- **Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.**
- **Require developers to submit a Tree Inventory**

319-1

Thank you for considering the **essential quality of life** which has made Seattle the special place it is.

- Neil Ludman  
6326 20<sup>th</sup> Ave NE, Seattle WA 98115



**From:** [Finu Lukose](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Monday, May 6, 2024 1:59:50 PM

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**CAUTION: External Email**

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Finu Lukose

320-1

**From:** [Dennis Lund](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** EIS  
**Date:** Monday, May 6, 2024 11:41:21 AM

---

**CAUTION: External Email**

Hello,

I have concerns about the environmental impact statement for the Comprehensive Plan:

I have watched trees disappear on my block as older houses and yards are replaced by much larger houses and almost no trees and shrubs, and with much more concrete hardscape. So I disagree with the statement in Section P 3-3 that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover". I have seen the tree canopy decline on my street already. How will this plan mitigate lost, established trees as new housing is built that covers more of the lots?

I would like to know how the city will reach the 30% tree canopy goal. Since the new tree ordinance allows development that will reduce private land available for trees, how will the city provide more public land to make up the difference in order to reach the 30% goal? What is the plan for planting trees to replace trees lost to development?

Are there specific studies/data that support statements in Section P 3-3 that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild"? How will the plan impact plants and animals in Seattle?

I support building more housing in Seattle, especially more affordable housing. But we also need to protect and expand the tree canopy in our city.

Sincerely,

Martha Taylor, Seattle 98115

**From:** [David Luxem](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 12:55:18 PM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

David Luxem  
daluxem1@yahoo.com  
1903 SW Hillcrest Rd  
Seattle, Washington 98166

322-1

**From:** [Sonia Lyris](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:10:32 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

I agree that we need more affordable housing. We need livable and vibrant communities, too.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

323-1

- \* The draft EIS lacks the means to protect current 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity, and sustainable urban forestry. This is unacceptable.
- \* The draft EIS does not analyze the impact of tree loss but speculates WITHOUT PROOF that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover". Really? Without quantification this is meaningless.
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services. This is unacceptable.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to REQUIRE alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be COMPLETED before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Trees are not just pretty, folks. Our canopy is critical to the city's ability to maintain wildlife, pollinators, cope with hot summers and cold winters, mitigate water runoff, and contributes meaningfully to community health.

Don't take our trees away.

Thank you for your consideration.

Sonia Lyris  
slyris@gmail.com  
PO Box 31181  
SEATTLE, Washington 98103

**From:** [Lois Martin](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 6:32:01 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

We need healthy and livable communities. The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

324-1

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.
- \* Completely exclude red lined areas, from ALL density bonuses, including non-profit and religious organizations, and remove "highest and best use" zoning from our lots that is causing astronomical property tax increases causing displacement and harm to legacy wealth building.

Thank you for your consideration.

Lois Martin  
cdlegacy\_206@icloud.com  
129 - 21st Avenue  
Seattle, Washington 98122

**From:** [niousha.mashayekh](mailto:niousha.mashayekh)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Kettle, Robert](#); [Woo, Tanya](#); [Nelson, Sara](#)  
**Subject:** Inquiry Regarding Environmental Impact Statement for Comprehensive Plan  
**Date:** Thursday, May 2, 2024 8:10:08 PM

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**CAUTION: External Email**

Dear Seattle Planning Commission,

I hope this message finds you well. I am reaching out with several questions regarding the environmental impact statement (EIS) for the comprehensive plan, aiming to gain a deeper understanding of how the plan will affect our urban environment.

325-1

1. In Section P 3-3 of the environmental impact statement, it is mentioned that none of the proposed alternatives would be expected to negatively impact the survival or recovery of plant or animal species in the wild. Could you provide more detailed insights into how the plan specifically impacts Seattle's plants and animals, considering aspects like habitat preservation and ecosystem health?
2. The EIS also states that none of the alternatives would have significant, unavoidable adverse impacts on tree canopy cover. Can you share the analysis or studies conducted to support this claim? I am particularly interested in understanding how tree planting initiatives and the increase in hardscape will compensate for any potential loss of urban forest cover.
3. With the city's goal of achieving a 30% canopy cover, the new tree ordinance has reduced private land available for trees. Could you clarify how much public land remains available to reach this goal? Additionally, what are the projected annual planting requirements for trees in these public areas to offset the trees removed due to development activities and maintain or enhance our overall canopy coverage?

Thank you for taking the time to address these questions. Your insights will greatly contribute to a more informed decision-making process regarding the comprehensive plan's environmental implications.

Best regards,

Niousha Mashayekh

2617 27th ave W. Seattle, WA 98199

(323)646-2393

[niousha26@gmail.com](mailto:niousha26@gmail.com)

**From:** [Bernice Maslan](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** important comments on Draft EIS  
**Date:** Monday, May 6, 2024 11:14:17 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Hello,

I'm a Seattle resident since 1972. Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. Trees make it far more pleasant and healthy.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

\* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry. Planting baby trees isn't the same thing.

\* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover" This is not true!

\* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services. This must be in a timely manner. Trees take years to grow.

Mitigation recommendations:

\* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees. Please! This is serious.

\* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued. Also crucial!

\* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.

\* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees. Let us not remove large trees when it can be avoided.

Thank you for your consideration.

Bernice Maslan  
bmaslan08@gmail.com  
9705 1st Avenue Northwest  
Seattle, Washington 98117

**From:** [Cristin Mattione](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Saturday, May 4, 2024 9:49:24 PM

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**CAUTION: External Email**

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

327-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Cristin Mattione (she/her)

"shame lives in should. swap guilt with grace. see what happens." - ALOK



**From:** [Gabriel Mauel](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:27:58 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Gabriel Mauel  
gabemauel@gmail.com  
418 Bellevue Ave E 508  
Seattle, Washington 98102

328-1

**From:** [kim.mccormick@comcast.net](mailto:kim.mccormick@comcast.net)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comments Comprehensive Plan Draft EIS  
**Date:** Monday, May 6, 2024 5:01:38 PM

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**CAUTION: External Email**

**Comments: City of Seattle Comprehensive Plan Draft EIS**

**I prefer Alternative Plan #2.** I recognize the need for more affordable housing in Seattle. I would like to see this accomplished via a comprehensive plan that retains as much of our current urban forest as possible, with an emphasis on retaining mature trees and addressing storm water runoff into our streams and wetlands. I am especially concerned about the potential loss of tree canopy in the areas adjacent to the 130<sup>th</sup> Street and 145<sup>th</sup> Street Light Rail Stations. For these reasons, I support Alternative #2, which focuses growth and limits the destruction of tree canopy.

329-1

**Please review and revise the Plants and Animals Section.**

- P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals" and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

**Specifically, this section ignores bird species that are currently (or were formerly) a [Species of Concern in Washington](#). Seattle is home to several species that are being monitored, including the native Band-tailed Pigeon, Great Blue Heron, and raptors, such as Bald Eagle, [Cooper's Hawks](#), and [Merlin](#). These species require mature trees for nesting and other behaviors. In particular, Merlins were once listed as a Species as Concern in Washington, but they were removed from the list when their numbers rebounded, due to their ability to adapt to nesting in urban areas, such as Seattle, where they nest exclusively in conifers over 100 ft tall.**

**Please amend this section to address the retention of large, mature, trees in our urban forest, including residential lots that are slated for development, and acknowledge the importance of maintaining and increasing diversity in urban plant and animal species.**

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of

Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative?

- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?
- Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

329-1  
cont

What is the acreage available and suitable for planting trees in each of the following public areas- the city's right of ways, Natural Areas and Developed Parks?

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots?
- What is the available acreage available to plant trees on private property?
- When will it be possible to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?
- What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?
- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff.
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

**I also support the following mitigation measures:**

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its

329-2

1-4 unit family zone.

- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

**329-2  
cont**

Thank you for your time and consideration,

Kimberly McCormick, Ph D  
11517 40<sup>th</sup> Ave NE  
Seattle, WA 98125

DEIS StoryMap Comment

Name: Ethan McCue

Email: ewm6as@virginia.edu

Date: 4/11/2024

Comment:

The impact of higher growth targets should be studied, an 'alternative 6'. Alternative 5 is the most preferable of current proposals, but more growth appears necessary to comply with state law requiring more density around transit, address historic inequities with SFH zoning being used as a tool of segregation, and to meet our climate goals.

**From:** [Kym McDonald](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 4:45:38 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

What is the actual impact to Seattle's plants, trees and animals?

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees. It's honestly egregious.
- \* Create a Department of Urban Forestry to oversee this plan given the obvious conflict of interest with SDCI

At this point, please choose alternatives 2 or 4 in the comprehensive plan so we can build 100,000 new homes while preserving our trees.

Many other large cities went down the pathway of overdevelopment without consideration of the environmental benefits of keeping our mature trees. They are now regretful and working to reverse their costly mistakes. Write the plan keeping these lessons in mind and show forward

thinking planning that's not simply for developer profit.

Thank you for your consideration.

Kym McDonald  
kymberly.mcdonald5@gmail.com  
3848 NE 87th st  
Seattle , Washington 98115

**331-1  
cont**

**From:** [Lori McEwuen](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comp Plan Comments - Nitze-Stagen  
**Date:** Monday, May 6, 2024 4:54:11 PM  
**Attachments:** [image001.png](#)  
[Seattle Comprehensive Plan Comments Nitze-Stagen.pdf](#)

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**CAUTION: External Email**

To Whom It May Concern:

Comments on the Draft Comprehensive Plan are below and attached via pdf.

Thank you for the opportunity to comment on the draft One Seattle Comprehensive Plan and Draft Environmental Impact Statement. We are writing to express broad support for the comment letter submitted from the Seattle Chapter of NAIOP. We believe that Alternative 5 would be the most successful option for addressing the city's severe housing shortage, though we believe much more can be done to encourage housing production in order to ease the housing crisis and associated issues.

We support strategies that maximize development capacity and remove or reduce zoning barriers in target growth areas. In addition to the Plan's proposal for a new Regional Center in Ballard, we strongly support a future Regional Center in southeast Seattle. Southeast Seattle is already served by several light rail connections and would benefit from additional investment to support the current residents and increase housing supply. The designation and expansion of Regional Centers should be completed as soon as possible.

We also support residential uses in Manufacturing Industrial Centers, but more generally support true mixed-use development around all transit corridors, including those located in a MIC.

In addition to an increase in the capacity for housing development, the current process for land use entitlements adds significant uncertainty and delay. We support the design review program changes included in HB 1293, but also encourage the City to go further in reducing regulatory barriers. The City should continue to exempt housing projects from design review and SEPA, and should develop a program for more clearly integrating utility approvals (Seattle Public Utilities and Seattle City Light) with the current land use and building permit approval processes.

We do not support additional impact fees or an increase in MHA fees and strongly encourage the City to evaluate the possibility of payment for MHA fees at Certificate of Occupancy, rather than building permit issuance.

Thank you for your consideration of these items and we look forward to continued engagement around the Comprehensive Plan update.

Lori A. McEwuen  
Vice President of Development  
Mobile 775.771.2553 | Direct 206.889.5949  
Email [lori@nsco.com](mailto:lori@nsco.com)



[159 S. Jackson Street, Suite 300](#)  
[Seattle, WA 98104](#)  
[www.nitze-stagen.com](http://www.nitze-stagen.com)



May 6, 2024

Mayor Bruce Harrell  
Rico Quirindongo, Seattle OPCD

*via email*

Re: Comments on Seattle Draft Comprehensive Plan Update

Mr. Harrell and Mr. Quirindongo,

Thank you for the opportunity to comment on the draft One Seattle Comprehensive Plan and Draft Environmental Impact Statement. We are writing to express broad support for the comment letter submitted from the Seattle Chapter of NAIOP. We believe that Alternative 5 would be the most successful option for addressing the city's severe housing shortage, though we believe much more can be done to encourage housing production in order to ease the housing crisis and associated issues.

We support strategies that maximize development capacity and remove or reduce zoning barriers in target growth areas. In addition to the Plan's proposal for a new Regional Center in Ballard, we strongly support a future Regional Center in southeast Seattle. Southeast Seattle is already served by several light rail connections and would benefit from additional investment to support the current residents and increase housing supply. The designation and expansion of Regional Centers should be completed as soon as possible.

We also support residential uses in Manufacturing Industrial Centers, but more generally support true mixed-use development around all transit corridors, including those located in a MIC.

In addition to an increase in the capacity for housing development, the current process for land use entitlements adds significant uncertainty and delay. We support the design review program changes included in HB 1293, but also encourage the City to go further in reducing regulatory barriers. The City should continue to exempt housing projects from design review and SEPA, and should develop a program for more clearly integrating utility approvals (Seattle Public Utilities and Seattle City Light) with the current land use and building permit approval processes.

We do not support additional impact fees or an increase in MHA fees and strongly encourage the City to evaluate the possibility of payment for MHA fees at Certificate of Occupancy, rather than building permit issuance.

Thank you for your consideration of these items and we look forward to continued engagement around the Comprehensive Plan update.

**From:** [Meegan McKiernan](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#); [LEG\\_CouncilMembers](#)  
**Subject:** Comments on our One Seattle Comprehensive Plan and EIS  
**Date:** Monday, May 6, 2024 11:13:18 AM

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**CAUTION: External Email**

Please accept my comments on the One Seattle Comprehensive Plan and the associated EIS.

I would like to see **Alternative 2** further examined and modified.

Please maintain the existing tree canopy goals of 30% by 2035 and 40% over time and specify how you will meet these goals with data.

333-1

Also, please analyze the potential impact of the final selected option on **Seattle’s plants and animals**.

And I have a few questions for you:

- What is your estimation of tree planting needs and a time frame to replace the equivalent lost canopy area and volume (over 5-year periods as tracked by the city's canopy studies)?
- Is canopy area and volume replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

What is the acreage available and suitable for planting trees in each of the following public areas: the city's right of ways, natural areas, and developed parks?

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots? How many trees and what size for all canopy loss?
- What is the available acreage available to plant trees on private property?
- When will it be possible to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan even possible?

- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

333-1  
cont

**I am seriously concerned about the significant loss of trees in Seattle as more and more residential lots undergo development. It seems that no mature trees are safe any longer in Seattle. I would like to see the following changes made to mitigate any further increase in the loss of our life-sustaining urban forest:**

333-2

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.
- Require developers to submit a tree inventory on lots they intend to develop.

Thank you for your work, and I hope that you will take great measures to ensure that, as we grow our city, we take into consideration all that makes life here so beautiful, sustaining and life-giving: our trees and plants, birds and animals, our creeks and hillsides. The city is not adequately protecting what makes Seattle most livable and beautiful, and we must do better!

Meegan McKiernan  
Seattle, WA

**From:** [Tina Michalski](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 7:16:34 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Tina Michalski  
tlmichalski@gmail.com  
18412 Thorsen Rd SW  
Vashon, Washington 98070

334-1

**From:** [Anne Miller](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comments re. the Draft EIS - please support development alternative 2  
**Date:** Monday, May 6, 2024 11:58:04 AM

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**CAUTION: External Email**

To whom it may concern,

In regards to the Draft EIS and alternatives for development, please support alternative 2. Clearly Seattle needs new houses but the health of the people living in those houses and in our city depends on preserving our trees and natural resources. Under Alternative 2, about 3,000 acres of currently lower-density parcels may be converted to higher-density uses (neighborhood centers), the smallest area of conversion among the action alternatives (Exhibit 3.3-4). Growth would be focused in neighborhood centers. Among the action alternatives, Alternative 2 would thus have the lowest potential for development-related impacts to vegetation (including loss of tree canopy cover) citywide.

In addition, Please prioritize the following: Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger. Give SCCI Director the ability to ask for alternative site designs to save trees. Support building higher and building attached units to allow for tree retention and planting areas. Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones. Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

Thanks,  
Anne Miller

**From:** [Bonnie Miller](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Woo, Tanya](#); [Nelson, Sara](#); [Hollingsworth, Joy](#)  
**Subject:** Questions on the Environmental Impact Statement:  
**Date:** Friday, May 3, 2024 9:11:31 AM

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**CAUTION: External Email**

To Whom It May Concern and my elected city council members,

I moved from a neighborhood in northeast Seattle to my current home in downtown Seattle. I miss the bird songs from the large trees in my old neighborhood. I miss walking down the block on the sidewalk and being in the shade of living breathing trees. How does your plan provide those human comforts while setting aside concerns for the existing trees and plants? What are your plans for future human comforts afforded by our natural urban environment?

336-1

Did you do your research to show that future plans will make up for the concrete structures and asphalt parking lots taking over our existing urban forest?

I make trips to my old neighborhood and am astonished by the loss of large old street trees and big trees on private lands that have been removed to build bigger and cover more of the dirt. I do believe that if we are to be a green city, we need to reach for more canopy cover and stop the destruction of the valuable older trees in our private and public lands. I learn that trees removed to build these bigger buildings are replaced but where?! Parks is constantly cutting and removing trees, as is the Transportation department. Who is watching the store? How many trees and where are they to be planted if you intend to reach a goal of thousands of new residences which will remove, not include, trees in the development?

Please consider my comments.

Bonnie Miller  
900 University Street Apt 15BC  
Seattle, WA 98101-1730

## DEIS StoryMap Comment

Name: Cameron Sidney Miller

Email: cameron.sidney.miller@gmail.com

Date: 5/6/2024

## Comment:

I am a Ballard renter and city worker. The City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would encourage social housing in all neighborhoods. Instead the current draft plan will worsen the many crises (housing, climate, unaffordability) our city faces. To create a more vibrant city, the plan should enable permanently affordable social, cross-class housing to be developed in all neighborhoods.

It is shocking to me that most, if not all of our major parks and coastlines remain surrounded by single family zoning, promising that the greenest neighborhoods will remain out of reach to all but the wealthiest. In Ballard, for example - a major neighborhood center - our main parks, Carkeek and Golden Gardens, remain untouched. Zoning and FAR regulations should be changed to not just allow but encourage stacked-flat, 6-plexes across the board, at minimum. 8-12 plexes in most places. Our greenest areas should be up-zoned even higher, instead of just our loudest, deadliest arterials. Serving these areas with more transit would both help these new residents, and residents of other neighborhoods access green space.

If the City of Seattle adopted my above proposed changes, then we would be able to provide much needed housing while still preserving and even increasing greenery and access to it, for all.

Thousands of people have already been forced to leave this city, and thousands are already on the streets because of our current inaction. We cannot do less than the minimum, which is the current path our Comprehensive Plan is on. It's time to move forward.



**From:** [Amy Miller Dowell](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 11:17:28 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

338-1

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Amy Miller Dowell  
amillerdowell@me.com  
2600 2nd Ave., #1902  
Seattle, Washington 98121

**From:** [Mireia](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Monday, May 6, 2024 1:08:26 PM

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**CAUTION: External Email**

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

339-1

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Mireia

**From:** [dmoehring@consultant.com](mailto:dmoehring@consultant.com)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Nelson, Sara](#); [Kettle, Robert](#); [Woo, Tanya](#); [Hubner, Michael](#)  
**Subject:** One Seattle Comp plan  
**Date:** Wednesday, April 24, 2024 9:58:06 PM  
**Attachments:** [IMG\\_4320.webp](#)  
[IMG\\_3170.png](#)

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CAUTION: External Email

“Seattle One” planners,

With the forthcoming light rail stops along Interbay between Smith Cove and Dravus/Nickerson , the Interbay Neighborhood Center designation is regrettably undersized and undervalued to its potential mixed use commercial and mid-rise to high-rise residential given the 2040 transit capacity, proximity to City Center, and immediate proximity to jobs with business office and light manufacturing industries.

Upgrade the recommendations of 2013 Envision Interbay considering appropriate eco-district and transit oriented models built in other smaller cities (such as Burnaby and New Westminster, British Columbia) that have transformed single-story commercial and parking lots into thriving urban centers.

City planners and partners and agencies can make this happen in current wasted prime real estate within the context of the City and tourism.

David Moehring AIA NCARB  
East Magnolia and Interbay resident  
312-965-0634

Update

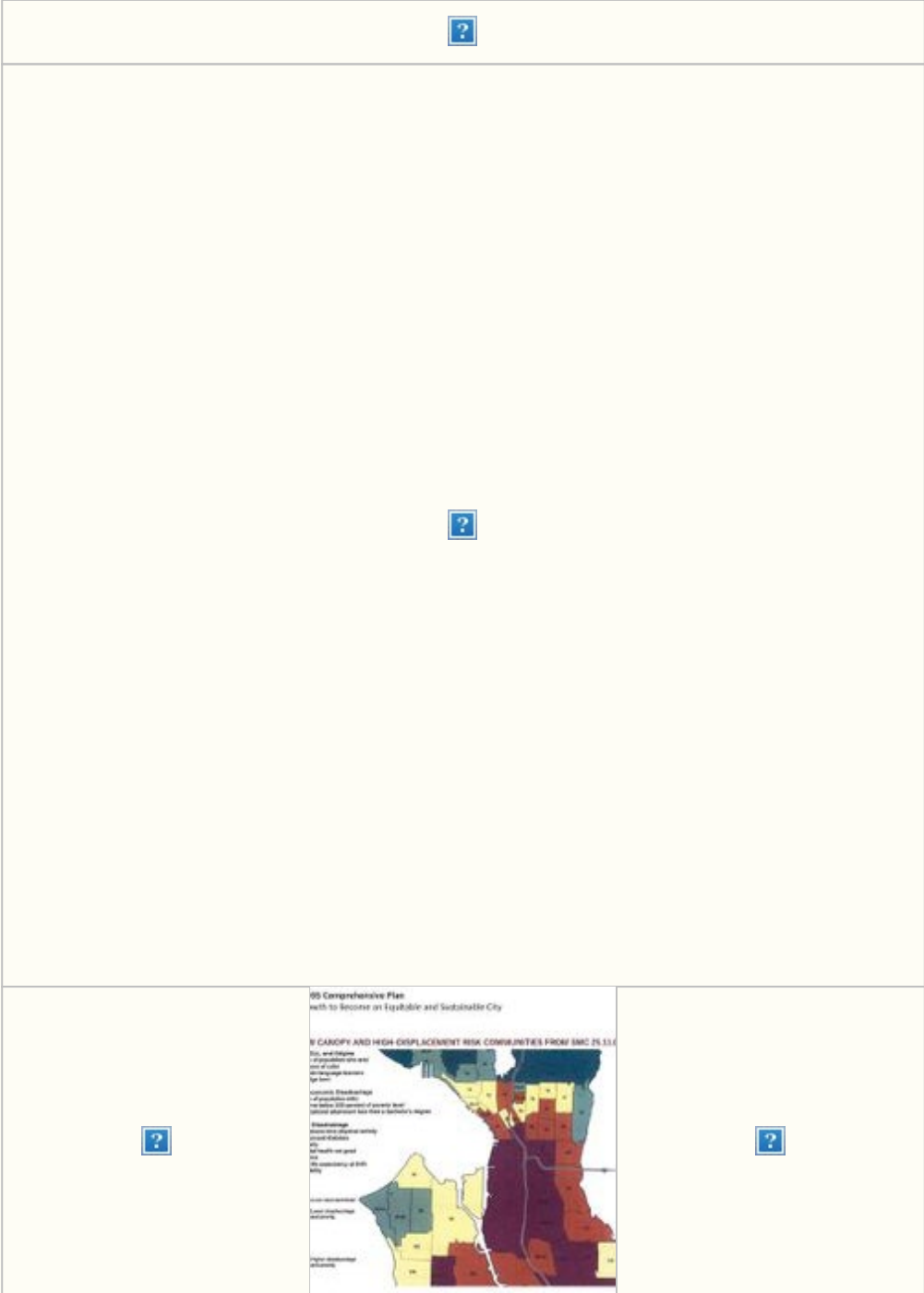
<https://www.seattle.gov/documents/Departments/OPCD/OngoingInitiatives/EnvisioningInterbay/InterbayLandUseStudyPreliminaryRecommendations.pdf>

Sent using the mobile mail

340-1

**From:** [David Moehring](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Woo, Tanya](#); [Kettle, Robert](#); [Nelson, Sara](#); [Strauss, Dan](#); [magnoliacommunityclub@gmail.com](#); [QueenAnneCC@gmail.com](#)  
**Subject:** Seattle One's draft comprehensive plan is not comprehensive - it's only about one item!  
**Date:** Thursday, May 2, 2024 6:47:17 PM  
**Attachments:** [ATT00001.png](#)

CAUTION: External Email





blank

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**Seattle does not support a 'single-minded' comprehensive plan that simply backs the financial interests of a few in the property investment industry, and disregards everything else we have collectively worked to achieve.**

**Plan vertically upward ... rather than planning to evaporate urban open spaces.**

**Support Urban Planning Alternatives 2 and 4!**

Out of the five alternatives in the plan, alternatives 2 and 4 would retain open moire open space and the greatest amount of tree canopy. According to recent data from Seattle Office of Planning and Community Development, without changing the current 2035 comprehensive plan and current Seattle zoning, Seattle has the capacity to add another 165,000 +/- dwellings.

Therefore, Seattle Legislators have a good reason to choose Seattle One alternatives 2 or 4 so we can add capacity for another 100,000 new homes while preserving our trees, and planting another 100,000 trees to achieve Seattle's tree canopy goals established in 2007.

## **'Seattle One (idea only)' DEIS questions as to environmental impact:**

### **In what way, if any, does the environmental impact statement sustain urban nature?**

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species *in the wild*.”
  - **Do People Belong in Cities, and Plants and Animals belong elsewhere? What is the impact of the plan specifically on Seattle’s plants and animals?**
  
1. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover."
  - **What analysis shows that tree planting**

**programs, coupled with increased hardscape, will compensate for lost urban forest?**

1. The plan states that Seattle will make progress toward its 30% canopy goal. Seattle's developed properties lost an average of 39% of tree canopy between 2016 and 2021. The new tree ordinance substantially reduces private land available for trees.
  - **How will areas of Seattle, such as within the Duwamish Valley, be planned to double their existing trees canopy in order to be equitable with the rest of the city?**
  - **How many acres of public land is available to reach our 30% tree canopy goal within the next 13 years?**
  - **How many trees will need to be planted in these areas every year to make up for trees removed by development?**
  - **What budget has been established for Seattle to expand it's canopy by over 1,000 acres plus an average annual net canopy loss of 50 acres per year?**

*Consider what makes Seattle a rose among the USA Cities, and amplify those feature! Plan upward! Retain treasured open space!*

David Moehring AIA NCARB  
3444 23rd Ave W  
Seattle WA 98199

May 6, 2024

Mr. Holmes.

The following are my comments on the DEIS on the Draft 2024 One Seattle Plan Comprehensive Plan Update.

Robert (Bob) Morgan  
559 N 74<sup>th</sup> Street  
Seattle  
bmorgan5@comcast.net

Comments:

### 3.1 Earth

1. “Alternative 5: Combined” Page 3.1-27 states that the alternative “would deter housing growth in the region beyond the city,” and thereby indirectly avoid adverse impacts regionally. The same argument is made at 3.1.4 (p. 3.1-32) “Significant Unavoidable Adverse Impacts,” (Page 3.1-32), and is a principle of the EIS in general. This “toothpaste” theory is erroneous. The simplistic assumption that allowing greater density in urban areas reduces sprawl in outlying areas has proven to be false. We don’t get density instead or sprawl. Experience proves that the result is density and sprawl. All of the alternatives have a high probability of driving those desiring a less dense lifestyle to further and further reaches of the region’s rural areas.

342-1

Question: What measures does this plan anticipate to actually deter development in outlying areas of the region other than allowing it in the city?

### 3.3 Plants and Animals

2. 3.3.2 Impacts. Page 3.3.-13. Here the draft states “the potential for adverse effects on plants and animals would be avoided, minimized, documented, and mitigated to the greatest extent possible through regulatory reviews and permitting processes that apply to individual projects.” This is blatantly false or misleading depending upon which of the plausible meanings given to the ambiguous statement. Also, 3.3.3 Mitigation Measures, “Regulations & Commitments” states that statutes and regulations “ensure” that impacts are “avoided, minimized, documented, and mitigated to the greatest extent possible.”

342-2

These statements are blatantly false if they mean to say the regulations are so good that they avoid the impacts to the greatest extent possible, which is laughable. For example, Seattle’s tree regulations are almost completely ineffective at saving mature trees when private land is developed. Does planting moribund tiny saplings and total lack of enforcement of the viability of those saplings preserve tree canopy to the greatest extent possible? Also, much of the middle housing development as proposed in the draft Comprehensive Plan that has actually



occurred to date, is almost completely devoid of plants and true open space other than parking areas and walkways.

If the statements mean, alternatively, that the impacts would be mitigated to the extent that is provided by regulations that apply, then it is misleading because it seems to imply the regulations are effective.

Question: Do these statements intend to say that the currently applicable regulations mitigate impacts to the greatest extent possible?

3. Mitigating measures cited under 3.3.3 Mitigation Measures “Incorporated Plan Features” (pp 3.3-24 and 25) include a lot of “encouraging” and monitoring only, except on City property. Programs for tree replacement and preservation of rare heritage trees are great, but significant development of 4-6 units in each Neighborhood Residential area and allowing 7-story development in Neighborhood Centers and other recommendations will result in loss of tree canopy throughout the city. Also, the draft is proposing to increase lot coverage in Neighborhood Residential zones to allow spread-out 2-story, rather than 3 story development. This will result increased loss of tree canopy.

The conclusion on page 3.3-30 that “none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover” is clearly false.

### 3.6 land Use patterns & Urban Form,

#### 4. 3.6.3 “Mitigation Measures:”

Regarding the proposed 4-story, six-unit development in Neighborhood Residential Zones when “affordable” housing is included and 6-story or 7-story development in Neighborhood Centers:

The proposed plan introduces significant inconsistencies in development scale and density by permitting 4-story development and near full-lot development in Neighborhood Residential zones and would have significant adverse impacts as a result. Page 3-6-186 states: “These impacts, if they occur, are likely temporary and will be resolved over time or reduced by the application of existing or new development regulations and design standards.” This is false, because not all properties within the Neighborhood Residential zones will be permitted 4-story or 6-unit development – only those that include “affordable” units, and these developments will be incompatible with the predominant form.

Also, there is no buffer proposed between Neighborhood Residential zones in Neighborhood Centers where zoning allowing seven-story developments is planned. \*

\*Although the land use changes summary seems to suggest 6 story development, the Executive Summary states on Page two that the regulations would “Allow a range of housing (from

duplexes to 7 story stacked housing) and commercial uses in neighborhood center areas...”)  
Also see the Growth Strategy Element, page 26, Policy GS 5.3: “Zoning in Neighborhood Centers should generally allow buildings of 3 to 6 stories, especially 5- and 6-story residential buildings to encourage the development of apartments and condominiums.”

Perhaps most egregious is the lack buffers proposed where large-scale development along frequent transit arterials is to be extended one-block into adjacent Neighborhood Residential Zones. This is hard to find in the plan documents, but this was conveyed by City staff at a Green Lake/Phinney Ridge Zoom meeting on this subject. This change will introduce extreme transitions in intensity and development scale. An example is along Greenwood Avenue North, where the topography falls off steeply on either side of the ridge. The large-scale zone along Greenwood currently extends only one lot on either side of the arterial for this reason.

Therefore, the conclusion that there is no significant environmental impact related to land use patterns and urban form is incorrect.

### 3.10 Transportation

5. The decision to establish Neighborhood Centers prior to localized analysis of pedestrian and transportation conditions will lead to unanticipated significant adverse transportation impacts. Here are two examples:

- The neighborhood center at 65<sup>th</sup> and Phinney Ave N. is at a location where an undersized street (N 65<sup>th</sup> Street) is currently overburdened and cannot safely accommodate the kind of increased automobile travel likely with 6 units allowed on all lots, much less with 6, or 7 story development proposed for Neighborhood Centers. Bike lanes and promises of increased transit will not be sufficient to address this impact. These areas need careful local scrutiny before general policies locking in such development is approved. At this location the proposal should prove to be unacceptable.
- The neighborhood center at Linden and 73<sup>rd</sup> street does not have adequate transit service. There is not a full regional transit stop in this location, but a North-bound stop only. This area should not be included in the proposed blob describing the Neighborhood Center.

342-3  
cont

342-4

## DEIS StoryMap Comment

Name: Robert (Bob) Morgan

Email: bmorgan5@comcast.net

Date: 5/6/2024

Comment:

Comment #1

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1. "Alternative 5: Combined" Page 3.1-27 states that the alternative "would deter housing growth in the region beyond the city," and thereby indirectly avoid adverse impacts regionally. The same argument is made at 3.1.4 (p. 3.1-32) "Significant Unavoidable Adverse Impacts," (Page 3.1-32), and is a principle of the EIS in general. This "toothpaste" theory is erroneous. The simplistic assumption that allowing greater density in urban areas reduces sprawl in outlying areas has proven to be false. We don't get density instead or sprawl. Experience proves that the result is density and sprawl. All of the alternatives have a high probability of driving those desiring a less dense lifestyle to further and further reaches of the region's rural areas.

Question: What measures does this plan anticipate to actually deter development in outlying areas of the region other than allowing it in the city?

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These statements are blatantly false if they mean to say the regulations are so good that they avoid the impacts to the greatest extent possible, which is laughable. For example, Seattle's tree regulations are almost completely ineffective at saving mature trees when private land is developed. Does planting moribund tiny saplings and total lack of enforcement of the viability of those saplings preserve tree canopy to the greatest extent possible? Also, much of the middle housing development as proposed in the draft Comprehensive Plan that has actually occurred to date, is almost completely devoid of plants and true open space other than parking areas and walkways.

If the statements mean, alternatively, that the impacts would be mitigated to the extent that is provided by regulations that apply, then it is misleading because it seems to imply the regulations are effective.

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DEIS StoryMap Comment

Name: Robert (Bob) Morgan

Email: bmorgan5@comcast.net

Date: 5/6/2024

Comment:

Comment #2

3.6 land Use patterns & Urban Form,

4. 3.6.3 "Mitigation Measures:"

Regarding the proposed 4-story, six-unit development in Neighborhood Residential Zones when "affordable" housing is included and 6-story or 7-story development in Neighborhood Centers:

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Also, there is no buffer proposed between Neighborhood Residential zones in Neighborhood Centers where zoning allowing seven-story developments is planned. \*

\*Although the land use changes summary seems to suggest 6 story development, the Executive Summary states on Page two that the regulations would "Allow a range of housing (from duplexes to 7 story stacked housing) and commercial uses in neighborhood center areas..." Also see the Growth Strategy Element, page 26, Policy GS 5.3: "Zoning in Neighborhood Centers should generally allow buildings of 3 to 6 stories, especially 5- and 6-story residential buildings to encourage the development of apartments and condominiums."

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Therefore, the conclusion that there is no significant environmental impact related to land use patterns and urban form is incorrect.

### 3.10 Transportation

5. The decision to establish Neighborhood Centers prior to localized analysis of pedestrian and transportation conditions will lead to unanticipated significant adverse transportation impacts. Here are two examples:

- The neighborhood center at 65th and Phinney Ave N. is at a location where an undersized street (N 65th Street) is currently overburdened and cannot safely accommodate the kind of increased automobile travel likely with 6 units allowed on all lots, much less with 6, or 7 story development proposed for Neighborhood Centers. Bike lanes and promises of increased transit will not be sufficient to address this impact. These areas need careful local scrutiny before general policies locking in such development is approved. At this location the proposal should prove to be unacceptable.
- The neighborhood center at Linden and 73rd street does not have adequate transit service. There is not a full regional transit stop in this location, but a North-bound stop only. This area should not be included in the proposed blob describing the Neighborhood Center.

**From:** [Aileen Morrow](#)  
**To:** [PCD\\_CompPlan\\_EIS](#); [LEG\\_CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Sunday, May 5, 2024 8:48:47 PM

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**CAUTION: External Email**

Please note my comment on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." **What is the impact of the plan specifically on Seattle's plants and animals?**

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?**

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? **How many trees will need to be planted in these areas every year to make up for trees removed by development?**

Sincerely,  
Aileen Morrow

**From:** [Guila Muir](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Inaccurate statement re: tree loss (section 3.3.7)  
**Date:** Sunday, May 5, 2024 10:27:19 AM

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**CAUTION: External Email**

The statement that "most canopy loss was not associated with development activities" is inaccurate. Only projects that started and finished in the 5 year period were examined for tree loss. No study counts tree loss in houses started in 2015 but not finished until 2016 or 2017

Tree canopy loss on lots undergoing development should look at loss on **all projects finished in 2016 to 2020.**

Guila Muir  
206 725 1994



**From:** [Guila Muir](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment on the EIS re: TREE CANOPY  
**Date:** Sunday, May 5, 2024 10:10:29 AM

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**CAUTION: External Email**

Here is my comment. Please take it into consideration.

As tree canopy is currently measured, the area does not include analysis of tree canopy **volume**. Without taking both measurements of **area** and **volume** into consideration, we cannot calculate ecological loss when mature trees are removed. Mature trees reduce storm water runoff, combat CO2, etc.

Small, new trees could *could* eventually gain the same canopy size when mature. But how can we possibly expect new, weak, immature trees to even make it to “adulthood”? I walk in my ggreen area nearly daily and see how small young saplings struggle to survive.

It makes sense to keep and nurture the tall, old trees that we have. Why tear down and then attempt to "re-create" something that is already working for us?

Thank you.

Guila Muir  
206 725 1994

**From:** [Alan Muller](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 10:38:03 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Seattle desperately NEEDS more affordable housing. And we also need healthy air as the climate heats up.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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Mitigation recommendations:

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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Alan Muller  
venerablelekshay@gmail.com  
609 Yesler Way, Apt 2-206  
Seattle, Washington 98104-3722

**From:** [Callie Neylan](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:27:31 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Callie Neylan  
neylano@me.com  
1934 4th Ave West  
Seattle, Washington 98119

**From:** [Susan Nicol](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:37:23 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. Large mature trees offer important green infrastructure services, reduce crime, and increase the health of people living in urban neighborhoods.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Susan M Nicol  
Wallingford neighborhood

Susan Nicol  
[susanmnicol@gmail.com](mailto:susanmnicol@gmail.com)  
4310 Sunnyside Ave North  
Seattle, Washington 98103

350-1

**From:** [Margaret Nims](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 1:38:26 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Margaret Nims  
margot888@comcast.net  
PO Box 15455  
Seattle, Washington 98115-0455

351-1

**From:** [Stuart Niven](#)  
**To:** [David Moehring](#)  
**Cc:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#); [Woo, Tanya](#); [Kettle, Robert](#); [Nelson, Sara](#); [Strauss, Dan](#); [magnoliacommunityclub@gmail.com](#); [queenannecc@gmail.com](#)  
**Subject:** Re: [TREE LOSS] Seattle One's draft comprehensive plan is not comprehensive - it's only about one item!  
**Date:** Thursday, May 2, 2024 9:19:16 PM

**CAUTION: External Email**

David,

As always your wisdom and attention to detail abound.

Unfortunately, the corruption that has permeated City Hall knows no limits and the likes of Mayor Lowe, puppet Strauss and other key MBACKS plants within the likes of SDCI and OSE have had too much time to set the environmental destruction ball rolling, to ensure their blatant pay offs by the shadowy and very visible real estate investment entities, keep rolling in my lying to the people of Seattle to push in regressive laws and code changes to allow full profit building, regardless of the negative impact to Seattle's neighbourhoods and its diverse residents.



352-1

I will expand on my comments soon, so new councilmembers know what their colleagues and predecessors have been up to with their meddling in dirty politics with their grubby, greedy little fingers.

Sent from my iPhone

On May 2, 2024, at 6:45 PM, 'David Moehring' via SeattleTreeLoss <[seattletreeclloss@googlegroups.com](mailto:seattletreeclloss@googlegroups.com)> wrote:



	<code>&lt;mime-attachment.png&gt;</code>	

352-1  
cont



352-1  
cont

**Seattle does not support a 'single-minded' comprehensive plan that simply backs the financial interests of a few in the property investment industry, and disregards everything else we have collectively worked to achieve.**

**Plan vertically upward ... rather than planning to evaporate urban open spaces.**



## Support Urban Planning Alternatives 2 and 4!

Out of the five alternatives in the plan, alternatives 2 and 4 would retain open moire open space and the greatest amount of tree canopy. According to recent data from Seattle Office of Planning and Community Development, without changing the current 2035 comprehensive plan and current Seattle zoning, Seattle has the capacity to add another 165,000 +/- dwellings.

Therefore, Seattle Legislators have a good reason to choose Seattle One alternatives 2 or 4 so we can add capacity for another 100,000 new homes while preserving our trees, and planting another 100,000 trees to achieve Seattle's tree canopy goals established in 2007.

### 'Seattle One (idea only)' DEIS questions as to environmental impact:

**In what way, if any, does the environmental impact statement sustain urban nature?**

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species *in the wild*.”

- **Do People Belong in Cities, and Plants and Animals belong elsewhere? What is the impact of the plan specifically on Seattle’s plants and animals?**

1. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover."

blank



blank



352-1  
cont

- **What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?**

1. The plan states that Seattle will make progress toward its 30% canopy goal. Seattle's developed properties lost an average of 39% of tree canopy between 2016 and 2021. The new tree ordinance substantially reduces private land available for trees.

- **How will areas of Seattle, such as within the Duwamish Valley, be planned to double their existing trees canopy in order to be equitable with the rest of the city?**
- **How many acres of public land is available to reach our 30% tree canopy goal within the next 13 years?**
- **How many trees will need to be planted in these areas every year to make up for trees removed by development?**
- **What budget has been established for Seattle to expand it's canopy by over 1,000 acres plus an average annual net canopy loss of 50 acres per year?**

*Consider what makes Seattle a rose among the USA Cities, and amplify those feature! Plan upward! Retain treasured open space!*

David Moehring AIA NCARB  
3444 23rd Ave W  
Seattle WA 98199

352-1  
cont



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Help support TreePAC's efforts to create a stronger tree ordinance, more informed residents, and more informed City Officials.

Guide to save trees before it is too late:

<https://treepac.org/step-by-step-saving-seattle-trees-guide-new/>

Donate to non-profit TreePAC:

<https://donorbox.org/support-treepac-and-seattle-s-urban-forest?>

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You received this message because you are subscribed to the Google Groups "SeattleTreeLoss" group.

To unsubscribe from this group and stop receiving emails from it, send an email to [seattletreeloss+unsubscribe@googlegroups.com](mailto:seattletreeloss+unsubscribe@googlegroups.com).

To view this discussion on the web visit

<https://groups.google.com/d/msgid/seattletreeloss/trinity-ebccb69c-1a2b-4aa6-ab10-97024818af38-1714700744292%403c-app-mailcom-lxa06>.

**From:** [Kris Niznik](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comprehensive Plan Scenario Choice  
**Date:** Monday, May 6, 2024 5:13:39 PM

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**CAUTION: External Email**

Hello,

I am writing to express my strong concerns about the loss of trees and wildlife habitat which will happen during the proposed development citywide, and especially near the 130th Street Station. Having commercial development so close to the parkland and Flicker Haven is not conducive to protecting the creatures that live there, and the loss of trees throughout the city is a tragedy.

I strongly advocate for Option 1 which will result in less destruction of neighborhoods and greenspace, while still resulting in more housing units. And if there was better planning, instead of just leaving it up to developers to decide what they wanted to do, I'm sure even more trees could be saved and more housing could be created without loss of greenspace. For instance, if you built apartments with underground parking, over a store, in places where currently there are stores with large parking lots. I know it isn't as cheap as clearcutting lots, but there could be more units; it would save open space, and they would be walkable neighborhoods.

The current plan that just suggests mitigation, but doesn't require it, is extremely unrealistic. When my neighbor cut down a bunch of trees, the temperature in my house rose 10 degrees in the summer. We don't want the entire city to suffer the same way.

Please consider the following questions before making such momentous quality of life decisions for the city. Remember we are known as the Evergreen City.

- How many trees and what size will need to be planted in these areas every year to make up for trees and canopy removed during development on lots?
- What is the available acreage available to plant trees on private property?
- When will it be possible to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?

Please also amend the Tree Protection Ordinance in the following ways:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

Thank you so much.  
Kris Niznik

## DEIS StoryMap Comment

Name: Brady Nordstrom

Email: brady.a.nordstrom@gmail.com

Date: 5/6/2024

## Comment:

Broadly speaking, I hope that the plan will be updated to be bolder around housing capacity and growth. As I understand it, this plan assumes that Seattle will grow more slowly than it has over the last 10-15 years. We need more housing capacity than what is being proposed.

I hope that our City leaders will consider expanding urban centers boldly near transit and adding additional neighborhood centers. There are several small hubs in my neighborhood (Beacon Hill) apart from the Urban Village center (near clock out lounge for example) that add vibrancy and convenience to my life. I hope the City will add more or even allow midrise housing (4-8 stories) wherever housing is allowed that is also near frequent transit. We shouldn't be artificially holding back our City's growth; we want abundant housing.

Allow corner stores in more places-- not just in centers. I have a corner store near my house that is otherwise a 12 minute walk from the grocery store. The Three Little Pigs is a great example of a neighborhood asset that should be enabled in more places. I know the workers and see my neighbors there.

Allow more types of middle housing everywhere in neighborhood residential zones. I currently live in a stacked triplex as a renter. I would love to own a humble stacked flat condo if more housing types like this were allowed. The FAR being proposed in the draft plan would NOT sufficiently allow for stacked flats and would favor taller, skinnier townhomes. I don't have anything against town homes being created and know people that live in them, however, Townhomes are not going to work for a major proportion of people looking to buy (ex: aging adults or people with mobility issues).

I also hope that this City will find ways to include affordability in growth by giving substantial bonuses in FAR, height, etc. for affordable housing provision.

I was born in Seattle and still can't afford a house here. I'd like to start a family here because my job and social network are in the City. Please enable more housing in the City, including homeownership options and rentals. Cities MUST change and evolve and I hope that you will create a bold growth strategy that allows organic growth where it's needed: near transit and jobs and community amenities. The current plan is not bold enough and will likely make our affordability challenges worse and will lock out more people who are already contributing and living in the City.

**From:** [Pennie O](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 7:25:49 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. Seattle needs to do both things, and ought to be able to find a way.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Pennie O  
pennielink@mac.com  
8038 Meridian Ave N  
Seattle, Washington 98103

**From:** [Barbara OSteen](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** tree canopy  
**Date:** Tuesday, May 7, 2024 1:33:39 PM

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**CAUTION: External Email**

P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals" and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance increases the potential for tree removal and loss in several ways. One is that all the zones that can undergo development under the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current guaranteed lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur in the Neighborhood Residential zone means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development and density in each alternative?
  
- What is your estimation of tree planting needs and a time frame to replace the equivalent lost canopy area and volume (over 5 year periods as tracked by the city's canopy studies)?

356-1

Sent from a concerned citizen  
Barbara O'Steen

**From:** [Hali O Bray](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Monday, May 6, 2024 7:46:31 AM

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**CAUTION: External Email**

Dear Seattle City Council Members,

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Hali O Bray

357-1



**From:** [Margaret Okamoto](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** My Comments RE: One Seattle Comprehensive Plan Draft EIS  
**Date:** Monday, May 20, 2024 12:49:23 PM

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**CAUTION: External Email**

What follows are my comments with regard to the Draft EIS:

After reviewing the five alternatives and their impacts, I would prefer to see Alternative 2 selected for a detailed final EIS.

The City established a goal in 2007 of having a 30% tree canopy cover by 2037. A study undertaken in 2022 by the Seattle Office of Sustainability and Environment determined that in the five-year period of 2016-2021, Seattle lost 255 acres of tree canopy.

Along with population growth and the attendant increase in housing must come protections for Seattle's existing trees and commensurate growth in a diverse tree canopy; one that provides protection for animals and other vegetation. I believe whatever the City chooses to do must sustain a healthy ecosystem that promotes well-being, resilience, clean air, and sustainability equitably across all neighborhoods.

Sincerely,  
Margaret Okamoto  
margaretokamoto@yahoo.com  
2563 6th Ave W  
Seattle WA 98119

358-1

**From:** [Joe Olson](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Saturday, May 4, 2024 9:48:11 PM

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**CAUTION: External Email**

To whom it may concern,

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Joe Olson  
98117

359-1

**From:** [Carol Olwell](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 10:28:49 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

The One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS) is deficient for the following reasons.

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration of these requests.

Carol Olwell  
cjolwell@gmail.com  
2117 5th Ave. W  
Seattle, Washington 98119-2809

360-1

**From:** [Marisol Ortega](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 5:03:44 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Marisol Ortega  
marisol.ortega@hotmail.com  
3596 Tacoma Ave S  
Tacoma, Washington 98418

361-1

**From:** [David Ortiz](#)  
**To:** [Rivera, Maritza](#); [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on One Seattle Plan and Draft EIS  
**Date:** Monday, May 6, 2024 8:43:44 AM

**CAUTION: External Email**

Dear Project Staff and Council Member,

While I applaud the city’s efforts to increase housing while preserving and expanding tree canopy, particularly in disadvantaged areas, I take issue with two areas of the One Seattle Plan (Plan) and Draft EIS (DEIS):

- The Plan clearly states the benefits of proper stewardship of our tree canopy (Land Use policy 4.8 aims to “use tree requirements to preserve and enhance the City’s physical, aesthetic, and cultural character and to enhance the value of trees in addressing stormwater management, pollution reduction, and heat island mitigation.”). In opposition to this goal, the DEIS states that “development projects on parcels in the Neighborhood Residential or Multifamily management units are likely to result in more loss of tree canopy” and that “alternatives with a higher likelihood of contributing to canopy cover loss in areas with low canopy cover would have an elevated risk of exacerbating local heat island impacts (Section 3.3.2).” To mitigate this, the DEIS states “enhanced restrictions on tree removal will reduce related canopy loss on private parcels, and tree replacement requirements will ensure that a substantial portion of such losses are reversed over time (Section 3.3.3).” While this sounds effective in theory, in practice the current tree protection ordinance, and thus the mitigation plan, is insufficient and my concern is this may result in new heat islands in neighborhoods slated for development. Specifically, the current tree protection ordinance gives developers excessive latitude to remove Tier 2 trees which encroach on their guaranteed 85% developable space in Low Rise zones. To presumably offset this removal they may either replant a comparable tree onsite or pay into a fund which replaces the tree on public land or private land with low tree canopy. While this policy aims to maintain 30% tree canopy across the city over time and benefits disadvantaged areas (both admirable goals), it effectively redistributes trees away from where we need them most, on private land in our neighborhoods. Further, Tier 2 trees take decades to mature and provide protection *now*, not decades from now. To properly mitigate tree loss we need a Tree Protection Ordinance that imposes uniform restrictions on Tier 2 tree removal for all parties, individual homeowners and developers. We need a Plan that reduces heat islands in all areas of the city, not creates new heat islands in some areas. **I support alternative plans 1 and 2 since the DEIS acknowledges they involve the lowest reduction in tree canopy while still creating 80K-100K homes.**
- Some Alternative Plans include a Neighborhood Center at 35th Ave NE and NE 85th St and the DEIS indicates there will be increased traffic and travel time. It is worth noting this intersection has arterials going North, East, and South, but heading West is a non-arterial neighborhood street. The mitigation plans do not address how having a Neighborhood Center connected to a non-arterial street will negatively impact the residential streets in the adjacent neighborhood. Given the current high traffic volume in that area and multiple nearby schools with restricted speed limits during rush hour, it is likely the residential streets will be used as cross streets for overflow traffic. **Can the DEIS comment on impact to neighborhood traffic, noise, and safety in special cases such as NE 85th St.? Does the Plan include alternative Neighborhood Center options in this area which have arterials in all 4 directions (e.g. NE 95th St or NE 75th St)?**

362-1

Best regards,

David J. Ortiz, PhD  
District 4 resident

**From:** [Allison Ostrer](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Saka, Rob](#); [Gheisar, Leyla](#)  
**Subject:** Seattle Comprehensive Plan  
**Date:** Friday, May 3, 2024 3:05:46 PM

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**CAUTION: External Email**

Hello, I have some questions about the EIS for the Comp plan.

Section P 3-3 states that no impact is expected on survival to plants and animals. What exactly is the impact of the plan on Seattle's plants and animals, if any?

Section P 3-3 states that "none of the alternatives would be expected to have significant, adverse impacts on tree canopy cover." What evidence do you have to demonstrate this? What analysis, if any, indicates that tree planting programs along with increased hardscape will compensate for lost urban forest?

The plan states that Seattle will make progress toward its 30% canopy goal. This sounds ridiculous. The new tree ordinance substantially reduces private land available for trees. How much public land is actually available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development? Also, mature trees absorb much more CO2 than tiny immature trees. Are you taking into account this difference?

Sincerely,  
Allison Ostrer  
Highland Park, Seattle, WA

**From:** [Dan Overgaard](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Kettle, Robert](#)  
**Subject:** Comments on One Seattle Plan  
**Date:** Monday, May 6, 2024 11:20:17 AM

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**CAUTION: External Email**

Dear Comp Plan team and Councilmember Kettle,

We have reviewed the draft Comprehensive Plan, and would like to offer some comments.

1. We urge you to select alternative 2 or 4, as they would save more of the City’s tree canopy. We are very concerned about the potential loss of tree canopy, as many single family homes will be replaced by multiple units. In our Queen Anne neighborhood we have already seen the removal of many mature trees as replacement structures have eliminated yards and other spaces for trees.

364-1

2. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the basis for this claim, and what is the impact of the plan specifically on Seattle’s plants and animals?

3. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? What incentives will there be for developers to retain or replace affected trees? Please include this analysis in the updated plan.

4. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development? Please provide supporting analysis in the updated plan.

5. Upper Queen Anne is identified as an Expanded Regional or Urban Center, with expanded development allowed from approximately Galer to Smith, and 6th West to 5th North. We agree with the need for additional housing, but recommend that you reduce the proposed expansion area by at least 50%. Most of the streets and avenues in this expansion area, especially to the east and west of Queen Anne Ave, are effectively one lane streets since there is neighborhood parking on both sides. We do not think this street network will be able to support the added traffic and parking requirements that will be generated by the level of proposed development.

364-2

Thank you for your consideration.

Dan & Gloria Overgaard

**From:** [MICHAEL OXMAN](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on Seattle Comprehensive Plan & DEIS  
**Date:** Monday, May 6, 2024 2:37:30 PM

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**CAUTION: External Email**

Howdy,  
Please include the tree canopy goals of 30% working goal, and 40% aspirational goal, to be accomplished by 2037.

Please provide for enhanced diversity of the ecosystem biosphere.

Please add language that equity will only be achieved by allocating greater funding of maintenance in underserved locations.

Arboreally yours,  
Michael Oxman  
5612 Delridge Way SW  
Seattle, WA 98106



**From:** [Carmen Pan](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:49:31 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities!

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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Mitigation recommendations:

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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Carmen Pan  
hopes-subsets-0v@icloud.com  
418 Bellevue Ave E, Apt 103  
Seattle, Washington 98102

366-1

## DEIS StoryMap Comment

Name: Ryan Paul

Email: ryan@ryandpaul.com

Date: 5/6/2024

## Comment:

The city should study the impacts of Floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes, Higher floor area ratios for middle housing in all residential zones, such as those corresponding to the state model code for middle housing, Social housing in every neighborhood on affordability, and Greater height and density bonuses within a quarter mile of transit stops.

Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets. Ideally I'd prefer that the city look at higher growth targets for Alternative 5

**From:** [Alex Pearson](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:02:47 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Alex Pearson  
alexandrabronwyn@gmail.com  
5515 28th Ave Ne  
Seattle, Washington 98105

**From:** [Anna](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Strauss, Dan](#)  
**Subject:** Question Regarding the One Seattle Comp Plan EIS  
**Date:** Sunday, May 5, 2024 5:24:34 PM

---

**CAUTION: External Email**

Hello!

I volunteer with the Urban Carnivore Project and am concerned about the vagueness of the Draft EIS when it comes to our urban vegetation and wildlife. Please provide more information on the impact specifically on Seattle's plants and animals. I find it hard to believe that the loss of green space and urban canopy will have no impact at all. Development is removing habitat. The removal of habitat harms a species. Any other implication doesn't make any sense to me.

369-1

I also have a hard time believing the Draft EIS actually stated that this would probably minimize development in rural areas. This throwaway line is not backed by facts even though it is tossed around all the time. Please back up your assertions.

369-2

Many years ago, I worked for a land use consulting firm and I know that EIS's are often written to accommodate the client's needs. I am concerned that is the case here.

Please fix this.

Sincerely,

Anna Pedroso

**From:** [Noel Pelland](#)  
**To:** [PCD\\_CompPlan\\_EIS](#); [PCD\\_OneSeattleCompPlan](#)  
**Cc:** [LEG\\_CouncilMembers](#)  
**Subject:** Comment on Draft One Seattle Plan  
**Date:** Monday, May 6, 2024 3:14:09 PM

**CAUTION: External Email**

Dear OPCD Staff and Seattle City Council:

I am a longtime Seattle resident writing to express my serious concern with the draft One Seattle Plan, and to urge modifications that will increase smart growth and help make the city accessible to a wider range of people.

In the past 20 years, I have seen firsthand the rapidly accelerating crisis of affordability in our city, as friends, many of whom are artists, teachers, or other non-tech workers, have been forced to downsize, or relocate out of the city entirely. As a non-tech knowledge sector worker, I have watched my own ability to stay in the city become increasingly tenuous amid constant rent hikes, and the prospect of ownership of any housing vanish entirely. It is widely documented that these issues, of which my experience is far from isolated, are rooted foremost in an undersupply of housing. The continued upward trajectory of housing costs in Seattle seriously threatens the city's long-term prospects as a multifaceted, culturally vital, inhomogeneous place that offers prospects to more than a select few.

370-1

In light of this, I find the proposed plan wholly inadequate for meeting the current moment. Specifically, here are some minimum recommendations to improve Seattle's comprehensive plan:

1. Actually support missing middle housing. Increase the floor-area-ratio above the proposed value, to make development of fourplex and sixplex-zoned areas actually viable. Or, go further to tailor zoning that would support sixplexes configured as in [Spokane](#).
2. Include provisions for transit-oriented development that anticipate elements similar to [House Bill 2160](#) -- larger buildings around all transit corridors would be a major step forward for the city. Rather than waiting to be told what to do at the state level by passage of a similar bill, Seattle should be a leader in this conversation.
3. [Eliminate parking requirements](#) -- like other forward-thinking American cities. These requirements discourage and stunt development away from what is most critically needed.

In a larger sense, I recommend city leaders reconsider what kind of city they want Seattle to be: a jeweled but cloistered artifice, that is nice to visit, but only accessible to everyday people through commuting? Or, a modern, hybrid metropolis that understands, accepts, and seizes the opportunities presented by growth? Having a comprehensive plan that anticipates less growth than what would be allowed at maximum by Bellevue is embarrassing. Please keep in mind the widespread support for Alternative 5 during the scoping period and by many city council candidates -- that is the mandate that is present among Seattle's electorate.

Thank you for your time and consideration.

With regards,

Noel Pelland

District 6

**From:** [Sarah Pellkofer](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** Comp Plan EIS questions  
**Date:** Tuesday, May 7, 2024 7:54:27 PM

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**CAUTION: External Email**

Hello,

I have a few questions/concerns about the comprehensive plan EIS that I would love for you to consider as the public comment period is coming to a close:

1. Regarding Section P 3-3 which states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” Can you say directly what the plans impact on plants and animals will be?
2. And RE Section P 3-3 which states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." Do you have any data or studies showing that tree planting program along with with more hardscape will actually compensate for lost urban forests?
3. And finally, the plan states that Seattle will make progress toward its 30% canopy goal. But there will be significantly less private land available for trees with the new tree ordinance so can you say how much public land will be usable for reaching the 30% goal? And about how many trees per year will need to be planted there to compensate for the trees that are removed by development?

Thanks so much for your time and feedback.

Best wishes,

Sarah Pellkofer

**From:** [Nancy Penrose](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:05:23 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Nancy Penrose  
mue.rose@gmail.com  
2402 E Olive St  
Seattle, Washington 98122

372-1

**From:** [Jan Peterson](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#); [Pollet, Henry](#)  
**Subject:** EIS Plan around N 145th and N 130th St stations  
**Date:** Sunday, May 5, 2024 11:42:00 AM

**CAUTION: External Email**

Mr. Holmes,

I'm writing with comments on the EIS for the North Seattle light rail station areas.

I live just west of I-5 near both of these stations, and appreciated the online EIS presentation by Jim Holmes and others focusing on this area.

**N 148th St Station**

I believe the assessment that the areas in Seattle on or near N 145th St west of I-5 were "too far" from the coming Shoreline South station for increased development was made in error. It is a short walk in this neighborhood, especially east of Meridian Ave N. Look at what Shoreline has done just north of N 145th. Surely Seattle citizens can walk or ride a bike as well as Shoreline citizens. The future Shoreline non-motorized pedestrian bridge over I-5 at N 148th St will make the distance and ease to the station even easier from neighborhoods just west of I-5. Please re-evaluate.

**N 130th St Urban Center (old "Urban Village")**

I fully support an Urban Center near the N 130th St Station. However, the area west of I-5 should do more. Please allow higher apartment buildings (multistory, stacked flats, etc) in the neighborhood between N 130th and N 135th. Allow more zoning for apartments with ground floor commercial / community spaces, especially along 1st Ave NE and all of Roosevelt Ave N. Expand this area west to at least Meridian Ave N. I'm especially concerned that Haller Lake United Methodist Church (at 1st Ave NE and N 133rd St ) be able to build such an apartment. Not allowing commercial use there seems really strange, as there is already a daycare center across the street from the church.

**Impacts and Mitigation Options for this area:**

Sturdy, safe, predictable, planned pedestrian, wheelchair, and bike lanes and sidewalks must be developed for the neighborhoods near the light rail stations.

In this Urban Center West of I-5, planned improvements of 1st Ave NE (added shareway from N 117th to 130th NE) and N. 130th will help. The area needs OFF-CORRIDOR bike routes also. Continue improvements on 1st Ave NE from N 130th to N 145th st. (or at the minimum, from N 130th to Roosevelt Way N.) SDOT planned Neighborhood Greenways in the area (Corliss Ave N, Ashworth Ave N., N 137th, etc.) must be implemented .

Roosevelt Way N (west of I-5) will become a very important 'Boulevard' for this new Urban Center. The city owns 40ft of right-of-way on this street. Plan protected bike lanes AND sidewalks AND trees on Roosevelt between 3rd Ave NE and at least Stone Ave N / N 143rd St. IT WILL BE IMPORTANT TO NOT ALLOW STREET PARKING for new housing on this street. Note the newer housing development on Roosevelt Way N & Meridian Ave N - with a great sidewalk, trees, and space on Roosevelt Way for a protected bike lane. DO THIS. Further north on Roosevelt Way N there are newer apartments / townhomes between Stone Ave N and Lenora Pl N that does not allow for a protected bike lane. PLEASE DO NOT

373-1



ALLOW THIS PARKING WITH FUTURE DEVELOPMENT ALONG ROOSEVELT WAY N.

#### Tree Canopy loss

The Mitigation Options for tree canopy loss include "additional incentives to encourage retaining / expanding tree canopy." I support this and would like to know how this will be done? There are a number of established trees (possibly 'heritage' trees) in this area. Codes that encourage higher structures that preserve more open ground - including established trees - need to be developed. Developers should work with arborists and submit plan options that include saving established trees whenever possible.

373-1  
cont

Green Space: Use city property to develop pocket parks where possible. Consider this for the triangle section on the north side of N 133rd St. at Roosevelt Way N.

Of course, listing the many mitigations in the EIS is helpful, but unless the city takes on the responsibility of ACTING on these mitigations, the Seattle One Comp Plan will result in thoughtless worsening of the quality of life that Seattle residents deserve.

Thank you,

Jan Peterson  
Haller Lake Neighborhood

**From:** [Ellen Pifer](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Monday, May 6, 2024 8:01:17 AM

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CAUTION: External Email

Hello,

Urban natural spaces are important to me and what set Seattle apart from other major cities. Urban forestry reduces the overall surface temperature for pedestrians and what make a city not just liveable but enjoyable to live in. Staring at telephone poles through a window instead of trees is also unsightly.

Please note my comment on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,

Ellen Pifer

DEIS StoryMap Comment

Name: Emily Pike

Email: [elaurepike@gmail.com](mailto:elaurepike@gmail.com)

Date: 5/6/2024

Comment:

I am a renter in Ballard, and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would allow for more sustainable, car-free or car-light living. Instead the current draft plan will worsen congestion and pollution by forcing more people into long commutes. To create a more sustainable and equitable city, the plan should eliminate parking minimums, convert underutilized golf courses into free public parks and affordable housing, and allow taller and bigger buildings in more neighborhoods.

If the City of Seattle adopted my above proposed changes, then we would be able to reduce vehicle miles traveled, reduce greenhouse gas emissions, and create a more affordable city for everyone. Land use has a huge impact on the environment. We should seek to increase density wherever possible in order to lower per capita greenhouse gas emissions.

DEIS StoryMap Comment

Name: Emily Pike

Email: [elaurelpike@gmail.com](mailto:elaurelpike@gmail.com)

Date: 5/6/2024

Comment:

The city has an obligation to pursue the comprehensive plan as proposed by OPCD last fall--a plan that is much more ambitious in upzoning to increase density and build an equitable and sustainable city for all. The plan should be revised to do the following: allow bigger buildings in more places; restore all 42 originally proposed neighborhood centers to create more walkable environments so people can access the things they need in their immediate area; match or exceed the state floor area minimums and allow more housing, taller housing, and greater lot coverage to increase housing diversity; increase density around transit corridors so that people can rely on more sustainable modes of transportation rather than remaining dependent on personal vehicles; remove parking requirements citywide to further divest from personal-vehicle infrastructure; and allow small scale businesses in all zones including small cafes, stores, services, and even small scale production.

## DEIS StoryMap Comment

Name: Emily Pike

Email: elarelpike@gmail.com

Date: 5/6/2024

Comment:

It is extremely disappointing that the Mayor's office has disregarded the overwhelming call for a much bolder growth strategy than this plan proposes. During the scoping phase, over 60% of commenters voiced desire for alternative 5 or an even more progressive alternative six, and it's hard to understand why those suggestions have been so watered down in this draft. Seattle residents want to see bold change--more dense housing everywhere, more housing around transit corridors, more corner stores in their neighborhoods to create vibrancy and meet needs locally. We need more fourplexes and sixplexes, not more townhomes. This plan simply does not meet the moment. It will not create enough housing to accommodate the number of new residents projected to arrive over the next 20 years, and low-income residents like myself will inevitably be priced out of their communities.

DEIS StoryMap Comment

Name: Allison Placido

Email: alli1111@live.com

Date: 4/9/2024

Comment:

Re: the 130th & 145th station areas, my preference is for Combined (Alt 5) or Focused (Alt 2). I live and work in this neighborhood and we expect big, lasting changes that coincide and take advantage of the improvements happening on Aurora as well. Go big or go home.

**From:** [Helen Pope](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** Feedback- Comprehensive Plan  
**Date:** Sunday, May 5, 2024 8:09:37 AM

**CAUTION: External Email**

As our population increases, the best possible living environment for Seattle will be to increase greening our communities NOT depleting these resources.

In your Comprehensive Plan I'm concerned that in your haste to develop you are ignoring studies from some of the largest urban centers in the world that prioritize increasing green spaces as a way to enhance environmental and ecological benefits, such as mitigation of the urban heat island effect and air and noise pollution. Such benefits are irrefutable.

To succeed, we will need a whole-of-government collaboration among multiple agencies, including tree preservation organizations and including studies that examine human wellbeing. This balance of power will help us protect the canopy of green where we live, not only in public parks.

The words in your plan skip the details of who makes these choices. Is it the Land Developers or the hollow if the city continues its same approach to cutting down our trees. I'd appreciate some clarity on the following:

- In your Comprehensive Plan *what specific studies shows planting programs can compensate for the loss of already established larger trees and the increase of hardscape?*
- In section LZU 2.7 it says "Encourage the *preservation* and expansion of the tree canopy throughout the city for the benefit they provide". *What tree advocacy committees and arbor scientists have been involved in the Comprehensive Plan, and what **oversight** will be in place to ensure scientists will lead the SDCI decisions in the approach to tree preservation?*

Thank you,

Helen Pope  
H pope@live.com

379-1

**From:** [Helen Pope](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Feedback Comprehensive Plan  
**Date:** Sunday, May 5, 2024 5:20:10 PM

**CAUTION: External Email**

Thank you for the chance to voice my perspective of Seattle future growth.

In your Comprehensive Plan you are not specifically addressing what committee or department will make the day-to-day decisions regarding preserving existing green spaces in city lots (all zones).

This concerns me especially after recent public efforts to save large trees (some of 150 years old) from being cut. My conclusion is there isn't any official tree advocacy group in the city government that has the power to evaluate and preserve trees. Unfortunately this important fact will leave our trees in the hands of Developers and city's short term financial goals.

380-1

I eagerly await your response which clarifies this point, as I hope I'm wrong because it would show us you are ignoring studies from some of the largest urban centers in the world that prioritize increasing green spaces as a way to enhance environmental and ecological benefits, such as mitigation of the urban heat island effect and air and noise pollution. Such benefits are irrefutable.

To help succeed and take the long view to the emerald city, we will need a whole-of-government collaboration among multiple agencies, including tree preservation organizations and including studies that examine human wellbeing.

It is imperative that The Department of Construction and Inspection's authority is balanced by other separate agencies which are educated in understanding the science of urban nature, wildlife and the importance of existing trees, especially larger trees whose contribution is far greater than any monetary compensation.

"Encourage the *preservation* and expansion of the tree canopy throughout the city for the benefit they provide" (written in your plan under section LZU 2.7.) Please share specifics including:

- What specific studies shows planting programs can compensate for the loss of already established larger trees and the increase of hardscape?
- *Name the specific tree advocacy groups and science based studies have been used concerning this subject*
- *What **oversight** will be in place going forward to ensure scientists will lead the SDCI decisions in the approach to tree preservation?*

Thanks!

Helen Pope  
H pope@live.com



**From:** [Janice Price](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:29:58 AM

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Dear city decision-makers,

I am deeply concerned about the lack of attention to QUALITY of life being paid in development plans. Yes, we need more affordable housing, but we also need to have healthy and livable communities.

These are weaknesses of the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

381-1

\* It does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.

\* It does not ANALYZE the probable scale of impact of tree loss or give numbers but instead SPECULATES that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"

\* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Please consider the following recommendations to mitigate damage to our natural environment:

\* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.

\* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.

\* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.

\* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Janice Price  
Seattle Resident, Concerned Citizen

Janice Price  
janicepr@earthlink.net  
118 N. 43rd St  
Seattle, 98103

**From:** [Jacquie Quarre](#)  
**To:** [Holmes, Jim](#); [PCD\\_CompPlan\\_EIS](#); [PCD\\_OneSeattleCompPlan](#)  
**Cc:** [Hubner, Michael](#)  
**Subject:** Re: Comment Letter on draft One Seattle Comprehensive Plan Update & DEIS  
**Date:** Monday, May 6, 2024 11:17:56 AM

**CAUTION: External Email**

Great, thank you very much.

Jacquie

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**From:** Holmes, Jim <Jim.Holmes@seattle.gov>  
**Date:** Monday, May 6, 2024 at 11:05 AM  
**To:** Jacquie Quarre <jacquie@tharsis.land>, [PCD\\_CompPlan\\_EIS](#) <[PCD\\_CompPlan\\_EIS@seattle.gov](#)>, [PCD\\_OneSeattleCompPlan](#) <[OneSeattleCompPlan@seattle.gov](#)>  
**Cc:** Hubner, Michael <Michael.Hubner@seattle.gov>  
**Subject:** Re: Comment Letter on draft One Seattle Comprehensive Plan Update & DEIS

382-1

Yes. Thank you for your comment.

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**From:** Jacquie Quarre <jacquie@tharsis.land>  
**Sent:** Monday, May 6, 2024 11:04 AM  
**To:** [PCD\\_CompPlan\\_EIS](#) <[PCD\\_CompPlan\\_EIS@seattle.gov](#)>; [PCD\\_OneSeattleCompPlan](#) <[OneSeattleCompPlan@seattle.gov](#)>  
**Cc:** Hubner, Michael <Michael.Hubner@seattle.gov>; Holmes, Jim <Jim.Holmes@seattle.gov>  
**Subject:** Re: Comment Letter on draft One Seattle Comprehensive Plan Update & DEIS

**CAUTION: External Email**

Good morning,

Just asking for confirmation that you received my comment letter submitted yesterday afternoon. I want to make sure it is included in the record for the DEIS.

Thank you!

Jacquie

Jacquie Quarré  
Tharsis Law P.S.  
[jacquie@tharsis.land](mailto:jacquie@tharsis.land)  
Direct/cell: 425-891-7842

**From:** Jacquie Quarre <jacquie@tharsis.land>

**Date:** Sunday, May 5, 2024 at 4:57 PM

**To:** PCD\_CompPlan\_EIS@seattle.gov <PCD\_CompPlan\_EIS@seattle.gov>, OneSeattleCompPlan@seattle.gov <OneSeattleCompPlan@seattle.gov>

**Cc:** michael.hubner@seattle.gov <michael.hubner@seattle.gov>, jim.holmes@seattle.gov <jim.holmes@seattle.gov>

**Subject:** Comment Letter on draft One Seattle Comprehensive Plan Update & DEIS

Hello,

I sent this email from my personal email address earlier this afternoon by accident. Please use this one instead, my apologies. The attached letter is the same.

Please find attached a comment letter submitted for the draft One Seattle Comprehensive Plan Update and its Draft Environmental Impact Statement.

Please let me know if you have any questions or would like to discuss further.

Thank you.

Jacquie

Jacquie Quarré

Tharsis Law P.S.

[jacquie@tharsis.land](mailto:jacquie@tharsis.land)

Direct/cell: 425-891-7842

382-1  
cont



May 5, 2024

Tharsis Law P.S.  
Jacquie Quarré  
425-891-7842  
[jacquie@tharsis.land](mailto:jacquie@tharsis.land)

Office of Planning and Community Development  
Seattle City Hall  
600 4th Ave, 5th Floor  
Seattle, WA 98104

**VIA EMAIL TO:**     [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)  
                                  [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

*Copy to:*                     Michael Hubner  
                                      Long Range Planning Manager,  
                                      One Seattle Plan Project Manager  
                                      [michael.hubner@seattle.gov](mailto:michael.hubner@seattle.gov)

                                      Jim Holmes  
                                      EIS Lead  
                                      [jim.holmes@seattle.gov](mailto:jim.holmes@seattle.gov)

Dear Office of Planning and Community Development:

I represent Elizabeth and Jonathan Roberts, who own a home located next to the E. Harrison Street End on Lake Washington in Seattle. We are writing to provide comment on the draft One Seattle Comprehensive Plan Update policies that relate to Shoreline Street Ends in Seattle, and the Draft Environmental Impact Statement for the One Seattle Comprehensive Plan Update as it relates to those policies.<sup>1</sup>

In summary, we propose edits (1) to the language of draft P 1.14 to expressly include the need to “restore ecological conditions” that already is included in the current 2035 Comprehensive Plan, and (2) to the glossary definition of Shoreline Street Ends to be inclusive of neighbors to Shoreline Street Ends in the collaboration that occurs around these unique and important spaces. Please see the specific suggestions at pages 3-4 of this letter.

By way of background, the Roberts have lived in a community with multiple Shoreline Street Ends for decades, and in the last 3 years have owned a home next to a Shoreline Street End. Unfortunately, during this time the Roberts have observed deterioration of ecological conditions

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<sup>1</sup> See, e.g., Draft EIS at 3.11-28 (Shoreline Master Program Public Access).

382-1  
cont

of Shoreline Street Ends. For example, a mapped Environmentally Critical Area wetland in the shoreline at the E. Harrison Street End has been trampled and degraded over time, and vegetation is frequently cut back and removed without a plan or consideration for the ecological benefit the vegetation may provide.

There is a strong emphasis in state and federal law on protecting critical areas, including wetlands. The Growth Management Act (Chapter 36.70A RCW), Shoreline Management Act (Chapter 90.58 RCW), and numerous regulations in the Washington Administrative Code require Cities and Counties to protect critical areas. *See, e.g.*, WAC 365-190-080 (“Counties and Cities must protect critical areas.”). Additional state and federal laws also regulate wetlands, such as the Water Pollution Control Act (Chapter 90.48 RCW), the State Environmental Policy Act (Chapter 43.21C RCW), and Section 401 of the federal Clean Water Act.

The overall goal for statewide wetland resource management in Washington State, quoted from Executive Order 89-10 is:

“...to achieve no overall net loss in acreage and function of Washington's remaining wetlands base. It is further the long-term goal to increase the quantity and quality of Washington's wetlands resource base.”<sup>2</sup>

The Washington State Department of Ecology also recognizes the importance of wetlands in mitigating climate change: “Wetlands are a key player in global greenhouse gas budgets . . . they are also an important sink for greenhouse gases, where carbon is stored and prevented from entering the atmosphere.”<sup>3</sup>

For Seattle to continue to have healthy shorelines with vegetation and natural features that provide a beautiful environment for the public to enjoy while also supporting wildlife and battling climate change, ecological restoration needs to remain a clear policy for Shoreline Street Ends in the comprehensive plan.

The current Comprehensive Plan (2022 Update) includes two policies specifically addressing Shoreline Street Ends:

- P 1.6: “Provide public access to shorelines by using street ends, regulations, or acquisition.”
- SA P10: “Shoreline street ends are a valuable resource for public use, access, and shoreline restoration. Design public or private use or development of street ends to enhance, rather than reduce, public access and to restore the ecological conditions of the shoreline.”

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<sup>2</sup> See <https://ecology.wa.gov/water-shorelines/wetlands/tools-resources/wetland-program-plan>.

<sup>3</sup> See <https://ecology.wa.gov/water-shorelines/wetlands/tools-resources/wetlands-climate-change>.

The draft One Seattle Comprehensive Plan Update includes the following policy that directly addresses Shoreline Street Ends:

- P 1.14: “Provide sustainable public access to shorelines by improving shoreline street ends, applying shoreline regulations, and acquiring waterfront land.”

382-2

In addition to this policy, there are other policies in the draft One Seattle Comprehensive Plan Update that are protective of the shoreline and public safety that would apply to Shoreline Street Ends as public spaces. We generally support the new policies and provide a few suggestions that address protection of the ecological environment against environmental impacts at Shoreline Street Ends:

### 1. Include Ecological Restoration in P 1.14.

Elements of the last sentence of current SA P10, quoted above, should be added to draft P 1.14 so it reads (additions in bold and underline):

P 1.14            Provide sustainable public access to shorelines by improving shoreline street ends **to enhance public access while also restoring ecological conditions of the shoreline**, applying shoreline regulations, and acquiring waterfront land.

This proposed edit carries forward the current policy and makes P 1.14 more consistent with other policies in the Comprehensive Plan requiring ecological protection and restoration, for example:

382-1  
cont

- SA G10 which “[r]equire[s] that no net loss of ecological functions occurs as a result of uses, development, shoreline modifications, maintenance activities, or expansion of existing uses.”
- P G5 which requires that “[p]ublic spaces support a healthy environment and resilient shorelines and mitigate the impacts of climate change.”
- LU 17.12 which aims to “[s]eek a net gain in wetland function by enhancing and restoring wetland functions across the city in City projects.”

The proposed change is also consistent with the code, Resolution 29370 and Directors Rule 12-2015 that govern Shoreline Street Ends in Seattle, along with Seattle’s Shoreline Master Program. It also reflects one of the goals of the most current Shoreline Street Ends Work Plan Update (Oct. 2017), which is to “[e]nhance shoreline habitat by including, where possible, ecological benefits such as native plantings and green stormwater treatment.”

### 2. Be inclusive of neighbors as part of “community partners” who collaborate on Shoreline Street Ends.

The Glossary at page 189 of the draft One Seattle Comprehensive Plan Update defines Shoreline Street Ends as:

“Shoreline street ends are City Council designated areas for public access and occur where streets meet a shore. Our program collaborates with community partners on maintaining and improving shoreline street ends for public use.”

This should be revised as follows to be more inclusive of neighbors of Shoreline Street Ends, who sometimes are not heard in the processes around maintaining and improving Shoreline Street Ends (additions in bold and underline):

“Shoreline street ends are City Council designated areas for public access and occur where streets meet a shore. Our program collaborates with community partners **including neighbors of shoreline street ends** on maintaining and improving shoreline street ends for public use.”

382-2  
cont

For some Shoreline Street Ends, community members volunteer as “stewards” and serve as a sort of liaison from community partners such as Friends of Street Ends to the Seattle Department of Transportation. There currently is no manual or formal certification process that governs stewards. In this de facto system of Shoreline Street End stewards, the voices of neighbors of Shoreline Street Ends are often unheard. Accordingly, it is important that when the One Seattle Comprehensive Plan Update mentions collaborating with “community partners”, it is clear that community partners include neighbors of Shoreline Street Ends so that all voices are heard in the future maintenance and improvement of Shoreline Street Ends.

Shoreline Street Ends provide incredible opportunities in Seattle for public access alongside ecological restoration and conservation that can make Seattle and its shorelines healthier and more environmentally sustainable for decades to come. The policies related to Shoreline Street Ends in the One Seattle Comprehensive Plan Update should acknowledge the importance of ecological restoration to public access and enjoyment of these spaces. Focusing on improving the ecology of Shoreline Street Ends may help to mitigate many of the environmental impacts that will be felt from increased growth and urbanization of Seattle in the coming decades.

We appreciate your consideration of these changes and look forward to continuing to be involved as the update process moves forward.

Sincerely,



Jacqueline C. Quarré  
Tharsis Law P.S.

**From:** [Aleksandra Radmanovic](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Concerns around proposed changes to zoning West Green Lake  
**Date:** Monday, May 20, 2024 11:18:06 AM

---

**CAUTION: External Email**

I'm deeply concerned by the proposal to rezone our neighborhood to allow up 3-6 story buildings along the Green Lake.

Please use C1-55 (M) zoned area along Aurora in West Green Lake for building affordable housing instead of rezoning NR3 neighborhood residential community between Winona and the lake that would devastate our community and displacing neighbors that have lived here for decades.

Thank you,  
Aleksandra Radmanovic  
206.261.0269

383-1



**From:** [Carlos Rai Trapero](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 11:03:14 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

384-1

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Carlos Rai Trapero  
iqrai.2564@gmail.com  
121 15th Ave E 306  
Seattle, Washington 98112

**From:** [Linda Ramsdell](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#)  
**Subject:** Comment on the Seattle Comprehensive Plan/130th Station Rezone Draft EIS  
**Date:** Monday, May 6, 2024 4:59:51 PM

**CAUTION: External Email**

Thank you for this opportunity to provide comments. I have lived on Corliss Ave North just south of 128th in the triangle area of land of our Haller Lake neighborhood that was rather newly included in what is now designated as an "Urban Center" as this parcel of land is in the walking zone that surrounds the upcoming 130th light rail station. I have lived in this location since 1989 and and anticipate staying in this neighborhood for the next 20-30 plus years.

Our city is experiencing growth and I support managed growth to add housing in our area recognizing that we are in walking distance from the upcoming 130th light rail. We have been seeking attention from the City of Seattle for decades to place sidewalks in our neighborhoods as promised when our area was first annexed by the city. I support a focus of growth between Interstate 5 and Aurora along 130th that will enhance safe walking to grocery stores and amenities. Since Washington State law is impacting re-zoning for all single family neighborhoods I favor a city wide plan that focuses on transportation corridors as noted in Alternative 4. Adding high-rise apartment buildings around neighborhood amenities that could provide single story living for families and for elderly.

385-1

Our neighborhood is surrounded by a wonderful tree canopy that provide energy efficient shade and many already have the designation of being a Tier 1 or heritage tree. Under Alternative 5 the charts shown our neighborhood as being zoned as LR1. I support that level of growth if developers are required to maintain a maximum percentage of healthy, long-living trees.

I understand that specific zoning street by street is still in the planning stages and that the public will have a chance to comment later this Fall about specific zoning recommendations.

385-2

Thank you,

Linda  
Linda Ramsdell  
12572 Corliss Avenue North  
Seattle, WA  
98133

**From:** [Carol Rava](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Morales, Tammy](#)  
**Subject:** comp plan enviro impact statement  
**Date:** Monday, May 6, 2024 11:22:01 AM

---

**CAUTION: External Email**

Hi there-

I am concerned that the EIS on the comprehensive plan fails to adequately address key issues related to urban forestry and the city's canopy.

Specifically, in section P3-3 the EIS does not state directly what the impact of the plan will be on Seattle's plants and animals, only that the impacts wouldn't reduce their survival rates in the wild. This is super vague language and should be clarified.

Also in that section, saying that the plan alternatives would not have 'significant unavoidable adverse impacts' on tree cover seems to gloss over real potential problems. What are the adverse impacts it will have? How is significant defined? And what makes this 'unavoidable'? I mean couldn't adverse impacts on the tree canopy absolutely be mitigated by requiring more greenscape vs. hardscape on new developments??

Finally - the EIS seems to say that the city can still meet it's 30% canopy goal largely through public lands. That is ridiculous - we will have whole swaths of the city with little to no canopy, increasing exposure to climate change impacts, etc. There is surely not enough public land nor would it make sense to foist all of the onus on public lands to count toward the 30% canopy goal. There needs to be provisions to have private lands explicitly have a % contribution goal in this 30%.

Thank you for your consideration.

carol

**From:** [Mireia Ravell Padial](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 6:07:21 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Mireia

Mireia Ravell Padial  
mravell@gmail.com  
6303 224th St SW  
Mountlake Terrace, Washington 98043

387-1

**From:** [Mireia Ravell](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 3:13:59 PM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Mireia R.P.

Mireia Ravell  
mravell@gmail.com  
6303 224th St SW  
Mountlake Terrace , Washington 98043

**From:** [Sarah Reuben](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Public Comment on One Seattle Draft Comprehensive Plan Update  
**Date:** Monday, May 20, 2024 2:01:04 PM

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**CAUTION: External Email**

Hello,

My name is Sarah and I live, work, and study in Seattle. I am emailing as I have many concerns with the Draft One Seattle Plan and call upon you to embrace a plan that allows for greater abundance and diversity of housing.

The Draft Plan does not plan for enough housing, keeping housing production below expected growth. The Draft Plan also does not allow for family-sized homes in middle housing. Restrictive size limits will limit the growth of family-sized homes in middle housing, which will continue to push families out of Seattle.

Instead of the Draft Plan that preserves the status quo and makes Seattle even more expensive, embrace housing abundance that will better meet Seattle's needs as a growing world-class city. This includes, but is not limited to:

- Allow bigger buildings in more places.
- Follow the spirit of HB 1110 to allow more middle housing to actually get built. Match or exceed state floor area minimums, setting FAR at at least 1.2 for fourplexes and 1.6 for sixplexes instead of a measly 0.9 across the board.
- Embrace transit-oriented development.
- Make Seattle a truly accessible and climate-conscious city by improving access to transit, identifying gaps in transit and work towards filling those gaps, and building infrastructure for safe active transportation like walking and biking.
- Allow more growth in low-displacement areas.
- Embrace mixed-use zoning so we can actually become a 15-minute city. Add more "neighborhood centers" and allow for corner stores on more than just corners.

I love Seattle, but without significant change, I may not be able to afford living here in the future. As a renter, I've experienced firsthand how expensive Seattle's housing market is, and without a financial windfall or zoning and market reform, I doubt I will ever be able to own a home in Seattle. More generally, as a Seattle resident, I see homelessness every day. Knowing that the 2024 point-in-time count shows a 24% increase in homelessness from 2022, and knowing that homelessness is tied to housing affordability, Seattle must embrace affordability through abundance if we wish to keep more of our unhoused neighbors off the streets and prevent displacement of underprivileged communities.

The Draft Plan maintains the status quo and will make Seattle more expensive -- increasing rent burdens, making homeownership less accessible, and driving displacement. We cannot afford a Plan that does not adequately address our housing crisis. Please change the Comprehensive Plan to reflect the needs of Seattle and make it a better, more affordable, more accessible, and more climate-conscious city.

Sincerely,  
Sarah Reuben

**From:** [Mickey Riley](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:22:07 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

390-1

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

PLEASE KEEP WHAT IS LEFT OF "THE CITY" GREEN" !

Thank you for your consideration.

Mickey Riley  
mickeyriley40@gmail.com  
5006 37 Ave NE  
Seattle , Washington 98105

**From:** [Susan Robb](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Sunday, May 12, 2024 9:42:40 AM  
**Attachments:** [41598\\_2024\\_56968\\_Fig1\\_HTML.png](#)  
[apha\\_favicon.png](#)

**CAUTION: External Email**

Dear Seattle City Council and Comprehensive Plan Drafters,

As you are most likely aware, daily access to urban green spaces (UGS) increases physical and mental well-being. Lack of access has the greatest impact on underserved populations, who are already impacted by the effects of economic, minority, and environmental stressors.

Additionally, urban green spaces will be increasingly important for us all as climate change worsens.

Seattle should be making a concerted effort to increase UGS and ensure that historically disenfranchised populations are experiencing an equal percentage of UGS and aren't being asked to travel to benefit from them.

With these issues in mind, I have comments about the proposed comprehensive plan.

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

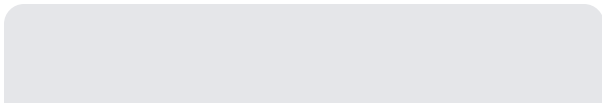

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

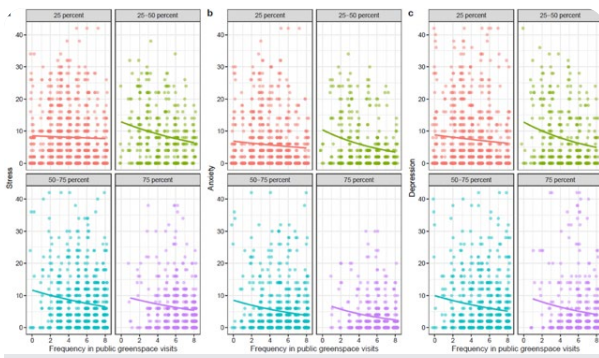
Sincerely,  
Susan Robb

391-1

Nature and mental health: An ecosystem service perspective  
science.org







A lower connection to nature is related to lower mental health benefits from nature contact - Scientific Reports nature.com

Improving Health and Wellness through Access to Nature apha.org



sciencedirect.com





May 5, 2024

Tharsis Law P.S.  
Jacquie Quarré  
425-891-7842  
[jacquie@tharsis.land](mailto:jacquie@tharsis.land)

Office of Planning and Community Development  
Seattle City Hall  
600 4th Ave, 5th Floor  
Seattle, WA 98104

**VIA EMAIL TO:**     [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)  
                                  [PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

*Copy to:*                   Michael Hubner  
                                  Long Range Planning Manager,  
                                  One Seattle Plan Project Manager  
                                  [michael.hubner@seattle.gov](mailto:michael.hubner@seattle.gov)

                                  Jim Holmes  
                                  EIS Lead  
                                  [jim.holmes@seattle.gov](mailto:jim.holmes@seattle.gov)

Dear Office of Planning and Community Development:

I represent Elizabeth and Jonathan Roberts, who own a home located next to the E. Harrison Street End on Lake Washington in Seattle. We are writing to provide comment on the draft One Seattle Comprehensive Plan Update policies that relate to Shoreline Street Ends in Seattle, and the Draft Environmental Impact Statement for the One Seattle Comprehensive Plan Update as it relates to those policies.<sup>1</sup>

In summary, we propose edits (1) to the language of draft P 1.14 to expressly include the need to “restore ecological conditions” that already is included in the current 2035 Comprehensive Plan, and (2) to the glossary definition of Shoreline Street Ends to be inclusive of neighbors to Shoreline Street Ends in the collaboration that occurs around these unique and important spaces. Please see the specific suggestions at pages 3-4 of this letter.

By way of background, the Roberts have lived in a community with multiple Shoreline Street Ends for decades, and in the last 3 years have owned a home next to a Shoreline Street End. Unfortunately, during this time the Roberts have observed deterioration of ecological conditions

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<sup>1</sup> See, e.g., Draft EIS at 3.11-28 (Shoreline Master Program Public Access).

of Shoreline Street Ends. For example, a mapped Environmentally Critical Area wetland in the shoreline at the E. Harrison Street End has been trampled and degraded over time, and vegetation is frequently cut back and removed without a plan or consideration for the ecological benefit the vegetation may provide.

There is a strong emphasis in state and federal law on protecting critical areas, including wetlands. The Growth Management Act (Chapter 36.70A RCW), Shoreline Management Act (Chapter 90.58 RCW), and numerous regulations in the Washington Administrative Code require Cities and Counties to protect critical areas. *See, e.g.*, WAC 365-190-080 (“Counties and Cities must protect critical areas.”). Additional state and federal laws also regulate wetlands, such as the Water Pollution Control Act (Chapter 90.48 RCW), the State Environmental Policy Act (Chapter 43.21C RCW), and Section 401 of the federal Clean Water Act.

The overall goal for statewide wetland resource management in Washington State, quoted from Executive Order 89-10 is:

“...to achieve no overall net loss in acreage and function of Washington's remaining wetlands base. It is further the long-term goal to increase the quantity and quality of Washington's wetlands resource base.”<sup>2</sup>

The Washington State Department of Ecology also recognizes the importance of wetlands in mitigating climate change: “Wetlands are a key player in global greenhouse gas budgets . . . they are also an important sink for greenhouse gases, where carbon is stored and prevented from entering the atmosphere.”<sup>3</sup>

For Seattle to continue to have healthy shorelines with vegetation and natural features that provide a beautiful environment for the public to enjoy while also supporting wildlife and battling climate change, ecological restoration needs to remain a clear policy for Shoreline Street Ends in the comprehensive plan.

The current Comprehensive Plan (2022 Update) includes two policies specifically addressing Shoreline Street Ends:

- P 1.6: “Provide public access to shorelines by using street ends, regulations, or acquisition.”
- SA P10: “Shoreline street ends are a valuable resource for public use, access, and shoreline restoration. Design public or private use or development of street ends to enhance, rather than reduce, public access and to restore the ecological conditions of the shoreline.”

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<sup>2</sup> See <https://ecology.wa.gov/water-shorelines/wetlands/tools-resources/wetland-program-plan>.

<sup>3</sup> See <https://ecology.wa.gov/water-shorelines/wetlands/tools-resources/wetlands-climate-change>.

The draft One Seattle Comprehensive Plan Update includes the following policy that directly addresses Shoreline Street Ends:

- P 1.14: “Provide sustainable public access to shorelines by improving shoreline street ends, applying shoreline regulations, and acquiring waterfront land.”

In addition to this policy, there are other policies in the draft One Seattle Comprehensive Plan Update that are protective of the shoreline and public safety that would apply to Shoreline Street Ends as public spaces. We generally support the new policies and provide a few suggestions that address protection of the ecological environment against environmental impacts at Shoreline Street Ends:

392-1  
cont

### 1. Include Ecological Restoration in P 1.14.

Elements of the last sentence of current SA P10, quoted above, should be added to draft P 1.14 so it reads (additions in bold and underline):

P 1.14            Provide sustainable public access to shorelines by improving shoreline street ends **to enhance public access while also restoring ecological conditions of the shoreline**, applying shoreline regulations, and acquiring waterfront land.

This proposed edit carries forward the current policy and makes P 1.14 more consistent with other policies in the Comprehensive Plan requiring ecological protection and restoration, for example:

- SA G10 which “[r]equire[s] that no net loss of ecological functions occurs as a result of uses, development, shoreline modifications, maintenance activities, or expansion of existing uses.”
- P G5 which requires that “[p]ublic spaces support a healthy environment and resilient shorelines and mitigate the impacts of climate change.”
- LU 17.12 which aims to “[s]eek a net gain in wetland function by enhancing and restoring wetland functions across the city in City projects.”

The proposed change is also consistent with the code, Resolution 29370 and Directors Rule 12-2015 that govern Shoreline Street Ends in Seattle, along with Seattle’s Shoreline Master Program. It also reflects one of the goals of the most current Shoreline Street Ends Work Plan Update (Oct. 2017), which is to “[e]nhance shoreline habitat by including, where possible, ecological benefits such as native plantings and green stormwater treatment.”

### 2. Be inclusive of neighbors as part of “community partners” who collaborate on Shoreline Street Ends.

The Glossary at page 189 of the draft One Seattle Comprehensive Plan Update defines Shoreline Street Ends as:

“Shoreline street ends are City Council designated areas for public access and occur where streets meet a shore. Our program collaborates with community partners on maintaining and improving shoreline street ends for public use.”

This should be revised as follows to be more inclusive of neighbors of Shoreline Street Ends, who sometimes are not heard in the processes around maintaining and improving Shoreline Street Ends (additions in bold and underline):

“Shoreline street ends are City Council designated areas for public access and occur where streets meet a shore. Our program collaborates with community partners **including neighbors of shoreline street ends** on maintaining and improving shoreline street ends for public use.”

392-1  
cont

For some Shoreline Street Ends, community members volunteer as “stewards” and serve as a sort of liaison from community partners such as Friends of Street Ends to the Seattle Department of Transportation. There currently is no manual or formal certification process that governs stewards. In this de facto system of Shoreline Street End stewards, the voices of neighbors of Shoreline Street Ends are often unheard. Accordingly, it is important that when the One Seattle Comprehensive Plan Update mentions collaborating with “community partners”, it is clear that community partners include neighbors of Shoreline Street Ends so that all voices are heard in the future maintenance and improvement of Shoreline Street Ends.

Shoreline Street Ends provide incredible opportunities in Seattle for public access alongside ecological restoration and conservation that can make Seattle and its shorelines healthier and more environmentally sustainable for decades to come. The policies related to Shoreline Street Ends in the One Seattle Comprehensive Plan Update should acknowledge the importance of ecological restoration to public access and enjoyment of these spaces. Focusing on improving the ecology of Shoreline Street Ends may help to mitigate many of the environmental impacts that will be felt from increased growth and urbanization of Seattle in the coming decades.

We appreciate your consideration of these changes and look forward to continuing to be involved as the update process moves forward.

Sincerely,



Jacqueline C. Quarré  
Tharsis Law P.S.

DEIS StoryMap Comment

Name: Janet Robinson

Email: janetrobinson65@gmail.com

Date: 5/6/2024

Comment:

I am a property and business owner at 12303 15th Ave NE. I am very excited about the prospect of changing the zoning in the 130th & 145th Street Station Area. Especially Alternatives 2 and 5. I think that allowing for higher elevations of townhomes, apartment buildings, and mixed use buildings with fewer requirements for parking will make for more vibrant and walkable streets. We need more density in this part of Seattle. We need more living units as well as room for small businesses. The light rail station will allow for easy commuting into downtown Seattle and so more working families will want to live close to the station. And the more services that are provided within walking distance, the more appealing this neighborhood will be. Fewer parking lots will make the area appeal to more people.

**From:** [Jason Rock](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Bring back the Abundance Map  
**Date:** Monday, May 6, 2024 8:51:39 AM

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**CAUTION: External Email**

It's clear that this process has been political, as we move forward with this process we need to bring back the planner proposed Abundance Map that begins to meet the needs of our growing city instead of the politically motivated options presented by the mayor's office that would double down on the mistakes of the past.

**From:** [Anne Roda](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:32:11 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Mitigation recommendations:

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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Anne Roda  
imanneroda@gmail.com  
1941 Gilman Dr W Lowr  
Seattle, Washington 98119



**From:** [carrie root](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Moore, Cathy](#)  
**Subject:** Questions regarding the Comprehensive Plan's environmental statement  
**Date:** Monday, May 6, 2024 3:25:22 PM

---

**CAUTION: External Email**

There are some parts of the Comprehensive Plan's environmental statement that I believe need to be clarified:

- Seattle has a goal of 30% tree canopy. I trust that there has been analyses of how much public land is available to be used to replace trees removed by development on private land. Is there a concrete plan to ensure that these trees will be planted in a timely fashion?
- In the same vein, I would like to see documentation that the alternatives put forth in the Comprehensive plans will not have "significant, unavoidable adverse impacts on tree canopy cover", nor will they "reduce the likelihood of survival or recovery of a plant or animal species in the wild". Those are pleasant sentiments, but we need to have supported analysis of what the impacts on trees and wildlife are expected to be, and that the proposed tree planting programs will compensate for the lost urban forest and associated increased hardscape.

Regards,

Carol Root  
11032 30th Ave NE, Seattle, 98125  
206-499-3962

**From:** [Keith Roraback](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Saturday, May 18, 2024 6:50:48 PM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

397-1

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Keith Roraback  
kroraback@me.com  
4327 NE 45th St  
Seattle, Washington 98105-5139

**From:** [Cynthia ROSE](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** One Seattle Plan response  
**Date:** Monday, May 6, 2024 12:18:07 AM

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**CAUTION: External Email**

I am in favor of alternative 2 or 4 for future housing plans for Seattle as there is more possibility in these alternatives for the city to try to maintain a tree canopy in order to help our environment Seattle while providing additional housing.

I also believe that the TREE PROTECTION ORDINANCE SHOULD BE AMENDED TO MAXIMIZE RETENTION OF EXISTING TREES 6" DSH AND LARGER, AND THAT THE SCCI DIRECTOR SHOULD BE GIVEN the ability to ask for alternative site designs to maximize the retention of trees.

I am wondering what impact there will be on the plants and animals in each of the alternatives.

Sincerely yours,

Cynthia Rose, 11557 23rd Ave Ne, Seattle , Wa. 98125

398-1

**From:** [Hannah Rosentreter](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Bring back the OPCD Abundance Plan  
**Date:** Saturday, May 18, 2024 9:16:42 AM

---

**CAUTION: External Email**

Hello,

I am in favor of the OPCD Abundance plan and reject Mayor Harrell’s current plan that has significantly reduced the amount of planned housing in Seattle’s comprehensive plan.

The OPCD Abundance Plan showcases a future with transit-oriented development that helps create desperately needed housing along natural corridors that will help make our city more accessible, walkable, and enjoyable. This is the future Seattle needs to be working toward. Mayor Harrell’s proposal falls short and removes critical opportunities for development of neighborhood centers.

Please bring back the OPCD Abundance Map!!!

Thank you for your time,  
Hannah

--  
**Hannah Rosentreter**  
(she/her)  
UX Portfolio: <https://hannahrosentreter.com>  
715-338-9517 | [hannahrosentreter@gmail.com](mailto:hannahrosentreter@gmail.com)  
[LinkedIn](#) | [Instagram](#)

399-1

**From:** [Carolyn Rubenkönig](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS - comprehensive plan  
**Date:** Monday, May 6, 2024 10:34:44 AM

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**CAUTION: External Email**

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for urban forest loss?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development? Why are we even considering removing mature trees already doing fine work of ecosystem services? Services that any young replacement tree cannot possibly replicate any time soon, if at all, given how climate change is making it harder to establish new plantings.

Mature trees and pocket forests are doing so much for us- millions of dollars in ecosystem services like cleaning and storing water, reducing erosion, cooling and shading, providing habitat, and more. We should be prioritizing saving and honoring these trees already doing the work. They cannot be replaced.

Sincerely,

Carolyn Rubenkönig

**From:** [Catherine Ruha](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** One Seattle Comments  
**Date:** Saturday, May 4, 2024 11:19:21 AM

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**CAUTION: External Email**

Dear City of Seattle,  
Concerning the One Seattle Plan:

As I look over my notes from waking at 2:00 am and from the virtual meeting I attended on May 2, 2024 this is what comes up:

Climate Change Resilience and Displacement concerns and cutting costs on the lower class and poor:

- Energy efficient construction is needed for all these new homes in whatever form they will take. Social Housing is focused on this. I support Social Housing for its commitment to energy efficiency and to paying no more than 30% of your income.
- Walkable neighborhoods to healthy food and pharmaceuticals. I think more City encouragement/rezoning to putting close access to necessities is important.
- Not so excited by large apartment buildings along neighborhood streets – smaller multi-family units feel more neighborly and also more able to keep access to nature – trees and places for gardens.

What makes walking pleasurable and desirable? Find places to change focus on car culture to focus on walking/biking/human culture:

- Decrease hardscape and increase trees and other vegetation. More trees and rain gardens along easements.
- Encourage homeowners to plant drought tolerant, native and near native trees and other plants as well as creating rain gardens. (via water utility bills and City could lead by example)
- More crosswalks with islands and walk lights. Again, refocus on walking/biking/human oriented culture and away from car culture.

New housing and sense of community - built to encourage interaction – community garden space incorporated into?

Also:

- P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals" and

"none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

- p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative?
- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?
- Is canopy replacement equivalence even possible with replanting since removed trees, if not removed, would have increased growing according to scientific articles?

Thank you! Much has gone into this. Please continue to be thoughtful and respectful to communities on this and to what remains of the natural world in Seattle. Seattle used to be the Emerald City, let's not lose this and make sure the beautiful green plants are expanded into poorer areas. And, more small parks – for Forest Bathing ☺

Catherine Ruha  
1541 NE 91<sup>st</sup> Street  
Seattle, WA 98115

**From:** [Moani Russell](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 11:07:31 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Moani Russell  
moanirussell@gmail.com  
7526 39TH AVE NE  
Seattle, Washington 98115

402-1



**From:** [Hayk](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comprehensive Plan Feedback  
**Date:** Monday, May 20, 2024 8:46:12 PM

---

**CAUTION: External Email**

I support the original abundance map, allowing for 10,000+ new dwelling units a year, 44+ neighborhood centers, and more. Thoughtful upzoning/density and housing will decrease housing cost, traffic, and pollution. I support what Complete Communities Coalition is advocating.  
- Hayk Saakian

403-1

May 6, 2024

VIA Email  
[PCD\\_CompPlan\\_EIS@seattle.gov](mailto:PCD_CompPlan_EIS@seattle.gov)

**RE: DEIS Comment Letter (RSL-Zoned Property between Union and E Pine St.)**

404-1

Dear Mr. Holmes:

**Background:** A common critique is that the draft Comprehensive Plan and its associated draft environmental impact statement (DEIS) does not go far enough to generate housing to adequately address Seattle's housing crisis while appropriately balancing displacement concerns that the City acknowledges is difficult to quantify and measure.

**Requests:** As a City resident and property owner, I strongly encourage the City to be more bold to address the housing crisis and enact the following:

- Create a preferred alternative that increases housing potential for RSL-zoned land **between Union and E Pine St.**
- Enact a specific land use policy that encourages rezoning this property from RSL to LR1, LR2, or LR3:

*Proposed LU 1.7.1: Rezone areas currently zoned RSL to an appropriate LR zone for land between Union and E. Pine St. located in the 23rd and Union-Jackson Residential Urban Center.*

This approach advances the City's housing goals and continues to address the City's displacement concerns.

I also request that the City's FEIS include an analysis of the trade-offs between the draft anti-displacement strategies and the quantifiable need to generate more housing. Specifically, I request that the City analyze the amount of additional housing that could be generated under the following scenarios:

404-2

1. if all RSL-zoned land in Centers was rezoned to LR regardless of displacement risk;
2. if all RSL-zoned land in Centers that is not a high-displacement risk was rezoned to LR;
3. if all RSL-zoned land in Centers that is only low-displacement risk was rezoned to LR; and
4. if none of the RSL-zoned land in Center was rezoned to LR (no action). For the no action alternative, identify the number of homes that would likely be demolished or renovated to create luxury homes and still result in displacement.

This data would help the City weigh the pros and cons of its draft plan to limit RSL to LR rezones in Centers only with low-displacement risk.<sup>1</sup>

### Background Information:

- RSL-zoned land between Union and E. Pine St. is located in the 23rd and Union-Jackson Residential Urban Center. This area is attractive: walking distance to Capitol Hill, Central District, and Madrona/Leschi.
- As we've repeatedly seen, high-income individuals purchase existing homes in this area, demolish or substantially renovate the homes, and build new luxury single family homes in the exact area where the City desires to encourage new housing and discourage displacement. The displacement risk is already here and real.

### City Displacement Analysis:

- Comp Plan materials state that "market pressures ... drive displacement."<sup>2</sup> The DEIS shares a similar sentiment with supplemental information.<sup>3</sup>
- The City is attempting to balance encouraging housing production and discouraging displacement. To this end, the City's broad approach currently contemplates rezones from RSL to LR only for areas within existing centers that are zoned Residential Small Lot and are in areas of low-displacement risk. The RSL-zoned land between Union and Pine St. is not low-displacement risk. Thus, the City is poised to miss an opportunity to provide additional housing here.
- The City's draft documents understandably use a broad brush, and one purpose of public comment is to inform City Staff of the realities on the ground.
- ***For this unique area***, the City's draft approach will, ironically, exacerbate displacement and restrict new housing. Again, the practice of creating luxury homes in under-zoned property is commonplace between Union and Pine St in this Urban Center.
- The DEIS and associated draft Comp Plan presume that "market pressures" and associated displacement will be lower if the area is not rezoned to LR. This presumption is not accurate in this particular neighborhood.<sup>4</sup>

<sup>1</sup> Updating Seattle's Neighborhood Residential Zones (March 2024) ("We propose to remove RSL as a zoning category. Areas currently zoned RSL with low risk of displacement or within a half mile of a light rail station would be rezoned to Lowrise 1 (LR1), a multifamily zone that allows a similar number of units but more floor area. Areas zoned RSL located elsewhere would be rezoned to one of the updated Neighborhood Residential zones.") (emphasis added).

<sup>2</sup> One Seattle Plan Anti-Displacement Framework, p. 4.

<sup>3</sup> DEIS, Ch 3.8-22-30.

<sup>4</sup> The DEIS does not quantify the displacement impact of single-family home development / substantial alterations on under-zoned property. The cited TRAO data does not provide relevant information on this point.

- Rezoning this area from RSL to LR would create more housing and generate more funding for affordable housing through MHA. The DEIS notes that MHA is an identified mitigation measure for displacement. Rezoning would also discourage displacement from converting existing housing stock to luxury homes.

**Comprehensive Policy:** The requested policy is consistent with draft Policy LU 1.7, although we would encourage the City to refine its analysis to understand the trade-offs of the need for housing while enacting sensible anti-displacement strategies. We also encourage the City to enact a specific Comprehensive Plan policy for this unique area:

Proposed LU 1.7.1: Rezone property currently zoned RSL to an appropriate LR zone for land between Union and E. Pine St. located in the 23rd and Union-Jackson Residential Urban Center.

Thank you for your consideration.

Sincerely,

Kevin Saliba

DocuSigned by:

*Kevin Saliba*

8771E730239047C...

**From:** [Barbara Sanborn](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 2:05:19 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Please consider the following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration,  
Barbara Sanborn  
Seattle, WA 98105

Barbara Sanborn  
sanbornbarbara@gmail.com  
5038B Sand Point Way NE  
Seattle, Washington 98105

405-1

## DEIS StoryMap Comment

Name: Saunatina Sanchez

Email: saunatina@proton.me

Date: 4/26/2024

## Comment:

Corner stores throughout Neighborhood Residential areas is one of the best changes we can make to the city. Having small stores throughout neighborhoods will help bring neighbors together and help with safety by adding eyes on the street.

The Draft One Seattle Plan contemplates an average annual housing production rate of 5,000 homes over the next 20 years. This is significantly lower than the 6,800 to 12,500 homes that Seattle has actually built per year since 2015—which itself has been insufficient to keep up with job growth and demand.

Simply put, the current Draft Plan is a plan to make Seattle more expensive. This will most impact renters, low-income people, and people of color, as we face rising rents and displacement pressures. This is a step back in our efforts to meet the growing demand for housing.

Allow midrise housing (4-8 stories) and mixed uses in all residential areas within walking distance of frequent transit. Allow middle housing like triplexes, fourplexes, sixplexes, townhouses, and stacked flats throughout all residential areas. Enlarge the proposed Neighborhood Centers, from 800-ft to ¼ mile. Reintroduce Neighborhood Centers that were studied but not included in the Draft Plan. Allow the development of cross-laminated timber highrise buildings in Regional and Urban Centers.

I support the following features of the Draft Plan: Expanding Urban Center boundaries and creating a new Urban Center at 130th Street, Designating Ballard as a new Regional Center, Removing parking minimum requirements near transit and considering a citywide removal, Policy to support community-based developers working to help BIPOC homeowners avoid displacement, Allowing corner stores throughout Neighborhood Residential areas.

406-1

406-2

**From:** [Brent Silver](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comp Plan Update  
**Date:** Thursday, March 7, 2024 4:08:25 PM

---

**CAUTION: External Email**

Dear Seattle Officials,

Please consider the following to beef-up this weak Comp Plan

- Apartments allowed on ALL arterials with 10 minute or better bus service. The higher allowed the better. Perhaps the maximum height (7 floors) directly on them and 3/4 story not on the arterial but within the 800 feet distance.

-Apartments on all corner lots that are 50% larger than the underlying zoning. So 7500sqft minimum to qualify in typical 5000 sqft lot zoning.

-Look into those 6 & 8 pack flats for some areas. Just building townhomes will not get us to where we need to be. However if you plan to rely on townhomes so much you must increase apartments. See first point regarding that.

-The FAR has to be improved. Anything under 1 is pointless. Mid to high 1s at a minimum please in some areas.

Thank you,

Laura Sanders

**From:** [Hope Sanford](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:48:43 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

These are my comments regarding the One Seattle Plan draft Environmental Impact Statement: Most importantly, the draft EIS does not address saving the 6 inch and larger diameter trees we have. We need large trees for shade during our new, hot summers, and for the CO2 capture they provide for us all. A sapling planted to replace an old growth tree does not provide these for many years, and may not survive. A sapling has to be watered deeply at least once a week during our new summers for at least 5 years.

The EIS draft is mighty vague about the actual projected tree loss, gives no numbers, and simply guesses, conveniently, that there won't be adverse impact on Seattle's tree canopy. Their guess is disingenuous- the tree canopy loss under this plan will be extreme. Seattle will no longer be the Emerald City.

Under the current Tree "protection" ordinance, SDCI approves the removal of every single tree a developer wants to remove for any reason, regardless of size. If this is not changed, the impact on Seattle's tree canopy under the One Seattle Plan will be disastrous. Expect heat islands, worsening air quality and hotter summers. Developers will continue to rake in \$\$\$\$\$ and Seattle residents will suffer.

Thank you for considering my input, Hope Sanford

Hope Sanford  
Hopesnopes@gmail.com  
3230 NE 91st St  
Seattle, Washington 98115

408-1



**From:** [Lindsey Sargent](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comments on the comp plan  
**Date:** Thursday, April 11, 2024 8:06:08 PM

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CAUTION: External Email

Hello!

I'm not sure if this is the best place to send comments? I tried to join tonight but couldn't get into the meeting and the link in the calendar invite as broken as well :(

My husband and I live along 145th. We've been going to the meetings for several years now and we were disappointed to see the plan released with the potential rezone around the 145th street station removed. 145th is a busy connector, and Shoreline has really stepped up with some great taller projects (6-7 stories) already underway. We would love to see the same happening on our side of the street. Seattle desperately needs more housing, especially close to light rail and upzoning along these busier arterials and close to transportation makes great sense. Our neighborhood would love to see first story retail- 3rd spaces, coffee shops, a local market, day care and small businesses walkable to our neighborhood.

Please let me know if there is somewhere else I should go to submit comments. I would love to be involved if you have meetings coming up in the future.

Thank you,

Lindsey Sargent  
2219 n 145th street Seattle

409-1

DEIS StoryMap Comment

Name: Eleanor Saxton

Email: [archivistellie@gmail.com](mailto:archivistellie@gmail.com)

Date: 5/6/2024

Comment:

The city should study the impacts of citywide elimination of parking minimums, expanded highrise zoning within a half mile of all light rail stations, parks, and grocery stores, and floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

410-1

**From:** [Susan Scanlon](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:32:03 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

411-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Susan Scanlon  
scanlons4@comcast.net  
8021 11th Ave NW  
Seattle, Washington 98117

DEIS StoryMap Comment

Name: Jennifer Scarlett

Email: trentjen@yahoo.com

Date: 5/6/2024

Comment:

There is not a clear enough definition of affordability levels. I'm aware our greatest need is for very low income housing, please explain what "affordability at all levels" actually means.

412-1

## DEIS StoryMap Comment

Name: Jennifer Scarlett

Email: trentjen@yahoo.com

Date: 5/6/2024

## Comment:

Resolution #31870 was signed along with the last upzones, (MHA). This was the resolution to study whether or not South Park for the designation criteria as an Urban Village. This study was never done, and now South Park will be upzoned again. Why was the promised study not done? A large portion of South Park is in ECAs, and the area is remotely located, geographically isolated, and surrounded by industrial zoning, not residential as other urban centers are. Why are we still designated as something South Park has never been? When will South Park be planned using the most recent studies and best info?, (not assumptions or "visioning")

DEIS StoryMap Comment

Name: Jennifer Scarlett

Email: trentjen@yahoo.com

Date: 5/6/2024

Comment:

South Park does not fit the Urban Center guidelines. Why is South Park designated an Urban Center?

414-1

DEIS StoryMap Comment

Name: Jennifer Scarlett

Email: trentjen@yahoo.com

Date: 5/6/2024

Comment:

Why was residential small lot applied to 2500 sq ft lots in South Park? Other areas of the city were 5,000 sq ft,. Did the city planners overlook the historic 2500 sf lots in South Park? Developers are adding much more lot coverage than is allowed, and we are losing trees fast. Is this mistake fixed in the One Seattle plan?

415-1

**From:** [Jennifer Scarlett](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 11:53:08 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

416-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Jennifer Scarlett  
trentjen@yahoo.com  
1045 S SULLIVAN ST  
SEATTLE, Washington 98108



**From:** [Estelle Schiefer](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** EIS Question  
**Date:** Monday, May 6, 2024 4:41:07 PM

---

**CAUTION: External Email**

Hello,

Can you please explain to me in detail how you plan to maintain our current tree canopy while carrying out the comprehensive plan? If a bunch of big trees are going to be cut down, how can little twig trees be a suitable replacement?

Thank you,

Stella Schiefer  
Age 15  
Wedgwood, Seattle

417-1

**From:** [Hans Schiefer](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** question  
**Date:** Monday, May 6, 2024 4:51:24 PM

---

**CAUTION: External Email**

Hello,

I have a question about the proposed comp plan. How will the comp plan increase tree canopy in frontline communities where people have more asthma and need cleaner air?

-Hans Schiefer wedgwood neighborhood of seattle

418-1

**From:** [Delia Scholes](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Morales, Tammy](#)  
**Subject:** Comment on draft EIS for One Seattle Comprehensive Plan  
**Date:** Monday, May 6, 2024 10:46:17 AM

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**CAUTION: External Email**

Thank you for the opportunity to comment on the Plan and the draft EIS statement.

The EIS seems to say at several points that urban nature will likely need to be sacrificed to our housing needs. The housing vs trees (and other urban nature) type of thinking is absolutely a false dichotomy. The immediate thought when this language appears is that the document is in service to real estate or other vested interests that would find it simpler to go for the wholesale removal of many aspects of our urban nature and a pretense of replacing it later.

For example, Section P3-3 talks about how the alternatives under review will not impact plant or animal species in the wild. One question arising here is how will the plan impact our own urban plants and animals—with specific data? The omission is concerning. Please talk directly about how urban nature will be protected. It is essential for climate change protection and equitable treatment of our citizens.

The same section (P3-3) has a general statement that the alternatives would not be expected to have adverse impacts on tree canopy cover. A second question is how will this come about? If this is to be through tree planting after the removal of larger trees that are part of the current canopy, this is not in any way equivalent or acceptable. Given the current tree ordinance, which will diminish the private land available for trees and increase hardscape throughout the city, there need to be more specifics on how the tree current canopy will be preserved—and expanded. (We are currently losing canopy and are not progressing toward the 30% goal. Where I live, on Beacon Hill, we are not close to the 30% goal.)

I understand that all of the 5 alternatives will achieve approximately the same amount of housing.

Are any of the 5 alternatives more oriented toward preserving urban nature? If so, this should be noted as an asset of that alternative.

Thank you for your work and for your consideration of citizen comments,

Delia Scholes  
Beacon Hill 98108

**From:** [Jennifer Schubert](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Greenlake rezoning community input  
**Date:** Monday, May 20, 2024 2:41:07 PM

---

**CAUTION: External Email**

I live at 7426 Keen Way North. I purchased my home as a fixer-upper in 2020. I have worked very hard to improve it over the years. I have raised my son here and hope to spend the rest of my life here. My home is my primary investment.

This plan to re-zone my neighborhood for 6-story apartment buildings and condos would change it beyond recognition.

There is no infrastructure here to support such a drastic increase in density. Parking is already very tight, access is difficult, and congestion is a constant and growing problem.

Worse, high-rises filled with large numbers of short-term residents would transform a cozy urban neighborhood of old family homes and modest yards to a place much less safe and much more crowded. These looming commercial structures will block light and air and commandeer the open space.

A sprawling corridor of multistory buildings will ruin the neighborhood. Indeed, it will no longer even be a neighborhood.

Already, our neighborhood has been zoned for increased density and we see multiple dwellings being built on what used to be single-home lots. That's enough.

Thank you,  
Jennifer Schubert

420-1

**From:** [hannah.scott](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [Rivera, Maritza](#); [Harrell, Bruce](#); [PCD\\_CompPlan\\_EIS](#); [Hazelhoff, Aja](#); [Carroll, Patrice](#); [Holmes, Jim](#); [Staley, Brennon](#)  
**Subject:** Resident feedback: District 4 neighborhood center proposal (NE 55th St. and 40th Ave NE)  
**Date:** Monday, May 6, 2024 3:52:58 PM

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**CAUTION: External Email**

To whom it may concern (cc Mayor Harrell and Councilmember Rivera),

I'm writing to provide feedback on the recent city proposal to develop **District 4** as a high density neighborhood center; and specifically about the 800 ft radius around **the intersection of NE 55th St. and 40th Ave NE**. My husband and I live at 5614 40th Ave NE and this development will directly impact our home and neighborhood.

First, I would like to acknowledge the need for increased density and affordable housing in our city, which we are in support of when done in a thoughtful and sensible manner. However, the specific neighborhood that we live in does not have sufficient business opportunities for job placement, nor the public transit options to support adding high density living.

In the last 5 years hundreds of high density housing units have been developed in the area directly surrounding University Village, which is far more sensible as it is near to the light rail, UW campus, and retail spaces for business and job growth. This is where it makes sense!

In addition to added housing surrounding U Village, in the near vicinity to 55th and 40th, we have recently added 2 senior living facilities adding 150+ units and another large mixed use development will be installed at the intersection of 35th and 85th (old QFC building). Our neighborhood is simply not set up with the infrastructure to sustain the large influx of people. This will add hundreds more people on our already jam packed roads entering and leaving this area. We fought hard for bike lanes along 35th Ave NE a few years ago and it was struck down. Adding high density living without also having high density job opportunities to an already non-bike friendly neighborhood, without sufficient public transit will make this area impossible to traverse.

We are in support of positive infrastructure and sensible housing development (close to light rail, shopping center, etc.), but trying to turn the smaller pocket neighborhoods into those city centers without the transit, jobs, etc - is not the right way to fix the housing problem.

Please reconsider this site for increased density, we are not set up for it.

Hannah Scott & Cornelius Bradford Jr  
5614 40th Ave NE

Sent from my iPhone

421-1

**From:** [Norah Scully](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 10:29:20 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Norah Scully  
scullynorah@gmail.com  
1414 NW 62nd St.  
Seattle, Washington 98107

422-1

**From:** [Juliet Shen](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** environmental Impact Statement for One Seattle Comprehensive Plan  
**Date:** Friday, May 3, 2024 5:38:23 PM

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CAUTION: External Email

Please clarify how you will stop the continued loss of tree canopy in Seattle due to in-fill development in residential neighborhoods that allow developers to clear mature trees from single family lots in order to maximize their profit from redevelopment? The current tree ordinance has resulted in further loss of tree canopy when you state the goal is to achieve 30%. What studies have you made showing that planting young trees will compensate for removal of established mature trees during development?

Juliet Shen

423-1

**From:** [Sandy Shettler](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** DEIS Comment  
**Date:** Wednesday, May 1, 2024 10:26:12 PM

---

**CAUTION: External Email**

Hi there,

Does the 30% tree canopy goal newly listed as a "goal" also retain its status as a policy? In other words, is the City required to be make progress on toward 30% tree canopy, or is it simply aspirational?

Thank you,

Sandy Shettler

***"There is a magic machine that sucks carbon out of the air, costs very little, and builds itself. It's called a tree." - George Monbiot***

424-1



**From:** [Julia Shettler](#)  
**To:** [PCD CompPlan EIS](#); [Strauss, Dan](#)  
**Subject:** Comments on Draft Comprehensive Plan Environmental Impact Statement  
**Date:** Thursday, May 2, 2024 9:27:09 PM

---

**CAUTION: External Email**

Please see my comments below:

1.  
Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” **How does this plan impact Seattle’s urban nature and wildlife?**
  
2.  
Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **How does the increased hardscape, as set forth in this plan, and tree replanting programs make up for Seattle’s existing urban forest?**
  
3.  
The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. **How many acres of public use land will be available to meet our tree canopy goals? How many trees will need to be replanted annually to meet our tree canopy goals?**

**From:** [Sandy Shettler](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Public comment on DEIS for Comprehensive Plan  
**Date:** Monday, May 6, 2024 4:35:02 PM

---

**CAUTION: External Email**

Dear Comprehensive Plan DEIS comment coordinators:

Here is my comment on the Draft EIS for the Comprehensive Plan:

426-1

Neither the Plan nor the Draft EIS adequately consider how the loss of tree canopy, which has already been documented by the City, and which will accelerate under the proposed Plan. This will result in increased “heat islands” and adverse health effects on vulnerable populations and overburdened communities from reduced tree canopy. Indeed, the Plan and EIS are required to have strategies to reverse the documented loss of tree canopy reflected in Seattle now being further from its goal than when the goal was adopted.

1. Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” **What is the impact of the plan specifically on Seattle’s plants and animals? What data supports the conclusion that removing most of Seattle’s existing trees (47% on private residential property, 23% adjacent street trees often removed during construction) and replanting elsewhere will not have an impact on Seattle’s plants and wildlife?**
2. Section P 3-3 states that “none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover.” **What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for the loss of existing mature trees. What is the time frame of this analysis? Does the analysis evaluate the impact of the anticipated loss of approximately 4000 mature trees per year in the ten-year timeframe of this Plan?**
3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. **How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?**

The Comprehensive Plan should include revisions to the tree ordinance, as well as policy changes to ensure enforcement by moving tree protection out of an agency which has a structural bias against tree retention.

426-1  
cont

Thank you,

Sandy Shettler

***"There is a magic machine that sucks carbon out of the air, costs very little, and builds itself. It's called a tree." - George Monbiot***

Dear Public Policy Officials:

**I support Alternative 2.**

Below are comments on the DRAFT EIS, focused specifically on the plants and animals section.

P 3-3-29-30 Please analyze the potential impact of the 5 options on Seattle plants and animals. This is a Seattle EIS, not a regional or state EIS. Saying "unlikely to result in appreciable impacts on regional populations of plants or animals" and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals.

p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover" is not supported by trends, practice and what the impacts will be from the most recent tree removal ordinance passed in 2023. The new tree protection ordinance actually increases the potential for tree removal in several ways. One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5 year periods consistent with the city's canopy studies) with increased development density in each alternative?

- What is your estimation of planting needs and time frame to replace the lost canopy (over 5 year periods tracked by the city's canopy study)?
- How can this occur given current staffing within SDCI and the several arborists who work for SDCI?
- How could canopy replacement occur within the given time frame?
  
- What is the plantable acreage available for planting trees in each of the following public areas: the city's right of ways, Natural Areas and Developed Parks?
- How many trees and what size will need to be planted in these areas every year to make up for trees removed during development on lots?
- How will replacing evergreen conifers with deciduous trees lead to equivalent replacement?
- How long will it take for a 50, 60, or 80 year old conifer to regrow?
- How long would a deciduous replacement tree take to become a conifer's functional and biological equivalent from an ecosystem services standpoint?
- What is the available acreage available to plant trees on private property?
- When will it be *possible* to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?

427-1

- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible?
- What is the projected loss in canopy volume over the next 20 years as big conifer trees are removed?
- Canopy volume, especially of coniferous trees during our rainy season, are critical factors in reducing stormwater runoff. What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?
- As to other tree potential mitigation measures, add:
  - **Amend the Tree Protection Ordinance** to require developers to maximize the retention of existing trees 6" DSH and larger.
  - Give SDCI Director ability to ask for alternative site designs to save trees.
  - Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
  - Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
  - Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

427-1  
cont

#### **Additional questions that connect the draft EIS to the Comprehensive Plan:**

1. The city has a goal of reaching 30% canopy cover by 2037. Please articulate what policies in the One Seattle Plan will help reach this goal.
2. An estimated 67% of urban trees are in residential areas. How will the One Seattle Plan protect these trees when the 2023 tree code allows developers to cover 85% of a lot and the only protected trees are heritage trees?
3. The state's 2023 missing middle housing law legalized two to six-unit homes in all single family neighborhoods, including neighborhood residential which has most of the city's canopy. How will this level of density impact the city's 30% canopy goal?
4. Will the One Seattle Plan consider implementing construction site designs that protect existing trees?
5. Prioritizing tree canopy expansion in areas with the least tree canopy is listed as a specific goal of one the plans three key moves. "Community & Neighborhoods". How will the OneSeattlePlan achieve this goal under new state laws and Seattle's 2023 tree code?
6. Will the One Seattle Plan's DEIS consider removing any of the 2035 Comprehensive Plan urban forest / tree canopy policies, strategies, or other written objectives / goals? If so, which prior policies, strategies, and goals will be removed, and why?
7. Has the DEIS considered the difference in the average 2021 tree canopy cover between Neighborhood Residential zones compared to Multifamily zones? • NR zones had 33.6% coverage (7.0k acres of tree

canopy within 20.8k acres of land); • whereas Multifamily zones had 22% coverage (0.9 acres of tree canopy within 4.1k acres of land). If not, why? If so, in what way will each of the alternatives impact the long-term acreage of canopy cover within NR-zones?

8. Will the DEIS consider how much of Seattle’s 1,600+ acres of Developed Park Land without tree canopy has the physical and logistical potential to plant medium to large trees?

9. Will the DEIS consider how much of Seattle’s 8.0k acres of Neighborhood Residential and Multifamily Residential which has roughly 500,000 medium to large trees will be lost with the addition of 150,000 new dwellings within the next 20 years for each of the proposed alternatives?

10. Will the DEIS consider a significant shift in Seattle’s tree canopy from private land to public land? If so, (as was done by Cambridge and Los Angeles) will the DEIS consider how much of Seattle’s 11k acres of Right-of-Way (R.O.W.) without canopy has the physical and logistical potential to plant medium to large trees (when mature) and what land volume is needed to plant that quantity?

11. How many years will it take for a sapling planted today to replace an 80 year old tree and for it to perform all the ecosystem services of that tree – from carbon sequestration and stormwater runoff, to climate and heat island mitigation?

## References

Your plant and animal section does not have any references that apply to the urban forest, urban forestry, tree growth, tree measurement and the long term effects of removing thousands of mature conifers and replacing them with dwarf seedlings that are not sufficiently maintained. The City’s urban forest management plan lacks specificity.

Sincerely,  
Heidi Siegelbaum  
Seattle, WA.

427-1  
cont

## DEIS StoryMap Comment

Name: Sarajane Siegfriedt

Organization: Seattle Fair Growth

Email: sarajane3h@comcast.net

Date: 5/3/2024

## Comment:

428-1

- 1) Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against.
- 2) If the Plan says it implements HB 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan?
- 3) In the DEIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices caused by limited supply and create more opportunities for income-restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to low-income people, during the past 5 to 10 years of the most extreme increases in supply of rental housing ever experienced in Seattle?
- 4) If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market?
- 5) Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the DEIS acknowledge this?
- 6) Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions? Do you agree that townhouses are the predominant form of new housing being permitted in formerly single-family zones?
- 7) Although HB 1110 allows duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments, what is the likelihood that any of these Middle Housing forms will be built by current for-profit infill developers, when these builders refuse to build rentals of any sort? If these forms are meant to produce rental apartments in formerly single-family neighborhoods, and non-profits have told the city that they can't build there either, because they need economies of scale for construction and staffing, where are the programs or zoning incentives in Urban Residential neighborhoods?
- 8) What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods?
- 9) Where does the plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?
- 10) Where does the plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability, when a Stanford researcher who studies this determined that Seattle hadn't built enough housing 40 years ago for this to be a significant factor, when instead, Seattle tends to recycle older affordable rentals by rehabbing them into new, market-rate housing?
- 11) Specifically, how many low-income affordable rentals will be built under Alternative 5? Will this be half of all new housing units, as called for by the Governor and the Department of Commerce? If not, what zoning and policies could mitigate the extreme lack of affordable rentals in Seattle?
- 12) Several years ago, the City redefined "family-sized housing" as 2 bedrooms, rather than 3 bedrooms. How has that change contributed to the lack of family-sized rental housing being built, and what would

be the effect of restoring the definition of family size to the common understanding of 3 bedrooms?

13) What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels?

14) Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs? How can the plan incentivize stacked flats and courtyard apartments? Wouldn't such forms mean one-third to half the apartments would be ground-floor accessible apartments? Could these apartments be built by non-profits with the benefit of land trusts funded by the City?

15) Shouldn't courtyard apartments be an option, especially where "protected" trees occupy the center of a parcel? How can they be incentivized?

16) Instead of insensitively promoting residential units with the first floor raised up, shouldn't the City be promoting Universal Design in all new construction, so that seniors and people with disabilities can find suitable homes in our future city?

17) Since we no longer have single-family neighborhoods, should every developer be required to build sidewalks on their property, not just in multi-family or Urban Villages, as now?

18) What is the effect of lacking 11,000 blocks of sidewalks on our vision of a 15-minute city? On accessibility for seniors, people with mobility aids, baby strollers and ADA requirements? How can we include and fund a plan for a complete sidewalk grid within 20 years?



## DEIS StoryMap Comment

Name: Sarajane Siegfriedt

Organization: Seattle Fair Growth

Email: sarajane3h@comcast.net

Date: 5/3/2024

## Comment:

## Displacement:

1) How can the plan recommend paying someone to move under the Tenant Relocation Assistance program as a mitigation, when it actually facilitates displacing someone? Someone who will certainly find no comparable rental housing within their community of support?

429-1

2) The plan says: "Overall the action alternative would tend to reduce displacement as the benefit in terms of reduced economic displacement pressure increases production of affordable units offered by the action alternatives outweigh any increased risk of physical displacement." Where is the evidence of this??? Rather, it depends on the tired and disproven theory of trickle-down housing. This, despite the chart that shows 1324 to 1416 units at 50% to 80% of AMI were lost to demolition.

3) New MHA units under Alternative 5 are 17,293, and 2788 renter households were physically displaced. How does this compare with the statement in number 2)? When the city reports on displacement, are they counting buildings demolished, or units demolished? How many of these are low-income? How can we know with an inventory?

4) This plan is suffused with the supply-side myth, such as in Land Use "All alternatives increase the overall number of units and improve housing affordability." Since no evidence is offered, and no evidence exists, are you willing to remove this false supply-side statement? Are you willing to scrub the DEIS and the Plan itself of this delusion that simply building more housing creates affordability defined in HB 1110 as less than 60% of AMI for renter households and less than 80% of AMI for owner-occupied units.? Otherwise, won't that prevent us from ever achieving housing equity? (Note: affordable doesn't mean less expensive!)

5) Isn't it true that the last CompPlan resulted in a loss of workforce or middle-income housing, since almost all market-rate rental apartments were built for high-income workers and older housing lost to demolition?

6) Isn't it true that continuing on the present course, as this plan does, will exacerbate the hollowing out of our middle class because of the loss of low-income housing and family-size housing affordable to them?

429-2

7) Isn't it true that since infill builders will never build rentals (not their business model) and no nonprofits can build at the scale of six units or less, that no affordable rental units are likely to be built in Urban Neighborhoods?

7b) And that seniors who live there now, being priced out by rising property taxes, will have no place in their own neighborhoods to downsize, unless stacked flats and courtyard buildings are incentivized or zoned for? What are the recommendations to allow seniors (of all races) to remain in their communities of support?

429-3

8) The Housing element clearly displaces trees from all new development. Where is the mitigation to prevent loss of tree canopy, by stronger enforcement of permitting, by requiring developers to replace full-size trees with full-size trees, by determining some lots to be unbuildable? Where are your mitigations for the trees that will increase the tree canopy to 30%, rather than continuing on the present course and displacing our tree canopy?

429-4

9) In the Housing Appendix, shouldn't trees be shown in the idealized drawings of housing?

429-5

10) If buildings (condos) are allowed to be four-story blocks in Urban Residential zones, doesn't that block the sun from 2-story craftsman homes that are or are likely to have solar panels? Is this economic loss being evaluated? Shouldn't four-story buildings be grouped with taller, not shorter buildings?

429-9

**From:** [Kimberly Sims](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 3:28:22 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Kimberly Sims  
simsk9512@gmail.com  
9512 30th Ave NE  
Seattle, Washington 98115

430-1

**From:** [Kimberly Sims](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Saturday, May 18, 2024 4:33:40 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Kimberly Sims  
simsk9512@gmail.com  
9512 30th Ave NE  
Seattle, Washington 98115

431-1

**From:** [Vanessa Skantze](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Morales, Tammy](#)  
**Subject:** Regarding the Environmental Impact Statement  
**Date:** Sunday, May 5, 2024 2:52:21 PM

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CAUTION: External Email

Greetings Councilmember Morales and others involved in the drafting of this statement.

I am deeply troubled by this plan and have questions.

Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” This is murky at best. What study is ongoing or will be (we need this cited), and what clear provisions will be implemented to ensure protections for Seattle’s plants and animals? What is the actual impact we can expect? This is our home.

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." As you know we are losing tree canopy at an alarming rate due to poor legislation like the current tree protection ordinance. What studies can you cite that shows any tree planting or landscape programs could possibly compensate for lost urban forest?

The plan states that Seattle will make progress toward its 30% canopy goal. The abovementioned tree ordinance removes a large portion of private land available for trees. Is remaining public land truly sufficient to reach the 30% stated goal? Is there a plan for the many trees that must be planted in these areas every year to compensate for trees destroyed by development? May I remind you that saplings are not and will not be in our lifetime any kind of substitute for the magnificent old growth trees of Seattle being butchered?

I am deeply concerned at the lack of consideration shown to the magnificent trees and by extension, wildlife and natural beauty that we are so gifted with in being residents of Seattle. I am horrified at the trend in recent years that is turning the Emerald City into a concrete city for the interest of developers. This is not necessary in order to furnish more housing. It is simply short-sighted and a terrible choice not only for the quality of our lives but for those to come.

I am a constituent and I vote.

Sincerely,  
Vanessa Maria Skantze

432-1

DEIS StoryMap Comment

Name: Reid Smith

Email: reidasmith2@gmail.com

Date: 4/12/2024

Comment:

The city should study the impacts of Social housing in every neighborhood on affordability. Of the available alternatives, I strongly prefer Alternative 5 with higher growth argets.

433-1

**From:** [Alice Speers](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 11:39:50 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Mitigation recommendations:

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- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Alice Speers  
alicespeers@gmail.com  
6850 Woodlawn Ave NE  
Seattle, Washington 98115

434-1

**From:** [Zoe Stephenson](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Modify the Comprehensive Plan toward the recommendations of The Urbanist  
**Date:** Monday, April 29, 2024 8:50:52 PM

---

**CAUTION: External Email**

Dear Comprehensive Plan Coordinators,

Hello, I am a Mount Baker resident and I want to provide a comment on the Comprehensive Plan. Specifically, I want the city to adjust the plan to be more like the recommendations of The Urbanist in this editorial: <https://www.theurbanist.org/2024/04/29/op-ed-building-the-seattle-we-want-with-the-growth-we-have/> . Please read it and incorporate its ideas.

435-1

Allow for taller buildings, especially around transit. Support and truly incentive middle housing and affordable housing as they describe. Remove barriers for increased density. Invest in desirable, dense housing as well as business development opportunities for current residents of the South End. Add some Neighborhood Centers in South Seattle: Mt. Baker, Rainier Valley, Columbia City, Leschi, the Central District, Othello, Hillman City, Seward Park, Beacon Hill - where are the Neighborhoods Centers there that are so present in other areas of the map?

Thank you for your time in reading this email,

Zoe Stephenson  
206-913-8510  
3711 37th Ave S, Seattle, WA 98144



**From:** [Ann Stevens](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comments  
**Date:** Friday, May 3, 2024 3:45:40 PM

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**CAUTION: External Email**

1. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." It is obvious that any alternative will result in large trees getting removed and the replacement trees will not replace the tree canopy lost for decades. The weak tree protection ordinance that was recently passed will not be sufficient to protect the canopy. What data supports the conclusion that tree planting programs will compensate for lost urban forest, given the increased hardscape in all alternatives?
2. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance dramatically reduces private land available for trees. Is there actually enough public land without trees that new planting of trees can eventually reach the 30% goal?

Ann Stevens

436-1

**From:** [Tonya Stiffler](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 3:32:03 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Tonya Stiffler  
tstiffler@comcast.net  
18051 Sunnyside Ave No  
Shoreline, Washington 98133

437-1

**From:** [Sean Stockwell](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Not Enough - Seattle's Comprehensive Plan  
**Date:** Saturday, May 4, 2024 10:29:51 AM

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**CAUTION: External Email**

Hello,

I am writing to encourage the city to plan for more types of housing throughout the city.

I am currently a resident in the Ballard area. And like many of my peers (young professionals in their 20-30s) I was hoping Seattle would take the opportunity to start building out our housing supply in order to blunt the ridiculous rise of housing prices, so that people like me could have a chance to settle here long-term.

I am requesting that the comprehensive plan be revised with the following modifications.

**Encourage transit-oriented development.** Why has the plan not included more zoning changes near frequent transit corridors? Transit enables greater density, and Seattle should be tapping into that. Additionally, zoning changes should be applied to a larger area surrounding the transit stops - and not just along the arterial.

**Increase the FAR.** State model code allows for 1.6 FAR in sixplex areas. 0.9 is overly restrictive and won't allow for the development of multi-family flats. Why would we want to restrict this? Many people find flats far more desirable to multi-story townhomes, and many people would have a great deal of difficulty living in a townhome, where everything is on a different floor! Whether they are elderly, disabled, etc. Give our neighborhoods the means to build housing for everyone. This *needs* to be changed.

**Add back the original Neighborhood Centers that were removed and allow neighborhood businesses!** - Living near a coffee shop or taproom is enormously popular, and adds a communal spot for neighbors to gather, and for small businesses to thrive. And it lessens peoples' dependence on cars to shop for basic goods ... because they can walk to them.

**Remove Parking Requirements** - This strikes me as overly restrictive zoning. Let the consumer decide if they want to live somewhere with a parking spot or not. If I choose to live without a car, why would you force me into renting/purchasing a unit that will have an unused parking spot?

Please don't let this opportunity pass us by. Seattle is a city full of beauty and opportunity. It will continue to be one of the most desirable places in the country, and we should embrace that. We can make a Seattle that works for everyone. But it starts with updating this plan to something far more visionary.

Thank you,  
Sean Stockwell

DEIS StoryMap Comment

Name: Linda Strock

Organization: HLUMC

Email: boblindaastrock@yahoo.com

Date: 5/5/2024

Comment:

We would advocate for density. Much needed.

439-1

## DEIS StoryMap Comment

Name: T.J. Stutman

Email: tstutman@gmail.com

Date: 5/6/2024

## Comment:

I support Alternative 5 as stated in the draft EIS, including the development of a new Urban Center on 130th Street. However, I do feel that the plan is not ambitious enough. I encourage more housing options in the neighborhood, including addressing the hidden obstacles to building denser housing. To that end, I ask that you consider:

440-1

1. Minimize or remove parking requirements -- make this a pedestrian-oriented neighborhood not beholden to car traffic and with precious space devoted to housing for people, not storage for cars.
2. Increase floor-area ratios -- The draft plan caps floor-area ratio at too low a number: 0.9 for all middle housing. This will reduce the amount of housing actually built. Other jurisdictions, including Spokane, have aimed much higher in this area. And the WA Dept of Commerce middle housing model code recommends higher floor area ratio as well. Don't make Seattle the outlier -- we should be leading in this area, not following.
3. Consider a broader rezone in the 130th Street area -- In my feedback on the 1 Seattle Comp Plan, I suggested extending upzones to more areas of the city rather than limiting to certain areas of the city. I still encourage a more ambitious approach to allowing different housing options, including apartments, across the city, but I especially encourage the development of taller and denser residential and commercial uses near the new 130th Street light rail station.

440-2

To the last point, I encourage the City to consider Pastor Laura Baumgartner of the Haller Lake Methodist Church's request to allow their lot to accommodate both residential and commercial development. We feel this would add new opportunity for both housing and small business in the new urban center:

440-3

"We would like to request that the DEIS be revised to include NC2-55 zoning for the church property, Lots 3, 4 and 5, of block 65, in the H.E. Orr Park Division No. 6 so that a development might be considered that includes both commercial and residential components." (feedback submitted 4/13/24)

Thank you for the opportunity to provide feedback.

T.J.

**From:** [Liann Sundquist](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 7:30:49 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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Mitigation recommendations:

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- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Liann Sundquist  
liann@oz.net  
7211-36th Avenue SW  
Seattle, Washington 98126-3218

441-1

**From:** [scott.surdyke@comcast.net](mailto:scott.surdyke@comcast.net)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Cc:** [Strauss, Dan](#); [bob.kettle@seattle.gov](mailto:bob.kettle@seattle.gov); [Hubner, Michael](#)  
**Subject:** One Seattle Comments- Magnolia/Interbay Land Use Committee  
**Date:** Monday, May 6, 2024 1:36:23 PM

**CAUTION: External Email**

Good afternoon,

Thank you for the opportunity to submit comments. Below are summarized comments from Magnolia/Interbay Land Use Committee’s last meeting, which included a presentation and overview of the One Seattle Plan.

Please feel to contact me if you have any questions.

Thank you,

Scott Surdyke  
*Chair, Magnolia/Interbay Land Use Committee*  
*Trustee, Magnolia Community Council*

**Urban Residential Zone: RE: Loss of Tree Canopy**

- We support the increased zoning, and inclusion of +2 units (if affordable)
- Our group is very concerned that the new zoning will substantially diminish Seattle's (and our neighborhood's) tree canopy, which will counter the city's tree canopy goals and increase potential for urban heat islands
- Please consider more substantial setbacks in the front yards (10'+) that allow for larger trees, more landscaping and personalized stoops
- Consider height or density bonuses (or reductions in setback requirements) for builders who strive to preserve existing trees (esp. substantial trees)
- Consider eliminating or reducing the side setbacks (offsetting the increase in front or back yards). This will allow for wider (more livable) dwellings, rather than super-skinny and inefficient 10' wide rowhouses.
- Consider encouraging more diverse housing types. Many design and real estate professionals (and tenants) decry the proliferation of 10' wide rowhouses. NOTE: Baltimore and Baltimore County, home to tens of thousands of rowhouses, does NOT allow rowhouses narrower than 16' because anything less is deemed undesirable and/or not livable.
- Remember, Seattle is NOT San Francisco (or San Francisco's Daly City). What makes our city and neighborhoods unique and livable is the substantial green canopy and connected greenscape. We do not support zoning that promotes the reduction of the tree canopy and substantially reduces opportunities for landscaping (which also is necessary for wildlife)

**Neighborhood Centers:**

442-1

There is almost unanimous consensus in our neighborhood that Magnolia Village is seriously underdeveloped and needs a major overhaul. We applaud the opportunity to have more robust zoning (65') and look forward to the discussion.

- We were surprised and disappointed that the proposed **North Magnolia Neighborhood Center** was dropped from the NC designation. This part of Magnolia (along 34th Ave and at the intersection of Government Way) is near the entrance to Discovery Park and has seen mid-rise, multifamily development for more than 50 years, including several low-income senior housing projects. This part of the neighborhood is ripe for additional development due to a number of factors:
  - Mid-rise development has occurred here for more than 50 years
  - Area is served by 2 bus lines (24 and 33)
  - Right next to the entrance to the City 's largest park
  - Major grocery store located here (Met Market)
  - Shops and services already exist, primarily in several mid-rise multifamily buildings.
  - Close to planned affordable housing village at nearby Ft. Lawton

#### **Station-area Planning**

- There is general consensus that LINK station-area zoning may be too conservative. TOD neighborhoods like Capitol Hill, Northgate, and even Ballard could likely support much taller, denser buildings. The approach that Vancouver and Burnaby, BC take is much more urban and promotes much more housing at rail stations



**From:** [Rick Swing](#)  
**To:** [PCD CompPlan EIS](#); [council @seattle.gov](#)  
**Subject:** Draft EIS  
**Date:** Sunday, May 5, 2024 10:39:32 PM

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**CAUTION: External Email**

Alternative 2 preferred

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
- Give SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
- Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.

443-1

Thank you  
,Rick

## DEIS StoryMap Comment

Name: Ryan Talen

Email: ry.talen@gmail.com

Date: 4/10/2024

## Comment:

I am writing to you because adding more housing in all neighborhoods, planning for much more growth, and developing the city in a more sustainable and equitable way via this Seattle Comprehensive Plan Update is a major political priority for me. I am looking to you and the Council for leadership on this and will certainly be considering your decisions and work on the Comp Plan in the next election.

I am a renter in Capitol Hill , and I believe that the City of Seattle did not listen to the overwhelming majority's call for an Alternative 6 vision, which would welcome more neighbors in areas with low displacement risk and high opportunity. Instead the current draft plan will perpetuate a racist history of exclusionary land use. To create a more sustainable, affordable, vibrant city, the plan should allow highrises and skyscrapers outside of just Regional Centers.

In Capitol Hill in particular, I think that the plan should Allow high-rise apartments.

If the City of Seattle adopted my above proposed changes, then we would be able to create a more affordable city for everyone.

Sincerely,  
Ryan Talen

DEIS StoryMap Comment

Name: Ryan Talen

Email: ryan.talen@protonmail.com

Date: 5/4/2024

Comment:

The city should study the impacts of expanded highrise zoning in Urban Neighborhoods within 1 mile of parks >1 acre. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

445-1

May 6, 2024

City of Seattle Mayor, Council, and Office of Planning and Community Development

**Subject: One Seattle Comprehensive Plan Update Draft EIS Comments and One Seattle Comprehensive Plan: Draft for Public Review Comments**

Dear Mayor Harrell, City Council Members, Director Quirindongo, and OPCD staff,

Thank you for the opportunity to comment on the “One Seattle Comprehensive Plan Update Draft EIS” (DEIS) and the “One Seattle Comprehensive Plan: Draft for Public Review” (“Draft Plan”). Please find my comments below. They are based on the letter provided by the Complete Communities Coalition, as it incorporates the best thinking of a broad collection of progressive land use organizations within our city.

I appreciate OPCD’s work that produced the Draft Plan. I strongly share the values expressed in the Draft Plan and concur with much of the Department’s analysis of the challenges facing the city and their root causes. However, the plan does not go far enough and seems intent on continuing the status quo of underproduction of housing, escalating costs, and continued displacement. To truly make housing more affordable, advance racial equity, mitigate displacement, and meet our climate goals, the Mayor’s Recommended Plan and the Final Environmental Impact Statement (“FEIS”) should incorporate the following revisions:

**EIS Preferred Alternative**

I recommend that the FEIS designate a Preferred Alternative. While FEIS documents prepared pursuant to SEPA are not required to designate a “preferred alternative,” there is a sound reason why doing so has become common practice among lead agencies over the years. As the Department of Ecology has explained, designation of a preferred alternative gives public reviewers more awareness of which alternative the professional staff members within the lead agency feel is best, or which appears most likely to be approved. In the high-profile, contentious and complex instance of the One Seattle Plan, identification of a preferred alternative in the FEIS would be an especially useful step. Not only has the DEIS discussed and analyzed five different alternatives, but two different complex alternative proposals have also entered public discussion in the form of the Mayor’s Draft Plan and the August 2023 OPCD staff recommended plan (“OPCD Draft Plan”). Given the sprawling and complex interrelated impacts that the One Seattle Plan will have on the future of our City, the FEIS will be best positioned to inform productive discussion and understanding if it clearly designates a preferred alternative.

- The growth strategy described by OPCD staff in their August 2023 proposal should be the basis for the preferred alternative. The OPCD Draft Plan is the boldest growth strategy presented to date. It responds to the overwhelming community feedback provided during scoping, and we believe it will best meet the city’s needs over the next decades.
- If the FEIS does not designate the growth strategy from the OPCD Draft Plan (or an updated version) as its preferred alternative, it should adopt a modified version of the DEIS’s Alternative 5. Preferably, modifications to the DEIS Alternative 5 would incorporate as many

446-1

attributes of the OPCD Draft Plan as possible, and as many of the policy positions requested in this letter as possible.

- If the FEIS adopts the Draft Mayor's Recommended Plan growth strategy as a preferred alternative, it should adopt many of the features of the OPCD Draft Plan or DEIS's Alternative 5, together with the additions requested by this letter.
- The FEIS should include a table that summarizes zoned land development capacity analysis and projected housing needs for the Preferred Alternative. The table should disaggregate housing unit development by AMI band, following the guidance provided by the Department of Commerce, in order to ensure we are providing sufficient capacity for housing affordable to low-income people and demonstrate that the plan will comply with the Growth Management Act's Housing Element requirements provided in RCW 36.70a.070(2)(c)-(d). Table 34 in the [Draft Housing Appendix](#) provides an excellent template for this information.

446-1  
cont

## **Urban and Regional Centers**

Regional and Urban Centers have and will continue to be the areas where the most new housing is built in the city. Currently, the City is proposing very little change within existing centers, minor expansion of the smallest centers, and only one new center at NE 130th St. The City should expand the potential for growth in Urban and Regional Centers by both increasing the area they cover and the intensity of development allowed. The City should also seek to undo the past harms of the Urban Village strategy, which is the basis of our centers-based growth framework, by allowing more intense development near public facilities such as parks, water ways, and high performance schools. The City should also take this opportunity to address the inequitable distribution of Regional Centers, none of which are currently located in South Seattle.

To Facilitate Immediate Progress, the Mayor's Recommended Plan Should:

- Continue to include the addition of Ballard as a Regional Growth Center and 130th Street Station as an Urban Center.
- Continue to include the expansions of existing Urban Centers such as the Greenwood-Phinney Ridge, Queen Anne, and West Seattle Junction Urban Centers.
- Expand the University District Regional Center to include University Village and lands adjacent to Seattle Children's Hospital, or create a new Urban Center to incorporate it.
- Create additional Urban Centers at all future Link stations, excepting areas within Manufacturing and Industrial Centers.
- Allow high rise zoning in all Regional Centers and within all Urban Centers adjacent to Link Stations.

- Allow eight-story residential construction on the majority of the land within all Urban Centers. Explore allowing greater height with the use of mass timber, to incentivize low carbon construction.
- Designate Mt. Baker and West Seattle Junction Urban Centers as future Regional Centers, include them in the list of Centers to receive updated subarea plans, and plan for combined jobs and housing unit density that exceed King County's Urban Growth Center threshold for both centers.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the maximum possible expansion of all existing Urban and Regional Centers.
- Study additional Urban Centers near all proposed Link Stations and adjacent to our greatest parks, including Discovery and Magnuson.
- Study increasing the zoning capacity of all Regional and Urban Center to maximize the productions of housing.
- Study the impacts of designating Mt. Baker and West Seattle Junction Urban Centers as Urban Growth Centers, using the definition provided in the 2021 King County Countywide Planning Policies.

## **Neighborhood Centers**

The One Seattle Plan's proposed "Neighborhood Center" model presents dramatic opportunities for our City. If fully realized, this could lead to increased housing supply and affordability, enhanced economic opportunities, improved walkability, and better environmental outcomes for more of Seattle's neighborhoods and a broader segment of the city's population. We request the following actions to bring the Council's request for a "fifteen minute city" and the Mayor's vision of "One Seattle" closer to reality.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Allow for the development of all Neighborhood Centers studied under EIS Alternative 5 and proposed under the OPCD Draft Plan. The total number of Neighborhood Centers should not be less than 50. Additional Neighborhood Centers should include (but not be limited to): Alki, High Point, Seward Park, South Beacon Hill, Gas Works, North Magnolia, Roanoke Park (North Broadway), Nickerson (North Queen Anne), and Upper Fremont.
- Expand the radii of Neighborhood Centers to ¼ mile to create enough land to support a small cluster of mixed-use development.

- Increase permitted Floor Area Ratio (FAR) to no less than 2.0 for multifamily housing in all Neighborhood Centers.
- Increase height limits to 85 feet throughout all Neighborhood Centers.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study expanding all Neighborhood Centers up to a ten-minute walkshed and 2.5 maximum FAR, for all multifamily housing across those areas.
- Be sure to thoroughly study any potential adverse environmental impacts of these actions, as well as the probable significant adverse environmental impacts of failing to take such measures.

## Corridors

The DEIS studies a “Corridor” growth strategy (Alternative 4) that would focus new housing in areas near transit and amenities. Increasing access to frequent transit and parks is one of our coalition’s goals, and it will help the City reduce cost of living while improving quality of life. While the DEIS includes this strategy, the Draft Plan significantly reduces the amount of area where such flexibility and walkable density would be possible. This is inconsistent with the Mayor’s One Seattle goals for housing, transportation, environmental, and climate. By restoring multifamily housing to the parcels off of arterials, the Mayor’s Recommended Plan can avoid disproportionately exposing renter households to environmental harms caused by high-traffic roadways. This would be more consistent with the City’s One Seattle values of racial and environmental justice.

To facilitate immediate progress, the Mayor’s Recommended Plan and any Preferred Alternative should:

- Add a Corridor place type that allows mid rise housing up to 85 feet in height. This place type should include all parcels currently zoned Neighborhood Residential that are:
  - a. within 0.5 miles (roughly a 10-minute walk) of light rail or bus rapid transit; or
  - b. within 0.25 miles (roughly a 5-minute walk) of frequent bus stops.
- Where appropriate, add the Corridor place type to policies that reference the three centers (Regional, Urban, and Neighborhood).
- Impose a maximum FAR no lower than 2.0 for multifamily development in Corridor areas.
- Allow mixed-use residential development in Corridor areas.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study all Corridor areas contemplated by EIS Alternative 5 or the OPCD Draft Plan up to a ten-minute walkshed, and no less than 2.5 maximum FAR, for all multifamily housing across those areas.
- Be sure to thoroughly study the probable significant adverse environmental impacts of failing to take such measures.

## **Urban Neighborhoods & Middle Housing**

This section focuses on the One Seattle plan's implementation of HB 1110 (2023) in Neighborhood Residential Areas and throughout the city. Full implementation of the state law needs to be planned to ensure we encourage a diversity of housing types, including backyard cottages, boarding houses, townhouses, and stacked flats. Urban Residential zones need to be planned to help us meet our equity, environmental, and affordability goals.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Increase the allowed FAR for middle housing to feasibly allow for family-sized two, three, and four bedroom homes to be built throughout the city. At a minimum, the city should align standards with the Department of Commerce's model ordinance. We recommend no less than 1.4 FAR for fourplexes and no less than 1.6 FAR for six-plexes.
- Create a 0.2 FAR bonus for stacked flats in middle housing, to incentivize the creation of physically accessible housing.
- Create a 0.1 FAR bonus for each Multifamily Tax Exemption (MFTE) unit, along with increasing height to 40 feet if two or more MFTE units are included.
- Encourage the development of housing for large households, including families with children and elders, by providing a development incentive of 0.05 additional FAR for 2 bedroom homes and 0.1 additional FAR for 3 or 4 bedroom homes.
- Create a 0.2 FAR bonus for housing that satisfies defined passive house, living building, or LEED specifications.
- Allow for a full range of middle housing types in Neighborhood Residential areas throughout the city, including allowing for six-plexes by right in all areas with low-displacement risk.
- Align the Draft Plan with HB 1110, by ensuring any alternative density requirements in high-displacement risk areas are temporary. Create a plan for implementing appropriate anti-displacement policies by the next implementation progress report. Partner with BIPOC-led community organizations to engage neighborhood and community residents,



both present and former, to better understand how to accommodate their housing needs and improve community resilience.

- Eliminate requirements for side and front setbacks, to allow for more of the lot to be usable open space and accommodate trees.
- When calculating minimum density, do not include ADU and DADU's in the unit density metric.
- Allow subdivision of lots into lots less than 1,000 square feet.
- Ensure that middle housing is not subject to more restrictive land use or other code requirements than single family housing, as required under HB 1101.
- Expand the "corner store" concept to allow greater flexibility for commercial uses to be introduced to neighborhoods that are currently primarily residential. Examples of greater flexibility include: non-residential uses that meet the daily needs of residents (e.g., health care, small grocers, "third place" leisure activities, etc.), ability to locate on off-corner lots, and increased height and FAR limits to facilitate the development of ground floor commercial units.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the impacts of removing side setback requirements in all areas, to allow for more of the lot to be usable open space and accommodate trees.

## **Affordable Housing and Social Housing**

The City of Seattle is facing a housing crisis in terms of scarcity and affordability. One of the goals of the One Seattle Plan, which we strongly support, is to achieve housing abundance:

*"When housing is safe, affordable, and abundant, we can fulfill many of our goals for the future....Achieving housing abundance is fundamental to addressing our homelessness crisis, redressing historical patterns of segregation and exclusion, and creating opportunities for displaced residents to return to their communities."*

I appreciate the inclusion of the affordable housing bonus to address this pressing need, by allowing for additional development capacity for income-restricted affordable housing in neighborhood residential areas that are within ¼ mile of frequent transit. Though I have not seen a detailed proposal for the income restrictions and set aside requirements, it is our understanding that this bonus is intended for use by non-profits and others building wholly affordable housing projects. This will blunt the impact of the proposed density bonus, as any developments benefiting from the bonus will need to compete for limited public funds available for affordable housing.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Revise the proposed affordable housing bonus to ensure it is usable by a broad range of developers—including private, nonprofit, and social housing developers—without needing scarce public funding. This could look like a requirement for no less than 20% of the homes to be affordable at 60% AMI for rental or 80% AMI for ownership.
- Increase the proposed FAR limit from 1.8 to no less than 2.2.
- Increase the proposed lot coverage from 60% to 70%.
- Allow the proposed affordable housing bonus to be used outside of frequent transit areas.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the impacts of allowing up to 80% lot coverage for developments using the affordable housing bonus.

### **Equitable Development and Anti-Displacement Strategies**

The City currently provides support to communities disproportionately impacted by displacement pressure, economic exclusion, and disinvestment through a variety of different equitable development programs and anti-displacement policies. I support the continuation of all existing equitable development and anti-displacement tools, notably the Equitable Development Initiative. However, it is not enough for the City to simply continue its current programs; the tools and policies need to be expanded based on feedback from communities disproportionately impacted by discrimination and displacement pressure.

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

- Expand the City's land banking strategy to support affordable rental, affordable ownership, and social housing projects.
- Create incentives and provide technical assistance for small community-based organizations to partner with larger developers in Equitable Development Initiative projects.
- Facilitate generational wealth building, by providing a way for low-income and fixed-income families to sell their home and gain a new high-quality home on the site of the new development.
- Collaborate with the Seattle school district to plan for affordable, family-sized housing near schools, pursuant to City Ordinance 124919.

- Provide information to support the development of Community Opportunity to Purchase Act (COPA) legislation, which would allow qualified non-profit organizations the first opportunity to make an offer on real estate sales involving multifamily buildings with low-income residents.
- Incentivize the use of affirmative marketing and community preference policies for private developments not receiving public subsidy. Continue to incentivize such policies for publicly-funded projects.
- Continue to explore and support the expansion of short-term rental assistance programs.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the impact of displacement and lack of affordable housing on school enrollment and ensuing school budget constraints and create incentives for family-sized units near schools.

### **Multifamily Housing Mapping Error**

The Draft Plan appears to include an unintentional mapping oversight which, if not corrected, would likely result in a loss of *existing* zoned housing capacity and a reduction in the fifteen-minute walkable neighborhoods envisioned by the Mayor's One Seattle policies and championed by the City Council. This loss would be found in neighborhoods that are today designated for "Multifamily Housing" future land uses *under the currently effective Comprehensive Plan*, but erroneously have been proposed to transition into Urban Neighborhood status under the Draft Plan. This change would replace a designation in the current Comprehensive Plan where "you might find duplexes or townhouses, walk-up apartments or highrise towers," with a new place type that "would primarily allow housing types within a three-story scale, such as detached homes, duplexes, triplexes, fourplexes and stacked flats." A ceiling of stacked flats in the proposed designation is much reduced from a ceiling of highrise towers in the existing designation. In particular, this issue would impact the proposed redevelopment of Fort Lawton with affordable housing, which is a major priority of the City of Seattle and Mayor's Office.

To preserve affordability, walkability and environmental progress made over the last ten years, the Mayor's Recommended Plan should:

- Ensure that all areas that are currently designated as Multifamily Residential on today's future land use map be redesignated as a Corridor, Neighborhood Center, Urban Center or Regional Center, rather than Urban Neighborhood.

## Transportation

Safe, accessible, and frequent transportation is a key element to the success of any city. I strongly support Goal TG 1 in the Draft Plan, which states, “Transportation decisions, strategies, and investments support the growth strategy for the City and the region and are coordinated with this Plan’s land use goals.” In order to achieve this, Seattle should prioritize *proximity*-based strategies over mobility-based ones. One example of this approach would be to plan for far more Neighborhood Centers than are included in the Draft Plan—especially in low-density, car-dependent neighborhoods (see the Neighborhood Centers section of this letter). In its mobility strategy, Seattle should prioritize carbon-neutral transportation modes such as walking, rolling, and cycling, and carbon-light modes such as mass transit and carpooling. Transportation infrastructure that primarily serves personal automobiles, including parking, should be deprioritized in relation to these other modes.

To Facilitate Immediate Progress, the Mayor’s Recommended Plan Should:

- Plan to accommodate housing and job growth in a manner that will enable the City to achieve the following transportation and environmental goals: net-zero citywide emissions by 2050 (see T 4.1), 20% reduction in VMT by 2044 (see T 4.2), and a 37% reduction in VMT by 2044.
- Eliminate parking minimum requirements for all land uses types citywide.
- Plan to serve all Neighborhood Centers with frequent bus service.
- Add the Corridor place type to the lists of places described in T 1.2, T 3.1, and T.2.12; for example, “all centers (Regional, Urban, and Neighborhood) and corridors”.
- Clarify that T 4.4, which describes neighborhood-scale strategies to reduce carbon emissions and pollution, applies to all types of neighborhoods—including neighborhoods with high-traffic arterial streets with frequent transit service.
- Use a racial equity lens when prioritizing sidewalk and pedestrian infrastructure construction in areas that currently lack it (see T 3.20).
- Plan to prioritize street right of way differently in different contexts: within centers and neighborhoods, streets should prioritize active transportation that is safe and sustainable; between centers and neighborhoods, streets should prioritize public transit; and within and between Manufacturing and Industrial Centers, streets should safely accommodate the reliable movement of goods.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Study the environmental impacts of maximum parking requirements for residential and commercial uses in frequent transit service areas.

## Climate & Environment

The City is preparing to comply with new climate requirements that will be required by state law in 2029. I support the City's decision to get ahead of these upcoming requirements, and I applaud the goal of 58% reduction in greenhouse gas emissions from 2008 levels. I also support the City's study of the environmental impacts of planning for additional density within Seattle, which found that DEIS Alternative 5 would produce the lowest GHG emissions per capita. I particularly support the following statement in the DEIS:

*While each [EIS] alternative would generate GHG emissions from growth and development within the city, the benefit of channeling development to targeted areas that might otherwise occur in peripheral areas of the city or region could serve to offset these impacts. (DEIS, p.3.2-51)*

I encourage the City to set additional specific climate goals that will allow for progress to be accurately assessed throughout the next twenty years.

To Facilitate Immediate Progress, the Mayor's Recommended Plan Should:

- Prioritize supporting transportation mode shift toward active mobility options over automobile electrification.
- Define specific anti-displacement strategies that meet the needs of communities most likely to be impacted by climate change.
- Set goals for building de-carbonization that can inform future revisions to the energy code.

To facilitate continued innovation and flexibility in the months and years to come, the FEIS should:

- Provide additional explanation for the conclusion that Alternative 1: No Action would have no significant adverse impacts on greenhouse gas emissions or air quality. Given the anticipated impacts that this strategy would have on greenfield development and increased vehicle-miles traveled, particularly by commuters, explain why these impacts would not be significant.

Thank you for considering my comments. I urge you all to think beyond the next election and to the future of our city. Do we want to the shut the door behind us or do we want to continue to welcome people from all walks of life to our wonderful city? If the latter then we need to plan for it and allow for the highest number of new homes.

Sincerely,

Patrick Taylor  
2006 15th Ave S  
Seattle, WA 98144

**From:** [Sarah Taylor](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:31:25 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

We need more tree canopy!!!!

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Sarah Taylor  
sunbella6@icloud.com  
8302 Linden N  
Seattle, Washington 98103

447-1

DEIS StoryMap Comment

Name: Mary K.Tenhoff-Barton

Email: MaryTBarton@gmail.com

Date: 5/5/2024

Comment:

There does not seem enough protections for the trees. It takes years to grow trees, how are you planning on mitigating the loss of trees? What is consider affordable housing for the middle clas with families? How does this plan provide for seniors and there issues? There seems a lack of incentives for building for families, families need more space.

448-1

448-2

DEIS StoryMap Comment

Name: Greg Thiessen

Email: greg.s.thiessen@gmail.com

Date: 4/10/2024

Comment:

The city should study the impacts of higher floor area ratios for middle housing in all residential zones, such as those corresponding to the state model code for middle housing. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

449-1



**From:** [Robin Thomas](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 12:49:26 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Robin Thomas  
rubiclark@yahoo.com  
1015 Mason St  
Bellingham, Washington 98225

450-1

**From:** [Toby](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Sunday, May 5, 2024 8:51:43 AM

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CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” What is the impact of the plan specifically on Seattle’s plants and animals? Where is the study?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest? Often trees planted as part of developers work die within three years. Even if those trees survive it will be many decades before they provide the same amount of shade and habitat as an adult tree, precisely at the time when climate change is rapidly affecting us. We need our mature trees right now more than ever.

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,  
Toby Thomas

1106 E Thomas St, #1  
Seattle, WA 98102

451-1

DEIS StoryMap Comment

Name: Kristen Toms

Email: kristen\_toms@hotmail.com

Date: 5/6/2024

Comment:

Hello,

We have lived in the Pinehurst neighborhood since 2000. I just wanted to put my vote in for Alternative/Option 5. I think that more housing options in our growing community is a good thing and is needed.

Thank you,

Kristen

452-1

**From:** [michael toohey](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 10:44:29 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

michael toohey  
toohey.michael@gmail.com  
12004 17th Ave NE  
Seattle, Washington 98125

453-1

DEIS StoryMap Comment

Name: Luke Travis

Email: luke.foobar@gmail.com

Date: 4/18/2024

Comment:

The city should study the impacts of higher density in all residential zones, such as the templates offered in the state model code for middle housing or better. Please especially study the impact this would have on housing affordability (both owning and renting). Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

454-1

**From:** [Matthew Trecha](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Kettle, Robert](#); [LEG CouncilMembers](#)  
**Subject:** Community feedback - One Seattle draft Comprehensive Plan - be more aggressive, ignore all Mayor Harrell edits  
**Date:** Wednesday, April 17, 2024 7:55:41 AM

**CAUTION: External Email**

Hi One Seattle Comprehensive Plan draft update team -

First, thank you for the work you do for the City. This is complex stuff!

**My community feedback is the following:**

Reverse any and all requests, edits or edicts from the Mayor's Office - Mayor Harrell has been an utter failure when it comes to ensuring the needs of our community are met both in the near-term and long-term as it comes to 'Space Needle thinking' around housing. A homelessness emergency is a 'build more housing everywhere all the time' emergency. We need more housing in every neighborhood now, tomorrow, *and* 20 years in the future.

**My personal Community Feedback to the One Seattle draft plan includes the following:**

- a) the removal of any and all parking minimums from every residential zone in the city (a single parking spot can cost a residential developer up to \$100,000 - drastically increasing the cost of homes, condos, and apartment rents)
- b) 4-6 story condo/apartment buildings by right in all neighborhoods; 20 stories (or higher) tall residential buildings by right within 0.25 miles of all light rail station (please see the entire province of British Columbia's recent legislation allowing height by right within distances to public transit: "For all SkyTrain stations in Metro Vancouver, municipal governments will be required to allow minimum residential building heights of up to 20 storeys for sites within 200 metres of a station, up to 12 storeys for sites between 201 and 400 metres from a station, and up to eight storeys for sites 401 metres to 800 metres from a station.")
- c) groundfloor multi-use storefronts (office, shops, restaurants) by right in all neighborhoods with zero minimum parking required (this drastically reduces the amount of people who need to get into a car to go to work, eat a meal out or buy daily essentials for use at home)
- d) the inclusion of multi-modal transportation options included in all plans and requirements for minimum bike parking and public transit-supportive amenities in all residential buildings (e.g., public transit passes that come with each lease (King County Metro has already launched a program for this), real-time arrival screens, information displays, etc.)

I'm incredibly disappointed to learn - through The Urbanist - of how this plan has been watered down. Please see The Urbanist "Planners Proposed Bigger Upzones Before Harrell's Team Intervened, Records Show" (April 16, 2024) for the story I reference.

I fully endorse and agree with plans put forward by **Complete Communities Coalition** (<https://www.completecommunitiescoalition.org/policy-priorities>), The Urbanist, and other members of our community who are advocating for anything that was previously cut from the Comp Plan, including an aggressive Option 6 as advocated by Councilmembers Mosqueda and Morales prior to the recent elections.

Housing is the #1 reason I would leave Seattle and Puget Sound in the near future (3-5 years) - the Mayor's current Comprehensive Plan draft guarantees Seattle will continue to fail upward as a city.

Discard all edits by the Mayor's Office. Be aggressive and follow the plan you had prior to the Mayor's edits.

Thank you,  
Matthew Trecha  
888 Western Ave  
Seattle, WA 98104

455-1  
cont

**From:** [Megan Tully](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 8:49:13 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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Mitigation recommendations:

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- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Megan Tully  
megtully@hotmail.com  
13722 Palatine Ave N  
Seattle, Washington WA

456-1



**From:** [Caroline Ullmann](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comments: Draft DEIS One Seattle Plan Comprehensive Plan Update  
**Date:** Friday, May 3, 2024 3:40:13 PM

**CAUTION: External Email**

Thank you for the opportunity to comment on the One Seattle draft comprehensive plan, draft environmental impact statement and neighborhood rezoning proposals.

We are Caroline and Mike Ullmann; we’ve lived in Maple Leaf since 1998. Our residential lot has several mature evergreen trees, we garden without pesticides to support wildlife and the city recently designated our street (12<sup>th</sup> Ave NE) as a “Neighborhood Greenway.” We have a deep respect for nature conservation, the positive effects of living beneath trees and the preservation of habitat.

457-1

We acknowledge and support the need to provide safe, affordable, comfortable housing for a diversity of income levels, family sizes, culture and ages. Mike helped found a membership-based nonprofit called NEST (North East Seattle Together) designed to allow seniors to safely age in place in their own homes, with support from volunteers and trusted vendors.

We respectfully submit the following comments.

Seattle is made up of a number of distinct neighborhoods, each with its own unique identity and characteristics. Maple Leaf is an established neighborhood known for its quiet, leafy residential streets. It is bordered by Interstate 5 and includes several arterials (5<sup>th</sup> Ave NE, Roosevelt Way NE, 15<sup>th</sup> Ave NE, Lake City Way NE, NE Northgate Way). It is family-friendly and not too far from the urban center, though transit cuts have made it harder to commute by bus to downtown Seattle in a timely fashion.

**Maple Leaf Neighborhood Center**

We support adding corner stores, small businesses and small apartment buildings in neighborhoods, and we appreciate that per the Growth Strategy Summary, Neighborhood Center boundaries would be determined by further analysis and community feedback.

You used Maple Leaf in your plan as an example of a Neighborhood Center, but siting it at NE 90<sup>th</sup> St and Roosevelt Way doesn’t meet the criteria per the One Seattle Plan FAQ. It doesn’t have frequent transit. It isn’t near everyday essentials such as grocery stores, pharmacies, libraries, banks, post offices, or most professional services – the four corners of its “commercial core” consists of a hardware store, a specialty toy store, a restaurant and a private school. The area already has multiple multifamily/apartment units. In fact, the recently completed, 5-story Maple Leaf Apartments is now leasing its 69 units, though regrettably they

are market-rate+.

The proposed circle for higher density of up to 5-6-story development interrupts the 12<sup>th</sup> Ave NE Greenway, defined as a “safer, calmer neighborhood street where people walking and biking are the priority.” This is especially concerning given the circle includes the stretch north of Maple Leaf Reservoir Park, which is a veritable promenade route for pedestrians, kids on bikes, dog walkers, etc.

457-1  
cont

Non-arterial streets in the proposed circle are narrow and density of the scale proposed would block the sun, reduce the tree canopy and associated animal life, block air flow and create concrete canyons that would destroy the character of the neighborhood and the very reason people want to move to Maple Leaf.

A better site for a Neighborhood Center would be at either Maple Leaf’s south end (near Lake City Way and NE 80<sup>th</sup> St) or closer to Northgate at the north end of the neighborhood. Either location has better access to transit and services, and the ability to scale up new residential buildings without adversely affecting the smaller, quieter streets.

In addition, the proposed 20+block circle is overly broad for the 5-6 story buildings the plan recommends as appropriate for the area. You can see on the aerial photo of Maple Leaf that you used in your presentation that the blocks around NE 90<sup>th</sup> St and Roosevelt Way NE are thick with mature trees. We will talk further about trees below, but for a city whose goal is to increase its shrinking tree canopy, it makes no sense to cut down mature trees that are making a significant contribution. The Neighborhood Center development zone should be modified to be a quarter-block from the main arterial along Roosevelt.

If the final version of the plan does not modify the size of the circle, then development beyond a quarter-block from the main arterial should be limited to buildings of 2-3 stories to better fit the character of the neighborhood.

**RECOMMENDATIONS:** Re-site Maple Leaf’s Neighborhood Center. Modify the circumference to a quarter-block on non-arterials. Limit density beyond a quarter-block on non-arterials.

**Affordable housing**

We support the need for ample, diverse housing, particularly the need to expand affordable housing, citywide. But we don’t see any data re: how many affordable units will be produced under this plan, aside from noting the affordable housing bonus to allow 6 units if 2 are affordable to low-income households.

457-2

The plan doesn’t require developers to take part in the city’s Mandatory Housing Affordability program, and we understand planners are concerned that including that requirement won’t

pencil out for builders. Please take a closer look at that. And please don't exempt developers from design review in exchange for promises of affordable housing – then we'll just get ugly, shoddy affordable housing – hardly equitable for a population that most needs equity.

The DEIS executive summary's section on Population, Housing & Employment states that all alternatives will increase income-restricted and affordable market-rate housing by increasing housing supply. Where does this assumption come from? Please amend the DEIS to cite sources for that conclusion, and provide an estimate of how long it takes for increased housing supply to filter downward to become affordable at less than 60% area median income for renters and 80% AMI owner-occupied.

We are not seeing lower prices in our neighborhood. Maple Leaf single-family homes are each being replaced with 3 large townhouse/ADU/DADU units, each of which sells for \$800,000-\$1.3 million. Hardly affordable. The plan considers apartments to be affordable alternatives but our neighborhood's newest apartment building calls itself luxury housing and is renting units for \$1,800 for a 400-SF studio to \$3,100 for 2 bedrooms. Only 2 of the 69 units in the 5-story building are 2 bedrooms, which doesn't encourage families. On the other end of the spectrum, at least one Lake City Way building designed to rent for 60% AMI is having trouble finding tenants because even that is too expensive for many families.

Also, please amend the plan to encourage social housing, land trusts and local decision-making authority to invest in affordable housing that meets the needs of the neighborhood. Give neighbors and local community organizations first dibs to bid on property for sale, ahead of regional or national developers.

**RECOMMENDATIONS:** Analyze and source supply/demand/affordability over time. Examine MHA. Encourage social housing.

### **Transit and parking**

We love the concept of a 15-minute city where everything you need in daily life is but a short walk, bike trip or bus ride away. In retirement, we enjoy being able to walk to buy coffee, a light bulb or a math game for kids in our own neighborhood.

But bus service in Maple Leaf has been decimated in recent years. Caroline rode her bike to work downtown year-round for 15+ years, and took the (now defunct #77) bus when she couldn't cycle. Busing downtown in a timely fashion is no longer possible, given the region's decision to prioritize light rail over buses. Were Caroline still working, she'd either have to spend more of her day commuting (walk 20 minutes or take a local bus to Northgate, take light rail through the University District and Capitol Hill and eventually downtown) or choose to drive.

We also question the urbanist belief that most people don't need cars or off-street parking. Maple Leaf is the third highest hill in Seattle, and 13% of Seattle's population is 65 or older, forecast to grow by 75% by 2045, per the plan Housing Appendix. Citywide rezoning plans that depend on prospective improvements to a transit system not under the city's control must address the concerns of older people.

Being able to walk/bike/take Maple Leaf's very limited public transit is an aspirational goal for a limited, able-bodied portion of the population. It's unrealistic, discriminatory, humiliating, and isolating for older people, or people with disabilities or limited strength. Three people on our street alone use canes or walkers. In addition, the east side of Maple Leaf is very steep, which provides extra challenges for people with mobility issues.

Maple Leaf now has only 2 local bus routes, neither of which goes downtown. The #67 runs along Roosevelt every 15 minutes (between Northgate and the U-District). The #73, which used to go downtown, was rerouted and now runs every 30-60 minutes along 15<sup>th</sup> Ave NE to the U-District. Bus service was removed entirely from the 5<sup>th</sup> Ave NE arterial several years ago, and the well-loved, peak-only #77 commuter bus downtown also was cut.

Given the city doesn't control Metro, it is disingenuous to add high density developments along assumed frequent transit routes, expecting that bus service will follow, when in fact we have been losing access to transit for years. We need better bus service before we redesign the city.

Parking also is an issue, and we are troubled by the lack of required off-street parking in the plan. On-street parking already is a premium in Maple Leaf, particularly around the Maple Leaf Reservoir Park and local restaurants and coffee shops. Modern cars don't fit in garages of older homes and not all homes have usable driveways. The new 69-unit apartment building on Roosevelt has underground parking but is charging \$175 extra a month for a stall. Given that the monthly rents are so high, we predict that some people won't want to pay extra to park, and will opt to jostle for space on the street.

**RECOMMENDATIONS:** Site Neighborhood Centers near transit hubs. Address needs of older people. Mandate parking in residential redevelopment.

### **Tree preservation**

We support the city's aspiration to achieve a 30% tree canopy, and note that coverage has shrunk in recent years, per the 2022 citywide review of tree canopy cover.

We believe more analysis of the effect of development on the tree canopy is needed for each proposed Neighborhood Center, and that the DEIS includes statements that either are irrelevant or not supported by facts.

The physical, mental and environmental benefits of preserving a healthy tree canopy are well-established, as are the adverse effects of losing trees.

Neighborhood Residential areas provided 47% of the tree canopy area in 2021, per the citywide review, and the Maple Leaf area has a moderate tree canopy cover of 25-40% (DEIS Exhibit 3.3-2 Plants and Animals). Proposed zoning changes in Neighborhood Residential areas increase lot coverage from the existing 35% to 50% and reduce front and rear setbacks, which would have a significant effect on plants and animals.

Per the DEIS Plants and Animals Impacts section: “Projects that increase the area of individual parcels occupied by buildings and impervious surfaces would be expected to result in long-term (but localized) reductions in the diversity and/or abundance of plant and animal communities in the affected areas.”

Furthermore, the DEIS examination of the Impacts of Alternative 2, which creates Neighborhood Centers, specifically warns of the effect of development in the proposed Maple Leaf Neighborhood Center at NE 90<sup>th</sup> and Roosevelt. It notes that due to the relatively high proportion of existing tree canopy in the area, development there could cause so much loss that it could prevent the city from achieving its tree canopy goal.

The DEIS concludes that none of the alternatives studied would be expected to have significant, unavoidable adverse impacts on tree canopy cover, in part due to new tree regulations and in part because a lot of development-related loss of canopy cover would be reversed “over time” as replacement trees grow.

That statement needs rigorous analysis given the lack of information on the effect of development and on the quantity of trees lost in each Neighborhood Center, the absence of acknowledging the decreased benefits of newly planted trees, and the use of the vague term “over time.” There is a great risk of underestimating development-related canopy loss and overestimating canopy preservation due to regulations.

The DEIS further states that city development could help preserve trees regionally, which certainly cannot be proven given that other cities make their own density decisions. Likewise, stating that any decreases to plants and animals in the city of Seattle wouldn’t affect numbers in the wild is irrelevant since the DEIS is not analyzing effects of development in the wild. Those statements are unsupportable and irrelevant and should be deleted.

In addition, the DEIS includes urban tree equity as a mitigation measure – namely, planting more trees in areas with disadvantaged populations. We support adding trees in those areas; it makes sense and it’s the right thing to do from an equity standpoint. But cutting down

mature trees in other areas does not make sense, and does not balance the scale.

In short, the mitigation measures proposed are based on faulty assumptions and are not appropriate to the scale of the loss.

**RECOMMENDATIONS:** Guarantee protection for large trees. Evaluate projected canopy loss for each Neighborhood Center. Define time needed for newly planted trees to achieve benefits of mature trees. Remove irrelevant and unsupported assumptions.

Thanks again for the opportunity to share our views. Please let us know if you have any questions about our comments. We look forward to further engagement.

Caroline and Mike Ullmann

8819 12<sup>th</sup> Ave NE

Seattle, WA 98115

[carolineu@mindspring.com](mailto:carolineu@mindspring.com)

[mikeu1@mindspring.com](mailto:mikeu1@mindspring.com)

Land line: 206-517-8096

**From:** [Skyler Urban](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comment Re: Comp Plan - More Housing Needed  
**Date:** Monday, May 20, 2024 11:51:28 AM

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**CAUTION: External Email**

Hello -

I write to submit a comment on the proposed Seattle Comprehensive Plan. I would like the city to pursue the Housing Abundance Map, i.e., the earlier Comp. Plan draft that was rejected by Mayor Harrell's policy team.

Since the 2021, my rent has increased year after year, and I expect it to increase again when I renew my lease. We need an ambitious plan to handle the housing crisis and cost of living crisis that go with a lack of housing. Only the abundant housing plan can turn us in the right direction, not the current comp. plan.

Thank you,

Skyler Urban.

458-1

**From:** [John Valett](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#)  
**Subject:** Comment on Seattle's One Comprehensive Plan EIS  
**Date:** Friday, May 3, 2024 9:50:24 AM

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**CAUTION: External Email**

This email is to serve as public comment on Seattle's Comprehensive Plan Environmental Impact Statement.

1. Section P 3-3 states that "none of the alternatives would be expected to result in impacts reducing the likelihood of survival or recovery of a plant or animal in the wild." **How would Seattle's comprehensive plan affect available standing habitat for Seattle's urban ecosystem and what impacts are created from the plan regarding landscape fragmentation and wildlife corridors?**
2. Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **What is the effectiveness of tree planting programs designed for tree replacement in preserving habitat and ecosystem functions? How does this impact Seattle's likelihood of achieving its canopy and climate goals set forth?**
3. The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. **How does the emphasis on public land achieving canopy goals account for the fact that current assessments show that canopy in parks is declining? How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?**

The city's comprehensive plan is meant to serve the people of Seattle, and not sit in the pocket of the developers and its industry.

Best,  
John Valett

459-1



**From:** [Emily Van Bronkhorst](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:51:22 AM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

460-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Emily Van Bronkhorst  
emilyveebie55@gmail.com  
4107 Wallingford Ave N  
Seattle, Washington 98103

**From:** [Luz Villasana](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Rivera, Maritza](#)  
**Subject:** Environmental Impact Questions  
**Date:** Saturday, May 4, 2024 9:53:27 PM

---

**CAUTION: External Email**

Hello,

I am concerned with the current proposal to increase housing in Seattle with regards to the urban forest and animals living within.

461-1

Specifically, in Section P 3-3, it states that “none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild.” However it does not spell out clearly how the plan will impact our city’s plants and animals. I think this must be addressed.

This same section also claims that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." However it seems to me that there is an in depth analysis lacking that will show that all the plants removed and corresponding fauna affected by such removal will be adequately "substituted" with the tree planting programs. Can you "show your work" like they use to tell my kids in grade school? It's hard to imagine the increased hardscape will not have unavoidable adverse impacts on tree canopy cover.

Finally, how is it possible that Seattle will reach its 30% canopy goal when the new tree ordinance translates in a net reduction of private land available for trees? Is there really enough public land that grants the assumption that the 30% goal will be reached? Over the years we have seen how private developers (whether for buildings, townhomes or private residences) remove trees over and over again. How many trees have to die, how many old, established trees will be cut? Has this plan made an accurate prediction of how many trees will need to be planted in these areas every day/month/year to make up for the trees killed by the proposed development?

Let us not forget that green spaces in cities mitigate the effects of pollution and can reduce a phenomenon known as the urban heat island effect.

Please, save our urban forest!

Sincerely,

Luz Villasana

**From:** [Michael Vitz-Wong](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Thursday, May 9, 2024 6:05:05 PM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Michael Vitz-Wong  
mike.but.not.just.mike@gmail.com  
123 Palatine Ave N  
Seattle, Washington 98103

462-1

**From:** [Nils von Veh](#)  
**To:** [PCD\\_OneSeattleCompPlan](#)  
**Cc:** [Saka, Rob](#); [EIS@seattle.gov](mailto:EIS@seattle.gov); [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Input/ feedback on One Seattle Plan current draft  
**Date:** Monday, May 6, 2024 4:49:16 PM

---

**CAUTION: External Email**

Greetings--

My partner Robyn Ramsey and I attended the Seattle Rezoning District 1 Info Session on April 29th in West Seattle. After reflecting on the information presented at that community meeting and reviewing the online information about the plan we have the following comments.

463-1

We are long-time Seattle residents and have been home owners for a good portion of our adult life. Seattle is at a major turning point in its existence and West Seattle residents recently also had a first-hand, front row seat at what happens when a major citywide medical emergency and a major West Seattle infrastructure crisis occurs simultaneously. And that also prompted us to imagine what might happen if there is a major earthquake in our area in the near future.

As we drove home from the presentation a week ago and as we have traveled around the city in the past week we have tried to imagine what the Seattle of the future might look like with four housing units built on many of the currently single family blocks we travel past. And it struck us repeatedly that we would not want to live in the city with the density proposed by this plan as it is currently proposed.

There is no question that we must take a creative look at trying to solve the homelessness crisis we are experiencing by providing more affordable housing options, but this plan would result in dramatically altering the unique character of our city that attracted us to live here in the first place. And has not really resulted in more affordable housing units in those new multiple unit rowhouses

If we are going to truly have a "comprehensive plan" it also needs to address the needs we will have in this denser, more populous city. That means more medical care facilities in all parts of the city. That means having an assurance that the basic infrastructure of the roads, bridges, energy grid, water supply, sewer systems and other critical parts of the infrastructure are

properly maintained and improved where needed.

The city has also just recently embarked on a dramatic, major plan to protect the existing tree canopy and additionally expand the tree canopy towards a 30% canopy goal. The impact of the higher density of the residential "urban neighborhoods" envisioned by this plan is not clearly taken into account. And it is not at clear how the goals of that tree canopy plan and this one will align.

The Fauntleroy neighborhood (and adjacent neighborhoods) we live in are also significantly impacted by the ferry traffic growth of people traveling through our West Seattle neighborhood from nearby areas as people move to nearby places like Vashon Island and over to Kitsap County to escape the already existing density of our Seattle urban landscape. And there does not seem to be a well coordinated effort by Metro Transit, SDOT and WSF to coordinate handling impact of the traffic traveling through our neighborhood. This impact needs to be properly addressed in the EIS review of this One Seattle Plan.

We look forward to hearing more details about how this One Seattle Plan/ Comprehensive Plan evolves and develops.

Nils von Veh & Robyn Ramsey  
9721 45th Ave. SW  
Seattle, WA 98136

**From:** [Sharon Wada](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments for the One Seattle Comprehensive Plan  
**Date:** Monday, May 20, 2024 7:01:28 AM  
**Attachments:** [FINAL-BCS-Comments-Draft-2024-Comprehensive-Plan-Update-and-DEIS.pdf](#)

---

**CAUTION: External Email**

As a native Seattleite, I strongly support the thoughtful, science-based recommendations that Birds Connect Seattle submitted to your office (see attached). BCS is one of the oldest and most established conservation organizations in our great city, and it's imperative that your planning team listen to their credible advice and apply their input to the One Seattle Comprehensive Plan.

464-1

In my lifetime, Seattle has rationalized sacrificing trees and surrounding nature under the guise of "job growth" or "property owner rights" or "urban villages" or whatever the new spin is. We all know it means more clearcutting, more concrete, more congestion and a lower quality of life for all.

Seattle can be a leader in protecting what's left of our dwindling tree canopy, parks, habitats and the wildlife that depends on us. Our city leaders must be less focused on developers and their endless paper greenery, and instead, **care more about the dwindling natural greenery in our Emerald City.**

Your committee has the power and opportunity to preserve and restore health to our best assets. Please do the right thing before it's too late.

Sincerely,  
Sharon Wada

**From:** [Sharon Wada](#)  
**To:** [PCD\\_OneSeattleCompPlan](#); [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments for the One Seattle Comprehensive Plan  
**Date:** Monday, May 20, 2024 7:01:28 AM  
**Attachments:** [FINAL-BCS-Comments-Draft-2024-Comprehensive-Plan-Update-and-DEIS.pdf](#)

---

**CAUTION: External Email**

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In my lifetime, Seattle has rationalized sacrificing trees and surrounding nature under the guise of "job growth" or "property owner rights" or "urban villages" or whatever the new spin is. We all know it means more clearcutting, more concrete, more congestion and a lower quality of life for all.

Seattle can be a leader in protecting what's left of our dwindling tree canopy, parks, habitats and the wildlife that depends on us. Our city leaders must be less focused on developers and their endless paper greenery, and instead, **care more about the dwindling natural greenery in our Emerald City.**

Your committee has the power and opportunity to preserve and restore health to our best assets. Please do the right thing before it's too late.

Sincerely,  
Sharon Wada

464-1  
cont

**From:** [Erin Wade](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Hollingsworth, Joy](#); [PCD OneSeattleCompPlan](#)  
**Subject:** Save mature trees throughout Seattle  
**Date:** Monday, May 6, 2024 4:12:23 PM

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**CAUTION: External Email**

Your draft proposal on the environment (comprehensive plan and environmental impact statement) is bad for the environment and bad for people's health. Alternatives 2 and 4 would save the most trees, but your overall philosophy is wrong.

It would be beyond short-sighted to think that the negative effects of a mostly treeless high-rise dense city could be offset by trees growing miles away. Reasons include:

- 1-the suburbs are increasing dramatically as the increasing rents drive people out of the city, so that argument is false.
- 2-it takes decades for a tree to truly have an impact on the environment, cooling and protecting people from our increasingly hot summers, and housing wildlife, particularly birds, who need mature conifers in which to live and nest, for the most part. Species of birds are going extinct at an alarming rate across the country, and it is all our responsibility to protect the natural world, including wildlife and trees. Temperatures on the ground are less when mature trees exist within cities. Otherwise, heat islands are created, and with global warming, these trees could save human lives, as well. You are being short-sighted to a dangerous degree.
- 3-this city has become an increasingly unpleasant place to live, crowded with highrises, and the presence of mature trees in neighborhoods really makes a difference between reasonably tolerable and absolutely unbearable. Those kinds of conditions drive people further out past the suburbs into the exurbs, into forest areas themselves, rendering your arguments foolhardy and cynically false.
- 4- Plans for replanting trees quite often fail, as it takes considerable attention to raise a young tree successfully into a semi-mature tree. Vandalism, lack of adequate watering, and topping kills many young trees planted in neighborhoods. Non-native trees do not support native bees, among other issues, either.
- 5-If you reduce space for new trees, while removing mature trees due to development, Seattle will not ever be able to reach its tree canopy goals, which are not very impressive in the first place. You would be causing irretrievable damage to Seattle's environment and to its liveability, for both humans and wildlife, especially in the face of global warming. Humans do not have a moral right to destroy the environment.

Sincerely, Erin Wade

465-1



**From:** [Christina Wagner](#)  
**To:** [PCD CompPlan EIS](#); [Morales, Tammy](#); [Woo, Tanya](#)  
**Subject:** Seattle Comprehensive Plan Environmental Impact Statement  
**Date:** Monday, May 6, 2024 2:58:04 PM

---

**CAUTION: External Email**

Hello Tammy Morales, Tanya Woo and to whom it may concern;

I am writing as a long time Rainier Beach resident to provide input on the Seattle comprehensive plan/Environmental Impact;

Please re-consider any EIS that does not specifically detail the impacts on our valuable urban birds and wildlife and plan for their protection.

Please make sure the alternatives chosen provide analysis of what the effect of increased buildings and accelerated tree removals will have on the urban tree canopy cover in terms of health(physical and mental), climate, wildlife benefits and stated goals of 30%.

What analysis is there that can consider carefully how loss of large urban trees with their valuable contributions can be replaced by smaller re-plantings and time needed for maturation?

Thank you for your careful consideration of these issues so important to the future livability of Seattle for all Generations (people and wildlife)!!

Sincerely,

Christina Wagner

10437-67th Ave South

Seattle,

WA 98178

466-1

**From:** [Christina Wagner](#)  
**To:** [PCD CompPlan EIS](#); [Morales, Tammy](#); [Woo, Tanya](#)  
**Subject:** Re: Seattle Comprehensive Plan Environmental Impact Statement  
**Date:** Wednesday, May 15, 2024 7:04:48 AM

---

**CAUTION: External Email**

Resending by new deadline of 5/20 as received newsletter of Tammy Morales that indicated some comments not received due to technical issues.

On 05/06/2024 2:57 PM PDT Christina Wagner <cmwzia@comcast.net> wrote:  
Hello Tammy Morales, Tanya Woo and to whom it may concern;  
I am writing as a long time Rainier Beach resident to provide input on the Seattle comprehensive plan/Environmental Impact;  
Please re-consider any EIS that does not specifically detail the impacts on our valuable urban birds and wildlife and plan for their protection.  
Please make sure the alternatives chosen provide analysis of what the effect of increased buildings and accelerated tree removals will have on the urban tree canopy cover in terms of health(physical and mental), climate, wildlife benefits and stated goals of 30%.  
What analysis is there that can consider carefully how loss of large urban trees with their valuable contributions can be replaced by smaller re-plantings and time needed for maturation?  
Thank you for your careful consideration of these issues so important to the future livability of Seattle for all Generations (people and wildlife)!!  
Sincerely,  
Christina Wagner  
10437-67th Ave South  
Seattle,  
WA 98178

467-1

**From:** [wwaldmanmd@starpower.net](mailto:wwaldmanmd@starpower.net)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** trees  
**Date:** Tuesday, April 9, 2024 3:39:22 PM

---

**CAUTION: External Email**

however the comprehensive plan gets written protection for old trees is a necessity.....no more millions dollar developments with 2 dollar trees



**From:** [wwaldmanmd@starpower.net](mailto:wwaldmanmd@starpower.net)  
**To:** [LEG\\_CouncilMembers](#); [PCD\\_CompPlan\\_EIS](#)  
**Subject:** trees  
**Date:** Sunday, May 5, 2024 12:40:52 PM

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**CAUTION: External Email**

- I hope you all will asap:
  - Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger.
  - Give SCCI Director the ability to ask for alternative site designs to save trees.
  - Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone.
  - Amend Tree Protection Ordinance to require ordinance to apply to all city land use zones.
  - Remove the "basic tree protection area" loophole in the Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots.
  - Require developers to submit a Tree Inventory
  - i thank yu in advance.....wm waldman

468-1  
cont

**From:** [iwall@serv.net](mailto:iwall@serv.net)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Strauss, Dan](#)  
**Subject:** Comments on DEIS for the One Seattle Plan  
**Date:** Saturday, May 4, 2024 2:49:28 PM

**CAUTION: External Email**

1. The estimated housing needs are based on the notion that no household should have to spend more than 30% of their income on housing and basic utilities. Has the city of Seattle adopted this aspirational objective in any official way (resolution, ordinance, charter)? What legal mechanism requires the city to accept this as a goal for the CP growth strategy? Note that King County uses 40% as a more realistic share of income for housing. The Dept of Commerce acknowledges that the 30% measure does not apply to home buyers. This is a major policy question that is not analyzed in the DEIS but forms the basis for the potentially exaggerated housing demand estimates.

469-1

2. The Housing Appendix includes tables purporting to show the net new housing units by neighborhood for each of the DEIS alternatives. However, using Greenwood/Phinney as an example, the differences across the alternatives are negligible for both housing and jobs. How is this credible given the differences in the alternatives and the expansion of boundaries and zoning changes anticipated by the "centers" concept? Please explain the methodology behind these estimates.

3. The No Action alternative meets the GMA/KING COUNTY requirements to produce the 80,000 new housing units and the updated development capacity report estimates a capacity under existing zoning to almost double that number. What is the justification for selecting any alternative to reach 100,000 or more net new housing units? What new code requirements will need to be enacted to meet the housing needs of households between 0 and 50% AMI, since these low income HH represent close to half of the projected future housing needs?

4. The FEIS should include an estimate of the net new housing units that can now be created under HB1110 and the type of units (townhouses, flats, cottages) and occupancy status, i.e., rental, owner, congregate/shared housing. The estimates should recognize that nearly half of the parcels with NR 1 zoning are less than 5,000 SF.

5. The DEIS claims that existing regulations are adequate to mitigate all environmental impacts however this has a hollow ring to it given the clearly observable impacts of a growing population on energy demand, water supply, surface water quality, tree canopy, air quality (more VMT and congestion) and public safety. How will the environmental impacts of becoming a city of one million people be tracked and addressed over the timeframe of this plan?

469-2

6. The DEIS does not address the socio-economic impacts of the Growth Strategy. The FEIS should include an analysis of the public costs for infrastructure (parks, transportation, energy, drainage, wastewater, solid waste) to meet growth demands. How will increasing utility rates and property taxes under the anticipated zoning changes affect affordability for property owners and renters including those on fixed incomes? How will increasing cost of living in Seattle drive all kinds of displacement, not only from those areas mapped as having high risk of displacement? What measures will be required to preserve existing 'naturally affordable' housing including small apt buildings, older duplexes, triplexes, and small commercial

buildings that provide space for the desired urban amenities in the "15-minute" neighborhoods? The FEIS should address these elements that effect livability and desired variety in the urban built environment. We already see the monotony of the townhouse/rowhouse explosion and the dilution of design review. Which alternative will produce housing suitable for families with children, seniors, and people with disabilities?

469-2  
cont

7. In the DEIS chapter on utilities, Area 1 is described as having significant drainage and wastewater deficits yet Area 1 is targeted for the greatest percentage of new housing under two of the alternatives despite the upgrades to accommodate this growth being called 'cost-prohibitive'. Please explain this seeming inconsistency. In the section on electrical power, the DEIS says that City Light has plans to accommodate 65,000 additional housing units. How does that relate to the Growth Strategy that calls for between 80,000 and 100,000+ housing units? Do we really have affordable capacity to meet future electrical energy demand? Recent news coverage suggests we do not given climate change impacts.

469-3

8. The DEIS suffers from the usual problems of these documents. It does not articulate the cumulative impacts of the growth strategy and assumes that each incremental change is not significant. Seattle risks becoming the frog in the slowly boiling pot!

469-4

Irene Wall, District 6

**From:** [Galen Ward](#)  
**To:** [PCD CompPlan EIS](#); [PCD OneSeattleCompPlan](#)  
**Cc:** [Strauss, Dan](#)  
**Subject:** More family sized homes in Seattle  
**Date:** Monday, May 20, 2024 12:14:14 PM

---

**CAUTION: External Email**

Hi,

I am a Phinney Ridge homeowner and a parent of two elementary school-aged daughters.

The current draft plan does not go far enough to create real housing options. We need more homes.

I strongly support adding family-sized apartment buildings throughout Seattle neighborhoods like my own.

My feedback:

1. Please **increase the Floor Area Ratio (FAR)** and **increase the height** for 4- and 6-plexes in residential neighborhoods. Increase FAR further if the homes are stacked.
  - a. Small lots - even 3,000 sqft - in our neighborhoods should be able to accommodate four families in comfortably sized units.
2. Buildings in neighborhood centers should be taller and boundaries should expand a quarter of a mile more.
3. Add back the original neighborhood centers.

Thank you,  
Galen Ward  
Phinney Resident

470-1

**From:** [Sarah Ward](#)  
**To:** [PCD CompPlan EIS](#); [PCD OneSeattleCompPlan](#)  
**Cc:** [Strauss, Dan](#)  
**Subject:** Draft housing plan - Seattle resident feedback  
**Date:** Monday, May 20, 2024 4:16:55 PM

---

**CAUTION: External Email**

To Whom it May Concern:

As a homeowner in Phinney Ridge and a parent of two elementary school-aged daughters, I feel that the current draft plan falls short in providing adequate housing options. We need more homes.

I support the addition of family-sized apartment buildings across Seattle neighborhoods, including mine.

Here are my suggestions:

1. Increase the Floor Area Ratio (FAR) and height limits for 4- and 6-plexes in residential areas. Allow higher FAR for stacked homes.
2. Permit small lots, even as small as 3,000 sqft, to house four families in comfortably sized units.
3. Make neighborhood center buildings taller and expand the boundaries by a quarter mile.
4. Reinstate the original neighborhood centers.

Thank you,  
Sarah Ward  
Phinney Ridge Resident  
6206 2nd Ave NW, Seattle, WA 98107

471-1



**From:** [Sheila Warsinske](#)  
**To:** [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov); [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Fwd: Affordable housing?  
**Date:** Monday, May 6, 2024 1:36:56 PM

---

**CAUTION: External Email**

To: Whomever gets to read these emails. Apologies for duplicate emails. Responders suggested these emails instead.

472-1

Begin forwarded message:

**From:** Sheila Warsinske <[lostislandlodge@comcast.net](mailto:lostislandlodge@comcast.net)>  
**Subject:** Affordable housing?  
**Date:** May 6, 2024 at 7:47:57 AM PDT  
**To:** "[OPCD@seattle.gov](mailto:OPCD@seattle.gov)" <[OPCD@Seattle.gov](mailto:OPCD@Seattle.gov)>





Upper three photos - Six houses - on one lot - in Maple Leaf

Lower photo - Three on one lot. Please note proximity to home on the left .

Established statistics tell us that crime increases in densely populated areas. WE ALREADY HAVE MORE CRIME THAN CAN BE DEALT WITH in Seattle. Within weeks my empty, locked car was broken

into - \$400. to repair, all around locked mail boxes broken into, a prowler tried to enter my back yard - deterred by locked gate, a deranged person damaged a considerable section of landscaping - and these are just little inconsequential crimes.

I see middle school children waiting for a bus on 90th & Aurora - with a scantily clad prostitute 6' away looking for customers, another one working the west side of the street, while on the south side of that intersection a cluster of people are doing drugs. What will happen when people are packed in even more than they are now?

Sheila Warsinske

472-1  
cont

**From:** [Sheila Warsinske](#)  
**To:** [PCD CompPlan EIS](#); [OneSeattleCompPlan@seattle.gov](mailto:OneSeattleCompPlan@seattle.gov)  
**Subject:** Fwd: One Seattle Plan  
**Date:** Monday, May 6, 2024 1:38:17 PM

**CAUTION: External Email**

Apologies if this is redundant - responses to my previous emails suggested these two emails instead.

Begin forwarded message:

473-1

**From:** Sheila Warsinske <[lostislandlodge@comcast.net](mailto:lostislandlodge@comcast.net)>  
**Subject:** One Seattle Plan  
**Date:** May 6, 2024 at 7:47:24 AM PDT  
**To:** "[OPCD@seattle.gov](mailto:OPCD@seattle.gov)" <[OPCD@Seattle.gov](mailto:OPCD@Seattle.gov)>

Dear One Seattle Planners

I am not opposed to increased housing in Seattle - but the proposed plans are very concerning to me. If you would, please read more about the following:

- 1 Location
- 2 Density
- 3 Affordability
- 4 Design
- 5 Tree Canopy

Why are already crowded neighborhoods on the high density plans?  
Why aren't wealthier, roomier neighborhoods - Broadmoor, Windemere, Laurelhurst, North Beach, Blue Ridge, Olympic Manor, Madison Park, Mt. Baker,

Seward Park, View Ridge, Madrona- being considered for Urban Centers, Urban Neighborhoods? Lack of public transportation might be an excuse - more bus routes could solve that issue.

Why are developers allowed to construct multiple houses on one lot with no concern regarding the negative effect on our neighborhoods? I recently walked through a site in Maple Leaf - SIX houses on one lot. Six feet between structures. The 1200 sq. ft. houses will be priced at \$750-\$800,000; the 2500 sq. ft. houses at \$1,600,000. Affordable housing? Really? Trees gone, over built lots destroying neighborhoods, minimal parking space, reduced property value for the rest of the residents- where's the positive part of this?

Nearer to me - three houses are being built on one very small back lot - and four on the front lot. Three stories tall, looming over, at a minimal distance, the homes on north, east and south sides. All sense of privacy is destroyed - in their homes and back yards. What about Seattle's tree canopy and restrictions on removing exceptional trees? In order to get a better price, the owner of the small lot, had three 'beyond exceptional' trees on his property line illegally cut down. Despite it being reported, eye witnesses and photos - the owner was fined a minimal amount and one 6' tree (now gone) was planted in a feeble attempt at the required landscape restoration.

Architecturally these high density houses are a blight on any neighborhood. The developer and his profit will be long one - no concern for having contributed to diminishing the quality of the neighborhood. I worked so hard to earn the money to buy our home and now am facing declining property value as these ugly, "crammed in" houses appear. Additionally these developers completely clear cut the lots, there may be plans for some landscaping but in reality little room is left for planting anything.

I am sending photos in an accompanying email to further illustrate my concerns.

I actually feel that my voice is "in the wind", that my and our concerns are futile. That

said - I do want to thank you for reading my email and hope that someone on the council will have taken seriously what I've said. I wonder how many of you live in the areas of proposed changes and how many of you live or are willing to live right next door to one of these multi storied houses. Sacrificing your privacy/peacefulness & value of your home for the greater good?

Sincerely,  
Sheila Warsinske

473-1  
cont

**From:** [Carolina](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Seattle's comprehensive plan  
**Date:** Sunday, May 5, 2024 6:28:36 PM

CAUTION: External Email

1.

I am writing to you to comment on the comprehensive plan - Seattle's comprehensive plan which has been released related to URBAN TREES and urban tree removal.

474-1

I believe, out of the five alternatives in the plan, alternatives 2 and 4 would save the most trees. I am asking you to choose alternatives 2 or 4 in the comprehensive plan so we can build 100,000 new homes while preserving our trees.

I also have questions: The environmental impact statement doesn't protect urban nature:

Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." **What is the impact of the plan specifically on Seattle's plants and animals?**

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." **What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?**

The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. **How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?**

Regards.

Carol Wartman

**From:** [Matthew Weatherford](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Wednesday, May 8, 2024 10:04:41 PM

---

**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.
- \* We need more trees in seattle - especially in heat island areas - incentivize these plantings and follow up

Thank you for your consideration.

Matthew Weatherford  
Matt.weatherford@pobox.com  
2312 NE 113th St  
Seattle, Saint Croix Island 91825

475-1



**From:** [lassie webster](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** One Seattle Plan  
**Date:** Monday, May 6, 2024 12:33:03 PM

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**CAUTION: External Email**

To Whom it May Concern,

I believe we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

476-1

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Lassie Webster  
2727 NE 91st Street  
Seattle, WA 98115  
[lassiewebster@gmail.com](mailto:lassiewebster@gmail.com)

**From:** [Lassie Webster](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 11:54:36 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

477-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Thank you for your consideration.

Lassie Webster  
lassiewebster@gmail.com  
2727 NE 91st Street  
Seattle, Washington 98115

**From:** [Paul Weinstein](#)  
**To:** [PCD CompPlan EIS](#)  
**Cc:** [Moore, Cathy](#)  
**Subject:** Seeking Your Support to Protect Seattle's Urban Tree Canopy  
**Date:** Sunday, May 5, 2024 8:05:42 PM

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**CAUTION: External Email**

Dear Councilmember Moore,

As a longtime resident of District 5, I am reaching out to express my concerns about the Environmental Impact Statement's lack of robust protections for our city's precious tree canopy.

While Section P 3-3 suggests minimal impact on Seattle's wildlife, I believe the public would benefit from greater transparency regarding the data and methods used to reach this conclusion. Providing access to this information would help foster trust and understanding among constituents like myself.

I also have reservations about the reliance on tree planting initiatives to mitigate the loss of mature urban forests. Although well-intentioned, saplings cannot provide the same ecological benefits as established trees for many years. We must be cautious not to irreversibly damage our green spaces in the short term.

Furthermore, I worry that the new tree ordinance's restrictions on private land planting, combined with our already unmet 30% canopy goal, may put undue pressure on limited public land resources. Has the city conducted a thorough assessment of the feasibility and cost of this approach?

Councilmember Moore, I believe that you share my love for Seattle's urban canopy and the countless benefits it provides our community. I kindly ask for your support in ensuring that our city's growth does not come at the expense of our environment and quality of life.

I would greatly appreciate any insights you could provide on how these concerns are being addressed. Your leadership on this critical issue is vital to preserving Seattle's green legacy for generations to come.

Thank you for your time and consideration.

Best regards,  
Paul Weinstein  
Seattle Resident

478-1

**From:** [colleenmarcyw@gmail.com](mailto:colleenmarcyw@gmail.com)  
**To:** [Moore, Cathy](#); [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Environmental Impact statement lacks adequate protections for existing tree canopy  
**Date:** Sunday, May 5, 2024 8:27:11 PM

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**CAUTION: External Email**

Dear Council member Cathy Moore,

As a concerned resident of North Seattle's District 5, I am writing to express my serious reservations about the lack of protections for our city's existing tree canopy in the recently released Environmental Impact Statement.

479-1

First and foremost, I am troubled by the vague assertion in Section P 3-3 that the proposed plan will not significantly impact Seattle's plants and animals. Where is the concrete data to support this claim? Who conducted the studies, and what were their methodologies? The public deserves transparency and access to the scientific evidence that supposedly justifies this conclusion.

Furthermore, I challenge the notion that tree planting initiatives alone will adequately compensate for the loss of our mature urban forest. Newly planted saplings cannot provide the same ecological benefits as established trees for many years. Where are the displaced flora and fauna supposed to find habitat in the meantime? Once we lose our precious green spaces, they may be gone forever.

I also question the feasibility of reaching Seattle's 30% canopy cover goal, which we are already falling short of, given the new tree ordinance's significant reduction of available planting space on private land. Has the city calculated how many acres of public land would need to be dedicated to tree planting to make up for this deficit? Is there even enough suitable public land available?

Moreover, what is the projected annual tree planting rate necessary to offset the canopy loss from development? Is this figure realistically achievable within the city's budget and resources, year after year? I respectfully request a detailed, data-driven response to these critical questions.

Councilmember Moore, I urge you to prioritize the preservation and expansion of our urban tree canopy in all neighborhoods, on both public and private land. Trees provide irreplaceable benefits to our environment, health, and quality of life. We cannot afford to sacrifice Seattle's green legacy for short-sighted development.

Thank you for your attention to this vital matter. I look forward to your timely response and concrete actions to address these concerns.

Sincerely,

Colleen Weinstein  
4112 NE 103<sup>rd</sup> Pl  
Seattle, WA 98125

**From:** [Jeff Weissman](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 5:43:47 PM

**CAUTION: External Email**

Comments Planning and Community Development EIS,

480-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Jeff Weissman  
jr.weissman@gmail.com  
5222 Ivanhoe PL NE  
Seattle, Washington 98105-2837

**From:** [maggieweissman](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Housing and trees.  
**Date:** Monday, May 6, 2024 2:20:41 PM

**CAUTION: External Email**

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities and this can forestry.

\* The draft EIS does not help the situation

481-1

In addition to the recommendations below I would ask that European cities be looked at for example. Copenhagen and cities in the Netherlands do a good job with density while still having tree canopy. My brother lives in the Netherlands do and I can attest to this.

Mitigation recommendations:

\* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.

\* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.

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Thank you for your consideration.

Maggie Weissman.

Maggie Weissman  
[maggie.weissman@gmail.com](mailto:maggie.weissman@gmail.com)  
5222 Ivanhoe PI NE

Seattle, Washington 98105  
Sent from my iPhone  
Maggie Weissman  
Managing Broker, CNE  
Windermere Referral  
206.226.0543  
Www .maggieweissman.com

**From:** [Maggie Weissman](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 1:29:52 PM

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**CAUTION: External Email**

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Thank you for your consideration.

Maggie Weissman.

Maggie Weissman  
maggie.weissman@gmail.com  
5222 Ivanhoe PI NE  
Seattle, Washington 98105

482-1



**From:** [Lisa Westgard](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 1:14:34 PM

**CAUTION: External Email**

Comments Planning and Community Development EIS,

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483-1

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Thank you for your consideration.

Sincerely, Lisa Westgard

Lisa Westgard  
kailine94@hotmail.com  
240 S. 198th St  
Des Moines, WA, Washington 98148

**From:** [Woody Wheeler](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Fwd: DEIS comments  
**Date:** Tuesday, April 30, 2024 2:55:22 PM

**CAUTION: External Email**

### Plants and Animals Section

Protecting mature trees and other remaining native plant landscapes is key to Seattle’s future as an attractive, livable city. The urban forest, including large evergreen and other mature trees on public and private lands, is an essential component of Seattle’s green infrastructure. It provides a line of defense against climate change, as well as habitat for our city’s rich but declining bird and wildlife populations.

484-1

### Tree Canopy

According to DEIS “No appreciable impacts on regional populations of plants or animals... and a substantial portion of development-related reductions in canopy cover would be reversed over time as replacement trees grow and the potential for any such reductions would be limited by regulations that protect existing trees and require replacement of trees that are removed from private parcels.”

This statement is overly optimistic and somewhat delusional when it comes to the devastating impacts that developments will have under a weak tree ordinance which the Seattle Times correctly characterized as “a chainsaw.” Further, this statement makes the false assumption that a newly planted tree is an adequate replacement for a mature tree. The city’s own urban forest management plan debunks this myth.

So does New York Times columnist and author Margaret Renkl, who wrote in her 4/28/2024 column “America’s Urban Forests Deserve Protection: Newly planted seedlings can help, but with nowhere near the same effectiveness as mature trees.” “But too few of us (including the city of Seattle) understand the crucial contribution that trees make in our cities and suburbs: cooling hot buildings, preventing storm-water runoff, improving air quality, pulling carbon out of the air and the like. Not even to mention the habitat—food, shelter, nesting sites—that trees provide our wild neighbors.”

The DEIS claims were not substantiated. Current tree protections fall far short of the mostly ignored Seattle Urban Forestry Commission. Seattle is backsliding in its efforts to achieve our city’s agreed-upon goal of 30 percent canopy by 2037. In fact, our canopy declined by 255 acres, the size of Green Lake, in the last five years.

As Renkl concludes and I agree “In rapidly growing cities (like Seattle), where even a robust plan for planting trees can’t possibly keep pace with development, the preservation of existing trees would go a long way toward keeping the city livable for human beings as well as for wildlife.”

### Plant and Wildlife Populations

DEIS does not cite data nor does it provide data on specific impacts when it asserts that “ The plant and animal species found in Seattle are widespread in the region; some are globally

abundant."

DEIS needs to do a more thorough, scientific assessment of Seattle's urban wildlife where dozens of bird and wildlife species are declining due to shrinking habitat. To conclude that "there will be no environmental impact to urban wildlife populations" after adding 100,000 housing units is ludicrous.

As one exasperated tree advocate said recently "We can kiss the Emerald City goodbye if we continue to allow lots to be clear cut for development." Renkl added in her column "There are ways to preserve the trees on construction sites, of course, but spec-builders rarely bother." Of all cities, The Emerald City in the Evergreen State should be first to "bother!"

Woody Wheeler  
Conservation Catalyst  
P.O. Box 51151  
Seattle, WA 98115  
206-498-3553  
[www.conservationcatalyst.org](http://www.conservationcatalyst.org)

**From:** [Woody Wheeler](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Fwd: DEIS comments  
**Date:** Tuesday, April 30, 2024 2:55:22 PM

---

**CAUTION: External Email**

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485-1

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Conservation Catalyst  
P.O. Box 51151  
Seattle, WA 98115  
206-498-3553  
[www.conservationcatalyst.org](http://www.conservationcatalyst.org)

Bonnie Williams

Comments on DEIS Executive Summary Impacts April 27

### **Earth and Water**

486-1

Agree increased hard surfaces, and storm water run off are concerns and removing trees and clear cutting without more preservation of trees on private property should be worked into the Comp Plan at 30% tree coverage goal. Mitigations fall short for trees and need improved higher canopy goal of 30%.

I notice that every time a new unit or units connect gas lines or sewer systems that neighborhood streets are dug up then patched over until 3 or 4 projects on a block can cause street damage ( patches) to the point it needs resurfacing or replacing which is very expensive.

### **Air quality**

Smoke is terrible from wild fires and tree loss is mitigation not mentioned Increase tree canopy to 30%.

### **Plants and Animals**

Alt 3 broad ( HB1110 has similar impacts because 4-6 units will be spread across Seattle ) and Alt 5 combined “would likely result in the largest tree canopy loss due to lower density development in Neighborhood Residential zones”. Reject Alt 3 and 5 based on tree loss.

Replacing older trees with new trees that take 30 years to grow 30 feet do not function to absorb storm water as older trees. Planting in right of way is not nearly as effective as trees need to be smaller there.

Rabbits are being seen for the first time in my Wallingford yard because they are being displaced with so much development Cute, but damaging to plants and they multiply quickly (how to get rid of them?).

Big influx of large trucks related to construction in neighborhoods and delivery vehicles that are gas or diesel and idle while delivering to pollute air.

Smokers for barbeques should be banned to emit smoke all day long and are toxic for neighbors breathing this air.

### **Energy**

Expensive replacements for older homes converting from oil furnaces to electric are not mitigated.

Costly upgrades to connect electrical to so many more homes per lot not mitigated

April 27, 2024

Comments on DEIS Alternatives Executive Summary and overlap with Comp Plan

From: Bonnie Williams District 4 Wallingford

### Regarding DEIS Executive Summary

487-1

**Choose the No Action Alternative because the state mandated HB1110 is a required upzone. No other alternatives are needed. HB1110 should be considered the alternative of choice because the state requires Seattle to apply the legislation of Mandatory 4-6 units on all formerly single family lots across all neighborhoods outside urban villages depending on proximity to transit which creates massive capacity.**

**How much capacity in changing from commonly existing one home situation on a 5,000 square foot lot or smaller and increasing capacity to allow to 4-6 units per lot city wide? What are the impacts? How will concurrent infrastructure be met? Who will be at risk for displacement for 6 story apartments and retail surrounding new neighborhood centers and those ¼ mile from light rail and rapid transit?**

### Comp Plan Presentation to City Council March 11

Christa from the Mayor's office presented an overview to the Full City Council of the Comp Plan with Michael Hubner and Rico Quirindongo that was recorded on the Seattle Channel March 11, 2024.

**The link is here:**

<https://www.seattlechannel.org/CouncilBriefings/?videoid=x1553837=38:07>

**Christa mentions in the recording that there are 160,000 units of building capacity without any up zoning. The Comp Plan plans for 100,000 units without considering what HB1110 does in opening up additional zoning capacity in the DEIS making the 4 expanded alternatives listed in the DEIS unnecessary to reach a goal of 80k to 100K unit capacity. The capacity created by HB1110 has not been studied so apparently the capacity of 160,000 is inaccurate without more study?**

Up zone triggers suggested in the Comp Plan and Deis to be considered are:

Using an alternative from the DEIS focused, broad, corridor or combined  
**Frequent transit network bus lines across the city**

Expanding capacity of 24 New Neighborhood Centers

**HB1110 upzones anything within a ¼ mile of rapid transit or light rail.**

**All of these suggested ways to up zones need reducing or eliminating except to adapt to HB1110?**

**The other suggested alternatives and many ways to expand seem like excessive ideas that and will drive displacement. The DEIS needs to study impacts and capacity created by implementing HB1110. How the city can manage and provide the infrastructure needed to accommodate 4-6 units per lot required across the city? More thorough and transparent study in the DEIS of capacity projections and unique environmental impacts by implementing HB1110 alone. Council and the public need this capacity and impact information before any intelligent decision making by council should begin.**

**The state passed HB1110 legislation while the Seattle's DEIS was already underway. The DEIS and Comp Plan should include a history of 2019 upzones that was created through MHA and ADU/DADU legislation accounting for the additional development capacity that remains.**

The impacts of HB1110 requires focusing on keeping infrastructure concurrent with growth especially roads and sidewalks in the north end not just housing. Neighborhoods are not all the same, but, sadly, the city has gotten away from direct efforts to work with neighborhoods on rezoning. One size does not fit all.

The incentive is built into HB1110 for developers as they get two extra units by making them affordable. Withdraw the extra floor height bonus for builder incentive for HB110. The heights and scale of six plexes should be compatible in older established neighborhoods

#### **Impacts resulting from MHA and ADU/DADU upzones predict future impacts across neighborhoods**

The impacts of new development, since 2019, have resulted in higher property taxes, more people being displaced due to demolition of older properties, loss of affordable rentals, and the necessity of businesses to relocate out of older established neighborhood business districts to make way for new large apartment or office buildings. Many service businesses such as paint, hardware, and plumbing, roofing, electrical, dry cleaning businesses have left. Restaurants have come in instead.

Mayor Harrell just announced a property tax increase for a 1.3 billion transportation levy for infrastructure. Developers should be paying impact fees, but the levy raises property taxes if passed.

Additional neighborhood impacts include construction noise, very large noisy heavy truck and trailer traffic hauling construction related equipment traveling through Wallingford neighborhood streets. Detours at the base of Stone way due to the storm water project has caused noticeably much louder truck traffic noise, detours for two years. Contractors post no parking signs for weeks at a time when building on any given block for weeks at a time. Many triplex projects are under construction for about a year and neighbors endure inconveniences. Streets are repeatedly torn up for utility connections for each new addition to a block until the project is complete. Construction is ongoing. Major streets with increased truck traffic are getting very beat up and patched for each new project. Lots clear cut of trees.

#### **A proposal for 24 new Neighborhood Centers and is a big proposal.**

I question the compatibility of mixing 4-6 story apartment buildings without parking and street level retail without parking. The proposal includes a trade off to up zone a 2-4 block radius of moderate family homes to be replaced by 4-6 story apartment buildings. The proposal goes too far as it is not tailored to



each neighborhood. Some small businesses already exist in the targeted areas for new neighborhood centers. Some already have corner stores. Working with the neighborhood specifically is required. One size fits all is a mistake which includes a blanket 2-4 block circular rezone around a core intersection. The DEIS should have provided links to current zoning maps so people could be more informed of what properties might be targeted in the expansion plans. Too vague a concept to reply with informed feedback.

487-1  
cont

Some people will walk, some businesses will draw people in cars from nearby and other areas of Seattle.

We have Amazon and many delivery services that go door to door. The retail business climate is experiencing a lot of crime. The police are too short staffed to be effective in this crime spree. The idea that most will walk or bike to use these services and stay in their neighborhood is idealistic. Neighborhood stores are often not price competitive.

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Bonnie Williams

District 4

## Noise

Reduce hours of construction on Sunday in neighborhoods and allow no construction noise on Sundays

Reduce size of trucks, trailers, construction equipment trying to squeeze through neighborhood streets

For people on busy streets large semi trucks hauling containers are speeding and they are extremely noisy passing through neighborhoods (stricter truck routes for semis and trailers).

We have Metro buses and Microsoft buses they contribute to noise and pollution especially if increased frequency.

## Land Use

Loss of privacy with taller townhomes next to lower smaller older home and shorter setbacks

Arched roofs as compared to flat roofs cast less shadow from town homes on neighbors with solar panels . I suggest better roof designs on these taller buildings for protecting adjacent neighbor's solar panels.

Greater building bulk and heights definitely does decrease views of the city and protection of views is not happening nor are there good transitions from higher to lower building heights as promised.

Tree loss is horrifying and the tree legislation from 2023 unless changed will continue to create heat islands.

Unless the legislation goes to at least 30% canopy goal and OPCD ensures more lots are not clear cut.

## Population housing and employment

**“Alternative 3 spreading housing across the city would result in the highest level of renter displacement due to a higher ratio of homes demolished to new homes built”. HB1110 is closer to the “broad alternative 3” as both spread growth throughout the city so I conclude that Hb1110 would also result in the highest level of renter displacement. However, Hb1110 is likely to result with subdivisions of 5,000 square foot lots and homes for sale rather than rentals. Alternate 3 would be a bad choice because there is no way to justify that any alternatives will reduce displacement pressure because of increased production of affordable homes. Most of HB1110 will be market rate homes not “affordable” and that is unsubstantiated for either Hb1110 or any alternatives.**

**Mitigation to produce more affordable homes through implementing MHA developer fees for opting opt or providing units on site should be implemented. I recommend higher fees and more on site through city council review to strengthen the plan.**

## Cultural Resources

I believe preservation of historic landmarks and historical neighborhood honorary designations should be encouraged and contiguous areas of historic homes celebrated and shared through educational events , walks. I agree funding should be provided for additional historic surveys.

Yes I agree “ Modify demolition review process so that historic review occurs even if SEPA thresholds are increased.

## Transportation

Safety on public transit is priority and east west connections to light rail improved.

Prioritize moving cars efficiently over walking, biking while adding improvements for all.

Include maintaining Aurora as a major highway two lane without bike lanes, there are other safer routes for bikes ,scooters.

## Public Service

Prioritize adding police and fire protection staffing and equipment to be concurrent with growth.

Parks are overcrowded on sunny weekends in Seattle and some overcrowded all the time. They need to be safe and clean from homeless encampments and drug needles.

Building homes without yards and green space for child play and adult recreation is a resource on private property going away with many new housing types. You do not have to escape to a park if you have a yard.

**Green streets should not be permanent and In Wallingford and Phinney.** These streets prevent people from getting to small businesses without detours in cars. They are not used heavily enough to justify their existence. They should reopened and signs removed. In some areas of the city, it may be different, but here you see no one hardly using them as intended.

## Utilities

“All alternatives have the potential to stress utility systems. “No real mitigations offered. It takes money and infrastructure and who will pay? Why not developer impact fees? Why a levy by the Mayor to raise property taxes for these impacts? Area 1 and 2 where I live will be most impacted by demand for water, electricity, wastewater, stormwater collection. Alt 5 has the greatest impact so avoid alt 5.

**From:** [charles williams](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** EIS  
**Date:** Sunday, May 5, 2024 10:26:45 AM

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CAUTION: External Email

I live near Green Lake park, and seeing the number of visitors, families and children, that visit is a clear indicator that voting citizens want and need more trees in their own neighborhoods

488-1

I favor Alternative 2 for the EIS, as it will preserve the most canopy cover and limit the removal of established trees.

> Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is not backed up by facts but speculative at best. The new tree protection ordinance increases the potential for tree removal and loss in several ways. One is that all the zones that can undergo development under the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. This and current guaranteed lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur in the Neighborhood Residential zone means more trees, especially large ones, will be removed.

Charles Williams  
District 6  
>

**From:** [PAMELA WILLIAMS](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 7:03:09 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

489-1

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

PAMELA WILLIAMS  
pwilltrav@aol.com  
1912 30th Ave. S.  
Seattle, Washington 98144

## DEIS StoryMap Comment

Name: Tony Williams

Email: tmaxx98225@yahoo.com

Date: 5/3/2024

## Comment:

My housing questions for the Comp Plan DEIS (due Monday 5 pm):

- 1) Where is the definition of affordability that's used in the DEIS? It's often said that you can't manage what you can't measure. Without a clear definition, the City has nothing to measure against.
- 2) If the Plan says it implements HB 1011, and the definition of affordability in HB 1011 is clearly stated at less than 60% of AMI for renters and less than 80% of AMI for owner-occupied, why isn't this statewide definition in the Plan?
- 3) In the DEIS Executive Summary, the objective for affordability is: "Increase the supply of housing to ease increasing housing prices caused by limited supply and create more opportunities for income-restricted housing." Where is the evidence that this dependence on supply-side, trickle-down housing works, or that it has worked to reduce housing costs to a level affordable to low-income people, during the past 5 to 10 years of the most extreme increases in supply of rental housing ever experienced in Seattle?
- 4) If you exclude fanciful supply-side housing promises, what is the likelihood that this plan will result in affordable low-income housing provided by the market?
- 5) Do you agree that given the state definition of affordability in HB 1110, that no new for-profit housing will be affordable without subsidies? Where does the DEIS acknowledge this?
- 6) Do you agree that given the state definition of affordability in HB 1110, no new market-rate townhouses are affordable to households with incomes less than 80% of AMI, without subsidies and income restrictions? Do you agree that townhouses are the predominant form of new housing being permitted in formerly single-family zones?
- 7) Although HB 1110 allows duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments, what is the likelihood that any of these Middle Housing forms will be built by current for-profit infill developers, when these builders refuse to build rentals of any sort? If these forms are meant to produce rental apartments in formerly single-family neighborhoods, and non-profits have told the city that they can't build there either, because they need economies of scale for construction and staffing, where are the programs or zoning incentives Urban Residential neighborhoods?
- 8) What is the environmental impact of continuing to lose 1.7% of our tree canopy every five years, when 70% of our tree canopy and most of the loss is in formerly single-family neighborhoods?
- 9) Where does the plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?

490-1

**From:** [Kevin Wilmot](#)  
**To:** [PCD CompPlan EIS](#); [LEG CouncilMembers](#)  
**Subject:** Comment on DEIS  
**Date:** Monday, May 6, 2024 9:08:40 AM

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CAUTION: External Email

Please note my comment on the DEIS:

1: Section P 3-3 states that "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild." What is the impact of the plan specifically on Seattle's plants and animals?

2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

3: The plan states that Seattle will make progress toward its 30% canopy goal. The new tree ordinance substantially reduces private land available for trees. How much public land is available to reach the 30% goal? How many trees will need to be planted in these areas every year to make up for trees removed by development?

Sincerely,  
Kevin W.

Sent from my iPhone

491-1

**From:** [Marian Wineman](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 12:24:13 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

492-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
- \* The draft EIS does not analyze the probable scale of impact of tree loss or give numbers but speculates without proof that "none of the alternatives would be expected to have significant unavoidable adverse impact on tree canopy cover"
- \* No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services.

Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Marian Wineman  
mwineman@comcast.net  
3611 45th Ave W  
Seattle, Washington 98199



**From:** [Melody Winkle](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 6:44:36 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

493-1

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Melody Winkle  
mwinkle@gmail.com  
2518 NE 92nd St  
Seattle, Washington 98115

**From:** [Fritz Wollett](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Growth  
**Date:** Wednesday, May 8, 2024 7:11:13 AM

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**CAUTION: External Email**

Alternative plan 2 is my choice because it allows for the most tree and plant habitat while pursuing reasonable growth and density. Thank you.

Fritz Wollett  
7340 24th Ave. NE  
98115

494-1

DEIS StoryMap Comment

Name: Ginger Woo

Email: gmwoo.lj@gmail.com

Date: 4/13/2024

Comment:

The city should study the impacts of citywide elimination of parking minimums. Of the available alternatives, I strongly prefer Alternative 5 with higher growth targets.

495-1

## DEIS StoryMap Comment

Name: James Wu

Email: notify@james.analogist.net

Date: 5/5/2024

## Comment:

1. Section 3.2.2 and Appendix D of the DEIS describing Impacts of GHGs under Alternatives 1-5 scenarios seems to have simply scaled the population size to derive the inputs of VMT Data, with the rest of the variables being held constant or just defaulting to a single set of assumptions relying upon default "Kings County" (misspelled in DEIS Appendix D) data in order to run the EPA Motor Vehicle Emissions Simulator. Is this a correct reflection of the MOVES modeling framework described under Appendix D?
2. The possible modeling methodology described in #1 appeared to have led to the erroneous conclusion that Alternative 1 leads to the lowest GHG impact and Alternative 5 the most, which is an assumption that simply does not pass muster of how GHG pollution in suburban development patterns work and is a simulation that fails to reflect the reality of GHG emissions, as can be seen in any European city development vs an US city of equivalent population and size. This means the modeling methodology is misleading and does not inform reality. Has the City studied the impact of GHGs as an accumulative pollutant, with less urban development directly leading to a complete regional change in VMT patterns that causes exurban and suburban supercommutes that directly change the VMT patterns per regional resident?
3. If a 15-minute bus commute is transformed into a 90-minute regional exurban vehicle commute originating from outside of Seattle bounds into Seattle as a result of lack of affordable housing within Seattle, global and regional GHG emissions rise and is directly attributable and changable as other sources of Core vehicle emissions. Does the DEIS Core Emissions incorporate a model of emissions source attribution that correctly reflects reality, that counts displaced and expanded emissions as being something long range planning is directly responsible for?

**From:** [Cynthia Young](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 9:54:52 AM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

The following are comments on the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Cynthia Young  
pearl206@aol.com  
1523 NE 98th ST  
Maple Leaf in North Seattle, Washington 98115

497-1


**From:** [Steve Zemke](#)  
**To:** [PCD\\_CompPlan\\_EIS](#); [PCD\\_OneSeattleCompPlan](#); [LEG\\_CouncilMembers](#)  
**Subject:** Please add these 3 polls to the public comment on the draft One Seattle Comprehensive Plan and draft EIS  
**Date:** Monday, May 6, 2024 2:28:40 PM

**CAUTION: External Email**

Please add these 3 recent Seattle polls to public comment on the draft One Seattle Comprehensive Plan and the draft EIS. They provide valuable information of how those living in Seattle view the importance of trees and our Seattle urban forest.

Thanks,  
Steve Zemke, Friends of Seattle's Urban Forest and TreePAC.

<https://www.nwprogressive.org/weblog/2021/09/seattle-voters-overwhelmingly-favor-policies-to-protect-and-expand-the-citys-tree-canopy.html>


 [Seattle voters overwhelmingly favor policies to protect and expand the city’s tree canopy – NPI’s Cascadia Advocate](#)

In July of 2021, we teamed up with TreePAC to investigate support for a a range of sensible ideas for creating policy tools to protect trees. Majorities of over 75% and 80% endorsed every single one of our ideas.

[www.nwprogressive.org](http://www.nwprogressive.org)

498-1


<https://www.nwprogressive.org/weblog/2021/12/second-set-of-seattle-tree-protection-poll-findings-affirms-voters-value-urban-forests.html>

 [Second set of Seattle tree protection poll findings affirms voters value urban forests – NPI’s Cascadia Advocate](#)

Respondents to NPI’s October 2021 general election survey of the Seattle electorate are in strong agreement that the city should update its tree ordinance to strengthen tree protection policies, with more than seven in ten voters backing a majority of ideas tested.

[www.nwprogressive.org](http://www.nwprogressive.org)

<https://www.nwprogressive.org/weblog/2023/03/two-thirds-of-seattle-voters-concerned-about-tree-loss-with-housing-density-increasing.html>

 [Two-thirds of Seattle voters concerned about tree loss with housing density increasing – NPI’s Cascadia Advocate](#)

68% of 651 likely February 2023 special election voters interviewed from January 26th-30th for NPI by Change Research said they were concerned about tree and canopy loss, while 30% said they were not. Only 1% were not sure.

[www.nwprogressive.org](http://www.nwprogressive.org)

**From:** [Steve Zemke](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comments on Draft EIS for One Seattle Comprehensive Plan  
**Date:** Monday, May 6, 2024 4:45:11 PM

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**CAUTION: External Email**

Seattle Office of Planning and Community Development  
600 4th Ave, Floor 5  
Seattle, WA 98104  
May 6, 2024

**Response to Analysis of Plants and Animals in Section 3.3 of the One Seattle Comprehensive Plan draft EIS - lot coverage issue and building will be different than in the past and result in greater loss of large and other size trees. Numbers are given of housing units anticipated to be built. How many more canopy acres over time will be lost based on building projections in each of alternatives?**

Page 3.3.7 in the Draft EIS states "Notably, most canopy loss was not associated with development activities; only 14% of the canopy loss occurred on parcels that underwent development during that period.

499-1

This is based on a false methodology assumption used in the [2021 City of Seattle Tree Canopy Assessment Final Report](#).

"Methodology: To assess the impact of development (building) on tree canopy, the SAL team analyzed canopy changes on parcels that were redeveloped between 2017 and 2021 and compared them to parcels where no development projects were completed during this time. "Redeveloped parcels" were defined as sites that began and completed construction of new buildings that added residential units or new commercial buildings within the identified timeframe."

This is faulty methodology - compare it to number of housing units built in Seattle during this time period. Here is a CITY of Seattle chart on Development and Growth Information. Housing Units built are based on the year the project is completed, not projects started and completed in any 1 year or 5 year period. The same methodology should be used for tree loss. Look at canopy number on start of canopy period and end of period. Look at canopy loss on all projects completed in that 5-year period.

The actual canopy loss per project completed in the NR zone in the 2021 Tree Canopy Assessment was 39.8%. In multifamily the canopy loss per project was 49.5%.

The problem with comparing past loss to potential future loss is that zoning is going to change and the difference between single family housing units and ADU;'s and placing 4-6 units on what is now residential lots to the equivalent of multifamily lots is that a lot more lots will potentially have 4-6 plexes on them with even less room for trees. The LR zones right now are

guaranteed 85% development area of a lot and 100% lot coverage development area for MR, Seattle Mixed and commercial lots. **An analysis needs to be done based on projected building goals and projected canopy to be lost and what amount of tree retention and planting is required to increase canopy to 30% goal by 2037.** Goal needs to be increased afterwards if planting areas are available and more trees are retained rather than being removed. Climate resiliency, environmental equity, public health, ecosystem services, and sustainability suggest that efforts would be beneficial to maximize efforts to increase canopy area above 30% over time.

Steve Zemke TreePAC.org and Friends of Seattle's Urban Forest.



**From:** [Steve Zemke](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Questions regarding One Seattle Comprehensive Plan draft EIS  
**Date:** Monday, May 6, 2024 3:12:05 PM

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**CAUTION: External Email**

- What is your estimation of planting needs and time frame to replace canopy lost during development (over 5 year periods as tracked by the city's canopy study)? The Tree Protection Ordinance refers to "tree replacement required shall be designed to result, upon maturity, in a canopy cover that is at least roughly proportional to the canopy cover prior to tree replacement." Would you agree that in most cases removing an 80 year old tree will take probably 80 years to replace?
- Is canopy replacement equivalence even possible with replanting since removed trees, which if not removed, would have increased growing according to scientific articles? It would appear that you've lost any canopy growth that would have occurred if the tree had not been removed.

How many acres are available and suitable for planting trees in each of the following public areas - the city's right of ways, Natural Areas and Developed Parks?

- How many trees and what size (small, medium and large size) will need to be planted in the city every year to make up for trees and canopy removed during development on lots?
- What is acreage is needed and available to plant trees on private property?
- When will it be possible to reach the 30% citywide goal?
- What potential is there for more than 30% tree canopy in Seattle over time?
- Is up to 40% canopy coverage, over time, as proposed in the previous Comprehensive Plan possible with intense planting?
- What is the projected loss in canopy volume over the next 20 years as big conifer trees and others are removed?
- Canopy volume, especially of coniferous trees during our rainy season, is a critical factor in reducing stormwater runoff, particularly in the rainy season in Seattle. Is their loss really possible to replace in a reasonable amount of time?
- What is the projected increase in stormwater runoff and what costs are associated with on site and alternative city water management policies of stormwater and pollutant runoff as a result?

As to commenting on other tree potential mitigation measures, add:

- Amend the Tree Protection Ordinance to require developers to maximize the retention of existing trees 6" DSH and larger through the whole development process, not just platting and short platting as required now. Existing trees are the survivors and are providing ecosystem services now.
- Give the SCCI Director the ability to ask for alternative site designs to save trees.
- Support building higher and building attached units to allow for tree retention and planting areas like Portland, Oregon has with 20% areas for multifamily and 40% for its 1-4 unit family zone. Zones like the industrial zone are allowed to remove all trees during development under the current ordinance.
- Amend the Tree Protection Ordinance to require the ordinance to apply to all city land use zones.
- Remove the "basic tree protection area" loophole in the current Tree Protection Ordinance that allows developers to unnecessarily remove almost all large trees on lots. It is not standard arboriculture practice according to the Northwest Chapter of The American Arboriculture Society.

Steve Zemke for TreePAC and Friends of Seattle's Urban Forest

**From:** [Steve Zemke](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Comments on One Seattle Comprehensive Plan.  
**Date:** Monday, May 6, 2024 4:13:33 AM

**CAUTION: External Email**

The following comment is in regards to legislation passed last year on Comprehensive Plan requirements

1. In the Climate and Environment Section, p 149, of the draft One Seattle Comprehensive Plan, the heading **Tree Canopy**, should be changed to **Urban Forest and Tree Canopy**.
2. Discussion - Seattle's urban forest and tree canopy is fundamental...

**Rationale for adding urban forest is legislative amendments noted in text below. Highlighting is mine (SZ) for pointing out specific sections. Underlined areas are new to the 2023 legislation.**

**The Washington State Legislature in 2023 passed [E2SHB 1181](#) - AN ACT Relating to improving the state's climate response through updates to the state's planning framework.**

Section 1.(14) Climate change and resiliency. Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; **prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice. ...**

Section 3.(3) The comprehensive plan of a county or city that is required or chooses to plan under RCW 36.70A.040 shall consist of a map or maps, and descriptive text covering objectives, principles, and standards used to develop the comprehensive plan. The plan shall be an internally consistent document and all elements shall be consistent with the future land use map. A comprehensive plan shall be adopted and amended with public participation as provided in RCW 36.70A.140. Each comprehensive plan shall include a plan, scheme, or design for each of the following: (1) **A land use element designating the proposed general distribution and general location and extent of the uses of land, where appropriate, for agriculture, timber production, housing, commerce, industry, recreation, open spaces and green spaces, urban and community forests within the urban growth area.** general aviation airports, public utilities, public facilities, and other land uses. The land use element shall include population densities, building intensities, and estimates of future population growth. The land use element shall provide for protection of the quality and quantity of groundwater

used for public water supplies. **The land use element must give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities.** Wherever possible, the land use element should consider utilizing urban planning approaches that promote physical activity and reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state. **Where applicable, the land use element shall review drainage, flooding, and stormwater runoff in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound.** The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include, but are not limited to, adoption of portions or all of the wildland urban interface code developed by the international code council or developing building and maintenance standards consistent with the firewise USA program or similar program designed to reduce wildfire risk, reducing wildfire risks to residential development in high risk areas and the wildland urban interface area, separating human development from wildfire prone landscapes, and protecting existing residential development and infrastructure through community wildfire preparedness and fire adaptation measures.

2<sup>nd</sup> change - In the Land Use Element General Development Standards:  
Policies L.U.4.8 add underlined words.

Urban forest and tree requirements to preserve and enhance the City's physical, aesthetic and cultural character and to enhance the value of the trees and urban forest in addressing stormwater management, pollution reduction, climate resiliency and heat island mitigation.

Steve Zemke  
Friends of Seattle's Urban Forest

**From:** [Steve Zemke](#)  
**To:** [PCD CompPlan EIS](#)  
**Subject:** Additional Comments on draft EIS for One Seattle Comprehensive Plan  
**Date:** Monday, May 6, 2024 2:00:55 PM

**CAUTION: External Email**

Comments on draft EIS

- P 3-3-29-30 Section on Climate and Environment** - Please analyze the potential environmental impact of the 5 options **on Seattle's urban forest and its plants and animals**. The urban forest is not just the canopy. Canopy area is only one measure of the urban forest. And all that is seemingly being looked at is canopy area but not also canopy volume. Some birds only live at the top of Douglas fir trees. Other birds live and nest midstory and others are in the understory. The understory from a plants and animal sense is part of the urban forest. The word understory does not show up in a word search of the Climate and Environment section. Canopy volume is important in helping slow or reduce rainfall which is a big factor in reducing pollution runoff into streams and Puget Sound and Lake Washington which affect salmon and Orca and other marine and freshwater life. Conifers are important for reducing stormwater runoff most in the winter when deciduous trees have no leaves. Our rainfall is highest in the winter and not the summer.

A word search of Climate and Environment Section (times mentioned) came up with: tree (237), canopy (187), urban forest (9), canopy area (1), canopy volume (0), bird (3 - migratory bird treaty), conifers (1), deciduous (1), native plants (0), native trees (0), small trees (0), medium trees (0), large trees (0), evergreen (0), deciduous (1), Douglas fir (0), western red cedar (0), big leaf maple (0), understory (0), street trees (6), park trees (0), insects (0), bees (0), pollinators (0). There are other words that can be also searched relevant to climate and the environment, but this is an indication that a lot of issues have been left out of the discussion and evaluation.

- This is a Seattle EIS, not a regional or state EIS.** Saying "unlikely to result in appreciable impacts on regional populations of plants or animals" and "none of the alternatives would be expected to result in impacts that would reduce the likelihood of survival or recovery of a plant or animal species in the wild" is avoiding commenting on the specific impacts on Seattle plants and animals. Please respond to what will be the specific impacts to the urban forest in Seattle in Seattle, not "in the region" or "in the wild" or otherwise.

p 3-3-30 Saying that "none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." is also not backed up by facts but

502-1

speculative at best.

The new tree protection ordinance actually increases the potential for tree removal in several ways.

One is that all the developmental areas covered by the ordinance state that the newly defined "basic tree protection area cannot be modified" despite Portland, Oregon and the Northwest Society of Arboriculture saying it can be modified to save trees. The Tree Protection Ordinance SMC 25.11.060 says the tree protection area can be modified by the Director in Section 25.11.060 and then in SMC 25.11.070 for NR and LR, MR, Seattle Mixed and Commercial Zones. It says that the "basic Tree Protection area" cannot be modified. This is a significant loophole that developers are using to remove large trees and contrary to standard arboriculture practice in other cities. It was introduced at the last minute and appears to not have been completely understood as to its impact by the Council and the public at the time. This is an action that should be referenced in the potential mitigation measures.

The current lot coverage of 85 - 100% for multifamily lots and above and rezoning to occur means more trees, especially large ones, will be removed. What is your estimation of potential canopy acreage loss (over 5-year periods consistent with the city's canopy studies) with increased development density in each alternative? The NR zone, following HB 1120, will result in a rezone we are told, probably next year allowing 4 plexes and six plexes in that zone which will significantly increase lot coverage.

Steve Zemke  
for TreePAC and Friends of Seattle's Urban Forest

**From:** [Tona Zubia](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 1:23:30 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

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- \* The draft EIS does not respond to the need to keep as many existing 6" DSH and larger trees as possible during development for public health, climate resiliency, environmental equity or sustainable urban forestry.
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Mitigation recommendations:

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- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

Tona Zubia  
tonamolinazubia@gmail.com  
1703 Bellevue Ave, B 102  
Seattle, Washington 98122

503-1

**From:** [Júliana Zuluaga](#)  
**To:** [PCD\\_CompPlan\\_EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, May 6, 2024 3:26:33 PM

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**CAUTION: External Email**

Comments Planning and Community Development EIS,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities.

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Mitigation recommendations:

- \* Reduce tree loss by allowing the city to require alternative site designs on building placement on lots, building up, joined housing units, and larger setbacks for street trees.
- \* Require Tree Inventories and Landscape Plans be done before tree removal and building permits are issued.
- \* Consider dedicated tree planting and retention areas for trees as Portland does and Tacoma has proposed.
- \* Urge amendments to the current Tree Protection Ordinance to remove loopholes like the "basic Tree Protection Area" which allows removal of almost all large trees.

Thank you for your consideration.

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