



# City of Seattle

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Freight  
Advisory  
Board*

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The Seattle Freight Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the City in development of a functional and efficient freight system and on all matters related to freight and the impact that actions by the City may have upon the freight environment.

City Council Resolution  
31243

April 18, 2014

Gordon Clowers  
City of Seattle  
Department of Planning and Development  
700 5<sup>th</sup> Ave, Suite 2000  
PO Box 34019  
Seattle WA 98124-34019

RE: Scoping for the Programmatic EIS for the 2035 Comprehensive Plan Update

Dear Mr. Clowers:

Thank you for the opportunity to provide input into the scoping process for the Programmatic EIS for the Seattle 2035 Comprehensive Plan Update. (And thanks to Patrice Carroll, who gave us an informative, thought-provoking presentation and fielded our many questions on the Comp Plan Update at our April 15<sup>th</sup> meeting.) As you know, the purpose of the board is to “advise the City Council, Mayor, and all departments and offices of the City in development of a functional and efficient freight system and on all matters related to freight and the impact that actions by the City may have upon the freight environment.” (Resolution 31243) It is with the goal of fulfilling this purpose that we submit the following comments.

**1. Do you have comments on these alternatives? Are these the right alternatives to consider?**

In reviewing the materials and the presentation we received at our April 15<sup>th</sup> meeting, we noted a lack of any reference to the role freight, and the businesses most dependent on freight mobility—those located in the City’s MICs—play in ensuring the future prosperity of the City. We appreciate that staff has assured us that freight, and the economic and job contributions of the MIC, will be part of the technical analysis and policy review. We trust that this will indeed be the case. However, we feel strongly that the **public** discussion about the future of the City must include the role of freight, and the role of the MICs, in achieving that vision. Please revise the alternatives to include a scenario that illustrates the importance of freight in the same way Alternative 3 highlights the importance of transit. Similarly, the alternatives describing scenarios that are focused on land use designations should include a scenario that highlights the City’s MICs.

## 2. Are there additional topics that you would like to see included in the EIS?

**Economic impact analysis:** Although this is not a standard component of the SEPA process, we would like to encourage you to consider including an evaluation of the economic impacts of various alternatives, especially their impact on the economic viability of the City's MICs.

**Transportation:** The EIS should include a thorough analysis of the impact of the various growth scenarios on the City's Major Truck Streets and other arterials critical to the movement of freight, the latter in particular in the City's MICs. In recent years, we have seen a steady erosion of the capacity and functionality of the City's truck freight infrastructure. We need to begin protecting what remains and enhance it where appropriate. (This is also a major goal for the Comprehensive Plan update itself, and should be coordinated with the development of the City's first Freight Master Plan. We need to develop a transportation system that balances the needs of all modes while protecting and enhancing the freight system that remains.)

**Land Use:** The materials and presentation we received on April 15<sup>th</sup> did not show any work related to the protection of the MICs beyond reference of major plans and policy documents, which were (with the exception of the comprehensive plan itself) focused at the state and regional level. At a more local level, your slide presentation appears to indicate that the analysis will be focused on height, bulk, scale, aesthetic impacts within urban centers and villages. Yet, from our point of view, the PEIS must generate the information needed to understand the potential impact of land use decisions that could further erode the viability of the City's MICs. It will be critical for the Comprehensive Plan to increase the protection for the City's remaining industrial lands, and the PEIS must provide the information need to support that effort.

**Population, Employment and Housing:** The three proposed alternatives are focused on job growth in urban centers and villages, and do not reflect the value of the jobs in the MICs. Similarly, the staff presentation lacked reference to how the PEIS would analyze the role and value of existing jobs in the MICs, and those related to freight transportation. The jobs in the MICs, many of them family-wage, blue-collar jobs, are critical to maintaining a diverse employment base that supports a healthy middle class here in Seattle. The PEIS, and the development and refinement of policies throughout the Comprehensive Plan Update, must ensure protection of these jobs.

## 3. Are there specific issues related to any of these topics that should be addressed?

Please see our response to question 2 above.

**4. Do you have other comments or suggestions?**

We appreciated the staff presentation about the Comprehensive Plan Update, and the lively debate that ensued. It is obvious that there are many issues that will require more in-depth discussion both between the Board and DPD staff, as well as among Board members, as the update process moves forward. We are looking forward to these discussions. It would be helpful if staff could come back to us at appropriate intervals, in a fashion that allows us sufficient time to discuss the issues at hand and develop well thought-out comments.

Thank you for the opportunity to provide input into the PEIS scoping process. Please do not hesitate to call on the Board if you have any questions.

Sincerely,



Warren Aakervik, Chair

cc:

Mayor's Office  
City Council  
Goran Sparrman  
Diane Sugimura